### **2019 FTA SANTIAGO COMMUNIQUE**

We, the Heads and representatives of 46 tax administrations, met in Santiago for the 12<sup>th</sup> Plenary meeting of the OECD Forum on Tax Administration (FTA)<sup>1</sup>. The meeting brought together over 140 delegates, including the Finance Minister of Chile, Tax Commissioners and senior officials, representatives of business as well as international partner organisations. We would like to thank our hosts, the Chilean Tax Administration, for the excellent arrangements and for the warm welcome to Santiago. At this year's Plenary we focused on four priorities:

- Delivering on BEPS and tax certainty;
- Improving tax co-operation;
- Supporting the continued digitalisation of tax administrations; and
- Building capacity for developing countries.

### **BEPS and delivering tax certainty**

We continue to prioritise implementation of the OECD/G20 international tax agenda, with good progress being made in supporting the implementation of Country-by-Country reporting (CbC), the Mutual Agreement Procedure (MAP) and the exchange of rulings. BEPS remains a priority to ensure that every taxpayer, large or small, pays the correct amount of tax. Collective work on how to identify risks of tax leakage continues alongside efforts to provide tax certainty. We recognise that we can only be successful in delivering on the wider tax certainty agenda if we advance on a comprehensive and interlinked agenda focused on dispute prevention and dispute resolution. To this end, we will collaborate to bring together the different strands of the work further described below. Against this backdrop, we have agreed to:

- Launch an expanded pilot of the international compliance assurance programme ICAP 2.0. ICAP is a novel approach where taxpayers and tax administrations work co-operatively and multilaterally in close to real time to undertake risk assessment and assurance of key international tax risks. ICAP 2.0 builds on the experiences from the smaller initial pilot launched in 2018. 17 member tax administrations have agreed to participate in ICAP 2.0, up from the 8 tax administrations already involved in the first pilot. Several other FTA members are actively considering joining at a later stage.
- Advance work on improving the consistency and co-ordination of tax risk assessments: As a result of the BEPS project, tax administrations have access to unprecedented information on MNEs, much of which is made available to different tax administrations at the same time and in a common format. Building on this, work is underway to improve consistency in tax administrations' understanding of tax risk, the key indicators that risk may be present and the information needed to conduct an effective risk assessment. This will promote certainty for MNEs and tax

<sup>&</sup>lt;sup>1</sup> The <u>Forum on Tax Administration</u> brings together Tax Commissioners from 53 of the most advanced tax administrations worldwide, including all OECD and G20 countries. Our goal is to work collaboratively global tax administration challenges and opportunities, to ensure the fair, effective and efficient collection of public revenues. Together FTA members collect over EUR 11 trillion in revenues annually.

administrations by improving the efficiency and consistency of risk assessments and, in particular, by supporting the development of ICAP from a pilot to a mature and enduring programme.

- More closely integrate international audit activity. We advanced our work on joint audits with the release of, <u>"Joint Audit 2019 Enhancing Tax Co-operation and Improving Tax Certainty"</u>. We will take this agenda forward in a number of ways, most importantly by increasingly replacing separate un-coordinated audits of the same or related issue with joint audits, where appropriate, to the benefit of both taxpayers and tax administrations alike.
- Explore other aspects of the tax certainty agenda. The FTA MAP Forum, in conjunction with the FTA Large Business International Programme, will study other avenues to advance on the tax certainty agenda, including by identifying improvements that could be made to the APA process and exploring the potential for the wider use of multilateral APAs and MAPs. In addition, we will explore the potential use and sharing of benchmarks for standard situations in the area of transfer pricing.

We have a keen interest in the ongoing OECD/G20 work on addressing the tax challenges of the digitalisation of the economy and recognize the importance of enhancing co-ordination among tax administrations in the context of delivering tax certainty.

### Improving tax co-operation

Here we concentrated our efforts on two fronts: The Common Reporting Standard (CRS) and the Sharing and Gig Economy.

