

# IOTA PAPER

## How to Improve Tax Compliance in a Cross-border Tax Debt Setting?

Evidence from a cross-country behavioural experiment

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# Executive Summary

A cross-national experiment (field trial) between the Belgian Tax Administration (FPS Finance) and the Netherlands Tax Administration (Belastingdienst – NTA) to increase fiscal payment compliance of taxpayers living abroad was set-up in 2022 and implemented in 2023.<sup>1</sup> This project, called BeNe-project (Belgium-Netherlands project), builds on the long experience of good-neighbourly cooperation between Belgium and the Netherlands in the field of tax collection and recovery.

Both the FPS Finance and NTA are regularly dealing with taxpayers working and/or living “on the other side of the border”.<sup>2</sup> The ease by which individuals and companies can work or trade across the mutual border can come into conflict with the powers of the national tax administrations, which are limited to their own territory.<sup>3</sup> As a consequence, tax administrations are, when confronted with tax debtors living or registered in another country, limited to national enforcement measures to recover the unpaid tax claim(s) due by those tax debtors.<sup>4</sup> As experience has proven that relying solely on national enforcement measures to recover tax claims from taxpayers living abroad is rarely successful, tax administrations have to rely on European and international agreements to request and provide Cross-Border Assistance for Recovery of tax claims.

This form of administrative assistance is within the European Union based on Council Directive 2010/24/EU<sup>5</sup>. This Directive, along with its Implementing Regulation<sup>6</sup>, defines a set of rules, including a €1.500 threshold<sup>7</sup> below which mutual assistance for recovery is in principle not possible. For debts exceeding €1.500, the process of requesting and providing assistance is both time and resource intensive, relying on the efforts of small teams of dedicated experts.

Given the already high volumes and increasing number of uncollected cross-border tax claims needing recovery action, the FPS Finance and NTA decided to explore an alternative approach. This approach was aimed at reconnecting with taxpayers to see if this would increase taxpayer compliance, reducing compliance costs, and, at the same time, also reducing administrative burdens for tax administrations. An underpinning objective was to increase revenue by targeting all tax claims, including those which fall under the above-mentioned threshold of €1.500.

This alternative approach, the subject of the BeNe-project, was based on sending additional payment reminder letters incorporating Behavioural Insights techniques (BI - the application of behavioural knowledge on taxpayer behaviour) to taxpayers owing tax claims to the FPS Finance but residing in

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<sup>1</sup> The term ‘taxpayer’ in this report means any person or entity falling under the description in Article 3 (2) of Commission Implementing Regulation (EU) No 1189/2011 of 18 November 2011 laying down detailed rules in relation to certain provisions of Directive 2010/24/EU concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures, OJ L 302, p. 16–27. The term ‘tax debtor’ is used as a synonym.

<sup>2</sup> See, among others, Parker, L. *International/OECD Mutual Assistance in the Collection of Taxes*, Bulletin for International Taxation, August 2017, IBFD Journals, OECD (2014), *Working Smarter in Tax Claim Management*, Paris: OECD Publications, p. 85 and De Troyer, I. (2009), *A European Perspective on Tax Recovery in Cross-Border Situations*, EC Tax Review, 2009, p. 211.

<sup>3</sup> See, among others, OECD (2020), *Forum on Tax Claim Management: Enhancing International Tax Claim Management*, Paris: OECD, p. 9, para. 1.3.

<sup>4</sup> For the sake of simplicity, the term ‘tax claim’ should be understood as all claims falling within the scope of Article 2 of Council Directive 2010/24/EU.

<sup>5</sup> Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures, Official Journal L 84, p. 1–12.

<sup>6</sup> Commission Implementing Regulation (EU) No 1189/2011 of 18 November 2011 laying down detailed rules in relation to certain provisions of Directive 2010/24/EU concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures, OJ L 302, p. 16–27.

<sup>7</sup> This threshold is set in Article 18 (3) of Directive 2010/24/EU.

the Netherlands and, conversely, taxpayers residing in Belgium but owing tax claims to the NTA. As a result of this alternative approach, cross-border tax claims should not remain uncollected nor trigger the application of formal cross-border assistance for the recovery of tax claims.

The nudging letters aimed to re-establish communication and rebuild trust with defaulting taxpayers, encouraging them to address their fiscal debt and hopefully to become and remain compliant in the future. Once contact was re-established, taxpayers were offered personal support during the payment process, including tailored, low-cost solutions when immediate and full payment was not feasible.<sup>8</sup> Additionally, this approach helped tax administrations avoid using the more costly and time-consuming process of mutual assistance in recovering tax claims abroad.

The approach described above was tested on a relatively small intervention group of 303 taxpayers residing in the Netherlands (Belgian debts) and 391 taxpayers residing in Belgium (Dutch debts). The results showed that the BI-informed letters, incorporating behavioural insight-techniques (the application of behavioural knowledge on taxpayer behaviour), combined with additional taxpayer information verification, led to important and scientifically significant results. Follow-up letters resulted in a 56% increase for Belgium and a 55% increase for the Netherlands in terms of reactions (including payments, instalment requests, and contact via phone or email) by taxpayers after the intervention.

Looking at the payment behaviour (payment compliance being one of the main objectives of this experiment), the project led to a 44% increase in Belgium and a 24% increase in the Netherlands in payment of tax claims when compared to the control group. The experiment resulted in a reduction of unpaid tax claims (and a reduction of time and resource intensive follow-up and enforcement actions), generating an additional net revenue of €154.609 in Belgium and €149.720 in the Netherlands within the intervention group.

Finally, the number of tax claims requiring requests for recovery assistance dropped significantly. Although this effect was not as significant as the increase in reactivity and payment compliance levels, described earlier, it remains substantial. Lower-level tax claims were more impacted by the intervention than claims with a higher amount.

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<sup>8</sup> OECD (2014), *Working smarter in tax debt management*, Paris: OECD Publications, p. 36-56: reference to service-driven strategies.

# Introduction

This report describes an innovative experiment between the Belgian and Dutch tax administrations (BeNe-project) aimed at improving tax compliance of cross-border taxpayers through the application of Behavioural Insight (insight into behaviour of, in this case, taxpayers - BI). The innovative aspect of this project lies in the use of specially crafted additional payment reminder letters, incorporating BI-techniques to taxpayers owing tax claims to the FPS Finance but residing in the Netherlands; and, conversely, taxpayers residing in Belgium but owing tax claims to the NTA.

This new approach was thoroughly tested, and the results proved to be overwhelmingly positive in terms of both additional payments and increased taxpayer responses after the intervention.

The report begins with a brief overview of the problem analysis in Chapter 1, focusing on the context of cross-border debt between Belgium and the Netherlands as the main subject of this project. This chapter also discusses key issues related to the topic. Chapter 2 follows with a formulation of the hypothesis (research question), suggesting that an additional BI-inspired intervention can enhance taxpayer compliance with tax payments. Next, Chapter 3 explains the setup of the bilateral field trial, with particular attention to the selection of the target group and the experimental design, which employs a Randomised Controlled Trial (RCT). Chapter 4 then provides a detailed description and analysis of the field experiment results. Finally, Chapter 5 presents the conclusions and recommendations for tax administrations considering similar interventions.

Throughout the report, the following topics will be discussed:

- **Improving tax compliance:** The experiment between Belgian and Dutch tax authorities aimed to increase fiscal payment compliance of taxpayers living abroad by using BI techniques in payment reminder letters, i.e., nudging letters.
- **Behavioural insights:** The study investigated whether alternative interventions could be developed to prevent tax claims from remaining unpaid or escalating into costly and burdensome cross border tax collection procedures when Mutual Assistance Procedures for the recovery of tax claims (MAP) are used.
- **Control of taxpayer information:** An additional step in the experiment involved verifying and updating taxpayer addresses to ensure reminders were sent to the correct address.
- **Hawthorne Effect:** The phenomenon whereby individuals adjust their behaviour when they become aware that they are being observed.
- **Loss aversion:** A concept suggesting that people react more strongly to losses than to gains of the same value.
- **Use of active choice:** A strategy for decision-making that requires individuals to make conscious and deliberate decisions among available options.
- **Use of reciprocity:** In response to kind actions, taxpayers are much more cooperative than predicted by the self-interest model.
- **Personalisation:** Maximising taxpayer engagement through direct and personal contact. For this purpose, contact details of a designated tax collection officer are included in the letters. The 1<sup>st</sup> nudging letter tries to reconnect with the taxpayer concerned to discuss payment of outstanding tax claim. Failure to contact results in a 2<sup>nd</sup> nudging letter from the tax administration of the taxpayer's country of residence.<sup>9</sup> If contact again fails then the regular

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<sup>9</sup> Where applicable, 'country' can be read as 'Member State' and vice versa.

collection process is continued, including Mutual Assistance Procedure (MAP) for the recovery of tax claims.

- **Results of the experiment:** This experiment showed that the addition of BI-inspired reminder letters (nudging letters) led to higher payment and response levels among taxpayers. Moreover, it led to reduction in the application of MAP for the recovery of tax claims. Although the time it took to arrive at a result was not measured practical experience strongly indicated that the method used in this study was considerably quicker than applying MAP for the recovery of tax claims. Given the exploratory nature and the limited scope of the project, cost considerations were not included in the analysis.
- **Recommendations:** The paper provides recommendations for other tax administrations, the European Commission and the OECD on improving cross-border tax compliance.

## 1. Problem Analysis

This chapter starts with providing information on the issue at stake, i.e., cross-border tax claims (1.1) and the complexity involved in recovering those claims from a taxpayer residing in another country (1.2).

### 1.1 Cross-border tax claims

Enforcement actions are implemented to ensure compliance with the rules by all those who are required to follow them. In the context of tax collection, this means that a recovery mechanism is triggered if a tax claim remains unpaid past the due date. For taxpayers residing in another jurisdiction, this may involve initiating MAP for the recovery of tax claims, i.e., administrative cooperation in the field of cross-border recovery of tax claims, when appropriate.

### 1.2 Context of MAP for the recovery of tax claims in the EU

In order to provide an answer to this situation, countries can enter into legally binding agreements, international law instruments,<sup>10</sup> by which they assist each other by recovering the tax claims of another country relating to taxpayers resident within their territory. In the EU context, such recovery assistance for tax claims is regulated by Directive 2010/24/EU.<sup>11</sup> The possibilities offered by this Directive are undeniably beneficial, but implementing recovery assistance can nevertheless prove to be both time and resource consuming. Box 1 below provides a short, non-exhaustive, overview of the relevant legal and practical implications of using Directive 2010/24/EU.

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<sup>10</sup> The term 'international law instrument' should be understood as synonym for a treaty, convention, or EU legal instrument regarding international tax matters, in particular cross-border recovery of tax claims.

<sup>11</sup> Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures, Official Journal L 84, p. 1-12.

## Legal

The main arrangement between Member States at EU level to assist each other in collecting tax claims is Directive 2010/24/EU. The conditions to ask assistance in the recovery of tax claims under this Directive are laid down in Article 11. Article 11 (1) provides that if and as long as the claim and/or the instrument permitting enforcement (IPE) in the applicant Member State are contested in that Member State, the applicant authority may not make a request for recovery, except in cases where the third subparagraph of Article 14 (4) is applied. Furthermore, Article 11 (2) provides that before the applicant authority makes a request for recovery, it must use the appropriate means of recovery available in the applicant Member State (principle of exhaustion). Sub a and b of this paragraph contain exceptions which nuance the principle of exhaustion. This Directive aims to ensure that the recovery of tax claims is guaranteed and thus not hampered by national borders within the EU. To achieve this, while respecting tax sovereignty and the revenue rule, good cooperation between Member States' tax administrations is key. To safeguard the budgetary interests of the Member States and the EU, it is very important to have rules in place to ensure adequate recovery, including across national borders.

In accordance with Recital 8 of the Preamble in conjunction with Article 12 of Directive 2010/24/EU, a uniform instrument for enforcement action in the requested Member State shall be used to make a request for recovery assistance. While these electronic forms have proved to be an improvement, in practice they also can pose problems where appropriate, making the process time-consuming and burdensome.

## Practical example<sup>12</sup>

A request for notification covers 10 pages and 7 sections, a request for exchange of information covers 8 pages and 6 sections and a request for the recovery of tax claims covers 13 pages and 7 sections. In the Dutch situation, which might not be illustrative of other Member States but does paint a worrying picture<sup>13</sup>, observations within the NTA show that the completion of an e-form to request assistance for the recovery of tax claims takes on average 1.5 hours. The time increases as the number of tax assessment notices for which assistance is sought increases, for example for a number of tax assessment notices up to 10, it takes up to 4 hours to complete a request. As the case may be, in extremis, a taxpayer has dozens of outstanding tax assessment notices, for which completion takes several days, i.e., for a single request.

*Box 1: short description of the legal and practical implications of using Directive 2010/24/EU*

This formal approach, i.e., using MAP for the recovery of tax claims, indeed requires substantial time and investment from both countries involved and potentially increases costs for the taxpayer (in terms of recovery costs).<sup>14</sup> This is because the process involves the competent tax collection officer filling an e-form and forwarding it to the Central Liaison Office (CLO).<sup>15</sup> There, the electronic form (e-form) is usually reviewed to ensure all conditions are met before being sent to the CLO of the country where

<sup>12</sup> The practical example refers mainly to the Dutch situation where, as far as motor vehicle tax is concerned, taxpayers receive a tax assessment notice every three months (automatically), so 4 tax assessment notices every year. In this project taxpayers sometimes have more than 20 motor vehicle tax assessment notices, in addition to unpaid tax assessment notices of other taxes. Manually processing all relevant data related to those tax assessment notices in the relevant e-form takes a disproportionate amount of time.

<sup>13</sup> No further in-depth research has been done on the complexity and time taken to complete.

<sup>14</sup> OECD (2014), *Working smarter in tax debt management*, Paris: OECD Publications, p. 92.

<sup>15</sup> The term 'CLO' originates from EU legislation for administrative cooperation, such as Directive 2010/24/EU (Article 4 (2)): "The competent authority, usually at a political level such as a Minister of Finance (underlined text by PvdS), refers to a central liaison office that is primarily responsible for contacts with other member states in the area of mutual assistance covered by this directive. The central liaison office can also be designated as the office responsible for contacts with the Commission." the term 'CLO' is often used as synonym for 'competent authority' which is the entity responsible for receiving and sending requests for assistance, coordinating the MAP for the recovery of tax claims, resolving disputes and questions of interpretation of international law instruments (see IBFD (2015), *IBFD International Tax Glossary*, Amsterdam: IBFD, p. 96.

the taxpayer resides and/or has assets.<sup>16</sup> In turn, the request is forwarded to the tax office where the request will be executed. Finally, the result follows the reverse path back to the requesting country.

