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Dear Reader

We welcome readers to the first issue of the *BDO Indirect Tax News*, published by the BDO VAT Centre of Excellence.

This newsletter will inform you about issues of practical importance in the field of VAT and similar indirect taxes, such as GST. Experts from all over the world will provide you with first-hand information on recent developments in legislation, jurisdiction and tax authorities' opinions and Directives.

Specialists from the international BDO VAT network will be pleased to provide you with assistance and advice to tackle indirect-tax obstacles.

Please feel free to contact either the VAT specialists in the BDO Member Firm in your own country or my office located in Berlin. We shall put you in contact with a suitable VAT specialist.

Ulrich Grünwald
Chair, BDO VAT Centre of Excellence

NB: references in this Newsletter to the 'VAT Directive' are to Council Directive 2006/112/EC of 28 November 2006 on the common system of value added tax, as amended, where appropriate.

BELGIUM

VAT PACKAGE IMPLEMENTATION

Belgium implemented the EU VAT Package into national legislation at the last moment. The Belgian tax authorities have also issued several administrative instructions to clarify the new regulations. Worth noting in this respect is the administrative point of view on the place of supply of storage services in connection with the transport of goods.

As a rule, the place of supply in respect of the storage of goods is the place where the related immovable property is located. However, whereas in the past, the tax authorities had indicated that storage services connected with the transport of goods do not affect this principle, they now make the following distinction:

- Straightforward storage of goods: the above specific rule applies;
- A single, global supply of which the main constituent is the transport of goods: the entire supply is deemed to qualify under the business-to-business (B2B) main rule, including the storage services
- A single, global supply of which the main constituent is storage: the place of supply for the entire supply (including the transport services) is deemed to be the place where the related immovable property is located

The above does not apply in the relation between the main contractor and any subcontractors involved (e.g. only invoicing storage services).

The main B2B rule, it will be recalled, is that the place of supply is where the customer is established, but that where the supply is made to a fixed establishment located in a place other than where the customer is established, it is the place where the fixed establishment is located

that is the place of supply. Where the customer has no fixed establishment, the place of supply is the place where the customer has his permanent address or where he usually resides.

It goes without saying that these qualification rules strongly depend on factual circumstances, implying that one should always analyse the underlying contract for this global service.

Finally, also note that in certain cases, storage services located in Belgium can be zero-rated (exempt from VAT but with the right to deduct). These are:

- storage services in direct connection with the export of goods;
- storage services related to goods stored in a customs or VAT warehouse.



CZECH REPUBLIC

OPEN MARKET VALUE RULE FOR EMPLOYEE BENEFITS – AN UNEXPECTED DRAMA?

In March 2010, the lower chamber of the Czech Parliament approved further amendments to the Czech VAT Act (lately already amended for the VAT Package and an increase of one percentage point in both VAT rates). The amendments have provoked threats from Czech trade unions to go on a general strike and stop all traffic.

The open market value rules were introduced in the Czech VAT Act in reliance on the option allowed in Article 80 of the VAT Directive. Relations affected by this provision include also relations between an employer and employee. This provision brings a substantive mark-up in the cost to an employer of non-monetary employee benefits, e.g. free annual tickets and meals provided in the company canteen, with the result

that some employers intend to transfer the cost burden to their employees.

The amendment has been redrafted several times during the past months. The last version, which has been passed for a second time by the lower chamber of the Czech Parliament due to the need to override the veto of the Senate (the upper chamber), would have retroactive validity. Now the amendment has to be signed into law by President Klaus, who has already declared that the pressure by the trade unions must be faced down. If the Czech President refuses to sign the amendment, the lower chamber of the Czech Parliament would have very a tight deadline if it wished to override his veto.

EUROPEAN UNION

THE IMPLEMENTATION OF THE VAT PACKAGE IN THE EUROPEAN UNION

In February 2008 the European Council introduced three Council Directives, which were complemented by a fourth in December. Those Directives, together with an implementing Regulation, constitute the so-called VAT Package.

With respect to the supply of services between businesses, the VAT Package has brought about one major change. This rule requires that the place of supply of services will normally be situated where the recipient has established his business, unless the services are rendered to a permanent establishment. In the latter case, the place of supply is situated where the permanent establishment is established. Where these services are supplied cross-border within the European Union by a non-established

person it is obligatory that the reverse-charge procedure be used, so that the recipient (the customer) accounts for the VAT in his own Member State.

