

## 2020 FTA “AMSTERDAM” PLENARY COMMUNIQUE

We, the Heads and representatives of 50 tax administrations, met for the 13<sup>th</sup> Plenary meeting of the OECD Forum on Tax Administration (FTA) on 7 – 8 December<sup>1</sup>. The Plenary meeting, originally due to be held in Amsterdam in 2020, has, of necessity, become the first virtual Plenary of the FTA. The Plenary programme, as well as the Plenary itself, brought together over 300 delegates. These included the Netherlands State Secretary for Finance, Tax Commissioners and senior officials, representatives of business as well as international partner organisations.

The year 2020 has been among the most disruptive and challenging periods that our respective jurisdictions and citizens have ever faced. While the public dealt with the uncertainty of the pandemic, many tax administrations played a key role in helping their governments deliver emergency measures to support those in need. We applaud the efforts of the many tax administration officials and employees who were called upon to meet this challenge, and met this call with professionalism and pride.

In serving our citizens, most of us have had to make significant changes in our respective operations during the crisis, often at a very accelerated pace. Many administrations have implemented new ways of working, including the widespread adoption of remote working. In addition, the speed with which tax administrations designed and deployed complex programs, including in close cooperation with other parts of government, is very likely to lead to permanent changes to the way in which we operate in the future.

For many jurisdictions, recovery may still feel distant, and the fiscal and economic impacts of the pandemic may continue to be felt for a long time to come. Tax revenues are likely to decrease, there may be a substantial increase in tax debt, and many taxpayers are likely to face continuing difficulties.

In many ways, the COVID-19 pandemic has underscored the extent to which our economies are deeply interconnected. Against this backdrop, the OECD FTA has become even more relevant as an instrument of multilateral collaboration and at this year’s Plenary we focused our discussions on four key areas of FTA collaboration:

- The responses to the COVID-19 pandemic and lessons learned from the crisis to date;
- The identification and mitigation of emerging risks;
- The digital transformation of tax administrations in support of a more seamless model for taxation; and
- The next steps in enhancing tax certainty tools and outcomes.

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<sup>1</sup> The [Forum on Tax Administration](#) brings together Tax Commissioners from 53 advanced and emerging tax administrations worldwide, including all OECD and G20 countries. Our goal is to work collaboratively on global tax administration challenges and opportunities, to ensure the fair, effective and efficient collection of public revenues. Together FTA members collect over EUR 11.5 trillion in revenues annually.

### Responses to the COVID-19 pandemic

FTA members have worked closely and cooperatively together from the early days of the crisis in the rapid development of measures to support taxpayers and to review our own business continuity arrangements. In many instances, we were able to do so because we could learn from each other in almost real-time. This involved frequent virtual meetings across the FTA to discuss in depth the management of the crisis, and the distillation of that knowledge into a number of actions and communications aimed at assisting the wider tax administration community. This included reports produced in cooperation with the Inter-American Center of Tax Administrations (CIAT) and the Intra-European Organisation of Tax Administrations (IOTA) on measures taken to assist taxpayers, business continuity in a crisis context, and recovery period planning. Recognising the severe impacts of the crisis on SMEs, we have made this sector a priority of our collaborative work; this is why, at the Plenary, we published the first in a series of reports aimed at supporting SMEs to get their taxes right, including through a greater understanding of their operational realities.

We agreed to undertake further collaborative work that will build on our recent experiences to enhance our resilience to future crises, and to consider where we can make further improvements to our ongoing operations, through:

- Sharing new ways of working that are being considered by tax administrations that may improve efficiency, resilience and agility.
- Analysis of the role of digital tools and rapid changes in IT systems in helping to manage the crisis.
- Developing a handbook setting out the main considerations for successful remote working, which is likely to continue well beyond the crisis, including as regards supporting career development and improving gender balance.

### Emerging risks

Commissioners took stock of the major emerging risks for tax administration, including those resulting from the crisis. These risks, which are kept under constant review, have been informed through the work of the FTA's Enterprise Risk Management Community of Interest, as well as discussions on a data-driven horizon scan, led by the Australian Taxation Office and the FTA Joint International Task Force on Shared Intelligence and Collaboration (JITSIC). Based on this analysis and the input from our collective discussions at the Plenary, we have asked the relevant FTA Networks to undertake further collaborative work on understanding and mitigating the main emerging risks.