Furthermore, the results of MAP for the recovery of tax claims seems rather weak, i.e., in the EU the average recovery ratio<sup>17</sup> for formal requests for recovery is calculated around 5-6%.<sup>18</sup> Perhaps needless to say, but for the sake of completeness, it is noted that information on effectiveness outside the EU, i.e. MAP for the recovery of tax claims under other international legal instruments (bilateral and multilateral) is not available. Box 2 provides some figures on the situation in Belgium and the Netherlands. The tax debts listed therein are limited to those due from the taxpayers (individuals) concerned by this project.

In 2022, 11.979 taxpayers having their permanent residence in the Netherlands owed Belgium €6.902.181 in Belgian Personal Income Tax, divided over 11.476 tax claims.<sup>19</sup> The same year, 3.253 taxpayers having their permanent residence in Belgium owed the Netherlands €24.282.251 in Personal Income Tax and Vehicle tax, consisting in a total of 1.386 tax assessment notices and recoveries of family benefits. With regard to Directive 2010/24/EU, the Netherlands scores relatively high in terms of recovery ratio: 16,6% while Belgium scores 5-6%.<sup>20</sup> In 2022 Belgium submitted a total of 841 requests for recovery to the Netherlands for a total amount of €8.228.261 (only individuals) while the Netherlands sent 48 requests for recovery assistance to Belgium for a total amount of €1.814.993<sup>21</sup>

Box 2: Figures on outstanding balances and assistance.<sup>22</sup>

<sup>16</sup> OECD (2014), *Working Smarter in Tax Debt Management*, Paris: OECD Publishing, p. 90: "E-forms are sent via a secured network between the Member States, which allows the Central Liaison Offices of the Member States, that is the competent authorities, to communicate electronically, which has a significant positive effect on the processing time." These EU e-forms are JAVA web-based can also be used in relation to bilateral tax treaties or based on the Convention on Mutual Administrative Assistance in Tax Matters, as agreed in 2006, when the OECD participated in the development of these e-forms (see Karhusaari, E. (2011), *International Administrative Cooperation: Assistance for Collection*, Lisbon conference, Lisbon: CIAT, p. 320. :

<sup>17</sup> The difference between amounts requested by Member States to be collected and the amounts effectively collected by Member States expressed in percentage.

<sup>18</sup> In its report on the years 2011-2016 on the functioning of the schemes established by Directive 2010/24/EU, the European Commission states that it is not possible to give a clear indication of the recovery ratio, showing the ratio between the amounts recovered and the amounts for which recovery assistance is requested. Despite this observation, the recovery ratio is still used as an indication about the functioning of mutual assistance for the recovery of tax claims based on Directive 2010/24/EU or its predecessors. The recovery ratio fluctuates between 5-6% according to the latest reports from the European Commission. See among others: European Commission (2006), *Report from the Commission to the Council and the European Parliament on the use of the provisions on mutual assistance in the recovery of claims relating to certain levies, duties, taxes and other measures*, COM (2006) 43 final, Brussels: EU, para. 4.2.3 and 4.3.3., European Commission (2009), *Report from the Commission to the Council and the European Parliament on the use of the provisions on mutual assistance in the recovery of claims relating to certain levies, duties, taxes and other measures in 2005-2008*, COM(2009) 451, Brussels: EU, para. 2.4., European Commission (2012), *Report from the Commission to the Council and the European Parliament on the use of the provisions on mutual assistance in the recovery of claims relating to certain levies, duties, taxes and other measures in 2009-2010*, COM (2012) 58 final, Brussels: EU, para. 2.2.4, European Commission (2017), *Report from the Commission to the Council and the European Parliament on the operation of the arrangements established by Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance in the recovery of claims relating to taxes, duties and other measures*, COM(2017) 778 final, Brussels: EU, para. 4.2.b and European Commission (2017), *Commission Staff Working Document for the evaluation of the use of mutual tax recovery assistance on the basis of Directive 2010/24/EU by the EU Member States, Accompanying the document to the Report from the Commission to the European Parliament and the Council on the operation of the arrangements established by Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance in the recovery of claims relating to taxes, duties and other measures*, SWD(2017) 461 final, Brussels: EU, para. 6.1.1.2.

<sup>19</sup> These statistics only refer to tax claims originated in 2022. The tax claims which are pre-existing are therefore not included.

<sup>20</sup> European Commission (2017), *Report on the operation of the arrangements established by Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance in the recovery of claims relating to taxes, duties and other measures*, COM (2017) 778 final, Brussels: European Commission, para. 4.2.b. and European Commission (2017), *Commission Staff Working Document for the evaluation of the use of mutual tax recovery assistance on the basis of Directive 2010/24/EU by the EU Member States Accompanying the document Report from the Commission to the European Parliament and the Council on the operation of the arrangements established by Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance in the recovery of claims relating to taxes, duties and other measures*, Document COM (2017) 778 final, Brussels: EU, para. 6.1.1.2.

<sup>21</sup> Although no further research has been done on why this number is so low, it is plausible that COVID-19 is the biggest cause.

<sup>22</sup> There is a big difference, respectively average outstanding debt for the Netherlands is €34.000 and for Belgium €576. there is no identifiable explanation for this difference.

There are several reasons for these limited results, including the low priority sometimes given to MAP for the recovery of tax claims by tax administrations.<sup>23</sup> In both Belgium and the Netherlands, most of the tasks concerning information gathering and recovery measures are executed manually by staff members, which can result in a multiplication of steps and workforce involvement.<sup>24</sup>

Some of the issues are a result of the Directive itself. For instance requesting mutual assistance is not possible from the large number of smaller claims as the amount is often too low in relation to the €1.500 threshold amount under Article 18(3) of Directive 2010/24/EU, and the impossibility of using another international law instrument for this purpose, since between EU Member States, EU law takes precedence.<sup>25</sup>

The current e-form<sup>26</sup> used for requests for information is sometimes quite burdensome to complete if only address information is sought. Furthermore, it cannot be used for bulk requests in a straightforward way. For this project, Article 21(3) of Directive 2010/24/EU provided a solution. If the standard forms cannot be used, this does not affect the validity of the information obtained or the measures taken in response to a request for assistance. Consequently, this project reinforces the call for simplified forms to allow bulk requests to be made using a standard form. This implies that the statistical reporting in accordance with Article 27(1), sub a of Directive 2010/24/EU should be clarified. For example, if a bulk request for address verification is made for 100 taxpayers, it should be clear whether, for statistical purposes, this counts as one request or 100 requests.<sup>27</sup>

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<sup>23</sup> OECD (2020), *Forum on Tax Debt Management: Enhancing International Tax Debt Management*, Paris: OECD, p. 9-15.

<sup>24</sup> Neither the FPS Finance nor the NTA has automated the mutual assistance process which means that much manual and time-consuming work to be done. This is different from, for example, Spain, which is a textbook example of effectiveness and efficiency. Upon receipt of a request for assistance, relevant data such as the type and amount of the claim(s) and limitation date(s) from the electronic form (e-form) are automatically transferred into the recovery system. Additional data in the e-form are manually transferred, when sending a request for assistance, relevant data from the recovery system are uploaded into the e-form. Additional data are manually transferred into the e-form.

<sup>25</sup> However, it is not prohibited to provide recovery assistance to each other for amounts less than €1,500. This is for the Member States themselves to judge. Practice shows that Member States do not deviate from the text of Article 18 (3) of Directive 2010/24/EU for reasons of their own.

<sup>26</sup> See: <https://customs-taxation.learning.europa.eu/enrol/index.php?id=499>, retrieved on 2 January 2025: "The web-based Electronic Forms Central Application (eFCA) is designed to improve administrative cooperation by covering three domains: Value Added Tax (VAT), Recovery and Direct Taxation."

<sup>27</sup> European Commission (2017), *Commission Staff Working document for the Evaluation of the Use of Mutual Tax Recovery Assistance on the Basis of Directive 2010/24/EU by the EU Member States, Accompanying the document Report from the Commission to the European Parliament and the council on the operation of the arrangements established by council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures*, SWD (2017) 461 final, Brussels: European Commission, paragraph 6.3.2.2. under a: "It has also been suggested to introduce a specific provision on the handling of bulk information requests and to examine whether direct access can or should be granted to specific databases of other Member States, respecting the data protection rules, if these databases are relevant for tax recovery purposes".

## 2. Research Question

This chapter formulates the three hypotheses used for this study:

1. Adding to the regular workflow a set of two follow-up reminders inspired by BI (nudging) letters, preceded by an additional verification of address information, will lead to a higher reactivity level (taxpayers getting into action).
2. Adding a set of two follow-up reminders inspired by BI (nudging) letters to the regular workflow, preceded by an additional verification of address information, will lead to a higher payment compliance amongst cross-border taxpayers.
3. The increased payment compliance of taxpayers residing abroad leads to a decreased use of MAP for the recovery of tax claims and hence less time investment for both requested and requesting tax administrations in pursuing the tax claims due.

The focus of this project is payment compliance amongst cross-border taxpayers (individuals). Concerning the alleged increased compliance with regard to the fiscal payment obligations, the messenger and monitoring effects have an expected effect on payments made by taxpayers and contact between taxpayers (see Figure 1 below). The grey lines represent the hypotheses, and the orange lines indicate the hypothesised relationship with the constructs.

Monitoring effects relate to the Hawthorne effect<sup>28</sup>, known in psychology, which occurs when someone's behaviour changes as a result of being monitored or observed. By informing taxpayers that active monitoring and follow-up will be put in place, their behaviour can be influenced and encouraged to change. The messenger effect is a cognitive bias that triggers judging of the validity or relevance of information based on the person or institute delivering the message. In this case, the fact that both the country of residence and the country that holds the tax claim figure as messengers enhances the authority of the payment request or contact request message delivered to the taxpayer.

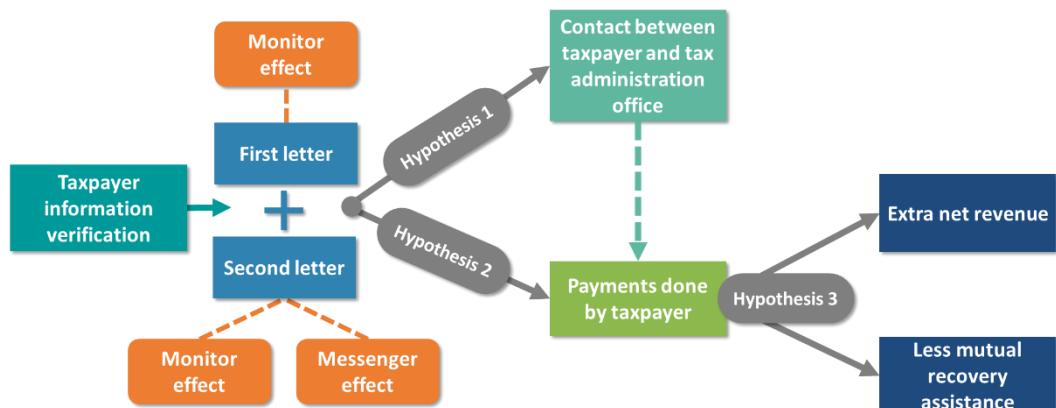


Figure 1: Visualisation of the experiment, the expected mechanisms at play, the hypothesis and the outcome variables.

<sup>28</sup> See McCarney R, Warner J, Iliffe S, van Haselen R, Griffin M, Fisher P (2007), *The Hawthorne Effect: a randomised, controlled trial*, BMC Medical Research Methodology 7, 30 (2007).

### 3. Set-up field trial

This chapter explains the methodology that was followed to set-up the field trial. The design of the trial, the type of intervention and the different steps in the intervention are elaborated.

To test the three hypotheses that an additional BI-inspired intervention can improve taxpayers' fiscal payment compliance, the project team designed an experiment to evaluate the effect of sending two follow-up reminder letters (BENE1 and BENE2) to non-compliant taxpayers living abroad. To examine changes in taxpayer behaviour in terms of tax payment and reaction level after receiving this letter (hypothesis 1 + 2), a selection of taxpayers with outstanding tax claims was randomly assigned to either the intervention group (receiving nudging letter(s)), or to the control group (receiving no letter). Taxpayers in the intervention group received one or two nudging letters, depending on their response to the 1<sup>st</sup> letter. A 2<sup>nd</sup> follow-up letter was sent only if there is no reaction to the initial reminder. Taxpayers in the control group followed the standard collection and recovery process, meaning they did not receive any additional nudging letters.

In this section, the selection of tax claims is discussed (3.1), along with the verification of taxpayer information (3.2), the use of BI to enhance payment compliance (3.3), and the setup of the Randomised Controlled Trial (RCT) as the evaluation method (3.4). Additionally, attention is given to the single point of contact provided to the target group (3.5).

#### 3.1 Selection of tax claims

The first step into the process consisted of selecting the right tax claims for the trial. For tax claims owed to the FPS Finance, five criteria were used.

Firstly, the selected tax claims concerned overdue tax payments in revenue tax (Personal Income Tax + Tax non-residents) for the last 2 years, revenue year 2020 or 2021 – declaration year 2021 or 2022. Secondly, for all these tax claims a reminder had already been sent by the national debt management system. It is a legal obligation to send a reminder 15 days after the 2-month payment deadline (4 months in exceptional periods such as post-covid) after the date the tax assessment notice is sent. It should be noted that mail delivery from the Netherlands to Belgium was faster than from Belgium to the Netherlands. The taxpayer should have a residential address in the Netherlands. Thirdly, because of cost-effectiveness the tax claim should have a minimum amount of €12,50. There was no limitation on the maximum amount. Fourthly, only tax claims that were handled by the team for special recovery in Ghent (TBI Gent) were selected in order to centralise this project and provide a single point of contact. The final condition was that no recovery through bailiffs or seizures in the hands of a third party had been started for these taxpayers. The reminder letter was the only action taken by the FPS Finance at the time of selection. The reminder letter forms the legal base for any further recovery action (legal title).