However, there are five exceptions to the general rule. If services are connected with immovable property, the place of supply will be where the property is located. The second exception concerns the short-term hiring out of means of transport. Where means of transport are hired for a period of no more than 30 days (in the case of vehicles) or no more than 90 days (in the case of motorboats), the place of supply is situated where the means of transport is actually put at the disposal of the customer. With regard to the supply of services and ancillary services relating to cultural,

artistic, sporting, scientific, educational, entertainment or similar activities, such as fairs and exhibitions, including the supply of services of the organisers of such activities as well as restaurant services and catering, the place of supply is the place where those services are physically carried out.

In addition, when services in relation to the transport of passengers are supplied, the place of supply is where the transport takes place, proportionate to the distance covered

Implementation of the Council Directives with respect to the VAT package

Council Directive implemented as at 1 January 2010	2008/8/EC	2008/9/EC	2008/117/EC
Austria	✓	✓	✓
Belgium	✓	✓	✓ ¹
Bulgaria	✓	✓	✓
Cyprus	✓	✓	✓
Czech Republic	✓	✓	✓
Denmark	✓	✓	✓
Estonia	✓	✓	✓
Finland	✓	✓	✓
France	✓	✓	✓
Germany	✓	✓	X ²
Greece	✓	✓	✓
Hungary	✓	✓	✓
Ireland	✓	✓	✓
Italy	✓ ³	✓ ³	✓ ³
Latvia	✓	✓	✓
Lithuania	✓	✓	✓
Luxembourg	✓	✓	✓
Malta	✓	✓	✓
Netherlands	✓	✓	✓
Poland	✓	✓	✓
Portugal	✓	✓	✓
Romania	✓	✓	✓
Slovakia	✓	✓	✓
Slovenia	✓	✓	✓
Spain	✓	✓	✓
Sweden	✓	✓	✓
United Kingdom	✓	✓	✓

¹ as at 5 February 2010

² as at 1 July 2010

³ as at 20 February 2010

JUDGMENTS OF THE EUROPEAN COURT OF JUSTICE

Published in the period 1 January 2010 to 31 March 2010

There follows a short overview of the judgments of the ECJ relating to indirect taxation issues. Generally, we have concentrated on the decisions made in relation to the VAT Directive.

1. *Alstom Power Hydro (Case C-472/08)*, judgment dated 21 January 2010
Legislation of a Member State providing for a limitation period of three years in which to make an application for a refund of excess value added tax collected by, though not due to, the tax authorities, is not precluded by former Article 18(4) of the Sixth VAT Directive (now Article 183 of the VAT Directive).

2. *Eulitz (Case C-473/08)*, judgment dated 28 January 2010
(a) Article 132(1)(j) of the VAT Directive (formerly Article 13A(1)(j) of the former Sixth VAT Directive) provides that Member States must exempt "tuition given privately by teachers and covering school or university education". In this case, the Court held that teaching work performed by a graduate engineer at an educational institute established as a private-law association to provide advanced training courses culminating in an examination for persons who already have at least a university or higher technical-college qualification as an architect or an engineer or who have an equivalent education could constitute such tuition. Activities other than teaching in the strict sense can also constitute such tuition, provided that they are carried out, essentially, in the context of the transfer of knowledge and skills between a teacher and pupils or students and cover school or university education. It is for the referring court, if need be, to ascertain whether all the activities at issue in the main proceedings were 'tuition' covering 'school or university education' within the meaning of what is now Article 132(1)(j).

(b) What is now Article 132(1)(j) must be interpreted as meaning that, in circumstances such as those at issue in the main proceedings, a person such as Mr Eulitz, a partner in the claimant in the main proceedings, who performs teaching work for training courses offered by another body, cannot be regarded as having given tuition 'privately' within the meaning of that provision.

3. *Graphic Procédé (Case C-88/09)*, judgment dated 11 February 2010
Article 14(1) of the VAT Directive (formerly Article 5(1) of the former Sixth VAT Directive) defines a 'supply of goods' as "the transfer of the right to dispose of tangible property as owner". The Court held that this provision must be interpreted as meaning that reprographics activities have

the characteristics or a supply of goods to the extent that they are limited to mere reproduction of documents on materials, where the right to dispose of them has been transferred from the reprographer to the customer who ordered the copies of the original. Such activities must be classified however as a 'supply of services', within the meaning of what is now Article 24(1) of the VAT Directive, where it is clear that they involve additional services liable, having regard to the importance of those services for the recipient, the time necessary to perform them, the processing required by the original documents and the proportion of the total cost that those services represent, to be predominant in relation to the supply of goods, such that they constitute an aim in themselves for the recipient thereof.

