IOTA Forum on Combating VAT Fraud

Presentation 10 - Subgroup on 'The use of Alternative Payment Systems in cross-border VAT fraud schemes'

Ms. So Young Kim



Hybrid Forum Meeting 11-12 June 2025





Project

- Purpose & methodology
- Timeline & participants

• Report

- Survey
- Case studies
- Large datasets analysis
- Best practices
- Conclusions
- Recommendations





What is an APS?

A method of paying for goods or services which sits outside of mainstream commercial banking systems and is not routinely used in the consumer market



What is Cross-border VAT fraud?

Any kind of tax fraud, resulting in the loss of VAT, which involves the movement of goods and/or services across borders, or which involves parties based in one jurisdiction committing a fraud in another





To share experiences among IOTA member countries and explore approaches for tackling APS used in cross-border VAT fraud schemes, including enhancing tax administration capabilities in collecting and analysing transactional data coming from new solutions for money transfers





1. Survey	2. Case studies	3. Large datasets analysis	4. Best practices
Gather data and get the overview on APSs	Examine how APSs are used in cross-border VAT fraud	Employ the analysis of large datasets for traces of APS	Determine how jurisdictions are investigating and monitoring the threat

Conclusions and Recommendations

(Provide practical solutions to administrations for identifying and countering APS use)

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Action plan	Ma	u Jun	Jul	Auc	Ser	Oct	Nov	Dec	Jan	Fet	Mai	ADI	May	Jun	Jul	Aud	Sen	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Auc	Ser
Online meeting - kick-off of the project		1		1.1.2									- ···,																
Action plan																										<u> </u>			
Survey - preparation																										<u> </u>	·		
Survey – publising to IOTA members																											·		
Survey - collection of the results																											·		
Survey – analysis of collected data and summaries from online Surveys																										·	·		
Presentation of the preliminary work at IOTA VAT Forum in Bern																										· · · · ·			
Survey – draft report																													<u> </u>
Online meeting - revisjon of the action plan, timeline, working methods,																													<u> </u>
tasks and planning of meeting in Oslo																													l l
Case studies - collection of cases																													<u> </u>
Best practices - collection of practices																													<u> </u>
In-person meeting in Oslo - presentation of Case studies and Best																													
practicies. Discussion on Conclusions and Recommendations																													
Case studies - description																													
Best practices - description																													
Conclusions and Recommendations																													
Large datasets analysis																													
Project report - draft (Survey, Case studies, Best Practices, and																													
Conclusions and Recommendations)																													
Project report - revision and finalisation of the draft report for consultation																													
Presentation of the final work at IOTA VAT Forum in Sarajevo																													
Consultation – distribution for comments to Steering Group/IOTA members (deadline for comments: 7 September)	· 🗌																												
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Finalisation and publication of the Report																								<u> </u>	<u> </u>		<u> </u>	<u> </u>	



Participants

8 IOTA member countries:

- Norway (So Young Kim)
- Austria (Julia Klopfer and Simon Klopfer)
- Belgium (Pieter Vercruysse and Pascal Beaujeant)
- Finland (Raita Melasniemi)
- Hungary (dr. Túri Emese)
- Portugal (João Nunes Fialho)
- Slovakia (Ing. Róbert Píš)
- United Kingdom (Gareth Marklew)

2 EU bodies

- EUROPOL (Bruno Freitas)
- EPPO (João Marques)

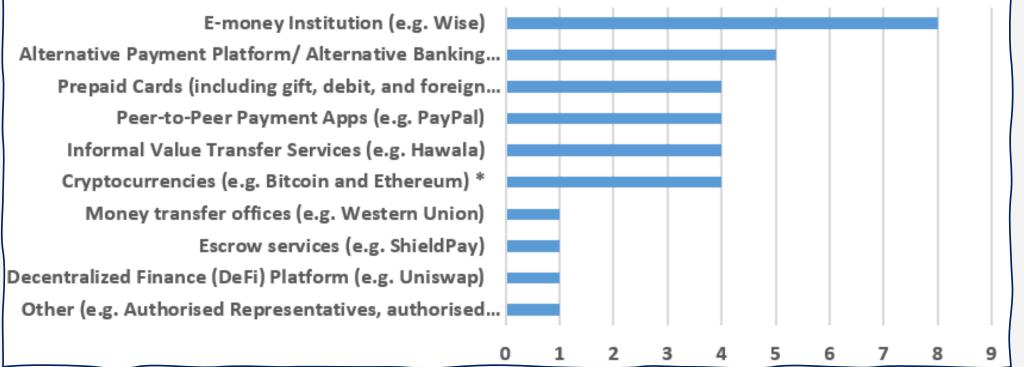
IOTA (Massimo Morarelli)