A pre-selection was made in March 2023 and updated on 3 April 2023 (last day before sending the 1<sup>st</sup> nudging letters). The final population was composed of 729 tax claims ranging from €12,70 to €48.090. The average amount of these tax claims was €2.639, and the median amount was €1.075.<sup>29</sup> This

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<sup>29</sup> The median is the value that is exactly in the middle of a dataset when you put the values from small to large. The Belgian system implies that a different letter must be sent to taxpayer for every tax claim. It means that some taxpayers of this trial did get two letters, one for every article. In the Netherlands the procedure allows to send a single letter containing several tax claims.

sample was randomised producing an intervention group (356 cases) and a control group (373 cases) - using the excel-function RANDBETWEEN (0;1), controlling for the mean and median amount of the variable 'amountOpen' that indicates the outstanding amount at the time of selection. This was to make sure the size of tax claim was equally distributed to both control and intervention group (stratified randomisation procedure). For the analysis, all claims within the population that had two claims and were either attributed to the intervention group (2 letters), the control group (no letters) or both intervention and control group (1 letter for one claim, but no letter for the other) were excluded because of the potential spill-over effect between control and intervention group. This left a sample of 569 (single) claims, 303 in the intervention group and 266 in the control group.

Initially, for tax claims owed to the NTA, a query on taxpayers residing in Belgium was created selecting taxpayers who had not fully paid their outstanding tax claims and whose tax assessment notices were finally determined.<sup>30</sup> This meant that a reminder and an instrument permitting enforcement (IPE) had been notified to the taxpayer. The deadlines for filing an objection, appeal, or cassation had been expired unused and the tax claim was not barred by limitation. Next, only taxpayers with an outstanding balance dated in 2019-2022 were selected, i.e., tax claims for which enforced collection had not yet been applied. Tax claims where a postponement had been granted, or enforcement had been applied in the Netherlands, were not selected. From this selection, 633 taxpayers were randomly selected for both groups, 391 taxpayers of the intervention group and 242 taxpayers of the control group, without check on the amount of the tax claim but always at least €25, the lowest amount for which enforcement action can be taken.

After the statutory payment period has expired, the tax administration may still allow a period of tolerance during which attempts are made to induce the taxpayer to still comply with his fiscal payment obligation. Figure 2 below shows the different time phases in the tax collection chain.<sup>31</sup> The tax collection chain enables the tracking of each tax claim and taxpayer over time, following them throughout their lifecycle and providing insights into taxpayers' payment behaviour. It is built up by segmenting proportions of the debt to their logistical stage, from tax assessment notice or liability order, 'payment on time or too late' up until either 'paid', 'uneconomic to pursue' or 'write off'. In between each stage, postponement can take place due to new facts and circumstances. This chain of collection is divided into a number of time-following phases as shown in Figure 2 below and discussed in more detail in the following paragraphs.

<sup>30</sup> No legal remedies left and not barred by limitation.

<sup>31</sup> OECD (2014), *Working Smarter in Tax Debt Management*. Paris: OECD Publishing, p. 22-23.

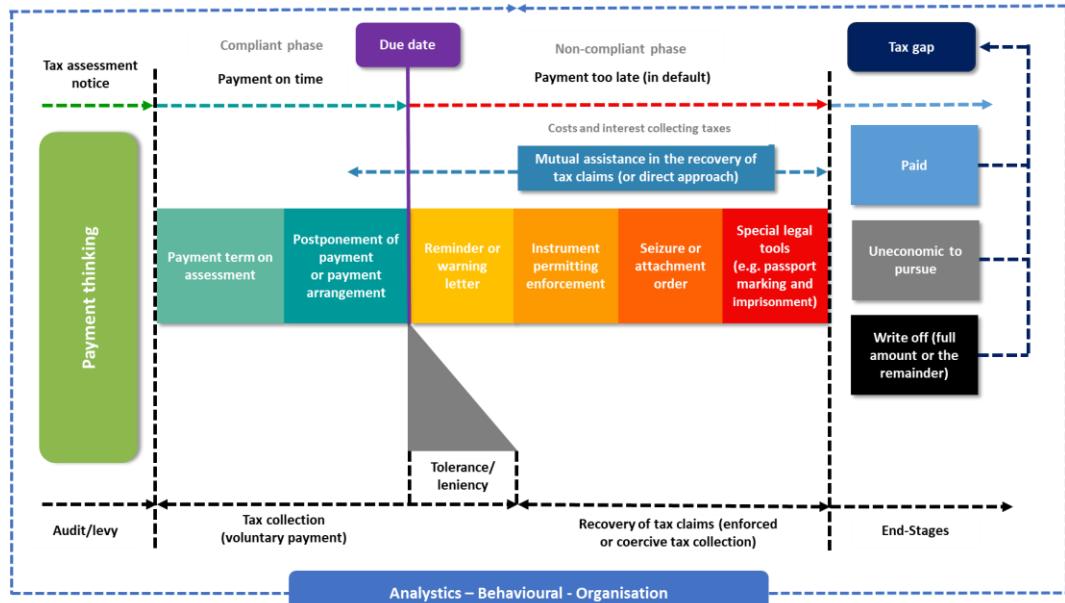


Figure 2: tax collection process

This soft method seems to have a positive impact on compliance. In addition, it is less burdensome.

### 3.2 Verification of taxpayer information

In order to maximise the effect of a payment reminder letter, an additional step was put into place to verify and correct the taxpayer information of the target group (see hypotheses 1 and 2). Past experience has proven that in many cases tax assessment notices and other documents sent abroad do not result in payment or contact with the taxpayer because of obsolete or incorrect addresses in the systems of the tax administration concerned. This can be caused by poor data quality or by the fact that taxable persons do not inform the authorities of their address after moving abroad or relocating again. While an initial move to another country may be reported, it is likely that subsequent moves within that country (or to yet another country) are often not communicated, thereby breaking contact with the tax administration where the tax is due.

In order to assure that the newly designed nudging letters for selected tax claims were likely to be received, a cross-check of addresses was conducted within the intervention group. This verification took place in the form of a bulk request for information, based on the same principle as the requests for information pursuant to Article 5 of Directive 2010/24/EU.

This verification procedure and address check proved to be highly important, as many of the original addresses were outdated and had to be updated using information obtained from the country of residence. A total of 633 addresses from both the control and intervention groups were verified by Belgium for the Netherlands. Of those, 144 addresses in the intervention group were found to be incorrect or incomplete. Vice versa, 729 addresses for debtors owing a debt to the Federal Public Service Finance but residing in the Netherlands, were verified by the Dutch tax administration. Within the intervention group (N=356) 246 addresses were found to be incorrect or incomplete. This indicates that non-compliant behaviour may, at least in part, result from inaccurate taxpayer data. In

the future, further research could be conducted on how to keep addresses of taxpayers residing abroad up to date.

Since both the NTA and FPS Finance pay great attention to ethical standards and privacy considerations in their taxpayer services, it is important to highlight the ethical standards used in this project. In line with this, data protection is taken very seriously. The personal data of the taxpayers concerned by this field trial was no exception to this rule and has been treated in full accordance with the relevant legal and administrative regulations under Belgian and Dutch (fiscal) law, and under Directive 2010/24/EU.

During this field trial, Personally Identifiable Information (PII) was exchanged between the FPS Finance and NTA. This is not an exception, as similar information is regularly exchanged between tax administrations as part of the implementation of their legal tasks. In this particular case, only the address information of taxpayers with debts falling within the scope of the field trial was exchanged. The legal basis for the exchange is Directive 2010/24/EU.

All exchanges were carefully managed to prevent any risk of data leaks or breaches in the course of the field trial. The European Commission's Common Communication Network (CCN)<sup>32</sup> was used as a secure channel, as only authorised users from the Central Liaison Offices can access the mailboxes connected to CCN.

Box 3: data protection

### 3.3 Behavioural Insights

Policymakers and public administrations express a growing interest in the findings of behavioural science and its applications. Public administrations in Belgium<sup>33</sup> and in the Netherlands, like in other parts of the world, are increasingly turning to BI to enhance tax compliance, in particular in the sector of tax debt management.

The Organisation for Economic Cooperation and Development (OECD),<sup>34</sup> the Intra-European Organisation of Tax Administrations (IOTA),<sup>35</sup> and the European Commission<sup>36</sup> have initiated conferences and published papers on the effectiveness of the use of BI-techniques in taxes.<sup>37</sup> Behavioural experts<sup>38</sup> were part of this research project from the start in order to integrate and test BI-techniques to tackle the problem of international tax claims.<sup>39</sup>

Combining scientific knowledge and legal possibilities, the FPS Finance and NTA designed a field trial aimed at positively impacting tax compliance among taxpayers living across the border. There are various causes for non-compliant behaviour:

- a. Tactical choice, where non-compliance is a deliberate decision.
- b. Financial hardship, where non-compliance results from an inability to pay.

<sup>32</sup> See among others Article 3 (e) of Directive 2010/24/EU.

<sup>33</sup> Roy, M. V., & Luts, M. (2019). *Nudging in the context of taxation*, IOTA Papers, February 2019.

<sup>34</sup> Among others, OECD (2014), *Working smarter in tax debt management*, Paris: OECD Publications, Chapter 3.

<sup>35</sup> See: <https://www.iota-tax.org>, retrieved on 13 March 2025.

<sup>36</sup> Baggio Marianna et al. (2021).

<sup>37</sup> See: [https://www.iota-tax.org/sites/default/files/documents/iota\\_paper\\_belgium\\_nudging\\_final.pdf](https://www.iota-tax.org/sites/default/files/documents/iota_paper_belgium_nudging_final.pdf), retrieved on 13 March 2025.

<sup>38</sup> See: <https://www.journals.uchicago.edu/doi/abs/10.1086/713096>, retrieved on 13 March 2025.

<sup>39</sup> De Neve, J. E., Imbert, C., Spinnewijn, J., Tsankova, T., & Luts, M. (2021) *How to improve tax compliance? Evidence from population-wide experiments in Belgium*. Journal of Political Economy, 129(5), p. 1425-1463.

- c. Situation of blip, representing one-time mistakes or oversights.
- d. Uncertainty and disorganisation, where non-compliance is unintentional but occurs repeatedly due to confusion or lack of structure.

To tackle these various faces of compliance, four types of BI-strategies were used in this study, which are described in Table 1 below.<sup>40</sup>

STRATEGY	IMPLEMENTATION IN THE PROJECT
<b>Work on awareness/attention</b>	The nudging letters designed by the FPS Finance and NTA aim to raise awareness of the taxpayer by providing a short and clear reminder of the outstanding tax claim, using simplified language and visual design elements.
<b>Help enactment/reciprocity</b>	The enactment was made easier by providing easy access to a personalised single point of contact, designed to assist taxpayers in committing to a plan. <sup>41</sup>
<b>Working on awareness/attention</b>	The nudging letters included comprehension insights into the potential sanctions and emphasised that failing to pay will be seen as a deliberate choice by the taxpayer. It counters the status-quo bias where people tend to stick with the "as is" (in this case: not paying).
<b>Improve credibility/persuasion</b>	Credibility is enhanced through both the messenger effect and the monitoring effect. The legitimacy of a tax claim issued by one tax administration is reinforced by the official support from the tax administration of residency, along with consecutive communications from both administrations involved.

Table 1: strategy and implementation

### 3.4 Randomised Controlled Trial

The next step consisted of setting up a Randomised Controlled Trial (RCT) to test the effect of the reminder letters on international taxpayers. Taxpayers in the intervention group received a nudging letter, while taxpayers in the control group did not receive any letter (see Figure 3). The FPS Finance sent reminders based on BI techniques to taxpayers living in the Netherlands with an outstanding

<sup>40</sup> OECD (2019), *Tools and Ethics for Applied Behavioural Insights: The BASIC Toolkit*, Paris: OECD Publishing.

<sup>41</sup> Regarding contact information, the results of a trial made by the Norwegian Tax Administration (2022) – presented during the conference 2023 of the BI community of interest – showed that level of satisfaction of taxpayers were higher for those who get a personalised phone number than for those who get the standard phone number of the Tax administration. Technical Report, Martin Langlo (2023). Not published.

Belgian tax debt, and the NTA sent such letters to taxpayers living in Belgium with an outstanding Dutch tax debt. Outcomes for both groups were measured and compared.

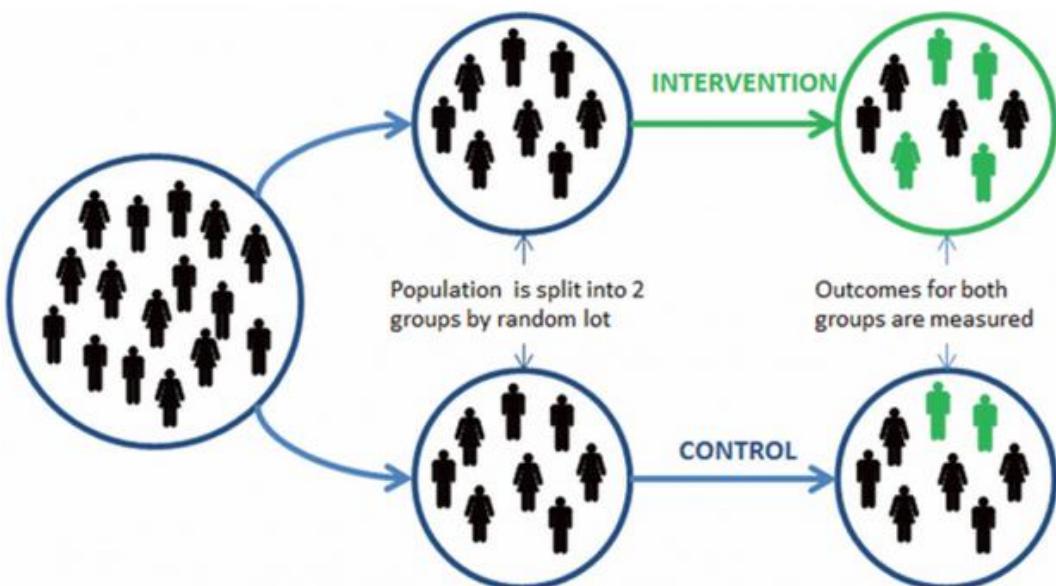


Figure 3: Dedicated groups for the BeNe-project

A first measure for success was to see if more payments came in after the reminder letter, as an indicator of fiscal payment compliance.<sup>42</sup> Secondly, the effect on restored contact with the taxpayer was evaluated. Re-establishing contact can lead to a better understanding of the taxpayer's situation, which may contribute to higher levels of tax compliance in the long term. Restored contact was measured by examining various types of reactions to the nudging letters, including phone or mail contact, requests for payment by instalments, and the submission of objections. In Belgium and the Netherlands, on request, a new tax assessment notice was sent, and the payment period of two months was reset. This is also seen as a reaction, as it can be the start of renewed contact and eventually payment of the outstanding debt.