- **CRS**: On the CRS and the Foreign Account Tax Compliance Act (FATCA) we have successfully and securely exchanged information through the FTA-procured Common Transmission System (CTS). And we see that the CRS is delivering. Going forward, the large-scale ongoing exchanges under the CRS will enable us to assure tax on a significant asset base in a way never before possible. We look forward to detailed reporting to the G20 on CRS exchanges in due course.
- Sharing and Gig Economy: We also discussed next steps on the effective taxation of those selling goods and services through the sharing and gig economy through the use of digital platforms. The FTA report "The Sharing and Gig Economy: Effective Taxation of Platform Sellers" contains three recommendations for further work: engagement with sharing and gig economy platforms on educating platform sellers on their tax obligations; improving the evidence base to understand the tax at risk; and assisting policy makers in the development of a standardised reporting model, including facilitating greater exchange of information between tax administrations.

We also acknowledged that the Joint International Taskforce on Shared Intelligence and Collaboration (JITSIC) remains essential to the FTA in ensuring collaboration in cross border compliance and operational issues and in maintaining community confidence in revenue administrations. We agreed that the JITSIC network will continue to be used to coordinate action and support co-operation between tax administrations.

### Supporting digital transformation

We are all increasingly exploring the use of new technologies, analytical tools and data sources to enhance compliance, reduce burdens, create efficiencies and improve services to taxpayers. Already we are seeing

major improvements in many aspects of tax administration as shown in the wide range of presentations we heard from FTA members. We agreed to continue our collaboration on this incremental path of change and in this regard, we welcomed the publication of three reports at the Plenary which will provide direct practical assistance to tax administrations:

- <u>Unlocking the Digital Economy A Guide to Implementing Application Programming Interfaces</u> (APIs) in Government.
- <u>Implementing Online Cash Registers: Benefits, Considerations and Guidance</u>: Advances in digital technology have opened up new opportunities to reduce the vulnerability of cash register data to manipulation, including through the adoption of online cash registers where appropriate.
- <u>Introducing a Commercial Off-The-Shelf (COTS) Software Solution</u>: The Experience of the Finish Tax Administration". Tax Finland replaced its legacy software systems, which numbered over 200, with a Commercial Off-The-Shelf (COTS) product.

Over time, the coming together of these new tools in a wider digital transformation is expected to facilitate a more fundamental shift towards greater parts of the tax base being secured automatically and seamlessly. We have agreed to work together on a new framework - Tax Administration 2030 – setting out a pathway as well as the technological and organisational building blocks for digital transformation. We will also examine ways that new technology and new processes can be used to both enhance compliance and reduce burdens for taxpayers, with a particular focus on small and medium enterprises.

### **Building capacity**

We discussed the work of the FTA Capacity Building Network and the new framework to guide enhanced co-operation in tax capacity building. The Capacity Building Network helps FTA members frame their capacity building contributions in a more coordinated, cost-effective and strategic way, recognising that we all stand to benefit from strong global tax administration.

We also had a fruitful discussion on the human resources needs to support effective tax administration, particularly in a digital age. We were proud to launch the new FTA Gender Balance Network. The network will aim to be a catalyst for positive institutional change to improve gender balance in leadership positions. Commissioners confirmed their support for the Gender Balance Network and the work of the Human Resources Community of Interest.

The FTA will be promoting the use of maturity models, currently being piloted alongside other diagnostic tools to help tax administrations build their own capability. We committed to the development of elearning and greater use of the <u>Knowledge Sharing Platform</u> for information sharing, training and improved co-ordination. We reiterated our commitment to the <u>Tax Inspectors Without Borders programme</u>, a highly successful example of effective collaboration currently supporting 20 tax administrations globally.

Finally, the Plenary thanked Commissioner Fernando Barraza and his team for the excellent organisation of the Plenary and looked forward to the subsequent FTA Plenaries to be held in the Netherlands in 2020 and in Singapore in 2021.

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Information on the FTA reports released at the Plenary, a list of Plenary participants and the outline of the FTA's future work programme are contained in the Annex.