### Digital transformation of tax administration

Responding to the request from Commissioners at the 2019 Santiago Plenary to develop a vision of future tax administration, the Plenary saw the publication of a discussion paper entitled *Tax Administration 3.0*. As more interconnections become possible among the different systems that taxpayers use to manage their affairs, it is becoming increasingly possible to move taxation processes into these systems, subject to appropriate assurance around accuracy, reliability and security. This digital transformation – *Tax Administration 3.0* - has the potential to foster built-in compliance in an increasing number of areas, to move taxation closer to taxable events, and to reduce the burdens that can arise from taxation.

We therefore endorsed the development, in early 2021, of a roadmap identifying the priority areas for future FTA work, including identification of areas where international standardisation could be beneficial,

such as digital identity, e-invoicing and secure mechanisms for the real-time sharing of information across borders. The roadmap will also look at how we can enhance the existing mechanisms for the exchange of practical knowledge regarding digital transformation, including change management considerations.

## Tax Certainty

Commissioners discussed the progress being made on the tax certainty agenda, one of the FTA's core priorities, with a view to developing and enhancing tools and processes for both dispute prevention and resolution. In this regard, we agreed to:

- Move the International Compliance Assurance Programme (ICAP) from a pilot phase to an established programme between an expanding set of tax administrations, supporting the co-ordinated assessment of multinational enterprise (MNE) groups' transfer pricing risks. More information on ICAP is available on the FTA website and further details will be released in early 2021.
- Continue the work to identify how greater tax certainty can be provided to business through improvements to Advance Pricing Arrangements (APAs), through the greater use of multilateral APAs and mutual agreement procedures (MAPs), and through the use of standardised benchmarking in common areas of transfer pricing dispute. Work will also focus on supporting tax administrations in conducting more effective tax risk assessments, including through the launch of a Tax Risk Evaluation and Assessment Tool (TREAT) for analysing country-by-country (CbC) reports filed by MNE groups in accordance with BEPS Action 13.
- Explore the development of more secure channels for multilateral interactions between tax administrations when discussing confidential taxpayer information - something that is particularly relevant in the tax certainty space. Experience during the crisis showed that there is a gap in the ability of tax administrations to have secure multilateral discussions where physical meetings are not possible. The identification of appropriate secure platforms will facilitate more frequent discussions between tax administrations, reduce the resources needed for these discussions, and support a range of multilateral approaches to providing tax certainty.

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Finally, we agreed to hold a meeting in the first quarter of 2021, focused on how FTA members can best assist developing countries in tax capacity building efforts, including around the digitalisation of tax administrations and the further development of the Tax Inspectors Without Borders programme. We also look forward to the subsequent FTA Plenaries, which can hopefully be held on a face-to-face basis in Singapore in 2021 and in Australia in 2022.

Information on the FTA reports released at the Plenary, as well as in the period since the 2019 Santiago Plenary, are contained in the Annexes to this Communique, as are a list of Plenary participants and the FTA Plenary agenda.

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

Australia	Greece	New Zealand
Austria	Hong Kong, China	Norway
Argentina	Hungary	Peru
Belgium	Iceland	Poland
Brazil	India	Portugal
Canada	Indonesia	Romania
Chile	Ireland	Russian Federation
China (People's Republic of)	Israel	Saudi Arabia
Colombia	Italy	Singapore
Costa Rica	Japan	Slovak Republic
Denmark	Korea	South Africa
Estonia	Latvia	Spain
Finland	Lithuania	Sweden
France	Luxembourg	Switzerland
Germany	Malaysia	Turkey
Georgia	Mexico	United Kingdom
	Netherlands	United States

**International Organisations**

African Tax Administration Forum (ATAF)  
Inter-American Center of Tax Administrations (CIAT)  
International Monetary Fund (IMF)  
Intra-European Organisation of Tax Administrations (IOTA)  
World Customs Organisation (WCO)

