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Global Tax Alert

The Latest on BEPS and Beyond

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EY Tax News Update

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Highlights

The end of June 2026 will mark an important milestone in the implementation of Pillar Two. After several years of technical design, detailed guidance and legislative activity across jurisdictions, the first wave of compliance obligations will soon become a reality for many multinational enterprise groups (MNE Groups).

The global minimum tax framework has developed into a highly intricate system consisting of Model Rules, extensive Commentary, successive releases of Administrative Guidance and differences in local implementation that has created a highly intricate system. For many MNE Groups, the challenge has involved both interpreting the rules and operationalizing them through data collection, system alignment and interaction with existing tax and financial reporting frameworks.

As we approach the first filing deadlines, it is becoming increasingly clear that the transition to a fully functioning system of global minimum tax rules will take time, for companies and tax authorities alike. Although a significant number of jurisdictions have enacted Pillar Two rules, implementation has not been uniform, and readiness varies across tax administrations. In particular, essential practical elements, such as the availability of filing portals, final forms and the activation of exchange of information frameworks, are still evolving in many jurisdictions.



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The recent Organisation for Economic Co-operation and Development (OECD) release of the Global anti-Base Erosion (GloBE) Information Return (GIR) common understanding, reported in this edition of *The Latest on BEPS and Beyond*, acknowledges these practical challenges. Implementing jurisdictions are working toward mitigating the impact of transitional issues, including delays in the availability of fully operational filing systems and exchange mechanisms. These efforts include encouraging central filing approaches and offering some transitional relief if MNE Groups meet specified criteria.

Questions remain around the potential for simplification through centralized filing and automatic exchange of GIRs. In the near term, some MNE Groups may still face the need for multiple local filings.

For MNE Groups, the focus now is on compliance readiness and informed decision-making, particularly as to the designation of the filing entity, the approach to central and local filing, and the management of data and compliance processes across jurisdictions.

At the same time, the minimum-tax framework and its implementation continue to be subject to ongoing changes and therefore should be closely monitored. *The Latest on BEPS and Beyond* will continue to provide updates on these developments as they unfold.

BEPS 2.0

OECD

OECD releases common understanding on GIR central filing and updates to Administrative Guidance under Pillar Two

On 18 May 2026, the OECD Secretariat published a series of documents addressing practical compliance and coordination challenges in connection with the first filings under the global minimum tax, together with updates to the Administrative Guidance.

The documents include a [common understanding](#) among jurisdictions implementing the global minimum tax from their 2024 fiscal year regarding the operation of the central filing mechanism for the GIR. The OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting (BEPS) acknowledges that, for the initial year of application, certain practical challenges may arise. In particular, some jurisdictions may not have fully operational GIR filing systems in place by the

filing deadline, and exchange relationships under the GIR Multilateral Competent Authority Agreement (GIR MCAA) may not yet be activated or finalized at that time. Accordingly, jurisdictions implementing the global minimum tax from 2024 have agreed to apply mechanisms, to the extent available under domestic law, to waive penalties or not enforce local GIR filing obligations, subject to certain conditions.

The OECD also updated the [Central Record of Legislation](#) with Transitional Qualified Status, which lists jurisdictions with legislation that has completed the transitional qualification mechanism process for the Income Inclusion Rule (IIR), the Domestic Minimum Top-up Tax (DMTT) or the Qualified Domestic Minimum Top-up Tax (QDMTT) safe harbor. The update notes that the following jurisdictions have introduced a QDMTT: Bahamas, Kenya, Kuwait and Oman.

Finally, the OECD/G20 Inclusive Framework on BEPS issued [Administrative Guidance](#) that recognizes that certain MNE Groups prepare financial statements based on accounting periods comprising full weeks that consistently end on the same day of the week each year (i.e., 52- or 53-week fiscal years). As a result, an MNE Group could have a fiscal year that begins on or before 31 December 2025 but ends after 31 December 2026. To address this outcome, the Administrative Guidance extends the application of the Transitional Undertaxed Profits Rule (UTPR) Safe Harbour to include fiscal years that begin on or before 31 December 2025 and end on or before 3 January 2027.

OECD releases toolkit to support tax administrations in applying Pillar Two and updates Pillar Two FAQs

On 30 April 2026, the OECD released [The Global Minimum Tax Implementation Toolkit](#) (the Toolkit) to support tax administrations with establishing a robust and efficient domestic compliance framework.