Both indicators were measured after the 1<sup>st</sup> and 2<sup>nd</sup> nudging letter to distinguish the impact of both nudging letters and assessing whether enhanced cooperation between two countries significantly added to the effect of a single reminder letter. Because the effect of the intervention could be due to updated taxpayer information (address), or to the letter itself, an attempt was made to compare the intervention group with a change of address with the intervention group without any change of address.

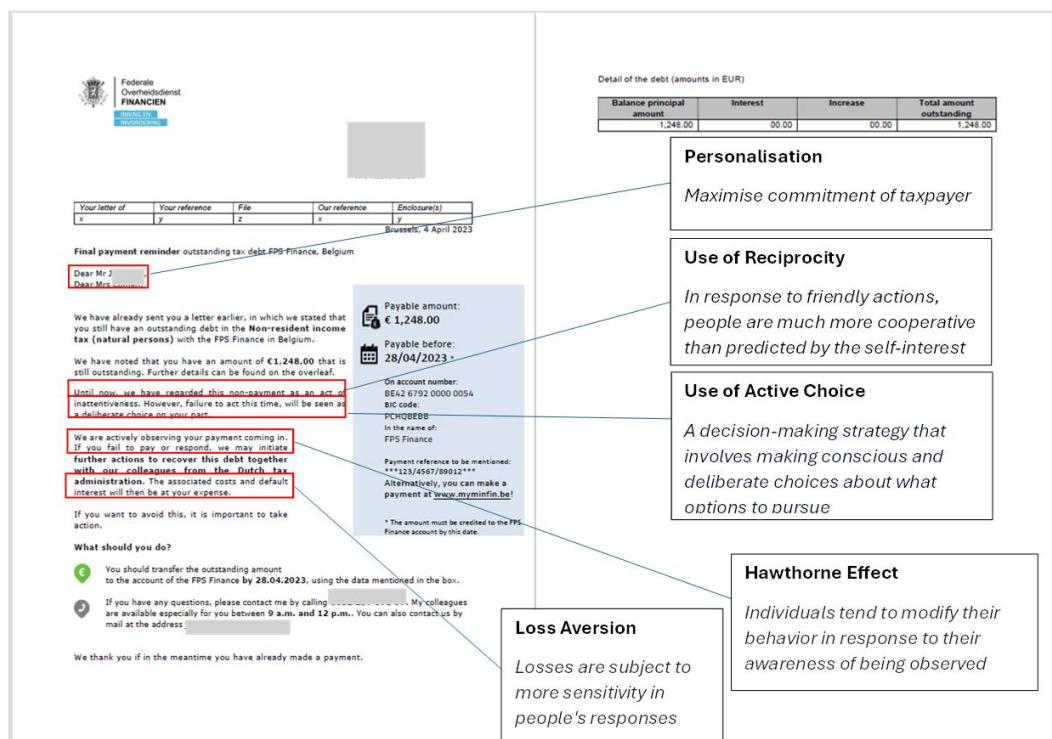
With reference to hypotheses 1 and 2, a 1<sup>st</sup> BI-informed letter, i.e., nudging letter BENE1, was sent by the tax administration to its taxpayers residing in the other country. This 1<sup>st</sup> nudging letter served as a gentle reminder to the taxpayer from the tax administration where the tax claim is due. The nudging letter calls for voluntary payment, sets out the payment procedure and offers a point of contact for further questions or advice on the settlement of the outstanding debt. It calls for action

<sup>42</sup> OECD (2021), *Behavioural Insights for Better Tax Administration: A Brief Guide*, Paris: OECD Publications, p. 7.

and indicates the possibility of asking the country of residence to take further measures to recover the debt.

Below is an example of the 1<sup>st</sup> nudging letter, translated into English. This example is the 1<sup>st</sup> nudging letter from the FPS Finance to BE taxpayers in the Netherlands. The tone of the communication used was designed to create trust with taxpayers.<sup>43</sup> Beginning a reminder letter with a hostile opening – e.g., “you did not pay on purpose” - can have a reverse effect on tax compliance. Making taxpayers feel guilty will not encourage them to react or make a payment, especially in a context where contact data is of poor quality. As a result, and since every action taken by a tax administration should be solution-oriented, any form of aggressive communication with taxpayers must be used carefully and only to a limited extent.

This is well in line with the trend of tax administrations showing a growing interest in the concept of “trust”.<sup>44</sup> Building or keeping trust between taxpayers and tax administrations is one of the most important goals to achieve. Being transparent in the letters sent to taxpayers by explaining the next steps and clearly stating what you expect from them helps to increase trust.



<sup>43</sup> See: [www.trustandcompliance.com](http://www.trustandcompliance.com), retrieved on 13<sup>th</sup> March 2025.

<sup>44</sup> See: [https://taxation-customs.ec.europa.eu/taxation/tax-co-operation-and-control/general-overview/tax-administration\\_en\\_and\\_en\\_csp\\_ac409bfaa6c9ea20b305177e52b6da74&itemIGO=oecd&itemContentType=book](https://taxation-customs.ec.europa.eu/taxation/tax-co-operation-and-control/general-overview/tax-administration_en_and_en_csp_ac409bfaa6c9ea20b305177e52b6da74&itemIGO=oecd&itemContentType=book), retrieved on 13<sup>th</sup> March 2025.

If there is no reaction or payment within one month, a follow-up letter, i.e., a 2<sup>nd</sup> nudging letter, BENE2, is sent by the tax administration of the country where the taxpayer resides. This 2<sup>nd</sup> nudging letter confirms that (1) both countries are aware of the taxpayer's non-compliant behaviour and (2) further enforcement measures are possible, including assistance in the recovery of the tax claim on behalf of the country where the claim was born. Both are consequences a taxpayer may want to avoid. This nudging letter calls for action one last time and gives information about mutual assistance measures that can be taken in the context of the debt.

Below is an example of the BENE2 follow-up letter, i.e., the 2<sup>nd</sup> nudging letter, sent by the NTA to taxpayers living in the Netherlands who owe tax debt in Belgium.



For communicating with taxpayers, i.e., re-establishing contact between the taxpayer and the relevant tax administration, it is important to do so as much as possible using clear and simple language. Consequently, the field trial also took into account the laws concerning the use of languages where appropriate. All letters sent by Belgium to the Netherlands were written in Dutch, while those sent to taxpayers residing in Belgium had to be written in Dutch, French or German, depending on the region of residence.<sup>45</sup> The taxpayer's address served as the basis for determining the correct language. In the Annex, the nudging letters are presented in their original languages.

Table 2 below shows chronologically what happened during the BeNe-project per phase and by group, i.e., intervention group and control group. Whereas taxpayers in the intervention group received one or two nudging letters, with regard to taxpayers in the control group, the regular national tax collection process was followed. For both groups, if no payment was received or no payment arrangement was

<sup>45</sup> See: <https://www.vlaanderen.be/uw-overheid/over-vlaanderen/taalwetwijzer/taalgebieden-in-belgie>, retrieved on 13 March 2025: Belgium is divided into 4 language areas: the Dutch language area; the French language area; the German language area and the bilingual area of Brussels-Capital.

agreed then MAP for the recovery of tax claims would be initiated if the relevant tax collection officer decided such MAP was appropriate.

INTERVENTION GROUP <i>Tracking approach by NTA and FPS Finance</i>	CONTROL GROUP <i>No particular approach (regular process)</i>
<b>1<sup>st</sup> nudging letter (BENE1) - payment or reaction</b>	Spontaneous payment or reaction on own initiative after receipt of tax assessment notice and/or enforcement order
<b>2<sup>nd</sup> nudging letter (BENE2) - payment or reaction</b>	Spontaneous payment or reaction on own initiative after receipt of tax assessment notice and/or enforcement order
<b>Recovery assistance - payment or reaction</b>	Recovery assistance - payment or reaction

Table 2: Difference between treatment conditions of the Control group and Intervention group

Before the nudging letters were sent, test letters were dispatched to Belgium and the Netherlands to assess the mail delivery time in each country. This helped determine a reasonable response period and the optimal timing for sending the 2<sup>nd</sup> nudging letter.

Both nudging letters in the BeNe-project were sent within an interval of approximately one month:

- 1<sup>st</sup> nudging letter (BENE1) was sent on 4 April 2023 with payment/reaction deadline 28 April 2023 (close to the end of the month to avoid additional interest – calculated, i.e., calculated on a daily basis in the Netherlands and on a monthly basis in Belgium).
- 2<sup>nd</sup> nudging letter (BENE2), where appropriate, was sent on 9 May 2023 with payment/reaction deadline 28 May 2023 (close to the end of the month to avoid the additional interest).

The disparities in laws, regulations and administrative practices led to different timings for actions. Figures 4 and 5 below show a schematic comparison of the regular tax collection processes in the Netherlands and Belgium respectively, with the addition of the specific process followed through the BeNe-project. Regarding the NTA, once a tax claim has been finally determined (i.e. no legal remedies left) and is recoverable (i.e. not barred by limitation), payment can be enforced by taking recovery measures after a reminder, a demand letter and an instrument permitting enforcement have been notified to the taxpayer, including assistance in the recovery of tax claims. For clarity, it should be mentioned that in Belgium the tax assessment notice is at the same time the IPE. This means that after the notice is sent, coercive collection can be initiated in Belgium. Thus, in principle, MAP for the recovery of tax claims can be applied immediately.

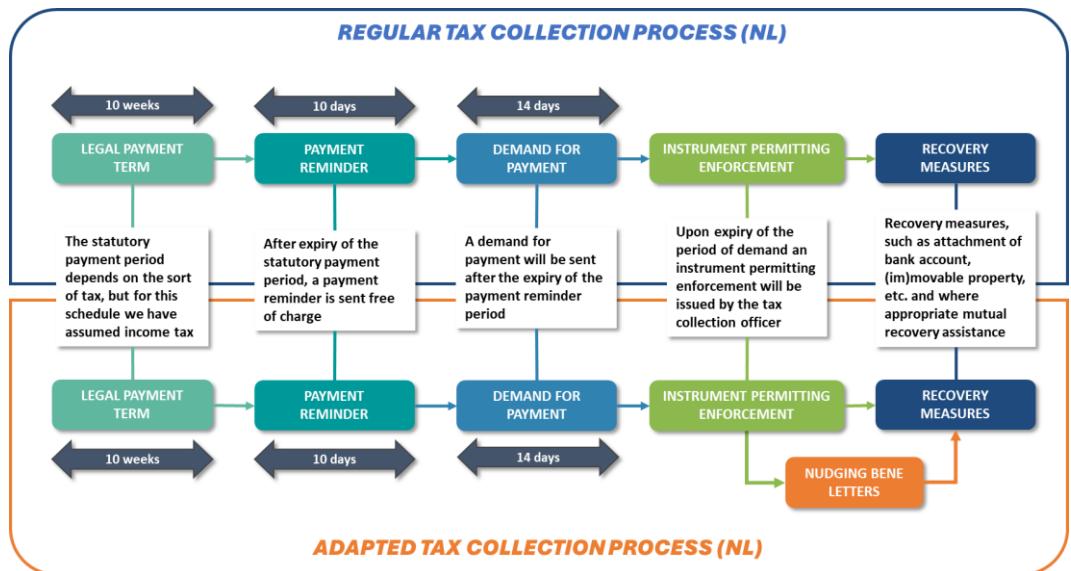


Figure 4: the tax collection process in the Netherlands regarding the BeNe-project.

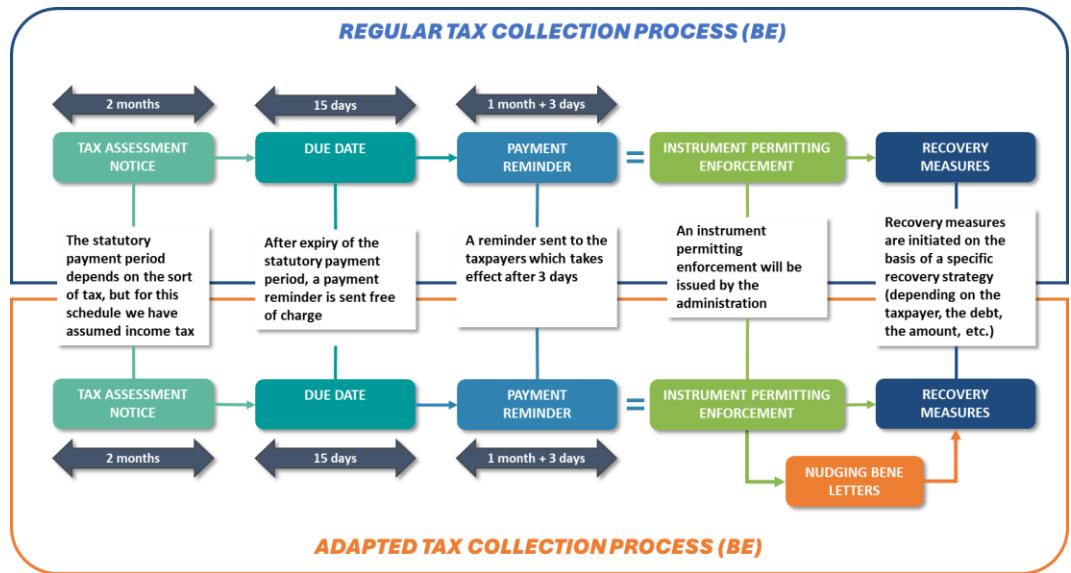


Figure 5: the tax collection process in Belgium regarding the BeNe-project

If, after the 2<sup>nd</sup> nudging letter, no contact is established, no full or partial payment is received, and no payment arrangement is concluded, MAP for recovery of tax claims is initiated if the total tax claim is higher than €1.500 in accordance with Article 18(3) of Directive 2010/24/EU and the amount is finally determined (no legal remedies left) and recoverable (not barred by limitation). Of course, all reasonable national recovery actions that can legally be taken must first have been exhausted (principle of exhaustion).

