

MEMO# 32399

April 20, 2020

Coalition Letter to the European Commission and OECD on COVID-19-Related Tax Treaty Challenges

[32399]

April 20, 2020 TO: ICI Members

ICI Global Members

ICI Global Regulated Funds Committee

ICI Global Tax Committee

Tax Committee SUBJECTS: Fund Accounting & Financial Reporting

International/Global

Tax RE: Coalition Letter to the European Commission and OECD on COVID-19-Related Tax Treaty Challenges

ICI Global joined eleven other associations representing cross-border portfolio investors in a letter to the European Commission and the Organisation of Economic Co-operation and Development (OECD) regarding COVID-19-related treaty relief concerns. Many of these concerns were described in an earlier coalition letter to the OECD that was crafted by ICI Global.[\[1\]](#)

Generally, the letter urges a relaxation of certain existing requirements, such as the reliance on physical paper documents and existing time limits (e.g., filing and statute of limitations periods). These recommendations include:

- Acceptance of electronic tax forms and digital signatures
- Acceptance of previously issued (*i.e.*, stale) certificates of tax residency
- Elimination of apostillisation and notarization requirements
- Extension of statute of limitations by six months to allow additional time to submit tax reclaims
- Extension of deadlines to respond to requests by tax authorities
- Guidance to clarify the ability of participants in the documentation chain to rely on such recommendations

The letter requests that it be shared with the 27 EU Members States and the 53 members of the [Forum on Tax Administration](#). ICI Global understands that these issues are on the agenda for the OECD Working Party 10 meeting that will be held (virtually) next week.

Katie Sunderland
Assistant General Counsel

[Attachment](#)

endnotes

[1] See ICI Global Memorandum 32394, dated April 16, 2020, *available at*:
https://www.ici.org/my_ici/memorandum/memo32394.

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