The Toolkit is structured as a roadmap to the key steps and actions that tax administrations commonly undertake in implementing the global minimum tax (GMT), setting out a series of implementation steps, each elaborated through complementary models. The Toolkit was developed by the OECD Forum on Tax Administration, with insights from delegates of the OECD/G20 Inclusive Framework. It builds on the GloBE Model Rules and other standards agreed by the Inclusive Framework. The Toolkit is not intended to interpret or modify the application or interpretation of these standards.

On the same date, the OECD also released an updated set of [Frequently Asked Questions \(FAQs\) on the GloBE Model Rules and the Global Minimum Tax](#). The FAQs address practical aspects of the operation of the global minimum tax, including safe harbors, interaction with other tax regimes and administrative features.

See EY Global Tax Alert, [OECD releases toolkit to support tax administrations in applying Pillar Two and updates FAQs](#), dated 12 May 2026.

Country developments

Australia launches public consultation to implement the side-by-side package

On 1 May 2026, Australia launched a [public consultation](#) on draft amendments to its Pillar Two legislation. These amendments propose the extension of the Transitional Country-by-Country Reporting (CbCR) Safe Harbor by a year, as a measure to align the domestic legislation with the OECD's Side-by-Side Package. At present, the draft does not include the other measures from the Side-by-Side Package.

Further, the amendments also propose changes aimed to further align the local legislation with the OECD's Administrative Guidance from December 2023 and June 2024.

If approved, these amendments will apply retroactively from 1 January 2024.

Brazil launches public consultation to introduce a Substance-Based Tax Incentive Safe Harbour

On 17 April 2026, the Brazilian Federal Revenue Service launched a [public consultation](#) on proposed amendments to the Pillar Two legislation. The proposed changes aim to incorporate elements of the OECD's January 2026 Administrative Guidance into Brazilian domestic law, namely the introduction of a Substance-Based Tax Incentives (SBTI) Safe Harbor.

The proposals set out detailed rules for qualifying incentives, including expenditure-based incentives (e.g., those linked to eligible costs) and production-based incentives, as well as provisions addressing the measurement of eligible expenditures and output, the treatment of qualified refundable tax credits and the application of substance-based limitations.

If approved, the SBTI Safe Harbor would apply for fiscal years starting on or after 1 January 2026.

Canada introduces UTPR into domestic legislation

On 6 May 2026, Canada released draft amendments to its Pillar Two legislation through [Bill C31 \(Budget 2025 Implementation Act, No. 2\)](#).

The proposed amendments include the introduction of a UTPR for fiscal years beginning on or after 31 December 2025. A transitional UTPR Safe Harbor is also introduced for fiscal years beginning before 1 January 2026 and ending before 31 December 2026.

The Bill also incorporates elements of the OECD's SidebySide package, including the introduction of a SidebySide Safe Harbor and an Ultimate Parent Entity (UPE) Safe Harbor for fiscal years beginning on or after 1 January 2026. In addition, the Transitional Country-by-Country Reporting (CbCR) Safe Harbor is proposed to be extended by one year.

Further amendments are proposed to the existing Transitional CbCR Safe Harbor provisions, along with certain technical changes intended to align Canada's domestic legislation with OECD Administrative Guidance issued from time to time.

See EY Global Tax Alert, [Canada | Budget 2025 implementation Bill No. 2 tabled in House of Commons](#), dated 15 May 2026.

Curaçao confirms no introduction of QDMTT

On 13 April 2026, the government of Curaçao released a [statement](#) regarding Pillar Two confirming that, after careful consideration, the implementation of a QDMTT is not considered opportune at this time and, accordingly, Curaçao will not proceed with the introduction of this tax. According to the statement, the introduction of a QDMTT would reduce Curaçao's attractiveness as a jurisdiction, particularly for subsidiaries of United States (US)-based MNE Groups.

The statement also confirmed that Curaçao will not implement the UTPR, consistent with its earlier considerations.

However, the statement noted that Curaçao maintains its intention to implement the IIR with retroactive effect from 1 January 2025.

See EY Global Tax Alert, [Curacao's Pillar Two policy position](#), dated 20 May 2026.

Greece amends Pillar Two legislation to introduce DAC9

On 30 April 2026, Greece introduced [draft amendments](#) to its Pillar Two legislation, including the transposition of European Union (EU) Directive on Administrative Cooperation (DAC9) into domestic law. These amendments are currently being reviewed by the Hellenic Parliament.

