

Public Consultation Meeting on the Review of Country-by-Country Reporting (BEPS Action 13)

Agenda



AGENDA
Meeting to discuss the Public Consultation
on the Review of Country-by-Country Reporting

The public consultation meeting will be held on 12-13 May 2020, from 12:00 to 16:00 (Paris time).

Please note that the meeting will be held remotely through a videoconference platform. This meeting will be recorded and the replays will be made available on the OECD website.

To read the collection of submissions received, please visit the [OECD Public Consultation webpage](#).

TUESDAY, 12 MAY 2020

12:00-12:20

Item 1. WELCOME AND INTRODUCTORY REMARKS

The Co-Chairs of the Joint Session of Working Party No. 6 and Working Party No. 10 (WP6/WP10 Joint Session) will welcome the participants and will provide an overview of the consultation process launched on 6 February 2020 with the invitation by the Inclusive Framework to the public, to submit written comments on the [consultation document on the review of the Country-by-Country Reporting \(BEPS Action 13\)](#).

Following this, the Secretariat will outline the arrangements for the public consultation meeting.

Item 1.a. **Introductory remarks from Will Morris (BIAC) and Richard Murphy (Tax Research LLP)**

12:20 – 13:30

Item 2. GENERAL TOPICS CONCERNING THE IMPLEMENTATION AND OPERATION OF BEPS ACTION 13

Item 2.a. **Operation and implementation of BEPS Action 13 minimum standard**

Item 2.b. **Other elements of the BEPS Action 13 report.**

Speakers will be invited to share their general views on the status of implementation of CbC reporting by member countries of the Inclusive Framework, the appropriate and effective use of CbC reporting, as well as other elements of BEPS Action 13 (i.e. the master file and local file).

During this session, speakers and participants will also have the opportunity to respond to suggestions in a number of written comments concerning the publication of CbC reports.

Speakers:

- Mr. Bastian BUCK ([GRI](#))
- Mr. David ERNICK ([PwC](#))
- Mr. Masafumi HAMADA ([Keidanren](#))
- Mr. Sol PICCIOTTO ([BMG](#))

13:30 – 14:20

Item 3. TOPICS CONCERNING THE SCOPE OF CBC REPORTING

Speakers will be invited to provide their views on the following questions concerning the scope of CbC reporting:

Item 3.a. **Should the level of the consolidated group revenue threshold be reduced?**

Item 3.b. **Should a jurisdiction with a consolidated group revenue threshold denominated in a currency other than EUR be required or permitted to rebase its threshold periodically?**

Speakers:

- Ms. Barbara ANGUS ([E&Y](#))
- Mr. Tommaso FACCIO ([ICRICT](#))
- Ms. Awesta SARKASH ([Small Business Majority](#))
- Ms. Tania SAULNIER ([MEDEF](#))

Break
(14:20 – 14:40)

14:40 – 16:00

ITEM 4. TOPICS CONCERNING THE CONTENT OF A CBC REPORT

Speakers will be invited to provide their views on specific questions regarding the content of the CbC report. They will be also invited to reflect on the challenges and benefits of such changes:

Item 4.a. **Should information in Table 1 be presented by entity rather than by tax jurisdiction?**

Item 4.b. **Should consolidated data rather than aggregate data be used in Table 1?**

Item 4.c. **Should additional columns be added to Table 1?**

Speakers:

- Mr. Richard MURPHY ([Tax Research, LLP](#))
- Ms. Severine PICARD ([TUAC](#))
- Mr. Michael H. PLOWGIAN ([KPMG](#))
- Mr. Peter SCULLY ([Rio Tinto](#))

16:00 - END OF THE FIRST DAY OF THE CONSULTATION

WEDNESDAY, 13 MAY 2020

12:00 – 13:10

Item 5. TOPICS CONCERNING THE SCOPE OF CBC REPORTING

Speakers will be invited to provide their views on specific questions concerning the scope of CbC reporting:

Item 5.a. Should a single enterprise with one or more foreign permanent establishments be a Group for the purposes of CbC reporting?

Item 5.b. Should separate CbC reports be prepared by groups that are under common control and which in aggregate have consolidated group revenue above the CbC reporting threshold?

Speakers:

- Ms. María ABUÍN PORTO ([Ferrovial, S.A.](#))
- Ms. Olivia LALLY ([Eurodad](#))
- Ms. Alison LOBB ([Deloitte](#))
- Ms. Eva LUTHI ([EBIT](#))

 13:10-14:20
Item 6. TOPICS CONCERNING THE SCOPE OF CBC REPORTING

Speakers will be invited to provide their views on the following questions concerning the scope of CbC reporting:

Item 6.a. Should the threshold for Excluded MNE Groups take into account more than one year of consolidated group revenue?

Item 6.b. Should extraordinary income be included in consolidated group revenue?

Item 6.c. Should gains from investment activity be included in consolidated group revenue?

Item 6.d. In cases where the immediately preceding fiscal year of an MNE Group is of a period other than 12 months, should the consolidated group revenue threshold (or, alternatively, consolidated group revenue in the immediately preceding fiscal year) be adjusted in determining whether the MNE Group is an Excluded MNE Group?

Speakers:

- Mr. Karl BERLIN ([Ørsted](#))
- Mr. Olivier HERMANN ([TEI](#))
- Mr. Sol PICCIOTTO ([BMG](#))
- Mr. Ben SEMPER ([Mazars, UK](#))

Break
(14:20-14:40)

14:40 – 15:50

Item 7. TOPICS CONCERNING THE CONTENT OF A CbC REPORT

Speakers will be invited to provide their views on specific questions regarding the content of the CbC report and to reflect on the challenges and opportunities of such changes:

Item 7.a. Should changes be made to how constituent entities that are not resident in any tax jurisdiction for tax purposes are categorised for CbC reporting purposes and how information on these entities is reported in Table 1?

Item 7.b. Should fields required in the XML schema (e.g. tax identification number) that are not in the CbCR template in the BEPS Action 13 report be incorporated into the template?

Item 7.c. Should standardised industry codes be included in Table 2?

Item 7.d. Should pre-determined fields be added to Table 3, in addition to free text?

Speakers:

- Ms. Rocio BERMUDEZ ([Repsol](#))
- Mr. Didier JACOBS ([OXFAM](#))
- Mr. Ulrich SAUTER ([Novartis](#))
- Mr. Graeme WOOD ([P&G](#))

15:50 – 16:00

Item 8. CONCLUSION

The Co-Chairs of the Joint Session of WP6/WP10 and the OECD Secretariat will make closing remarks.

END OF THE CONSULTATION MEETING
(16:00)