

The Year in Review- An Annual Publication of the ABA/Section of International Law: International Tax

Date: October 22, 2020

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Please see the 2019 Year In Review attached, edited by our partner Sunita Doobay, who also co-chairs the International Tax Committee of the Section of International Law of the American Bar Association (ABA). The Year In Review is an annual publication of the ABA Section of International Law, highlighting significant international tax developments that took place around the globe. This Review focuses specifically on Brazil, Canada, the European Union, Mexico, and the United States.

In Canada, the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI) was ratified in June 2019, and entered into force in December. The MLI applies to treaties where both treaty partners agree to its terms. If so agreed, the treaty is referred to as a Covered Tax Agreement (CTA). Most of the MLI's articles are optional, with the mandatory articles containing the OECD/G20 minimum standards adopted by most jurisdictions who have signed the MLI.

Of Canada's 93 tax treaties, 84 are listed as CTAs. Notable exclusions are treaties with the United States, Germany and Switzerland.

Another notable topic addressed in Canada and elsewhere includes plans on a "digital tax" targeting multinational tech giants.

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