### 3.5 Single point of contact

To keep track of the reactions of the intervention group, all communications were channelled to one local office per country and the telephone number and direct email address of a designated officer were provided. This enabled the project team to monitor incoming payments, emails and phone calls after taxpayers received the nudging letters. For the Netherlands, the cases were selected from and dealt with by Kennis-en Expertise Centrum Buitenland, the Knowledge and Expertise Centre of Non-resident Taxpayers of the NTA. In Belgium, Team Bijzondere Invordering Gent, the Special Recovery Team in Ghent (which deals mainly with collection of non-resident tax) managed the whole operational communication flow. For each taxpayer the competent team manually registered the method and date of reaction to monitor the day-by-day reaction level and link this to the interventions.

This set-up was only possible thanks to the good cooperation with the special units and the permanent availability of operational staff. It also enabled a service driven approach to taxpayers with direct and concrete information on the debt situation.<sup>46</sup>

## 4. Results

The first section (4.1) provides an overview of the descriptive statistics of the target group, including both the intervention and control groups. The second section (4.2) discusses the results in relation to the three hypotheses.

### 4.1 Descriptive statistics

In this section, we describe the population and sample selection used in the experiment. The process began with a representation check for both the Netherlands and Belgium to assess whether the control and intervention groups were representative of the total sample and could be compared with each other.

Table 3 below, regarding Belgium, shows the representation check that was conducted to verify for randomisation of the groups (receiving the nudging letters or not). The control and intervention groups were also compared based on relevant demographics and characteristics. No significant differences were found, confirming that both groups were representative of the total sample. As stated earlier, claims within the population that had two claims were excluded from the analysis.

BELGIUM	Intervention group	Control group	Total
Count	N: 303	N: 266	N: 569
Age	M: 45	M: 45	M: 45
Gender M/F/Couple	56,1% / 31,0% / 12,9%	63,2% / 25,9% / 10,9%	59,4% / 28,6% / 12,0%
Average amount of the tax claim	M: € 1.890	M: € 2.209	M: € 2.039

*N = total number      M = Mean/Average      SD = Standard Deviation*

Table 3: Belgium - Demographics and characteristics per group

<sup>46</sup> OECD (2014), *Working smarter in tax debt management*, Paris: OECD Publications, Chapter 3 and OECD (2020), *Forum on Tax Debt Management: Enhancing International Tax Debt Management*, Paris: OECD, paragraph 67.

For the Netherlands, a representation check was conducted to verify the correct randomisation of the groups (receiving nudging letters or not). The control group and the intervention group were compared based on relevant demographics and characteristics (see Table 4). No significant differences were found, indicating that both groups were representative of the total sample.

NETHERLANDS	Intervention group	Control group	Total
Count	N: 391	N: 242	N: 633
Age	M: 47 SD: 12	M: 47 SD: 12	M: 47 SD: 12
Gender M/F	59,8% / 40,2%	60,7% / 39,3%	60,2% / 39,8%
Average amount of the tax claim	M: € 6.387 SD: € 34.710	M: € 6.142 SD: € 46.316	M: € 6.572 SD: € 39.517
<b>N = total number</b>	<b>M = Mean/Average</b>	<b>SD = Standard Deviation</b>	

Table 4: Netherlands - Characteristics and demographics per group

These comparisons were conducted to determine whether the control and intervention groups could be matched. The results confirmed that matching was possible.

## 4.2 Results

In order to test the three hypotheses and analyse the effect of the nudging letters a comparison was made between the intervention and control group. This tested for:

- › the number of taxpayers that responded more (hypothesis 1);
- › the number of taxpayers that made a full or partial payment (hypothesis 2); and,
- › whether the use of nudging letters led to a decrease in the use of MAP for the recovery of tax claims (hypothesis 3)

The dates used in the measurement were 9 May 2023 (sending date of the 2<sup>nd</sup> nudging letter: BENE2) for the 1<sup>st</sup> nudging letter (BENE1) and 31 May 2023 (last day before national recovery actions could be launched) for the 2<sup>nd</sup> nudging letter, BENE2. Below, the result for each hypothesis is shown.

**HYPOTHESIS 1**

**If you send additional BI-informed reminder letters to taxpayers abroad, then more of them will react.**

To assess the reactivity level in the intervention group, the impact of the intervention on each type of response (merging payments, contacting the responsible team by phone or email, lodging an objection, e.g., requesting for an instalment plan or a copy of the tax assessment notice) was assessed.

As can be seen in Figure 6 below, the nudging letters led to an increase in reactions. In the Belgian sample the reactivity level of taxpayers in the intervention group was 67,30% in comparison to 11,30% in the control group. Two third of the taxpayers receiving at least one nudging letter made a response to the tax administration. In the Dutch sample the reaction level of taxpayers in the intervention group was 60,40% in comparison to 5,40% in the control group. This difference is statistically significant in both cases.

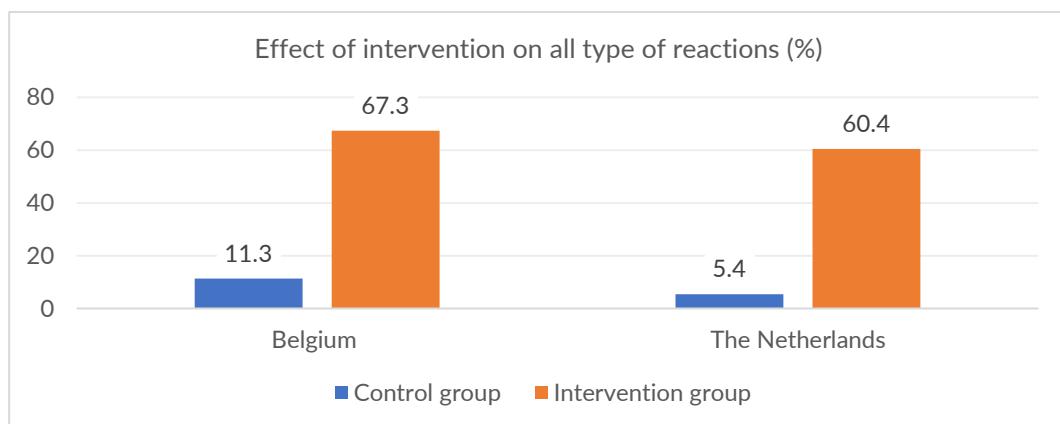


Figure 6: All type of reactions per group for Belgium and the Netherlands

#### Effect of the 2<sup>nd</sup> nudging letter on reactions by taxpayers

The number of reactions by taxpayers was compared after the 1<sup>st</sup> and the 2<sup>nd</sup> nudging letter.

Figure 7 below shows the added effect for Belgium of the 2<sup>nd</sup> nudging letter on a timeline, starting from the sending of letter 1 (Day 0), and looking at key points in time. It demonstrates the evolution of the proportion of items with some form of reaction between the control group (blue) and the intervention group (orange). The red bar assesses the total effect for letter 1, counting for all reactions up till Day 29, counting from the receipt of 1<sup>st</sup> letter (10 April 2023). At this point in time the 2<sup>nd</sup> letter was sent, so all additional payments can be seen as a result of the two nudging letters. The total effect of the nudging letters was measured 49 days after receipt of 1<sup>st</sup> letter, on 31 May 2023.

The results show a clear and significant difference in reactions between the intervention and control groups in Belgium, with respectively 50,50% vs 7,89% after the sending of the 1<sup>st</sup> nudging letter, BENE1 (Day 29) and 67,33% vs 11,28% after the sending of the 2<sup>nd</sup> nudging letter, BENE2 (cumulative effect of both nudging letters) (Day 49). The Netherlands does not have payment data by day, which is why a similar graph was not included.

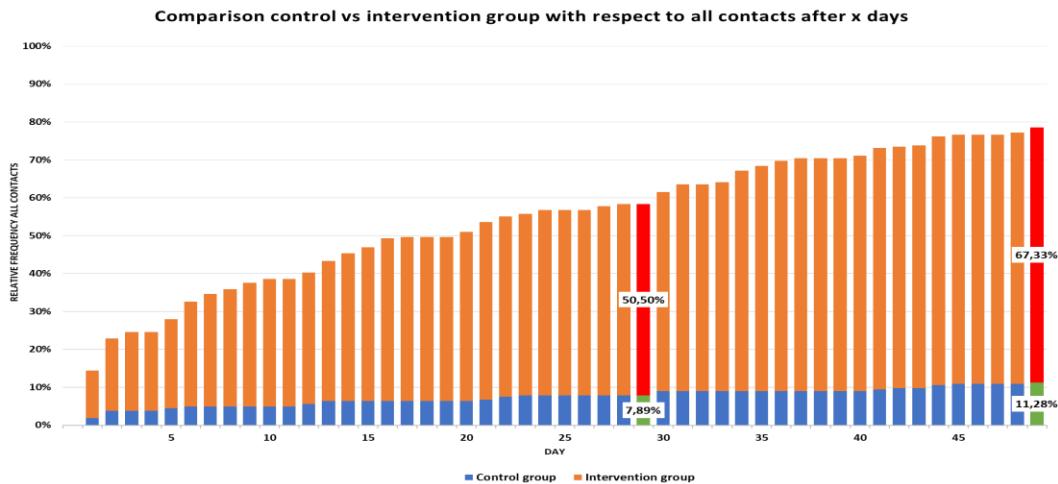


Figure 7: Comparison Control vs Intervention group with respect to any contact (Belgium)

The results show that there was an additional effect from sending the 2<sup>nd</sup> nudging letter (see Figure 8). In the Belgian sample 50,50% of taxpayers within the intervention group showed some type of reaction after the 1<sup>st</sup> nudging letter. Whereas the cumulative total of 67,33% in the intervention group showed some type of reaction after the 2<sup>nd</sup> nudging letter was sent, i.e. after the sending of both nudging letters. It can be concluded from this that an additional 16,83% of the intervention group showed some form of reaction as a result of the 2<sup>nd</sup> nudging letter.

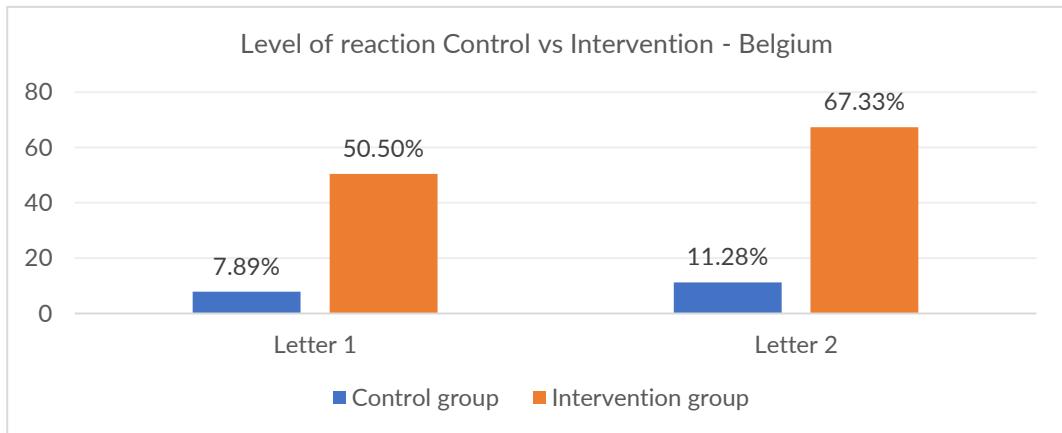


Figure 8: Level of reaction after the 1st and 2nd letter within Intervention group and Control group for Belgium.

This is a particular important result, showing that in the Belgian sample, 2 out of 3 contacted taxpayers responded to the contact, either by paying, by making a payment arrangement (via instalments) with the tax administration or reacting in another way.

Figure 9 below shows, in the case of the Netherlands, that 40,70% of the intervention group's tax items resulted in some form of reaction after the 1<sup>st</sup> nudging letter. After the 2<sup>nd</sup> nudging letter, a total of 60,40% of the intervention group showed some form of reaction. This represents an additional 19,70% of the intervention group that responded following the 2<sup>nd</sup> nudging letter.

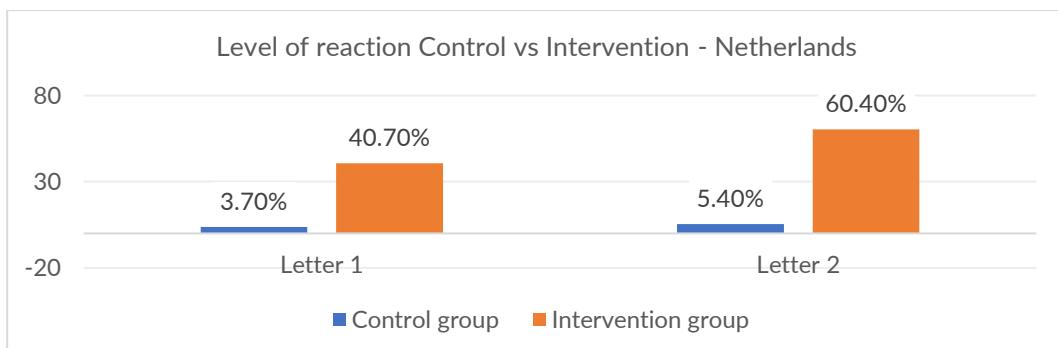


Figure 9: Level of reaction after the 1st and after the 2nd letter within intervention group and control group for the Netherlands.

This indicates that, without this new initiative, most taxpayers would have remained passive, increasing the risk of additional costs and administrative burden. From the tax administration's perspective, this would have led to higher enforcement efforts, including more repressive actions against taxpayers, resulting in further costs and accrued interest for those taxpayers.

#### Effect of response on fiscal payment compliance/behaviour

In Belgium (see Figure 10), most taxpayers with a response made a full or partial payment (52,48%). Almost 1 in 4 (23,43%) taxpayers reached out to the designated the contact point, by phone or mail, to ask for more information or guidance on the payment process. 12,87% asked for a copy of the tax assessment notice to be paid, with the payment deadline being reset at 2 months after the sending date of the copy. 5,28% decided to object to the tax assessment notice (calculation), and only 1,32% received an instalment plan to pay in stages.