4. *Erotic Center BVBA (Case C-3/09)*, judgment dated 3 March 2010

Annex III paragraph 7 of the VAT Directive (formerly Category 7 in Annex H of the former Sixth VAT Directive) lists (inter alia) admissions to cinemas as one of the supplies that may be charged at a reduced rate of tax. The Court held that this provision must be interpreted so as to exclude a supply in return for a payment made by a customer to watch on his own one or more films, or extracts from films, in private cubicles such as those in issue in the main proceedings.

The following questions are still pending before the Court:

5. *Minerva Kulturreisen GmbH (Case C-31/10)*
Does the special scheme for travel agents (tour operators) in what is now Title XIII Chapter 3 of the VAT Directive apply also to the sale by a travel agent of opera tickets in isolation, without the provision of additional services?

6. *SEB (Case C-540/09)*
Is what is now Article 135(1) of the VAT Directive (exempt supplies) to be interpreted as including services (underwriting) that involve the provision in return for consideration by a credit institution of a guarantee to a company about to issue shares, where under that guarantee the credit institution undertakes to acquire any shares that are not subscribed for within the period for share subscription?

7. *Inter-Mark Group (Case C-530/09)*
(a) Are the provisions of Article 53 of the VAT Directive (as amended by Directive 2008/8/EC) (place of supply for services and ancillary services relating to, inter alia, fairs and exhibitions) to be interpreted as meaning that services consisting in the temporary provision of exhibition and fair stands to clients presenting their goods and services at fairs and exhibitions must be classified as services ancillary to fair and exhibition services referred to in those provisions, that is



to say services for which the place of supply is the place where they are physically carried out or

(b) should it be accepted that they are advertising services for which the place of supply is the place where the customer has established his business on a permanent basis or has a fixed establishment to which the service is supplied, or, in the absence of such a place, the place where he has his permanent address or usually resides, in accordance with Article 59(b) of the VAT Directive (as amended by Directive 2008/8/EC) on the basis that those services concern the temporary provision of stands to clients presenting their goods and services at fairs, which is normally preceded by the drawing-up of a design and visualisation of the stand and, possibly, transportation of parts of the stand and its assembly at the place where



the fair or exhibition is organised; the service supplier's clients exhibiting their goods or services pay separately to the organiser of the relevant event fees for the very possibility of participating in the fair or exhibition (those fees to cover utility, fair infrastructure and media-service costs and so forth); each exhibitor is separately responsible for fitting out and constructing his own stand and in that respect uses the services at issue which require interpretation; and organisers charge visitors individually fees for entrance to their fair or exhibition which accrue to the organiser of the event and not to the supplier of the service?

8. *Fleischerei Nier* (Case C-502/09; joined with Cases C-499/09 and C-501/09)

Is the term 'foodstuffs for human consumption' in what is now Annex III paragraph 1 of the VAT Directive (supplies that may be charged at the reduced rate) to be interpreted as covering only 'take-away' foodstuffs as typically sold in the grocery business, or does it also cover dishes and meals that have been prepared by boiling, grilling, roasting, baking or other means for immediate consumption?

In the event that 'foodstuffs for human consumption' does include dishes or meals for immediate consumption:

Is the process of the preparation of the dishes or meals to be taken into account as a service element if it has to be decided whether the single supply of a party-service business (provision of dishes or meals ready for consumption together with the transport thereof and, perhaps, the provision of cutlery and crockery and/or tables for standing at as well as the collection of the objects provided for use) is to be classified as a supply of foodstuffs that may be subject to a reduced rate or as a supply of services not subject to a reduced rate of taxation (Article 24(1) of the VAT Directive)?