## Annex B – 2020 13<sup>th</sup> FTA Plenary Agenda, Amsterdam Virtual Plenary

### DAY 1: Monday 7 December 2020: 13:00 to 16:00 Paris time

<b>13:00 – 13:15</b>	<b>SESSION I – INTRODUCTION &amp; WELCOMING REMARKS</b>
<p><b><u>Welcoming remarks</u></b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Bob Hamilton</b>, FTA Chair, Commissioner, Canada Revenue Agency, Canada</li> </ul>	
<b>13:15 – 13:25</b>	<b>SESSION II – SUPPORTING THE RECOVERY: KEYNOTE SPEECH</b>
<p><b><u>Keynote address</u></b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Hans Vijlbrief</b>, State Secretary for Finance, Tax Affairs and Tax Administration, Netherlands</li> </ul>	
<b>13:25 – 14:30</b>	<b>SESSION III – COVID-19 - LESSONS LEARNT FROM THE CRISIS</b>
<p><i>This session will explore the outcomes of the pre-Plenary discussion meetings regarding different aspects of COVID-19 experiences and their implications.</i></p> <p><b>Moderator:</b></p> <ul style="list-style-type: none"> <li>• <b>Ms. Naomi Ferguson</b>, Commissioner, Inland Revenue, New Zealand</li> </ul> <p><b>Panellists:</b></p> <ul style="list-style-type: none"> <li>• <b>Ms. Merete Agergaard</b>, Commissioner, Danish Tax Agency, Denmark</li> <li>• <b>Mr. Edward Kieswetter</b>, Commissioner, South African Revenue Service, South Africa</li> <li>• <b>Mr. Hans D'Hondt</b>, Chairman, FPS Finances, Belgium</li> <li>• <b>Mr. Ramez Katf</b>, Second Commissioner &amp; Chief Information Officer, Australian Taxation Office, Australia</li> <li>• <b>Mr. Tetsuo Kabe</b>, Commissioner, National Tax Agency, Japan</li> </ul>	
<b>14:30 – 15:45</b>	<b>SESSION IV – WHAT KEEPS YOU AWAKE AT NIGHT?</b>
<p><i>This session will explore the outcomes of the pre-Plenary discussion meetings on the main tax administration risks as seen by Commissioners.</i></p> <p><b>Moderator:</b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Chris Jordan</b>, FTA Vice Chair, Commissioner, Australian Taxation Office, Australia</li> </ul> <p><b>Panellists:</b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Charles Rettig</b>, Commissioner, Internal Revenue Service, United States</li> <li>• <b>Mr. Valerio Barbantini</b>, Deputy Director General, Italy Revenue Agency, Italy</li> <li>• <b>Mr. Sabin Samitah</b>, Chief Executive Officer, Inland Revenue Board of Malaysia</li> <li>• <b>Mr. Jesús Gascón</b>, Commissioner, Spanish Tax Agency, Spain</li> <li>• <b>Ms. Katrin Westling Palm</b>, Director General, Swedish Tax Agency, Sweden</li> </ul>	
<b>15:45 – 16:00</b>	<b>Closing remarks – Day 1: Mr. Bob Hamilton, FTA Chair</b>