### Annex A – List of Participating Tax Administrations and Organisations

Argentina Australia Austria Belgium Brazil Canada Chile China Colombia Costa Rica Denmark Estonia Finland France Georgia Germany Greece Hong Kong, China Hungary Iceland Indonesia Ireland Israel Italy Japan Kenya Korea Lithuania Luxembourg Malaysia Netherlands New Zealand Norway Peru Portugal Russia Saudi Arabia Singapore Slovak Republic South Africa Spain Sweden Switzerland	CIAT European Commission IMF IOTA WCO

### Annex B – 2019 12<sup>th</sup> FTA Plenary Agenda, Santiago, Chile

#### DAY 1: 26 March 12:30 - 18:30

12:30 - 13:30	LUNCH		
13:30 - 15:30	SESSION I - CURRENT AND FUTURE CHALLENGES		
13:30 - 13:35	Opening and logistical announcements		
13:35 – 13:50	<ul> <li>Opening remarks</li> <li>Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax Administration</li> <li>Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile (FTA 2019 Plenary)</li> </ul>		
	<ul> <li>Mr. Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration</li> </ul>		
13:50 - 14:10	Key note address     Minister Felipe Larraín Bascuñán, Minister of Finance, Chile		
14:10 - 15:30	<ul> <li>Reflections on the 2018/19 Work Programme and Projects</li> <li>Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax Administration</li> <li>Mr. Bob Hamilton, FTA Vice Chair, Commissioner, Canada Revenue Agency</li> <li>Mr. Chris Jordan, FTA Vice Chair, Commissioner, Australian Taxation Office</li> <li>Where can FTA collaboration add most value for members and stakeholders?</li> <li>Mr. Alan McLean, Deputy Chair, Business Industry Advisory Committee to the OECD (BIAC)</li> <li>Discussions at table on priority areas for FTA collaboration</li> </ul>		
15:30 - 16:00	COFFEE BREAK		

16:00 - 18:30	SESSION II – TAX CERTAINTY			
16:00 - 17:50	BEPS and Tax Certainty – where next?			
	Moderator: Mr. Bob Hamilton, FTA Vice-Chair, Commissioner, Canada Revenue Agency			
	Panellists:			
	• Mr. Martin Kreienbaum, Director General International Taxation, German Federal Ministry of Finance and Chair of the OECD Committee on Fiscal Affairs (CFA)			
	• Mr. Jaap Uijlenbroek, Director-General, Netherlands Tax and Customs Administration			
	Mr. Charles Rettig, Commissioner, Internal Revenue Service, United States			
	• Mr. Tim McDonald, Vice President Global Taxes, The Procter and Gamble Company			
	Breakout session 1: CbCR, ICAP and comparative risk assessments			
	(main room – simultaneous interpretation provided)			
	Facilitators:			
	Mr. Ted Gallivan, Assistant Commissioner, Canada Revenue Agency			
	Mr. Paolo Valerio Barbantini, Deputy Commissioner, Italian Revenue Agency			
	Breakout session 2: Mutual Agreement Procedure, joint audits and APAs			
	(neighbouring room – no interpretation provided)			
	Facilitators:			
	Mr. Jaap Uijlenbroek, Director-General, Netherlands Tax and Customs Administration			
	Mr. Douglas O'Donnell, Commissioner, Large Business & International, Internal Revenue Service, United States			
17:50 - 18:30	Perspectives from South America			
	Moderator: Ms. Claudia Suarez, National Superintendent, National Superintendent of Customs & Tax Administration, Peru			
	Participants:			
	Mr. Leandro Cuccioli, Federal Administrator of Public Revenue, Federal Administration of Public revenue, Argentina			
	Mr. Marcos Albuquerque Cintra, Special Secretary of the Federal Revenue of Brazil			
	Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile			
18:30	<u>Close</u>			
	Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax Administration			
18:30 - 20:00	Reception with welcome address at 19:00			