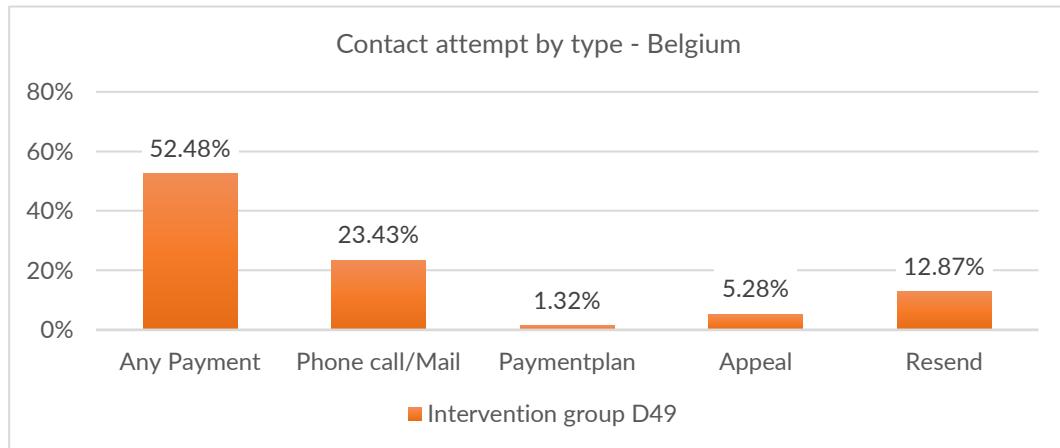


Figure 10: Any reaction, differentiated by method of reaction after the 1st and 2nd nudging letters regarding the Intervention group for Belgium

Looking at the type of reaction after two reminders (see Figure 11), in the Netherlands, most taxpayers with a form of activity made a full or partial payment (29,13%). Almost half (43,73%) of the taxpayers in the intervention group reached out to the designated the contact point, by phone or mail, to ask

for more information or guidance in the payment process. 9,21% asked for a payment plan, 10,23% lodged an appeal and 7,16% asked for a copy of the tax assessment notice.

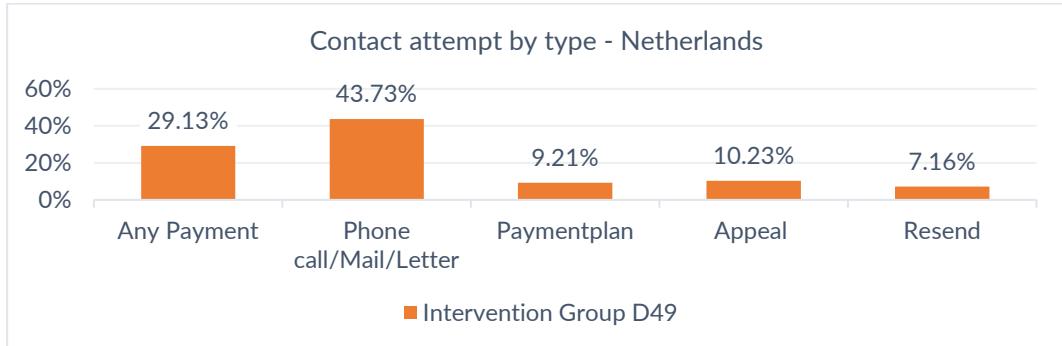


Figure 11: Any reaction, differentiated by method of reaction after Day 49 of the Intervention group for the Netherlands

From this, it can be concluded that, sending nudging letters to taxpayers in the intervention group had a great effect on restoring contact with these taxpayers and getting them into action.

### HYPOTHESIS 2

**If you send additional BI-informed reminder letters to taxpayers abroad, then they will pay off more of their tax claims.**

For the Belgian sample, within the intervention group 52,48% of taxpayers made some form of payment for their overdue taxes in comparison to 8,65% in the control group (voluntary payments) after sending both reminder letters (up till 31 May 2023). For the Dutch sample 29,13% of taxpayers in the intervention group made some form of payment for their overdue taxed in comparison to 5,40% in the control group. This difference (Figure 12) was statistically significant. In conclusion, the nudging letters had a positive influence on the number of taxpayers who made a payment for their overdue taxes.

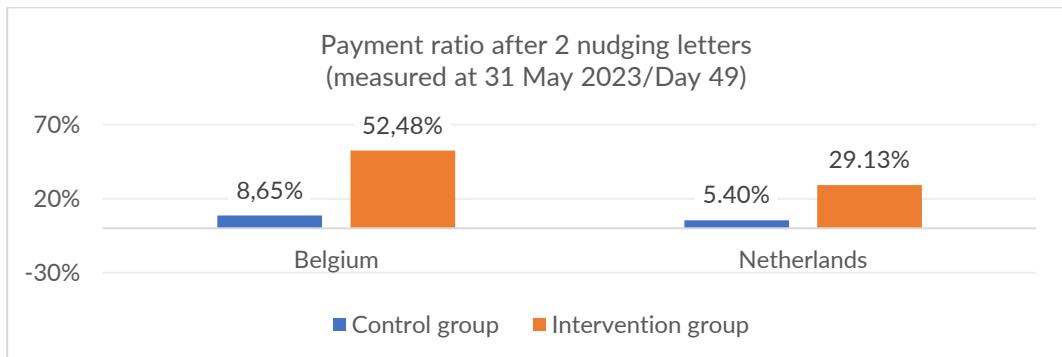


Figure 12: Payment ratio as of Day 49 for Belgium and the Netherlands – relative number of taxpayers who made any type of payment per group.<sup>47</sup>

<sup>47</sup> For further clarification:  $\chi^2(1) = 52,60$ ;  $p < ,001$ . The ' $\chi^2$ ' stands for 'chi-square' and is used to determine the 'p-value'. The 'p' signifies the 'p-value' which determines if a result is statistically significant.

### The effect of the 2<sup>nd</sup> nudging letter on the number of taxpayers who make a payment.

The project also checked whether there is an additional effect from sending a second nudging letters in comparison to sending one letter. To do this, the difference in the number of taxpayers who made a payment after the 1<sup>st</sup> and 2<sup>nd</sup> nudging letter was compared.

The results show that there is an additional effect from sending the 2<sup>nd</sup> nudging letter. This 2<sup>nd</sup> nudging letter not only reminds taxpayers a second time of the debt and payment obligation, but also reinforces a monitoring effect and confirms the statement contained in the 1<sup>st</sup> nudging letter that, upon request, the residing country can enforce the tax debt.

Figure 13 shows that in the case of Belgium after the 1<sup>st</sup> nudging letter 38,61% of the intervention group made some form of payment. After the second nudging letter a total of 52,48 % in the intervention group made a form of payment. That is another 13,90% of taxpayer in the intervention group that made some form of payment after receiving the 2<sup>nd</sup> nudging letter.

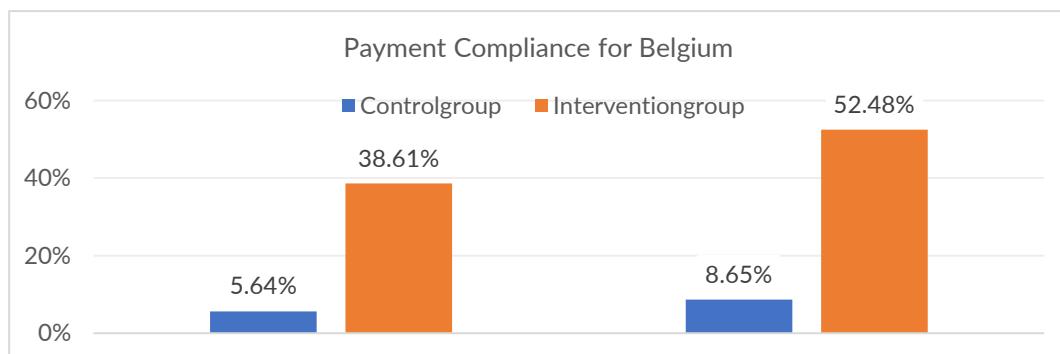


Figure 13: Belgium - number of taxpayers who made a form of payment after the 1st and the 2nd nudging letter per group.

In the case of the Netherlands (see Figure 14 below), 19,69% of the intervention group made a form of payment. After the 2<sup>nd</sup> nudging letter a total 29,13% of the intervention group made a form of payment. That is another 9,44% of taxpayers in the intervention group which made some form of payment after receiving the 2<sup>nd</sup> nudging letter. This difference is statistically significant.

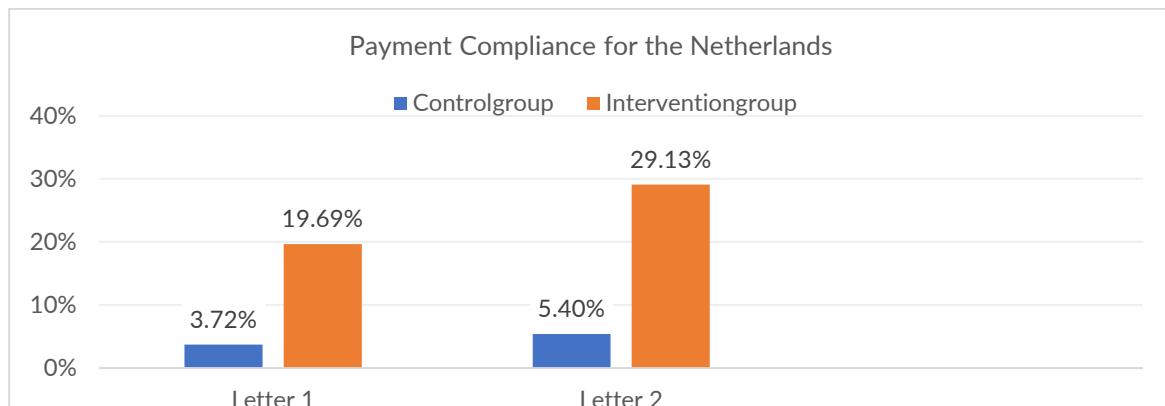


Figure 14: Netherlands - number of taxpayers who made a form of payment after the 1st and the 2nd nudging letter per group.

Figure 15, below, is a comparison of all payments (full and partial) within the control and intervention group in Belgium. It shows a timeline starting from the sending of nudging letter 1 (Day 0). Looking at key points in time, the evolution of the proportion of items with some form of payment (full and partial) between the control group (blue) and the intervention group (orange) becomes clear. The red bar assesses the total effect for nudging letter BENE1, counting all payments (full and partial) after 29 days, starting from the receipt of the 1<sup>st</sup> nudging letter (10 April 2023). At this point in time, the 2<sup>nd</sup> nudging letter (BENE2) was sent, so all additional payments can be considered as a result of nudging letters BENE1 and BENE2. The total effect of nudging letters BENE1 and BENE2 was measured after 49 days after receipt of the 1<sup>st</sup> nudging letter (BENE1), 31 May 2023.

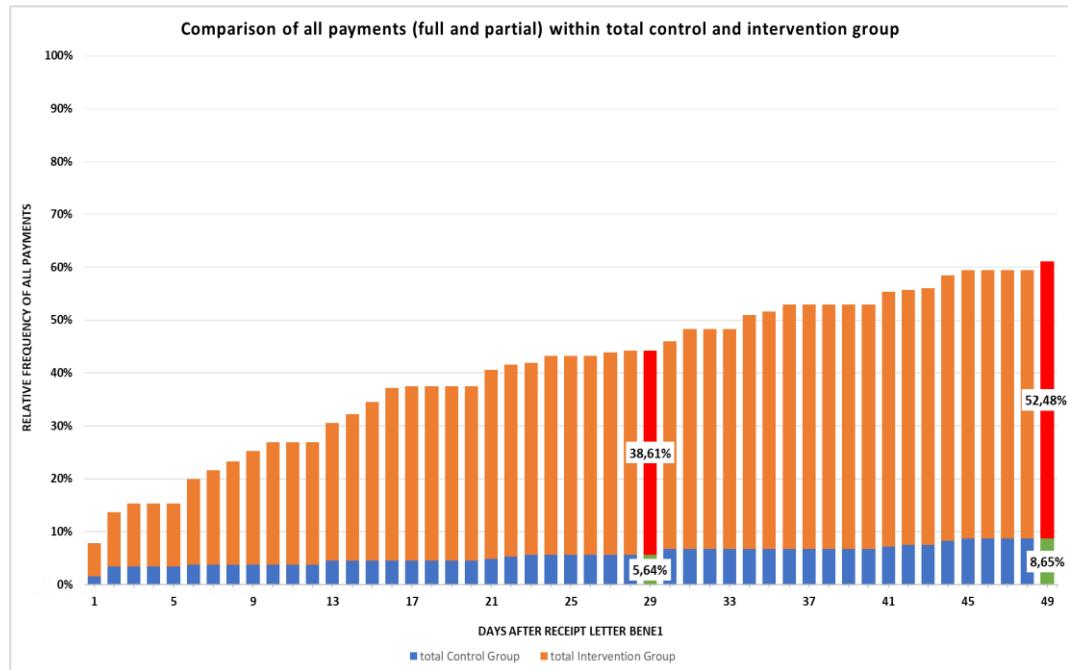


Figure 15: Comparison of all payments (full and partial) within total Control and Intervention Group in Belgium.<sup>48</sup>

The gross effect of the 1<sup>st</sup> nudging letter (BENE1) for the Belgian sample counts for 33 percentage points or a relative rise of 585% compared to the control group. The gross effect of the two reminder letters counts for 44 percentage points or a relative rise of 507% compared to the control group. The gross effect of the 1<sup>st</sup> reminder letter for the Dutch sample counts for 16 percentage points. The gross effect of the two reminder letters counts for 24%.

<sup>48</sup> For further clarification:  $\chi^2(1) = 12,56$ ;  $p < .001$ ;  $OR = 1,37$ .

## Net revenue

Assessing the net revenue brought forward by the intervention is done by comparing the amount collected for tax claims in the intervention group and the control group after the sending of 2 reminders (nudging letters BENE1 and BENE2).

Figure 16 shows the amount of Belgian tax paid after intervention by Belgian taxpayers living in the Netherlands. Within the control group, 8,6% (23 of the 266) tax claims received a payment (full or partial) by the end of the intervention phase (end of May 2023). In total this resulted in €18.106 of collected tax. In the same period within the intervention group 52,2% tax claims (159 of the 303) got a payment (full or partial). In total this led to €169.938 of tax collected. The control group had 3% of the outstanding amount collected, the intervention group 30%. Consequently, this means that 27% of the total outstanding amount for the intervention group can be seen as the effect of the intervention itself, which gives an additional collected revenue of €154.609.