**DAY 2: Tuesday 8 December 2020: 13:00 to 16:00 Paris time**

<b>13:00 – 13:30</b>	<b>SESSION V – INTRODUCTION ON TAXATION OF THE DIGITALISING ECONOMY</b>
<p><i>This session will update Commissioners on the ongoing discussions on the taxation of the digitalising economy and the implications for tax administrations.</i></p> <ul style="list-style-type: none"> <li>• <b>Mr. Bob Hamilton</b>, FTA Chair, Commissioner, Canada Revenue Agency, Canada</li> <li>• <b>Mr. Pascal Saint-Amans</b>, Director, OECD Centre for Tax Policy and Administration</li> </ul>	
<b>13:30 – 14:30</b>	<b>SESSION VI – TAX CERTAINTY – PREVENTION AND RESOLUTION</b>
<p><i>This session will explore the outcomes of the pre-Plenary discussion meetings on tools to provide greater tax certainty through more effective tax dispute prevention and resolution.</i></p> <p><b>Moderator:</b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Bob Hamilton</b>, FTA Chair, Commissioner, Canada Revenue Agency, Canada</li> </ul> <p><b>Panellists:</b></p> <ul style="list-style-type: none"> <li>• <b>The tax certainty landscape</b> <ul style="list-style-type: none"> <li>○ <b>Mr. Achim Pross</b>, Head of Division, OECD Centre for Tax Policy and Administration</li> <li>○ <b>Mr. Will Morris</b>, Chair, Business at OECD Tax Committee</li> </ul> </li> <li>• <b>The International Compliance Assurance Programme (ICAP)</b> <ul style="list-style-type: none"> <li>○ <b>Mr. Doug O'Donnell</b>, Deputy Commissioner, Internal Revenue Service, United States</li> </ul> </li> <li>• <b>APAs; multilateral APAs &amp; MAP; benchmarking</b> <ul style="list-style-type: none"> <li>○ <b>Mr. Ted Gallivan</b>, Assistant Commissioner, Canada Revenue Agency, Canada</li> </ul> </li> <li>• <b>Secure communication platforms to support tax certainty</b> <ul style="list-style-type: none"> <li>○ <b>Ms. Fiona Hay</b>, Head of International Relations and Capacity Building, Business, Assets and International (BAI), HM Revenue &amp; Customs, United Kingdom</li> </ul> </li> </ul>	
<b>14:30 – 15:40</b>	<b>SESSION VII – DIGITAL TRANSFORMATION</b>
<p><i>This session will explore the outcomes of the pre-Plenary discussion meetings on different aspects of the digital transformation of tax administrations.</i></p> <p><b>Moderator and keynote speaker:</b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Daniil Egorov</b>, Commissioner, Federal Tax Service, Russia</li> </ul> <p><b>Panellists:</b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Niall Cody</b>, Commissioner, Revenue Ireland</li> <li>• <b>Mr. Fernando Barraza</b>, Commissioner, Servicio de Impuestos Internos, Chile</li> <li>• <b>Ms. Nina Schanke Funnemark</b>, Commissioner, Norwegian Tax Administration, Norway</li> <li>• <b>Mr. Ng Wai Choong</b>, Commissioner, Inland Revenue Authority of Singapore</li> <li>• <b>Mr. Jérôme Fournel</b>, Commissioner, Direction Générale des Finances Publiques, France</li> </ul>	

15:40: – 16:00

SESSION VIII– CLOSING SESSION

**Closing Session**

- **Endorsement of the Communique**
- **Remarks on future FTA discussions on capacity building:**  
**Mr. Wang Daoshu**, Chief Economist, State Tax Administration, People's Republic of China
- **Closing remarks: Mr. Bob Hamilton**, FTA Chair, Commissioner, Canada Revenue Agency, Canada

## Annex C – Forum on Tax Administration Reports Issued at Amsterdam Virtual Plenary

### Tax Administration 3.0: The Digital Transformation of Tax Administration



This discussion document by the Forum on Tax Administration (FTA) sets out a vision for the digital transformation of tax administration, under which taxation becomes more of a seamless and frictionless process over time. The intention of this discussion paper, is to stimulate debate and conversation, both on the vision and its component building blocks.

It is hoped that this will lead to the establishment of a common language, framework and end-point, which will assist tax administrations in their individual and collective consideration of the digital transformation journey. It is envisaged that the next step will be to develop a roadmap identifying the priority areas for future FTA work.

### Supporting SMEs to Get Tax Right Series: Strategic Planning



This report is intended to assist tax administrations in the development and implementation of strategic approaches to support SMEs with tax compliance as well as to identify opportunities for burden reductions. It also provides some country examples as to the development and implementation of such strategies, including two case studies.

It is the first in a planned series of notes on supporting SMEs, with future notes looking at tax administration engagement with SMEs; the provision of digital services; issues around trust, fairness and co-operation; and solutions that integrate tax affairs in the software used to support the regular business operations of SMEs, so called "seamless taxation" solutions.

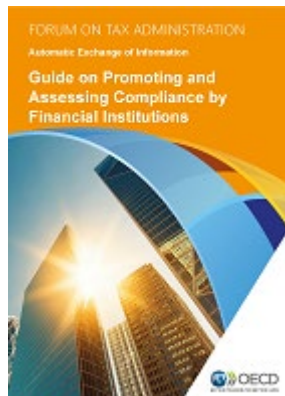
### Tax Debt management Network: Enhancing International Tax Debt Management



This report, which has been developed by the Forum on Tax Administration's (FTA) Tax Debt Management Network, looks at some of the main challenges currently facing international tax debt collection and makes a number of recommendations to help address them. These challenges include a lack of reliable statistics to inform decision-making, potential difficulties that can be faced in tracing debtors and assets, as well as an apparent lack of experience and knowledge in some cases as to the processes and best practices for requesting assistance in recovery. Building on the OECD report [Working Smarter in Tax Debt Management \(OECD 2014\)](#), this report recommends a number of areas for further work by the FTA's Tax Debt Management Network.