### DAY 2: 27 March 9:00 - 17:30

09:00 - 13:00	SESSION III - DIGITALISATION			
09:00 - 10:15	Digital Transformation – the Big Picture			
	Introduction by Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax Administration			
	Country presentations			
	Adapting the organisation to support reform - Mr. Suhua Huang, Deputy Director General, State Taxation Administration, People's Republic of China			
	<ul> <li>Welcome COTS – Goodbye legacy systems – Mr. Markku Heikura, Director General, Finnish Tax Administration</li> </ul>			
	Digital transformation goals and strategy - Mr. Mikhail Mishustin, Commissioner, Federal Tax Service, Russia			
	<ul> <li>Digitalisation and Taxpayer Experience – Mr. Wai Choong Ng, Commissioner, Inland Revenue Authority of Singapore</li> </ul>			
10:15 – 11:00	Priority Areas for Collective Work on Digital Transformation			
	Introductory presentation by Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax     Administration			
	Discussion at tables			
11:00 - 11:30	COFFEE BREAK & OFFICIAL PHOTO			
<b>11:00 – 11:30</b> 11:30 – 12:30				
	COFFEE BREAK & OFFICIAL PHOTO			
	COFFEE BREAK & OFFICIAL PHOTO Country Examples: Technology Tools and Use of Data (break out session)			
	COFFEE BREAK & OFFICIAL PHOTO Country Examples: Technology Tools and Use of Data (break out session) Breakout Session 1			
	COFFEE BREAK & OFFICIAL PHOTO         Country Examples: Technology Tools and Use of Data (break out session)         Breakout Session 1         Moderator: Mr. Wai Choong Ng, Commissioner, Inland Revenue Authority of Singapore         • Electronic ledger of purchases and sales for VAT purposes - Mr. Fernando Barraza, Commissioner,			
	COFFEE BREAK & OFFICIAL PHOTO         Country Examples: Technology Tools and Use of Data (break out session)         Breakout Session 1         Moderator: Mr. Wai Choong Ng, Commissioner, Inland Revenue Authority of Singapore         • Electronic ledger of purchases and sales for VAT purposes - Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile         • Big Data and Artificial Intelligence systems – Mr. Sunghee HAN, Commissioner, National Tax Service,			
	COFFEE BREAK & OFFICIAL PHOTO         Country Examples: Technology Tools and Use of Data (break out session)         Breakout Session 1         Moderator: Mr. Wai Choong Ng, Commissioner, Inland Revenue Authority of Singapore         • Electronic ledger of purchases and sales for VAT purposes - Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile         • Big Data and Artificial Intelligence systems – Mr. Sunghee HAN, Commissioner, National Tax Service, Korea			
	COFFEE BREAK & OFFICIAL PHOTO         Country Examples: Technology Tools and Use of Data (break out session)         Breakout Session 1         Moderator: Mr. Wai Choong Ng, Commissioner, Inland Revenue Authority of Singapore         • Electronic ledger of purchases and sales for VAT purposes - Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile         • Big Data and Artificial Intelligence systems – Mr. Sunghee HAN, Commissioner, National Tax Service, Korea         • Block Chain - Mr. Ping Liu, Director Tariff and Trade Affairs, World Customs Organization (WCO)			
	COFFEE BREAK & OFFICIAL PHOTO         Country Examples: Technology Tools and Use of Data (break out session)         Breakout Session 1         Moderator: Mr. Wai Choong Ng, Commissioner, Inland Revenue Authority of Singapore         • Electronic ledger of purchases and sales for VAT purposes - Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile         • Big Data and Artificial Intelligence systems – Mr. Sunghee HAN, Commissioner, National Tax Service, Korea         • Block Chain - Mr. Ping Liu, Director Tariff and Trade Affairs, World Customs Organization (WCO)         Breakout Session 2			

12:30 - 13:45	L U N C H & COUNTRY STALLS		
12:30 - 13:45	Innovative Tools : Country Stalls (outside the main conference room):		
	Innovation – adapting to the changing environment, Australia		
	Prefilled VAT return, Chile		
	• Online cash registers, Hungary		
	Consent based loan system, Norway		
	App based end-to-end solution, Russia		
	Big data tool for HNWI, Spain		
	AVIVA Virtual Assistant, Spain		
13:45 - 14:45	SESSION IV – OUR PEOPLE		
13:45 - 14:45	HR – Challenges and Responses		
	Moderator: Ms. Naomi Ferguson, Commissioner, Inland Revenue Department, New Zealand		
	Panellists:		
	Mr. Leandro Cuccioli, Federal Administrator of Public Revenue, Federal Administration of Public revenue, Argentina		
	Ms. Renate Büscher, Deputy Head of Division for International Taxation, Federal Central Tax Office, Germany		
	Mr. Georgios Pitsilis, Governor, Independent Authority for Public Revenue, Greece		
	Ms. Evelyn Khoo, Assistant Commissioner, Inland Revenue Authority of Singapore		
14:45 - 17:30	SESSION V - TAX CO-OPERATION		
14:45 - 15:45	Capacity Building for Developing Countries		
	Moderator: Mr. Bob Hamilton, FTA Vice-Chair, Commissioner, Canada Revenue Agency		
	Panellists:		
	• Mr. John L. Hutagaol, Director of International Taxation, Directorate General of Taxes, Indonesia		
	Mr John K. Njiraini, Commissioner General, Kenya Revenue Authority		
	Ms. Katrin Westling Palm, Director General, Swedish Tax Agency		
	Mr. Juan Toro, Assistant Director of Fiscal Affairs Department, IMF		
	Update of Tax Inspectors Without Borders		
	Mr. Pascal Saint-Amans, Director, Centre for Tax Policy and Administration, OECD		
15:45 – 16:15	COFFEE BREAK		
16:15 - 16:45	Maturity Models		
	Presentation: Mr. Oliver Petzold, Advisor, Centre for Tax Policy and Administration, OECD		
	Exercise on compliance burdens		