In the event that the question is answered in the negative:

Is it consistent with what are now Articles 2(1)(a) (general charging provision), in conjunction with Articles 14(1) (definition of 'supply of goods') and 24(1) (definition of 'supply of services') of the VAT Directive for the classification of the single supply of a party-service business as either a supply of goods or a *sui generis* supply of services to be based purely on the number of the elements in the nature of supplies of services (two or more) compared with the proportion constituted by the supply of goods, or must the elements in the nature of a supply of services necessarily be assessed independently of their number, and, if so, according to what criteria?

9. *Euro Tyre Holding BV* (Case C-502/09)

In the light of what are now Articles 138(1) (exemption for intra-Community dispatches), 32 (place of supply for the supply of goods with transport) and 41 (place of supply for intra-Community acquisitions), where, with regard to the same goods, two successive supplies are effected between taxable persons acting as such, in respect of which there is one single intra-Community dispatch or one single intra-Community transport, how should one determine to which supply the intra-Community transport should be ascribed, when the transport of the goods is effected by or at the expense of the person who acts both in the capacity of purchaser for the first supply and in the capacity of vendor for the second supply?

10. *Pannon Gép Centrum Kft* (Case C-368/09)

Do the provisions of Hungarian national law contained in section(1)(16) of the VAT Act (*általános forgalmi adóról szóló*, Act LXXIV of 1992), in force at the material time when the disputed invoices were issued, or in Article 1/E(1) of Order 24/1995 (XI.22) of the Hungarian Ministry of Finance, specifically the provision in Article 13(1)(16)(f) of the VAT Act, comply with the features of invoices, and the concept of an invoice, laid down in what are now Article 218-231 of the VAT Directive (concept, issue and content of VAT invoices)?

In the event that the first question is answered in the affirmative,

is a Member State's practice that consists of penalising formal defects in invoices intended to be used as a basis for the right to deduct by denying that right contrary to what are now Articles 167 (right of deduction), 178(a) (invoice required to deduct VAT on supplies received in one's own Member State) or 220 (obligation on taxable person to issue invoice) and 226 (minimum content of invoices)?

In order to be able to exercise the right to deduct, is it sufficient to fulfil the obligations laid down in what is now Article 226 (minimum content of invoices), or is it possible to exercise the right to deduct and accept the invoice as a reliable document only if, at the same time, all the details required under Articles 226-231 are fulfilled?

GERMANY

SEELING CASE LAW TO BE SCRAPPED



On 22 December 2009, the European Council issued Directive 2009/162/EU, further amending the VAT Directive. The new statutory provisions contained in the amending Directive have to be implemented in national VAT laws by 1 January 2011. One of the new regulations refers to the input VAT deduction with regard to the purchase of immovable property and expenditure related thereto.

Currently, taxable persons are entitled to deduct input VAT for the supply of immovable property and expenditure related thereto, even where the immovable property is not exclusively used for their business activities.

With respect to Germany, taxable persons have to meet inter alia the following conditions to be entitled to full initial input VAT deduction in this regard.

- The immovable property has to be allocated to the business assets of the taxable person.
- In addition, the minimum use for business purposes of the immovable property must amount to 10%. Within a timeframe of 10 years the taxable person is obliged to amend the input VAT deduction to adjust for actual use under Article 26 of the VAT Directive

This procedure was based on the judgment of the ECJ in the *Seeling* case (Case C-269/00), in which the ECJ clarified that the private use by a taxable person in this regard is not tax-exempt.

The European Council has now taken steps to close this possibility. With the insertion of Article 168a, the European Council intends to clarify and strengthen the ground rule that the right of input VAT deduction only arises insofar as the goods and services are used by a taxable person for the purposes of his business activity. Article 168a provides that a taxable person may deduct input VAT incurred on immovable property included in his business assets but also used for non-business purposes only to the extent of the proportion of business use.

INDIA

THE PERSPECTIVE ON GOODS AND SERVICES TAX

The Indian Finance Minister's Budget 2010 emphasised that recovery in India needs to be broad-based in coming months for India to have fiscal consolidation. The challenge is on three fronts – to revert quickly to high GDP growth of 9%; to harness economic growth making development more inclusive, and to address the weaknesses in government systems, structures and institutions at different levels of governance.

Current tax laws date back to 1940 to 1960 when business scenarios were completely different. Tax reform being one of the core areas for a government to augment resources, India is looking at introducing a Direct Tax Code and a nationwide Goods & Services Tax in April 2011.