Figure 16: amount paid after intervention (two letters + address verification) and total outstanding amount for control vs intervention group in Belgium

Figure 17 below shows to the amount of Dutch tax paid by taxpayers residing in Belgium. Within the control group, 4,5% (11 of the 242) tax claims received a payment (full or partial) by the end May 2023, i.e. at the end of the intervention phase. In total this resulted in €1.012 of collected tax. In the same period within the intervention group, 19,6% (77 of the 391) tax claims resulted in a payment (full or partial) which in total led to €149.897 tax collected. The control group had 0,07% of the outstanding amount collected, the intervention group 5,6%. Taken together, this means that 5,53% of the collected amount for the intervention group can be seen as the effect of the intervention itself, which gives an additional collected revenue of €149.720.



Figure 17: Amount paid after intervention (two letters + address verification) and total outstanding amount for control vs intervention group in the Netherlands

## The effect of the address verification on the fiscal payment compliance

The effect of the intervention on the intervention group is in fact a combination of the address update (structural change) and the addition of BI inspired nudging letter(s) (BI intervention). A comparison was made between taxpayers without an address update and taxpayers with an updated address after cross-check for both the intervention group and control group. See Figures 18 (the Netherlands case) and 19 (Belgium case) below for the results. The “w/o group” (w/o = without address change) shows the result for debtors for whom the address did not change following the address verification procedure and debtors whose address was updated after verification (w = with address change).

For the Belgian sample (Figure 18 below) the difference between both subgroups counts for 14,30% (46,38% vs 32,12%) after the 1<sup>st</sup> nudging letter, BENE1, and 11,4% (58,70% vs 47,27%) after the 2<sup>nd</sup> nudging letter, BENE2. It can be concluded that 14% of the 33% effect on fiscal payment compliance after the 1<sup>st</sup> nudging letter is explained by the exchange and update of address information for the taxpayers in the intervention group, and by 11% of the 44% for the 2<sup>nd</sup> nudging letter.

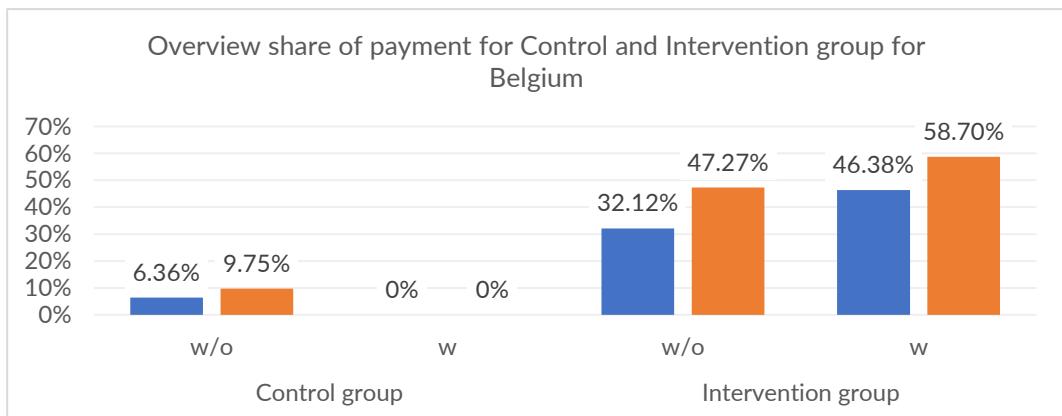


Figure 18: Number of payments (absolute) made with (w) and without (w/o) an address change per group for Belgium.

For the Netherlands (Figure 19 below) within the control group, there is no difference in percentage payments for taxpayers with no change of address between the date the 1<sup>st</sup> nudging letter was sent and the date the 2<sup>nd</sup> nudging letter was sent. A rate of 6,75% applies to both instances. However, for taxpayers with a change of address, there is a difference between the two events, 2,38% and 4,76% respectively. With regard to the intervention group, it counts for 6,50% (19,76% vs 13,29%) after the 1<sup>st</sup> nudging letter and for 3,80% (31,05% vs 27,27%) after the 2<sup>nd</sup> nudging letter. It can be concluded that 7% of the 13% effect on fiscal payment compliance after the 1<sup>st</sup> nudging letter is explained by the exchange and update of address information for the taxpayers in the intervention group, and by 4% of the 24% for the 2<sup>nd</sup> nudging letter.

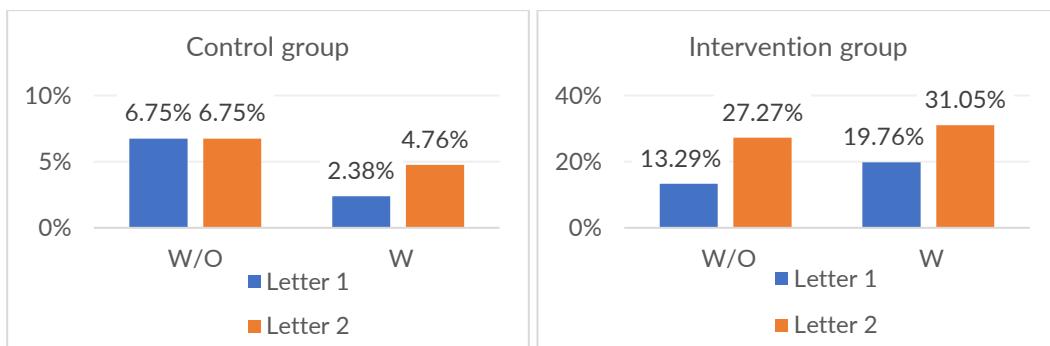


Figure 19: Number of payments (absolute) made with and without an address change per group for the Netherlands.

In conclusion, it can be said that a part of the effect on fiscal payment compliance comes from the address verification process, but the subsequent reminders also played an important role in changing taxpayer behaviour.

### HYPOTHESIS 3

**Lead an increase of fiscal payment compliance to a decreased use of MAP for the recovery of tax claims and hence less time investment for both tax administrations in pursuing the tax claims due?**

One of the desired outcomes of the project was to avoid having to use MAP to recover tax claims.

Figure 20 below shows the effect on the mutual assistance procedures for the recovery of tax claims in Belgium. It shows that 28% (27/95) of the tax claims of the intervention group evolved into a MAP for the recovery of tax claims request, whereas in the control group, this is 32% (30/95). In reference to hypothesis 3, it can be concluded that due to the intervention, the percentage of tax claims subject to MAP was 4 percentage points lower - a relative reduction of 13%.

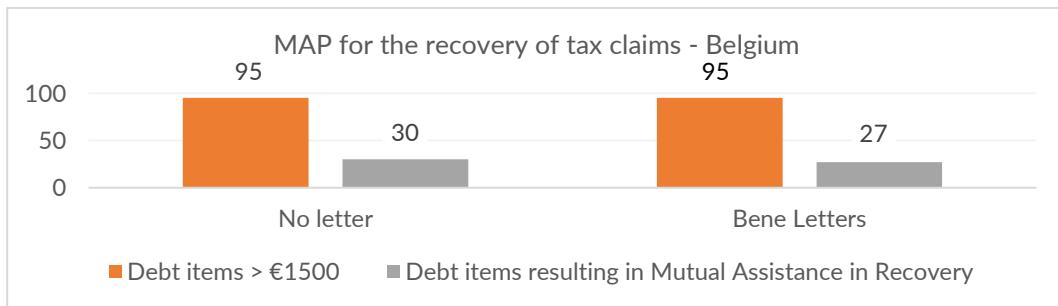


Figure 20: Effect on MAP for the recovery of tax claims in Belgium

For the Netherlands, Figure 21 below shows that the number of taxpayers with tax claims under €1.500 is smaller in the control group than in the intervention group (242 vs 391). In percentage, more taxpayers were eligible for mutual assistance requests for the recovery of tax claims in the control group (90/242 or 37%) than in the intervention group (74/391 or 19%). Of the number of taxpayers eligible for mutual assistance requests, the percentage was lower in the control group than in the intervention group, namely 41/90 compared to 53/74, representing 46% and 72% respectively. Without intervention, 145 taxpayers (37%) of the intervention group would have been eligible for

mutual assistance requests. However, because of the intervention, only 74 (19%) remained eligible, a decrease with 71 taxpayers. Because of the difference in size, it seems (wrongly) a distorted picture. Besides the result of payment after sending the nudging letters, this is also a positive result from the intervention. After all, in percentage terms, more mutual assistance requests were made than in the case of the control group.

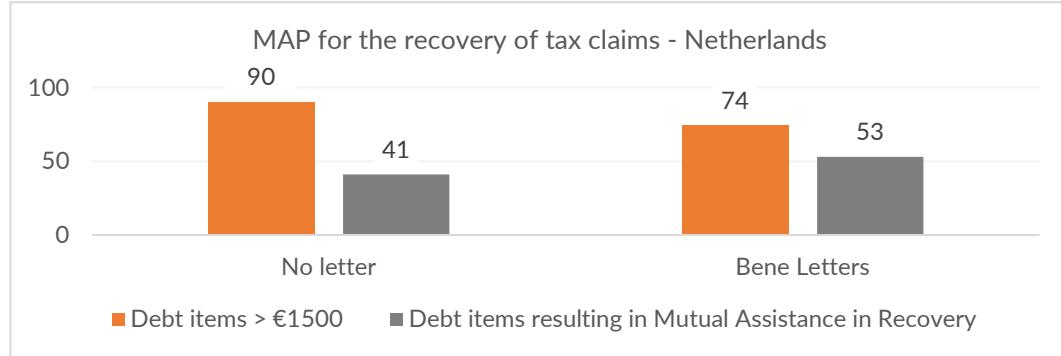


Figure 21: Effect on MAP for the recovery of tax claims in the Netherlands

The indirect savings this represents in terms of time, workload and cost for the tax administration have not been calculated. However, the feedback from the business representatives in Belgium responsible for the international recovery was very positive. The smooth and effective cooperation with Dutch and Belgian colleagues resulted in significant time savings, making it possible to concentrate resources on more complex cases. The project ensured a shorter throughput time for these files and enabled quicker initiation of the most appropriate follow-up actions. The exchange of address information, in particular, received strong positive support.

## 5. Conclusion

The results presented in Chapter 4 clearly demonstrate that the addition of two follow-up reminder letters inspired by behavioural science letters (and exchange of address information between countries), has led to a higher reactivity level (taxpayers getting into action) and a higher fiscal payment compliance amongst cross-border taxpayers. Any international tax claim settled before initiating MAP for the recovery of tax claims is beneficial for the taxpayer (no additional costs) and also advantageous for the tax administrations involved (reduced time investment). Triggering extra payments or reactions that could eventually lead to the settlement of the tax claim is indeed beneficial for all parties involved. The following sections examine the perspective of the taxpayer (5.1) and the administration (5.2), concluding with recommendations for other tax administrations (5.3).

### 5.1 Taxpayer reactions

The ultimate objective of the experiment was to initiate extra payments and also to re-engage taxpayers residing abroad who, consciously or unconsciously, neglect their fiscal payment obligations in their home country. Reconnecting with the tax authorities can be the first step towards higher fiscal tax compliance, both in the short and long term. To achieve this and (re)build trust among those taxpayers, it is essential to use appropriate wording and tone. The contact established following a taxpayer's response to a nudging letter should primarily focus on service-oriented support that encourages compliant behaviour.

The project benefits taxpayers by offering an additional opportunity to engage with the tax administration, even though the tax claim is recoverable and enforcement measures could already be taken. Through direct communication with a designated tax collection officer, taxpayers may also obtain additional information, request deferred payment, file an objection, or negotiate a payment arrangement.

The single point of contact established specifically for this project was considered a major success. It allowed taxpayers to receive information and advice promptly. Service agents were familiar with both the project and individual taxpayer situations, allowing for personalised, customer-oriented, and efficient service delivery.

In general, the vast majority of reactions were positive, with taxpayers acknowledging the clear, transparent and proactive service provided by the tax administrations. This type of taxpayer-oriented communication has a potential positive impact on the trust levels among internationally mobile taxpayers.

The feedback from the Belgian taxpayers involved in the project was largely positive. They appreciated that the FPS Finance made an effort to contact them and offer a solution for settling their outstanding tax claims. In particular, the tone of the communication and the availability of a personalised contact point were perceived as positive, trust-building elements.

In the Netherlands, the responses were marked by surprise but were generally positive. Most taxpayers had not been in contact with the tax administration for a long time and appreciated being given the opportunity to settle their outstanding balances. However, a few taxpayers reacted

negatively to the contact and refused to cooperate, with some even becoming aggressive or threatening.

Based on the figures presented in Chapter 4, it is clear that adding BI-inspired reminder letters with a call to action have led to significantly more payments in the intervention group. Compared to the standard procedure (one standard reminder followed by a waiting period before initiating MAP for the recovery of tax claims), an additional 44% of Belgian taxpayers and 24% of Dutch taxpayers made payments after receiving one or two reminder letters. This outcome also benefits taxpayers, as settling debts at an earlier stage helps to prevent extra costs related to interests and recovery actions. The substantial difference in response rates between Belgium and the Netherlands was not explored in detail, but the differences in the selection of tax claims and taxpayers, as well as cultural factors, may have played a role.

As most of the selected tax claims had already been overdue for some time and had received no response from the taxpayers, it was important to re-establish contact to facilitate the settlement of these debts (and potentially other fiscal obligations in the future). Therefore, not only additional payments but also other types of reactions were taken into account. Any engagement by the taxpayer could mark the beginning of higher commitment and improved tax compliance. An evaluation of all types of responses clearly indicates a significant effect of the intervention (address verification combined with one or two reminder letters) on taxpayer engagement. In the Netherlands, 44% more responses were recorded compared to the control group, while in Belgium, this increase reached 56%. Most reactions were related to payments, either partial or full, but many phone calls and emails concerning the outstanding debt were also received.

## 5.2 Tax administration benefits

As shown in Chapter 4, the field trial produced promising results in terms of generating additional revenue (through increased payments following the intervention) and eliciting other types of taxpayer responses relevant to compliance, such as post-intervention interactions. It not only led to extra revenue but also reduced the time and resources required for follow-up at later stages of the recovery procedure.

For the tax administration, it has the advantage that these seemingly difficult cases can be resolved more easily, without too much administrative burden and with higher revenue. By building trust among these taxpayers, it can be assumed that the observed increase in short-term payment compliance may also influence long-term taxpayer behaviour, particularly in terms of registration, filing, and payment compliance.