16:45 – 17:30	Use of Behavioural Insights in Enhancing Compliance		
	<ul> <li>Presentation: Mr. Eduard Müller, Director General, Federal Ministry of Finance, Austria</li> <li>Interactive session</li> </ul>		
18:00	Transfer to the Dinner Venue (meeting at <u>18:00 next to the concierge desk in the lobby of the Hotel W,</u> ground floor)		
19:00 - 22:30	Official Dinner		

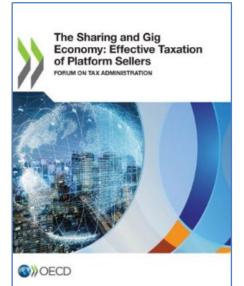
### DAY 3: 28 March 09:30 - 14:00

09:30 - 12:30	SESSION V CONTINUED - TAX CO-OPERATION			
09:30 - 09:35	Introduction			
	• Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax Administration			
09:35 – 10:00	Operational Collaboration through JITSIC			
	Introduction by Mr. Chris Jordan, FTA Vice-Chair, Commissioner, Australian Taxation Office			
	Mr. Mark Konza, Deputy-Commissioner, Australian Taxation Office, Australia			
10:00-11:00	Common Reporting Standard – Ensuring Effective Use of Data			
	Introduction by Mr. Chris Jordan, FTA Vice-Chair, Commissioner, Australian Taxation Office			
	Moderator: Mr. Antoine Magnant, Deputy Commissioner, Direction Générale des Finances Publiques (DGFiP) France			
	Panellists:			
	Mr. Ari Mäkelä, Senior Director, Finnish Tax Administration			
	• Mr. Isaya Muto, Director of the International Organizations Division, Ministry of Finance, Japan			
	Mr. Jaap Uijlenbroek, Director General, Netherlands Tax and Customs Administration			
	• Mr. Jon Sherman, Director of International, Her Majesty's Revenue and Customs, United Kingdom			
11:00 - 11:30	COFFEE BREAK			
11:30 - 12:30	Sharing and Gig Economy			
	Introduction by Mr. Chris Jordan, FTA Vice-Chair, Commissioner, Australian Taxation Office			
	Moderator: Mr. Paolo Valerio Barbantini, Deputy Commissioner, Italian Revenue Agency			
	Panel discussion on next steps:			
	Ms. Merete Agergaard, Director General, Danish Tax Agency			
	• Mr. Michael Gladney, Commissioner, Office of the Revenue Commissioners, Ireland			
12:30 - 13:00	SESSION VI – CLOSE			

12:30 - 13:00	Chair's Summary		
	Endorsement of the 2019 FTA Communique		
	Closing Remarks by:		
	Mr. Hans Christian Holte, FTA Chair, Director General, Norwegian Tax Administration		
	• Mr. Fernando Barraza, Commissioner, Servicio de Impuestos Internos, Chile (FTA 2019 Plenary host)		
13:00 - 14:00	LUNCH		

#### Annex C – Forum on Tax Administration Reports Issued at the Santiago Plenary

### The Sharing and Gig Economy: Effective Taxation of Platform Sellers



This report looks at approaches to help ensure the effective taxation of those earning income from the sale of goods or services in the sharing and gig economy. It considers the different ways that tax administrations can best engage with platform sellers, the sharing and gig economy platforms and each other in order to achieve more effective tax compliance. The report sets out three recommendations and considerations for further work: (i) joint work between tax administrations and platforms on providing information and support to platform sellers; (ii) improving the evidence base to enhance understanding of the tax at risk in relation to platforms, as well as options for minimising those risks; and (iii) assisting in the development of a legislative model for standardised reporting by sharing and gig economy platforms, including to facilitate automatic exchange of information between tax administrations.