• Type of APS identified within investigations

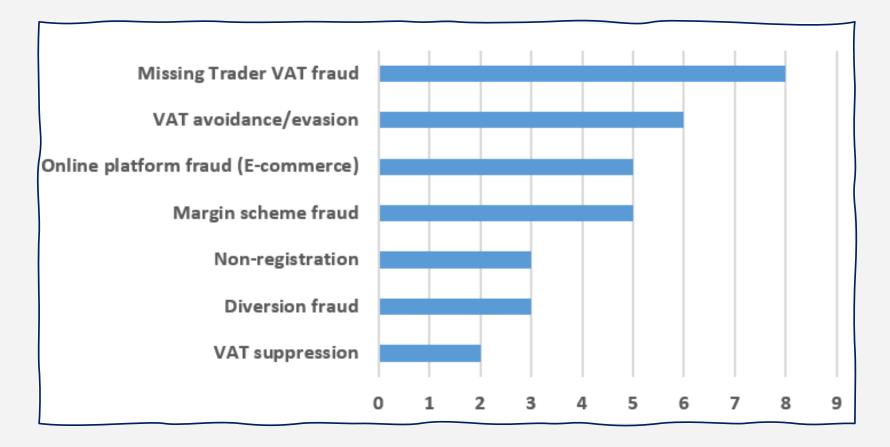


* Bitcoin, USDT, Tron and Ethereum blockchains





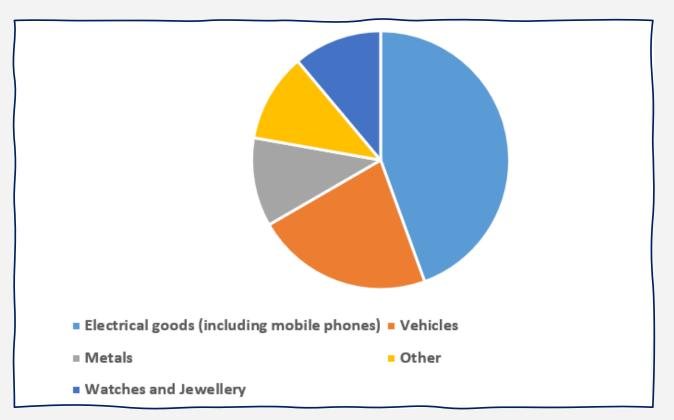
• Type of cross-border VAT fraud facilitated by the APS







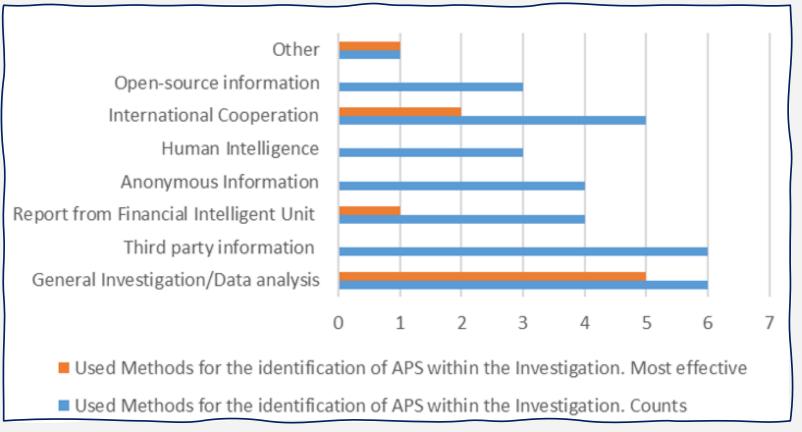
 Most common commodities featured within investigations containing an APS