Need for GST in India

The current multiple taxation system, at Central and State level has created complexity, multiplicity of jurisdiction and ambiguity in interpretation of laws apart from raising transaction costs for taxpayers. A comprehensive Goods and Services Tax law integrating domestic indirect taxes will pave the way for India to become a single market with uniform tax rates across the country.

Indirect tax reform in India and the GST Model

The first major reform in the field of indirect taxes in India was when Value Added Tax (VAT) was adopted in lieu of the previous archaic sales tax laws, which involved the cascading effect of tax on tax on account of multiple taxation. The introduction of VAT as a State-level tax in all the States witnessed unexpected buoyancy in the revenue, which encouraged the empowered Committee to use the opportunity to propose the introduction of a nationwide GST in India.

The Government of India published the *First Discussion Paper on Goods and Services Tax in India* prepared by the empowered Committee of State Finance Ministers on 10 November 2009, giving a broad indication of the design, structure and scheme of the proposed Goods & Services Tax.

The following would be the basic features of India's GST:

- The tax would be charged on value added
- It would be consumption-based, except the inter-State GST, which would be origin-based.
- Input tax would be deducted by the credit method
- There would be three separate enactments for central (nationwide) GST, State GST and Inter-State GST, with a common tax base and Centre and States to have concurrent jurisdictions

Learning from GST implementation worldwide

The Global GST implementation experience shows that:

- There is need for a long gestation period for business to identify the change and introduce internal changes
- GST is a "whole of business" transition
- Changes in organisational culture and behaviour not to mar competitiveness
- Technology to play a strategic rôle in the implementation

Focus for 'India Inc' in entering into a GST régime

The upcoming GST régime will affect all functional segments of an organisation. The single most critical impact of GST will be on the existing human expertise with the current laws that will have to make way for the new law. Businesses will have to prepare themselves for this challenge head-on and focus on the following strategic implementation programme as early as possible:

- Carry out an implementation exercise involving professional advisers
- Review IT and organisational structures
- Review the chart of accounts more closely to prevent systematic errors
- Develop risk-management strategies in relation to GST for the entire business
- Constitute a GST implementation project team consisting of people who are from
 - supply chains within the business
 - IT systems and processes
 - finance & tax
 - management
- Review the gestation period for GST implementation
- Allocate resources to monitor and maintain GST systems and processes
- Carry out education, training and SOP
- Carry out a post-implementation review and monitor transitional issues.

Conclusion

The proposed GST poses considerable challenges for implementation as it is designed to ride on the state-of-the-art hardware and software. Given the fact that technology absorption in India has an urban skew, it only remains to be seen if GST will indeed become a reality in 2011.

IRELAND

IRISH REVENUE INTRODUCES SPECIAL SCHEME FOR MOTOR DEALERS

With effect from 1 January 2010 Irish motor dealers have been required to account for VAT on the sale of used vehicles under the margin-scheme rules. These apply to all vehicles acquired in circumstances where a VAT invoice is not obtained upon acquisition, primarily on trade-ins from private individuals but also apply with respect to 'demonstrator' vehicles, which are deemed to be 'self-supplied' when registered in the dealer's name.

Under the previous rules, motor dealers were entitled to claim residual VAT on vehicles acquired without a VAT invoice, with a special-scheme invoice or under a margin scheme from a supplier in another jurisdiction. Such vehicles were subject to a clawback if the VAT on the subsequent sale was less than the residual VAT reclaimed. The introduction of the margin scheme has removed such clawback issues but may have a negative cashflow implication for dealers who retain stock for an extended period of time. To appease dealers in this regard, the Revenue has introduced transitional arrangements, under which motor dealers are able to recover an element of the residual VAT for the first six months of 2010; this operates on a sliding scale and is calculated as follows:

- Vehicles acquired in January or February 2010 – 40% of the residual VAT
- Vehicles acquired March or April 2010 – 30% of the residual VAT
- Vehicles acquired May or June 2010 – 20% of the residual VAT

No residual VAT may be claimed on vehicles acquired after 30 June 2010. Vehicles acquired prior to 1 January 2010 are subject to the old rules but no clawback will occur in respect of their disposal.

ITALY

INTRODUCTION OF THE VAT PACKAGE

The legislative Decree implementing the VAT Package was published on 19 February 2010 in the Italian Official Gazette, and is effective from 20 February 2010.

