

21. June 2019

## **PLANNED REAL ESTATE TRANSFER TAX REFORM - FINALLY, IT'S GETTING CON- CRETE!**

IN OUR NEWSLETTER 2018 | Q3, WE HAVE ALREADY ADDRESSED THE PLANNED REAL ESTATE TRANSFER TAX (RETT) REFORM, WITH WHICH IT IS INTENDED TO "PLUG LOOPHOLES" FOR STRUCTURES IDENTIFIED AS ABUSIVE IN THE CONTEXT OF A TRANSFER OF COMPANY SHARES. THE REFORM'S KEY POINTS ARE THE LOWERING OF THE THRESHOLD, THE EXTENSION OF RETENTION PERIODS AND THE CREATION OF A NEW TAXATION SITUATION FOR SHARE TRANSFERS OF CORPORATIONS. THESE REFORM PLANS HAVE CAUSED CONSIDERABLE UNCERTAINTIES WITHIN TRANSACTIONS, NOT LEAST BECAUSE THERE HAS BEEN MUCH SPECULATION ABOUT A RETROSPECTIVE APPLICATION OF THESE NEW REGULATIONS. IN THE MEANTIME, THE FIRST LEGISLATIVE DRAFT HAS BEEN PRESENTED. [\(more...\)](#)