### [Automatic Exchange of Information: Guide on Promoting and Assessing Compliance by Financial Institutions](#)



Automatic Exchange of Information (AEOI) under the Common Reporting Standard (CRS) and the United States Foreign Account Tax Compliance Act (FATCA) involves the exchange of large amounts of information on financial accounts between tax administrations. For the receiving tax administration to be able to use this information effectively requires both the sending administration and all Financial Institutions (FI) to have sufficiently robust due diligence and reporting processes in place.

The purpose of this compliance guide is to assist government officials and FIs regarding the obligations to monitor and ensure compliance with reporting obligations under CRS and FATCA. It also provides a practical overview of what a robust compliance regime may involve.

## Annex D – Forum on Tax Administration Reports Published since the FTA Santiago Plenary in 2019

### [Advancing Gender Balance in the Workforce: A Collective Responsibility](#)



This report has been produced by the Forum on Tax Administration (FTA) Gender Balance Network (GBN). It contains examples of initiatives, legislative and administrative, taken by a number of GBN members or their governments to support and enhance gender balance. It provides helpful comparative information, including for the consideration of possible future policies and activities at the domestic level. Work on this report was led within the GBN by officials from the Canada Revenue Agency (CRA). It is the second in an intended series of reports by the FTA's Networks and Communities of Interest which bring together experts to exchange views and work collaboratively on major themes of modern tax administration.

### [Tax Administration Responses to COVID-19: Assisting Wider Government](#)



This report sets out some of the new responsibilities that tax administrations are taking on to assist wider government in the provision of support to taxpayers and citizens. The report, put together with the assistance of the OECD Forum on Tax Administration's Enterprise Risk Management Community of Interest, sets out some of the considerations that administrations may wish to take into account in taking on these new responsibilities. It also highlights the opportunities to build on lessons learned to improve the resilience and agility of tax administrations for the future.

### [Community of Interest Series: Enhancing Reputational Risk Management](#)



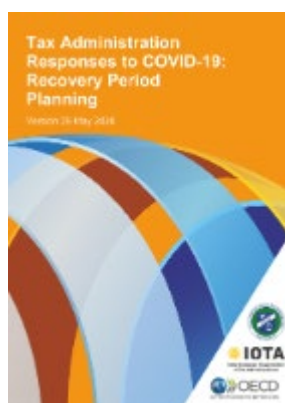
This report highlights the importance of reputational risk management in modern tax administration and sets out some key considerations as to how to identify and manage reputational risks. It also contains a set of tools to assist tax administrations in developing their capacity in this area including a maturity model which allows administrations to self-assess their current capacity and to identify areas for possible further development. The report has been produced by the FTA Enterprise Risk Management Community of Interest (COI). It is the first in an intended series of reports by the FTA's Communities of Interest which bring together experts to exchange views and work collaboratively on major themes of modern tax administration.

## [Code of conduct: Co-operation between tax administrations and sharing and gig economy platforms](#)



The OECD has developed Model Reporting Rules that require digital platforms to collect information on the income realised by those offering accommodation, transport and personal services through platforms and to report the information to tax administrations. In addition to the Model Rules, a Code of Conduct for online platforms has been developed and sets out some core elements of cooperation between tax administrations and online platforms on providing information and support to sellers on their tax obligations whilst minimising compliance burdens. This Code of Conduct is intended to supplement the Model Rules and promote voluntary compliance with tax obligations, in particular in instances where sellers are not subject to reporting under the Model Rules, for example because the transactions are out of scope or the jurisdiction has not implemented the Model Rules