Methods used to identify APS





Case studies

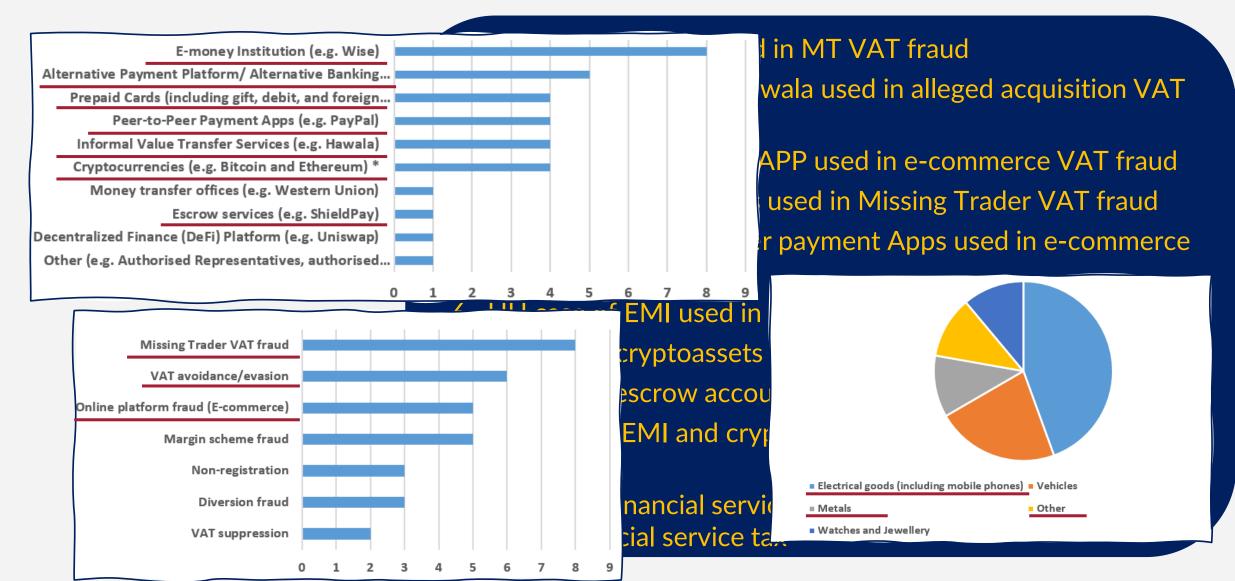


Structure:

- Case tittle: Country name + APS type + VAT fraud type
- Contents:
 - Case description
 - VAT fraud scheme with diagram
 - How APS is being used
 - How to detect/tackle
- Currency in the case: EUR





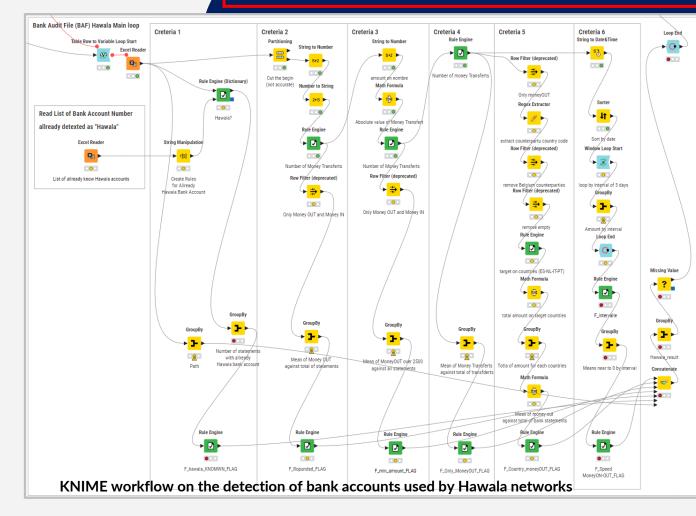


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Large datasets analysis

1. BE case of Hawala used in MT VAT fraud



alleged acquisition VAT

e-commerce VAT fraud sing Trader VAT fraud pps used in e-commerce

ing VAT fraud s-border VAT fraud ross-invoicing VAT fraud ed in cross-border supply