The draft provisions align with the DAC9 framework by introducing the template of the Top-up Tax Information Return (TTIR) and enabling a centralized filing approach.

Italy releases guidance for GIR submission

On 9 April 2026, the Italian Revenue Agency issued [Protocol No. 112451/2026](#), setting out the process for submitting the GIR, including practical instructions and the Extensible Markup Language (XML)/XML Schema Definition (XSD) technical specifications.

Under the procedures, Italy is expected to exchange GIR data with EU Member States and other jurisdictions that have a competent authority arrangement within three months (six months for the first fiscal year of application of the GloBE rules) after the filing due date. The first automatic exchanges are scheduled to begin no earlier than 1 December 2026.

Following the exchange of information, foreign competent authorities may report inconsistencies or errors to the Italian tax authority. If the Italian tax authority formally notifies the filing entity of such errors, the filing entity is required to submit an amended GIR within 30 days of receipt of that notification.

Other developments

OECD

Global Forum releases new batch of peer reviews on transparency and exchange of information on request

On 29 April 2026, the OECD [announced](#) that the [Global Forum on Transparency and Exchange of Information for Tax Purposes](#) published eight new peer review reports on transparency and exchange of information on requests (EOIR), as part of the second round of EOIR peer reviews.

The reports cover Belize, Cambodia, El Salvador, Gabon, Guinea, Montserrat, Niue and Vanuatu. Due to their limited practice of EOIR, the reviews of Guinea, Montserrat and Niue only provide an assessment of their legal and regulatory frameworks (Phase 1 of the review process), which were found to be overall in place. The second phase of their reviews will focus on the implementation of the EOIR standard in practice and are due to start by 2028 for Guinea, and 2029 for Montserrat and Niue.

Belize was rated “Largely Compliant,” reflecting improvements in its legal framework, resources, and exchange practices, although deficiencies remain in the availability of complete accounting information and in oversight and enforcement. Cambodia was rated “Largely Compliant,” as its framework ensures availability of key information and exchange practices have improved, but gaps remain in beneficial ownership identification, supervision of entities and timeliness of responses. El Salvador was rated “Largely Compliant,” maintaining its previous rating due to a generally aligned framework, although further improvements are needed in ensuring accurate beneficial ownership information, coverage of inactive entities and access to banking information. Vanuatu was rated “Largely Compliant,” reflecting progress in strengthening its legal framework and supervision, while remaining issues concern nominee shareholder identification and continued enforcement of information availability requirements.

Gabon was rated “Non-Compliant,” primarily due to its limited exchange-of-information network and gaps in beneficial ownership information, as well as insufficient evidence of effective implementation and supervision.

The reviews of El Salvador and Gabon were conducted in two phases, with Phase 1 reports adopted in 2022 and, following the adoption of their Phase 2 reports, both jurisdictions now fully reviewed.

The reports were approved by the Global Forum’s Peer Review Group in March 2026 and adopted by Global Forum members. To date, 132 jurisdictions have been fully reviewed in the second round of EOIR peer reviews, with 91% rated “Compliant” or “Largely Compliant,” 6% as “Partially Compliant” and 3% as “Noncompliant.”

OECD releases 'Secretary-General Tax Report' ahead of G20 Finance Ministers and Central Bank Governors' first 2026 meeting

On 16 April 2026, the OECD released its "[Secretary-General Tax Report to G20 Finance Ministers and Central Bank Governors](#)" (the Report), ahead of the G20 Finance Ministers and Central Bank Governors' (FMCBG) first 2026 meeting under the US Presidency. Following the meeting, the Chair issued a [Statement](#) regarding the discussions, which does not include any reference to international tax matters.

The Report outlines recent developments in international tax projects and emphasizes the OECD's support for G20 tax initiatives. It includes an update on progress in implementing the BEPS minimum standards and the global minimum tax, as well as developments in tax transparency, tax certainty, tax administration modernization, capacity building for developing economies and other tax topics.

See EY Global Tax Alert, [OECD releases 'Secretary-General Tax Report' ahead of G20 Finance Ministers and Central Bank Governors' first 2026 meeting](#), dated 24 April 2026.