The new provisions enlarge the scope of the reverse charge to all supplies of goods and services made by non-established suppliers to Italian business customers.

Due to the delay in implementing the VAT Package, the provisions of the amended VAT Directive related to the place of supply of services, to the extent they were sufficiently precise and detailed, were directly applicable in domestic law from 1 January 2010, while the provisions on the extension of the reverse-charge mechanism to the supply of goods entered into force from 20 February.

According to the new rules, non-resident suppliers (including foreign suppliers registered for VAT purposes in Italy through direct registration or by the appointment of a VAT representative) are no longer required to charge Italian VAT to resident business customers. However, they are still required to charge Italian VAT on supplies to private individuals (non-business customers) and to non-resident customers without a permanent establishment in Italy (even if the non-resident customer is registered for VAT in Italy).

Furthermore, VAT registration in Italy is also still required in respect of intra-Community transactions, exports and supplies to non-business customers.

As a consequence of these changes, non-established (non-resident) businesses will be left with potentially large VAT credits to be claimed from the Italian VAT authorities via the 8th and 13th Directive refund procedures. However, foreign businesses with a permanent establishment in Italy are no longer entitled to claim VAT refunds via these procedures, even if the relevant supplies are not made to the fixed establishment.

MALAYSIA

MALAYSIAN GOVERNMENT CONTEMPLATES GST INTRODUCTION

On 16 December 2009, the Malaysian government introduced the Goods and Services Tax Bill for its first reading in the Parliament of Malaysia. This is the second attempt by a Malaysian government to implement a full Goods and Services Tax régime. Its first introduction was contemplated for 1 January 2007, but no Bill was released at that time.

The fundamental framework of the GST régime proposed under the Bill can be summarised as follows:

- all goods, services and supplies will be regarded as standard-rated
- certain supplies may be gazetted as zero-rated or exempt by the Minister
- input-tax credit will only be available to the extent it relates to taxable supplies (standard-rated or zero-rated supplies)

Through other announcements and consultation papers, the Malaysian government has indicated that, amongst others, basic food items and agricultural products will be treated as zero-rated supplies. Supplies likely to be treated as exempt include supplies of residential property, health, education and those in the financial sector (margin-based or fee-based products).

The government has also indicated that the initial GST rate will be 4%, and it will replace the existing service tax of 5% and sales tax of 10%. The registration threshold is to be MYR 500 000 (approximately EUR 117 750).

Whilst GST was initially to come into effect from 1 July 2010, the government postponed the second reading of the GST Bill in March 2010 on the basis that further consultations needed to be carried out to ensure that the public was aware of the effect and the benefits of a GST régime. No further possible implementation date has been announced at this stage. However, the government has emphasised that GST will be introduced in Malaysia in the near future.

If you have business interests in Malaysia, we urge that you monitor the state of play in Malaysia and be prepared when the Malaysian government does confirm a date for GST implementation.

In addition, Malaysia is widely regarded as a major centre for Islamic banking institutions. Should it introduce a GST régime that proposes to treat supplies in the financial sector as exempt, the GST treatment of supplies within Islamic banking will provide an interesting model for other countries to consider.



SPAIN

VAT PACKAGE REQUIRES SIGNIFICANT CHANGES TO SPANISH LEGISLATION

The general rule in relation to the place of supply for services in business-to-business transactions has been modified and is now where the customer is established. In relation to business-to-private transactions (B2C), the place of supply generally remains as the place where the supplier is established.

However, there are special rules for services connected with:

- immovable property
- passenger transport
- intra-Community transport of goods (B2C transactions)

- cultural, artistic, sporting, scientific, educational, entertainment or similar activities
- electronically supplied services;
- restaurant and catering services, and where these services are supplied on a means of transport within the European Union
- intermediary services, ancillary transport services and work on goods (B2C transactions)
- telecoms and broadcasting services
- short-term hire of means of transport.

New regulations on EC Sales Lists require cross-border supplies of services to be listed as well as cross-border supplies of goods. Monthly filing is required if a EUR 100 000 threshold is exceeded during any month/quarter.

Refund claims for VAT incurred in other EU Member States must now be filed electronically with the tax authorities in the claimant's Member State not that in which the VAT was incurred. The deadline for submission of annual claims is the following 30 September.

For continuous supplies of services when no payments in advance have been made and the reverse charge is applicable, the accrual point is 31 December.



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