ite VAT refunds and



Large datasets analysis

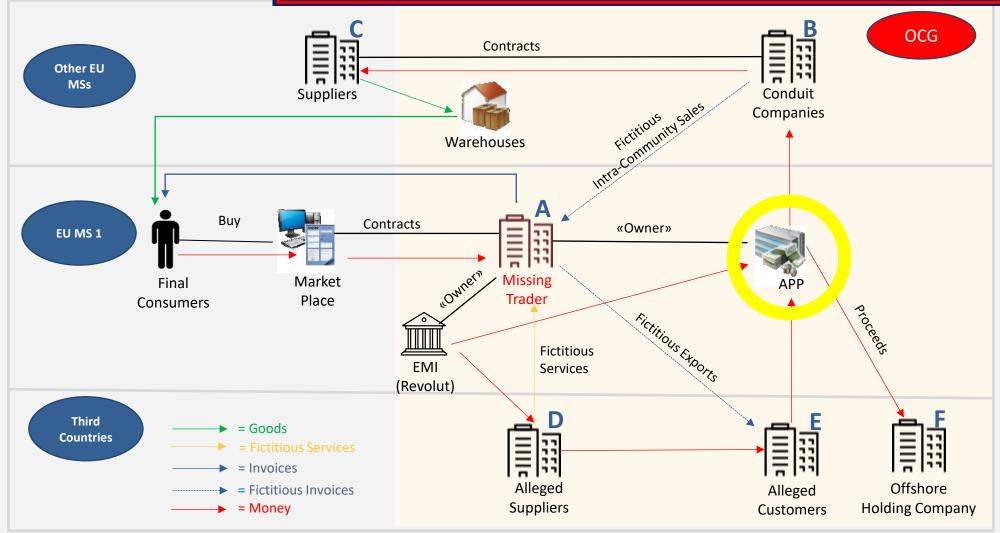
- 1. BE case of Hawala used in MT VAT fraud
- 2. DK case of EMI and Hawala used in alleged acquisition VAT fraud
- 3. EPPO case of EMI and APP used in e-commerce VAT fraud
- 4. EPPO case of gift cards used in Missing Trader VAT fraud
- 5. DE case of Peer-to-Peer payment Apps used in e-commerce VAT fraud
- 6. HU case of EMI used in cross-invoicing VAT fraud
- 7. PT case of cryptoassets used in cross-border VAT fraud
- 8. SE case of escrow account used in cross-invoicing VAT fraud
- 9. UK case of EMI and cryptoassets used in cross-border supply chain fraud

10.SI case of financial service to generate VAT refunds and avoid financial service tax



Large datasets analysis

3. EPPO case of EMI and APP used in e-commerce VAT fraud





Best practices



Belgium
Finland
Hungary
Norway
Spain
United Kingdom





- Robust strategies must be adopted, including:
 - Knowledge
 - Expertise/capabilities
 - Network
 - Interoperability
 - Rating APS

Raising awareness is the first step in adopting a concrete response to the risk posed by APS **Cooperation** between national authorities and international organisations is essential



Recommendations

- Raising awareness
- Risk analysis
- Use of data sources
- Data analytics
- Cooperation
- Training
- More human and technical resources to the topic







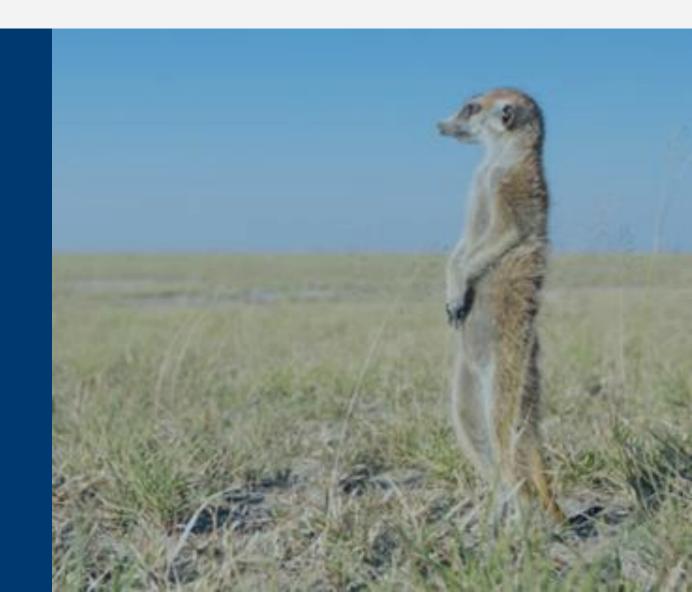


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Looking to the future

- We also hope to make recommendations on the following topics:
- Topics of interest for subsequent IOTA subgroups, webinars, conferences, including promotional activities of this report
- Areas for future research by using training sessions and workshops, e.g. the use of data analysis tools
- Opportunities for collaboration between IOTA members, including sharing of best practice and experiences to seek to get "ahead of the curve"





Any Questions?

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