European Union

European Commission publishes in Official Journal Delegated Regulation on market capitalization for FASTER

On 21 April 2026, [the Official Journal](#) of the EU published the European Commission published Delegated Regulation (EU) 2026/110, which sets out the methodology for calculating the market capitalization of Member States. This calculation is used to determine eligibility for the small-market exemption under the Directive on Faster and Safer Relief of Excess Withholding Taxes (FASTER). Member States with a market capitalization ratio below 1.5% may opt to benefit from this exemption and are therefore not required to apply certain FASTER obligations, whereas those above the threshold are, in principle, expected to implement the full set of rules.

The Delegated Regulation entered into force on the twentieth day following publication in the *Official Journal*. Member States have until the end of 2028 to transpose the Directive into domestic law and until 1 January 2030 to make the rules applicable.

Country developments

Bulgaria Council of Ministers submits transposition bill on tax transparency for crypto-assets and Pillar Two information exchange to National Assembly

On 7 May 2026, the Council of Ministers of Bulgaria approved and submitted to the National Assembly a [draft bill](#) supplementing the Tax and Social Security Procedure Code. The bill relates to the EU rules on tax transparency for crypto-assets, which implement the OECD Crypto-Asset Reporting Framework, and to the rules supporting the automatic exchange TTIRs between EU competent authorities.

The draft bill introduces reporting and due diligence obligations for Reporting Crypto-Asset Service Providers, including licensed operators, certain operators outside the EU Markets in Crypto-Assets framework and certain third-country operators. Reports must be submitted annually to the National Revenue Agency by 30 June, with the first reporting period covering calendar year 2026. The bill also provides sanctions for noncompliance, including monetary penalties and, in certain cases, court-ordered blocking of access to the relevant website or application.

In addition, the bill broadens automatic exchange of financial account information to include e-money and central bank digital currencies, adds noncustodial dividends and cross-border rulings for high-net-worth individuals and aligns the domestic transfer pricing definition of "market price" with the OECD Transfer Pricing Guidelines, including the possibility to apply a sixth transfer pricing method if the standard methods are inadequate.

For Pillar Two information exchange, the draft bill establishes the domestic framework for automatic exchange of TTIRs filed by groups within the scope of Bulgaria's Pillar Two rules. The first exchange may take place no earlier than 1 December 2026 and must occur within six months of the applicable TTIR filing deadline.

The bill is now before the National Assembly for first and second reading.

Cyprus Tax Authority publishes the list of low-tax jurisdictions for 2026

On 9 April 2026, the Cypriot Tax Department issued a circular listing the jurisdictions considered low-tax jurisdictions for the purposes of applying the relevant defensive tax measures against low-tax jurisdictions (i.e., dividend withholding tax and nondeductibility of interest/royalties). These measures are applicable as of 1 January 2026.

The jurisdictions on the list (LTJ List) for 2026 are: Anguilla, Vanuatu, Bermuda, British Virgin Islands, Guernsey, Cayman Islands, Turks and Caicos Islands, Isle of Man, Bahamas, Bahrain and Jersey.

The LTJ List is determined based on specific criteria (not made available by the Cyprus Tax Department) and will be reviewed and updated on an annual basis.

See EY Global Tax Alert, [Cyprus Tax Authority publishes the list of low-tax jurisdictions for 2026](#), dated 16 April 2026.

France updates guidance on MAPs and transfer pricing APAs following public consultation

On 15 April 2026, the French Directorate General of Public Finances (DGFIP) published an [update](#) to the guidance on mutual agreement procedures (MAPs) and advance pricing agreements (APAs) in transfer pricing matters, following the public consultation launched on 15 January 2025. The consultation relates to the transposition of Council Directive (EU) 2017/1852 on tax dispute resolution mechanisms in the EU and to updates of French administrative comments on transfer pricing, MAP and APAs. The consultation period ran from 15 January 2025 to 1 March 2025.

The update makes the following clarifications:

- ▶ First, a letter issued by the large business tax compliance service summarizing taxes due and applicable penalties, potentially followed by a pre-collection settlement, is treated as an administrative measure for purposes of opening a MAP case.
- ▶ Second, taxpayers may request a MAP review that modifies their transfer pricing through an amended return if the cumulative conditions set out in BOI-INT-DG-20-30-10, Section 135 are met.
- ▶ Third, the guidance sets out the conditions under which a retroactive extension, or “rollback,” of a transfer pricing APA may be granted. The update concerns the related Bulletin Officiel des Finances Publiques - Impôts (a DGFIP online database) documents on bilateral APAs, bilateral MAPs and EU tax dispute resolution procedures.