### Joint Audit 2019 – Enhancing Tax Co-operation and Improving Tax Certainty



This report focuses on the most advanced form of audit-related tax co-operation, with the highest levels of integration and coordination, under the heading of "Joint Audits". It identifies both the benefits that can arise from the greater use of joint audits as well as the challenges that need to be overcome to ensure that those benefits can be realised as effectively and efficiently as possible for both tax administrations and taxpayers. In addition to a summary of best practices and guidance for the conduct of Joint Audits, the report sets out a number of recommendations and areas of future work to further improve this form of mutual assistance.

### Implementing Online Cash Registers: Benefits, Considerations and Guidance

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This report provides insights on the core elements of the successful introduction of online cash registers. Cash registers provide the key source of original information on the sales of goods and services in the retail sector needed to support tax reporting, payment and verification. Advances in digital technology have opened up new opportunities to reduce the tax risks that were traditionally associated with the vulnerability of cash register data. For some jurisdictions, the adoption of a specific type of electronic cash register, online cash registers which are connected to the tax administration's systems, has been an important part of their compliance strategy. Drawing on the experiences and lessons learnt by a number of tax administrations, the aim of this report is to provide advice and guidance to tax administrations considering the adoption and implementation of online cash registers.

#### Successful Tax Debt Management: Measuring Maturity and Supporting Change



This report provides further insights into the elements of a successful tax debt management strategy, supplemented by examples of recent initiatives by tax administrations. This is against the background that in many jurisdictions outstanding tax debt continues to grow. Part I sets out four strategic principles that tax administrations may wish to consider when setting their strategy for tax debt management. Part II contains an overview of a new Tax Debt Management Maturity Model. The intention is that this will allow tax administrations to undertake a self-assessment to measure their level of maturity and, based on their individual circumstances, to consider whether there would be benefit from taking additional measures. Part III contains a compendium of successful tax debt management practices which have been provided by a number of FTA member countries.

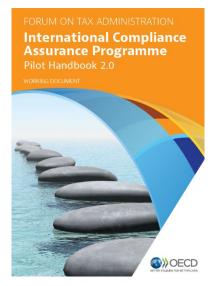
### <u>Unlocking the Digital Economy – A Guide to Implementing Application Programming Interfaces in</u> <u>Government</u>

FORUM ON TAX ADMINISTRATION Unlocking the Digital Economy -A Guide to Implementing Application Programming Interfaces in Government



This report provides an overview of the practices, techniques and standards used to deliver contemporary and effective digital services for taxpayers. New digital technologies are allowing tax administrations to be more data and service driven, with increasing use of proactive tools for providing services to taxpayers, greater use of third party data and increasing use of advanced analytics to better target interventions. A key enabler of these changes is the use of Application Programming Interfaces (APIs). This is the functionality that connects systems, people and things without facilitating direct access, an invisible process that people already use every day on mobile phones and via the internet. This report, aimed at the more specialist reader, is intended to provide practical assistance to tax administrations, and other parts of government, which are seeking to implement or further develop their API strategy.

### International Compliance Assurance Programme – Pilot Handbook 2.0



This publication is an updated handbook for participants in the the International Compliance Assurance Programme (ICAP). ICAP is a voluntary risk assessment and assurance programme to facilitate open and co-operative multilateral engagements between Multinational Enterprises (MNEs) willing to engage actively and transparently and the tax administrations in jurisdictions where they have activities. The first ICAP pilot was launched in January 2018 and involved eight tax administrations (Australia, Canada, Italy, Japan, the Netherlands, Spain, the UK and the US). The first risk assessments under this pilot have now been completed and extensive work has been undertaken to review and revise the ICAP approach, reflecting feedback received from both participating tax administrations and MNEs. A second pilot (ICAP 2.0) including a larger number of tax administrations was launched at the FTA Plenary in March 2019.

