

21. September 2018

## **PLANNED DUTY OF DISCLOSURE FOR TAX ARRANGEMENTS**

**ON 25 MAY 2018, THE ECOFIN COUNCIL, CONSISTING OF THE MINISTERS OF ECONOMICS AND FINANCE, PASSED THE DIRECTIVE (EU) 2018/822 AMENDING DIRECTIVE 2011/16/EU ON THE MANDATORY AUTOMATIC EXCHANGE OF INFORMATION IN THE FIELD OF TAXATION ON RELATION TO REPORTABLE CROSS-BORDER ARRANGEMENTS. THIS IS INTENDED TO CREATE AN OBLIGATION TO REPORT POTENTIALLY AGGRESSIVE TAX-PLANNING ARRANGEMENTS. THE DIRECTIVE MUST BE TRANSPOSED INTO NATIONAL LAW BY 31 DECEMBER 2019. THE DISCLOSURE OBLIGATION WILL COME INTO FORCE ON 1 JULY 2020.**

**AS EARLY AS 21 JUNE 2018, THE CONFERENCE OF FINANCE MINISTERS APPROVED A DRAFT BILL THAT WOULD ALSO COVER PURELY DOMESTIC MATTERS. THE DIFFERENCES AND SIMILARITIES BETWEEN THE TWO REGULATORY SYSTEMS WILL BE EXAMINED IN MORE DETAIL BELOW. [\(more...\)](#)**