German Federal Council approves law expanding Germany's BEPS MLI covered tax agreements

On 8 May 2026, the German Federal Council [approved](#) a law amending Germany's legislation on the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS (MLI), expanding the list of German tax treaties treated as covered tax agreements for MLI purposes. This follows Germany's earlier domestic implementation of the MLI through the 2020 treaty act and the 2024 MLI application act.

The lower house of Parliament had adopted the law without amendments on 26 March 2026, and the Federal Council's Finance Committee recommended approval.

The law expands the existing list of 14 German covered tax agreements by adding 62 more German tax treaties that do not currently meet the BEPS minimum standard. Its purpose is to create the legal basis for those treaties to be modified multilaterally through the MLI.

The treaty modifications will not apply automatically upon approval of the amending law, as the expansion of the treaty list is only the first step. As a second step, concrete MLI modifications must be specified through an amendment to the 2024 BEPS MLI application legislation, taking into account Germany's choices and those of the relevant treaty partner. Hence, the extension of the MLI to other treaties generally cannot be expected before the beginning of 2027. The modifications will also require the relevant treaty to be mutually designated by both contracting states and Germany to complete the necessary OECD notification process.

Greek parliament adopts L. 5301/2026 introducing advance tax ruling mechanism

On 13 May 2026, the Greek Parliament passed [Law 5301/2026](#). Published in the Government Gazette on 15 May 2026 ([FEK A 74](#)), this legislation focuses on administrative cooperation in the field of taxation.

Articles 36 and 39 of Law 5301/2026 introduce a formal advance tax ruling mechanism in Greece, which will be administered by the Governor of the Independent Authority for Public Revenue. The provisions form part of a wider tax reform package that has also been reported as covering DAC8, Pillar Two-related exchange-of-information measures and other institutional tax reforms.

The regime allows natural persons, legal persons and legal entities to request an advance interpretation of Greek tax and customs legislation for a specific set of future facts, subject to a written application and payment of a fee. The ruling will bind the tax administration, provided the facts and legislation remain unchanged, no conflicting supreme court interpretation is issued and any conditions attached to the ruling are met. It will not bind the taxpayer and cannot be challenged through administrative or judicial proceedings. Transfer pricing advance pricing arrangements, applicability of foreign law in Greece and matters already subject to administrative or judicial challenge fall outside the scope.

The regime provides for fees starting at €3,500 for admissibility, with total fees ranging from €10,000 to €50,000 depending on the complexity of the request, number of issues, applicant profile and whether expedited processing is requested. If a request is rejected within the 150-day processing period, the amount exceeding €3,500 will be refunded. Rulings will be published on the Independent Authority for Public Revenue website in anonymized or pseudonymized form, subject to protection of commercially sensitive information.

A decision of the Governor of the Independent Authority for Public Revenue is expected to be published soon to set out the procedural details of the regime.

Montenegro's Ministry of Finance launches consultation on draft CIT amendments to align with EU ATAD

On 23 April 2026, the Ministry of Finance of Montenegro published a [draft law](#) amending the Law on Corporate Income Tax, with the stated purpose of supplementing the domestic corporate income tax (CIT) framework in view of alignment with EU anti-tax avoidance rules. The draft was published alongside a public consultation notice, inviting stakeholders to submit comments by 13 May 2026. The consultation period has now closed, and no remarks or suggestions were submitted. Accordingly, the Ministry of Finance is expected to proceed with the next steps in the legislative process, including the submission of the draft law for government adoption and subsequent parliamentary consideration.

The draft introduces a new set of rules against base erosion and profit shifting into the CIT Law. These include an interest limitation rule restricting deductible exceeding borrowing costs to 30% of Earnings Before Interest, Taxes, Depreciation and Amortization (EBITDA) or €3m; controlled foreign company rules requiring inclusion of certain undistributed controlled foreign company (CFC) income in the Montenegrin tax base; exit taxation on transfers of assets, business or tax residence; and rules addressing hybrid mismatches, reverse hybrid mismatches and tax residence mismatches. The draft also introduces the possibility of entering into APAs with the Tax Administration, provides for accession to the EU Arbitration Convention on transfer pricing profit adjustments, and adds a general anti-abuse rule.

The new rules are envisaged to apply from the date of Montenegro's accession to the EU.