### Introducing a Commercial Off-the-Shelf Software Solution

FORUM ON TAX ADMINISTRATION Introducing a Commercial Off-The-Shelf Software Solution



This report sets out the experiences and the lessons learnt during the implementation process of a new commercial off-the-shelf software (COTS) solution introducted by Tax Finland. Like many tax agencies, the Finnish Tax Administration (Tax Finland) built its own tax administration software from scratch. As the whole system of applications grew larger, it became more and more expensive to maintain and slower and more difficult to change. Following detailed market research and after thorough consideration, Tax Finland decided to replace its legacy software systems with a COTS product. This report is intended to be an aid to others considering similar reforms. It covers all aspects of the introduction of the COTS solution, including: the procurement process; the planning processes; implementation considerations, including system requirements; and the core elements of maintenance and production support.

### Annex D – FTA Work Programme for 2019/2020

Tax certainty and BEPS	Tax co-operation	Digital transformation
Dispute prevention and resolution	Effective use of information received under the Common Reporting Standard (CRS)	Tax administration 2030
<ul> <li>A suite of projects will be carried forward to enhance tax certainty, including:</li> <li>taking forward work on enhancing unilateral and multilateral risk assessment, including through an expansion of ICAP and by developing the comparative risk assessment work to improve mutual understanding between FTA members;</li> <li>taking forward the recommendations of the Joint Audit report to be published at the March Plenary. This would include developing a pilot programme for joint audits together with supporting tools.</li> </ul>	<ul> <li>This project will aim to deliver more effective use of CRS information by:</li> <li>taking forward the building of toolkits and dissemination of lessons learnt, including around enhancing voluntary compliance;</li> <li>development of a "buddy system" to help improve matching rates;</li> <li>building the evidence base on the effectiveness of the CRS in assuring tax at risk;</li> <li>assisting in the development of a framework for both administrations and financial institutions (FIs) to help ensure that FIs are complying with the CRS/FATCA standards and to help tax administrations to identify risks.</li> </ul>	This project will set out a narrative of the wider goals of digital transformation, as well as identifying the stepping stones and the challenges to achieving this transformation. The aim is to create a collective FTA strategic framework within which to position and validate our future collective work on digital transformation with the aim of making tax a more seamless and automatic process creating minimal burdens for taxpayers.
BEPS: impacts and input	Common Transmission System (CTS): expansion and enhancements	Small and medium sized enterprises (SMEs): improving compliance and reducing burdens
This project will consist of two elements:	This project will take forward the expansion of the CTS to enable it to be used for a wider range of secure exchanges between tax	This project will look at the different ways that new technology and new processes can be used to enhance

- a short project surfacing the	administrations. This will include	compliance and reduce burdens
impacts of BEPS in changing	the necessary systems	for SMEs as well as potentially
behaviours and in the	development, testing and	reducing the amount of tax
safeguarding of revenue;	deployment of the agreed new	administration resource
	functionalities.	consumed in this area. This will
- the co-ordination of input into		involve exploring the
how the practical use of some of		administrative challenges for
the BEPS tools might be		SMEs and tax administrations
improved based on the		and options to help address
experiences of tax		them, including through the use
administrations in their		of Apps, pre-population of tax
application.		returns, e-service delivery, co-
		operative compliance regimes
		etc.
		Sharing and Gig Economy:
		Effective Taxation of Platform
		Sellers
		This project will take forward the
		recommendations of the report
		to be published at the March
		Plenary. This will involve the
		formation of a working group:
		- to finalise a voluntary Code of
		Conduct for Platforms as regards
		the education of taxpayers and
		co-operation with tax
		administrations;
		- to exchange information on the
		scale of tax at risk, the range of
		options for enhancing
		compliance and successful
		legislative and voluntary
		initiatives;
		- to assist WP10 with the
		development and operational
		aspects of a new standard
		reporting model, including in
		respect of VAT/GST as
		appopriate, and to explore
		exchange of information
		solutions.
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