## [Tax Administration Responses to COVID-19: Recovery Period Planning](#)



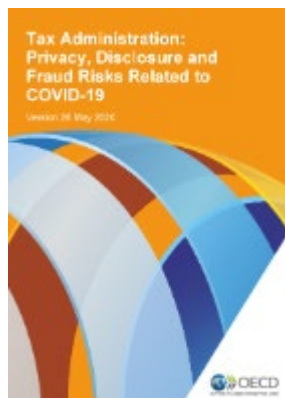
The OECD Forum on Tax Administration (FTA), in collaboration with the FTA Enterprise Risk Management Community of Interest, has drawn up this reference document which looks at some of the main issues that tax administrations may wish to consider in their planning for the recovery period from the pandemic. This may be a lengthy and potentially difficult period given the depth and scale of the economic shock and the likely continuing need for some containment measures, as well as the possibility of second waves of the virus. This is the third joint COVID-19 reference document which has been produced in cooperation with the Inter-American Center of Tax Administrations (CIAT) and the Intra-European Organisation of Tax Administrations (IOTA).

## [Tax Administration Responses to COVID-19: Measures Taken to Support Taxpayers](#)



The COVID-19 emergency will affect the lives of many people around the globe and governments worldwide are taking multifaceted actions to support their citizens, businesses and the provision of vital public services. Among these actions are measures being taken by tax administrations to ease the burdens on taxpayers and to support businesses and individuals with cash flow problems, with difficulties in meeting tax reporting or payment obligations or otherwise facing hardship. This reference document provides an overview of measures currently being undertaken by a number of tax administrations. It is a joint document of the OECD Forum on Tax Administration, the Inter-American Center of Tax Administrations (CIAT) and the Intra-European Organisation of Tax Administrations (IOTA).

### [Tax Administration: Privacy, Disclosure and Fraud Risks Related to COVID-19](#)



Tax administrations around the globe are taking a series of extraordinary measures to support taxpayers and the wider economy, including through helping to deliver wider government support, while also taking a range of actions to ensure continuity of critical operations and the safety of staff and customers. The speed with which those measures are implemented and the adjustments to some tax administration processes and ways of working can lead, however, to a significant increase of the risks of lapses or deviations from disclosure and privacy requirements as well as the risks of fraud. This document captures some of those high-level risks as well as possible mitigation strategies with a particular focus on remote working issues.

### [Tax Administration Responses to COVID-19: Business Continuity Considerations](#)



This reference document provides an overview of business continuity measures that tax administrations may wish to consider in the context of the current pandemic. This is a joint document of the OECD Forum on Tax Administration, the Inter-American Center of Tax Administrations (CIAT) and the Intra-European Organisation of Tax Administrations (IOTA). It takes account of examples and considerations provided by tax administrations in response to a survey sent by the three organisations to their members. The purpose of this document is to assist tax administrations in their own consideration of possible domestic measures. Although most administrations will already have well-developed business continuity plans these may need some adjustments given the nature of the current pandemic and wider government responses

### [Tax Debt Management Maturity Model](#)



Maturity models are a relatively common tool, often used on a self-assessment basis, to help organisations understand their current level of capability in a particular functional, strategic or organisational area.

This report covers one of the largest functional area of tax administration. Tax debt management employs around 10 percent of tax administration with outstanding collectible tax debt across OECD Forum on Tax Administration (FTA) members of around EUR 820 billion (2017 figures). There are, though, significant variations in tax debt management performance and tax administrations also have different powers and tools available to them to deal with tax debt which is set out in this report.

### [Tax Compliance Burden Maturity Model](#)



Maturity models are a relatively common tool, often used on a self-assessment basis, to help organisations understand their current level of capability in a particular functional, strategic or organisational area.

This report covers Tax Compliance Burden which while incredibly important for successful tax administration, compliance burden measurement and minimisation is not carried out by a single function within tax administration. The Tax Compliance Burden Maturity Model therefore focuses on a single overall description of maturity in this area rather than on the range of institutional arrangements and procedures more appropriate for a model covering a large tax administration function (such as tax debt management).

### [Tax Administration 2019: Comparative Information on OECD and other Advanced and Emerging Economies](#)



The eighth edition of the OECD's Tax Administration Series, this report provides internationally comparative data on aspects of tax systems and their administration in 58 advanced and emerging economies. The publication presents the results of the 2018 International Survey on Revenue Administration (ISORA), a multi-organisation international survey to collect national-level information and data on tax administration governed by four partner organisations: CIAT, the IMF, IOTA and the OECD.