Netherlands enacts DAC8 implementation law on exchange of crypto-asset data

On 1 April 2026, the Netherlands Ministry of Finance enacted the [law](#) implementing Council Directive (EU) 2023/2226 amending the Directive on Administrative Cooperation in the field of taxation (DAC8), with publication in the Dutch *Official Gazette* on 10 April 2026. The law took effect on the same day.

The law amends the Dutch rules on international assistance in tax matters and national tax administration to introduce reporting obligations for crypto-asset service providers active in or connected with the Netherlands. These providers must collect, verify and report information on reportable users and crypto-asset transactions to the Dutch Tax Administration. The rules cover, among other items, user identification data, transaction data, transfers, retail payment transactions and certain wallet or distributed-ledger address information. The law also provides for registration obligations, exemptions where equivalent reporting takes place in another qualifying jurisdiction, administrative penalties for noncompliance, and automatic exchange of reported information with other tax authorities.

The rules apply retroactively from 1 January 2026. Reporting crypto-asset service providers must submit the first reports for calendar year 2026 by 31 January 2027. The Dutch Tax Administration is required to exchange relevant information with other jurisdictions within nine months after the end of the relevant calendar year.

Peruvian Tax Administration updates guidance on Mutual Agreement Procedure

On 21 April 2026, the Peruvian Tax Administration published Version 2.0 of its [Guidance](#) on MAP. The guidance updates the operational framework for taxpayers seeking to use MAP under Peru's double taxation agreements.

The updated guidance describes who acts as Peru's competent authority, which matters may be submitted under the procedure (e.g., cases involving international double taxation and/or taxation not in accordance with a tax treaty), what information must be included in a request, and how the procedure interacts with domestic administrative and judicial remedies.

It confirms that taxpayers do not need to first exhaust domestic remedies before requesting access to MAP. However, the Peruvian Tax Administration cannot resolve a case while court proceedings on the same matter are pending and will be bound by a final court decision. The guidance also reflects treaty-related changes linked to the BEPS MLI, including a three-year filing period for requests under the treaties with Canada, Brazil and Chile, where applicable.

The guidance further adds grounds for rejecting requests, including if the request concerns tax years before the relevant treaty entered into force or taxes outside the scope of the relevant treaty. It also confirms that the procedure may cover matters such as residence conflicts, withholding taxes, permanent establishment issues and transfer pricing adjustments, and that the tax administration may enter into bilateral APAs with competent authorities of treaty partners.

Saudi Arabia and United States enter into Tax Information Exchange Agreement

On 14 April 2026, Saudi Arabia and the US signed a [Tax Information Exchange Agreement](#) (TIEA) to facilitate the exchange of tax-related information relevant to the administration and enforcement of tax laws in both jurisdictions.

The TIEA aims to strengthen cooperation between the Saudi Arabia Ministry of Finance and the US Internal Revenue Service (IRS) by enabling the exchange of taxpayer information for compliance and enforcement purposes.

The TIEA enables the competent authorities of both countries to request and share information relevant to tax matters, including income tax, zakat, value-added tax, excise tax and other federal taxes. It establishes procedures for information exchange upon request and provides a framework that allows for automatic exchanges subject to separate mutual agreement between the competent authorities.

See EY Global Tax Alert, [Saudi Arabia and United States enter into Tax Information Exchange Agreement](#), dated 12 May 2026.

South Africa Revenue Service releases draft subordinate legislation for APA pilot program

On 30 April 2026, the South African Revenue Service (SARS) published draft legislation under sections [76C](#), [76D](#), [76I\(b\)](#), [76J\(1\)](#), [76J\(3\)](#) and [76P](#) of the *Income Tax Act, No. 58 of 1962* (Income Tax Act), applicable to double-taxation-agreement – i.e., bilateral – APAs.

The draft notices address a range of operational matters, including eligibility to apply for APAs, applicable fees, pre-application consultation processes, prescribed application content, amendment and withdrawal procedures, rejection criteria, processing and finalization of APAs, ongoing compliance reporting obligations and record-keeping requirements, as well as the Commissioner's ability to issue further procedural guidance.

Consistent with the [Explanatory Note](#), the pilot framework is expected to apply as SARS commences the program on a phased, resource-constrained basis, with initial access limited and focused on bilateral APAs concluded under applicable tax treaties. Public comments are invited by 29 May 2026.

See EY Global Tax Alert, [South Africa Revenue Service releases draft subordinate legislation for APA pilot program](#), dated 11 May 2026.

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