It is important to note that selecting eligible taxpayers and verifying address information during the project was time-consuming, as these tasks were done manually.<sup>49</sup> Automation of these steps would be beneficial and reduce the time invested. In this context and as a follow-up of this project, the FPS Finance has recently started to automate the creation of request for information and request for recovery assistance forms. Maintaining accurate address records within tax administration systems should not be underestimated, as incorrect addresses can have far-reaching legal consequences,

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<sup>49</sup> Neither the FPS Finance nor the NTA has automated the mutual assistance process which means that much manual and time-consuming work to be done. This is different from, for example, Spain, which is a textbook example of effectiveness and efficiency. Upon receipt of a request for assistance, relevant data such as the type and amount of the claim(s) and limitation date(s) from the e-form are automatically transferred into the recovery system. Additional data in the e-form are manually transferred, when sending a request for assistance, relevant data from the recovery system are uploaded into the e-form. Additional data are manually transferred into the e-form.

including the infringement of taxpayers' rights. For example, if documents do not reach the taxpayer they are unable to exercise their rights. This is particularly critical for maintaining effective communication between taxpayers and tax administrations, which is essential for promoting compliant behaviour. After all, official documents can only serve their purpose if they are delivered to the correct address.

In addition, it is important for the protection of taxpayers' rights that they are able to take note of the content of official documents to evaluate their position and determine the necessary course of action. This is particularly relevant for taxpayers who have moved from one country to another and possibly relocated multiple times within or across countries over the years. In such cases, there is a high likelihood that the relevant tax administration no longer holds a correct address, resulting in communication being lost between the two parties.

This challenge is not unique, as government agencies around the world have long struggled, and continue to struggle, with the issue of untraceable taxpayers. When contact is lost entirely, it not only undermines the taxpayer's rights but also severely limits the ability of tax administrations to recover outstanding claims, which ultimately will be written off in many cases.

Other costs related to this project including staff time that went into the drafting of the letters to be used in the field trial, the negotiations between the two administrations to scope the project etc. have not been calculated. However, once the nudging letters are available and the intervention tested it can be reutilised multiple times. Depending on the context, the communication can be customised but the base is there.

The results of this field experiment are unambiguous, demonstrating a clear and significant impact resulting from the tested intervention. Positive outcomes were observed both in terms of additional payments and the re-establishment of contact with taxpayers. As a pilot study, this collaborative effort has also provided valuable insights and lessons learned. By sharing these, other tax administrations can benefit from the experience as well. In the following section, five recommendations are presented for tax administrations interested in pursuing similar forms of cross-border cooperation. A sixth recommendation is directed to the European Commission and concerns the further development of an enabling framework to support and facilitate such cooperation.

#### **Recommendation n°1: Mutual verification of taxpayers' addresses is essential**

It is not really surprising that tax assessment notices sent to incorrect addresses rarely result in additional payments. One of the conclusions of this project is that a significant number of address records for taxpayers living abroad were inaccurate. In such cases, the most effective approach to obtaining the correct address is to ask for assistance from the tax administration in the taxpayer's country of residence by sending a request for information. Automating this process or establishing regular information exchanges between administrations could create a solid basis for effective communication with taxpayers residing abroad.

#### **Recommendation n°2: Conduct a cost-benefit analysis before launching a similar project**

Implementing a field trial like this one takes time and effort. The processes of exchanging and verifying address information, as well as sending additional letters, are both costly and time-consuming. It is therefore important to be able to balance the pros and the cons through studying the costs and

expected benefits of such practices. With this in mind, it may not be efficient to establish similar collaboration between tax administrations where only a limited number of taxpayers reside or hold assets.

#### **Recommendation n°3: providing a dedicated point of contact on reminder letters pays off**

Both tax administrations included in their reminder letters the contact details of a dedicated point of contact, such as a specific office or an individual agent. These contact points were fully briefed on the field trial and familiar with the content of the letters, allowing them to provide direct assistance to taxpayers who responded. In addition, the dedicated staff were able to systematically record and categorise incoming contacts, allowing the administrations to quantify responses and distinguish between types of interactions.

From the taxpayer's perspective, having access to a specific phone number for a personalised and direct contact point appeared to facilitate contact with the tax administration more effectively than a generic contact channel. In contrast, general contact centres may discourage engagement due to perceived long waiting times and the concern that frontline staff may not be familiar with the taxpayer's specific case. This situation is not limited to Belgium and the Netherlands and may be relevant for other administrations considering similar initiatives.

The findings from a study made by the Norwegian Tax Administration in 2022 further highlighted the importance of providing a unique point of contact in letters sent to specific taxpayers.<sup>50</sup>

#### **Recommendation n°4: From a trust-based perspective, tax administration actions should be solution-oriented**

Establishing trust with taxpayers is essential. In this project, a deliberate effort was made to use a soft, non-confrontational tone in the nudging letters, avoiding aggressive or threatening language. The core message focused on restoring contact, informing taxpayers of their situation, and offering a clear solution to resolve their outstanding tax obligations.

Transparency was a key element: the letters clearly explained the next steps in the process and what was expected from the taxpayer. The overall positive feedback from taxpayers confirmed the value of this approach and proved its importance as a key factor in the project's success.

#### **Recommendation n°5: The method appears most effective between neighbouring countries**

One contextual advantage of this field trial is that it was conducted between two neighbouring countries that partially share a common language and have a long-standing history of collaboration in taxation and recovery matters. These shared characteristics likely contributed to the effectiveness and efficiency of the cooperation.

Further research will be necessary to determine whether the results can be sustained over the longer term and whether similar outcomes could be achieved through enhanced cooperation between non-neighbouring countries with fewer cultural or administrative similarities.

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<sup>50</sup> Presented on the FTA COI on Behavioural Insights Conference in Paris, 15-17 May 2023.

**Recommendation n°6: exchange of information within the EU framework for mutual assistance in the field of recovery of tax claims should be simplified**

Tax compliance becomes significantly more complex in cross-border scenarios. Good cooperation between (neighbouring) Member States, based on mutual trust, is necessary to address these challenges. The FPS Finance and NTA, where appropriate, regularly seek assistance from one another, under Directive 2010/24/EU concerning mutual assistance for the recovery of claims relating to taxes, duties, and other measures. As with any tax collection and recovery process, mutual assistance procedures should be kept as straightforward as possible. This includes the use of simplified forms and, ideally, automated processes for updating the information for the e-forms. Furthermore, as also recognised by the European Commission, Member States must have sufficient resources, such as dedicated staff, to handle requests for assistance efficiently.<sup>51</sup>

One of the main operational burdens today is the need to request updated address information on a case-by-case basis, which is very time-consuming. Ideally, sending bulk requests should be allowed under Article 5 of Directive 2010/24/EU, provided that Member States agree to this approach. Consideration should also be given to how such requests are counted statistically. For example, if a request involving 100 addresses is considered as one request or 100 individual ones. The European Commission is invited to submit this recommendation for discussion at the Recovery Expert Group to support future simplification and harmonisation efforts.

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<sup>51</sup> European Commission (2017), *Commission Staff Working Document for the evaluation of the use of mutual tax recovery assistance on the basis of Directive 2010/24/EU by the EU Member States Accompanying the document Report from the Commission to the European Parliament and the Council on the operation of the arrangements established by Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures*, paragraph 4.1.

## Annex I – effect of the amount of the tax claim

The Netherlands also conducted an exploratory analysis to assess the effect of the amount of the tax claim on the number of taxpayers making any form of payment. To examine this further, the following tests were carried out (see Figure 22):

- it was checked whether the effect would be different if high tax claims (over €100.000) were excluded from the analysis, which was not the case. The number of taxpayers with a tax claim over €100.000 was very small and did not skew the effect.
- it was also checked whether the effect of the letters on the number of taxpayers making a payment would change if taxpayers with a tax claim less than €1.500 were excluded. The effect on payments was lower if taxpayers with a tax claim amounting less than €1.500 is excluded (23% of the taxpayers in the intervention group with a tax claim > €1.500 made a payment vs 37.1% in the intervention with all tax claims included). Looking only at taxpayers with debt < €1.500, the effect on payment is more similar to that found in the Belgian sample, where 54.6% of the intervention group made a payment. The effect of the letters is stronger among taxpayers who have a tax claim amounting to under €1.500. The effect of the letters is weaker for taxpayers who have a tax claim amounting to over €1.500. For a visual graph of the effect see Figure 22 below.

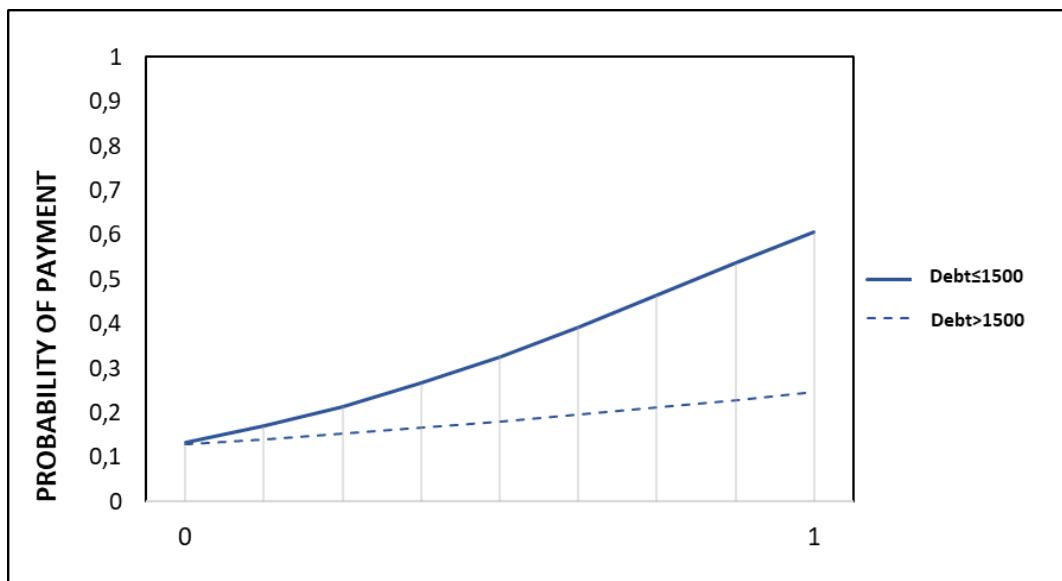


Figure 22: Effect of amount of debt on payment for the Netherlands.

Figure 23 below shows the effect of age on payment in the Netherlands, which is non-existent.

Also, when looking at the age of the taxpayers concerned, the interaction was not significant, but just ( $p=0,062$ ). The direction of the effect was negative, indicating that the effect of the intervention is less strong when people are older (age on x-axis). Although the interaction was not significant, a graph of the effect is included. There is no interaction effect of age on the other response types.

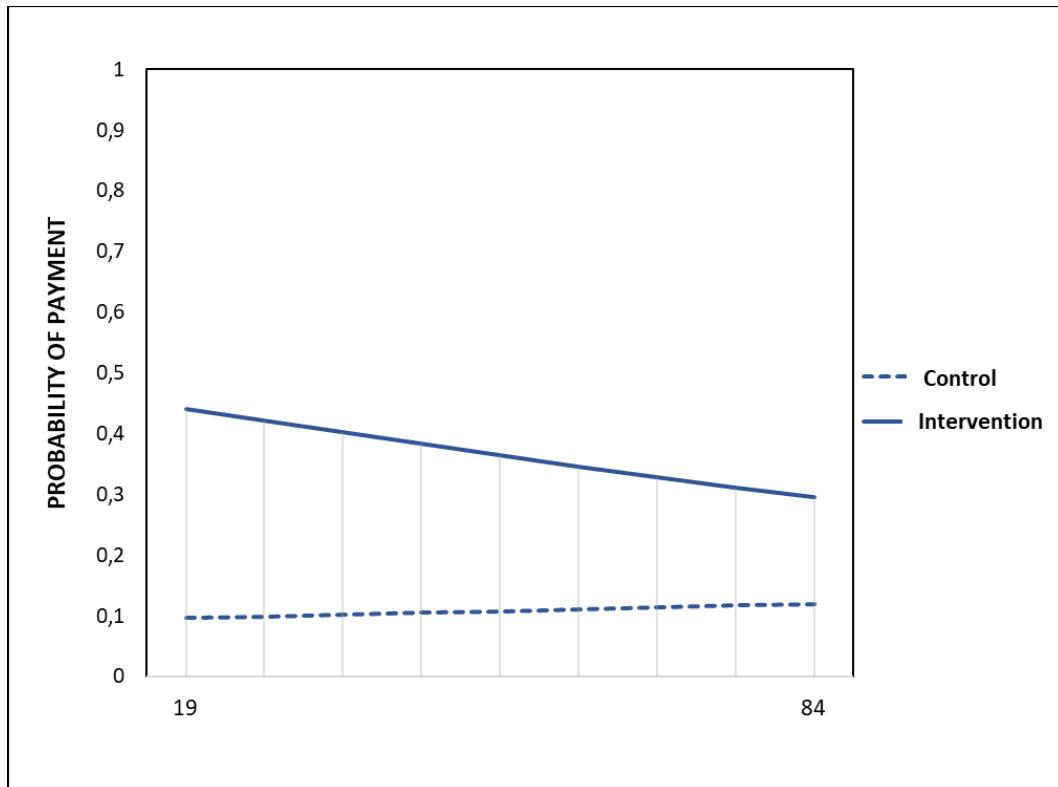


Figure 23: Effect of age on payment per group for the Netherlands.

#### Size of the tax claim

For Belgium tax claims higher than €100.000 could not be analysed since the maximum debt in the Belgium sample is only €30.982.

The probability of payment increases by 63% (95% CI [.535, .716]) for tax claims under €1.500 compared to tax claims over 1.500 euros. The size of the tax claim (< €1.500) on payment is significant ( $\chi^2 (1, N = 569) = 7,1444, p = 0,0075$ ). No significant effect on reaction was found. Of the tax claims over €1.500, 25,3% resulted in a payment, while 36,6% of the taxpayers with a tax claim under €1.500 made a payment. The effect of the letters is most strong for taxpayers with a tax debt under €1,500; 60,7% of the tax claims under €1.500 resulted in a payment after receipt of a letter.

## Age

There is no significant effect of age on payment or reaction (see Table 24 below).

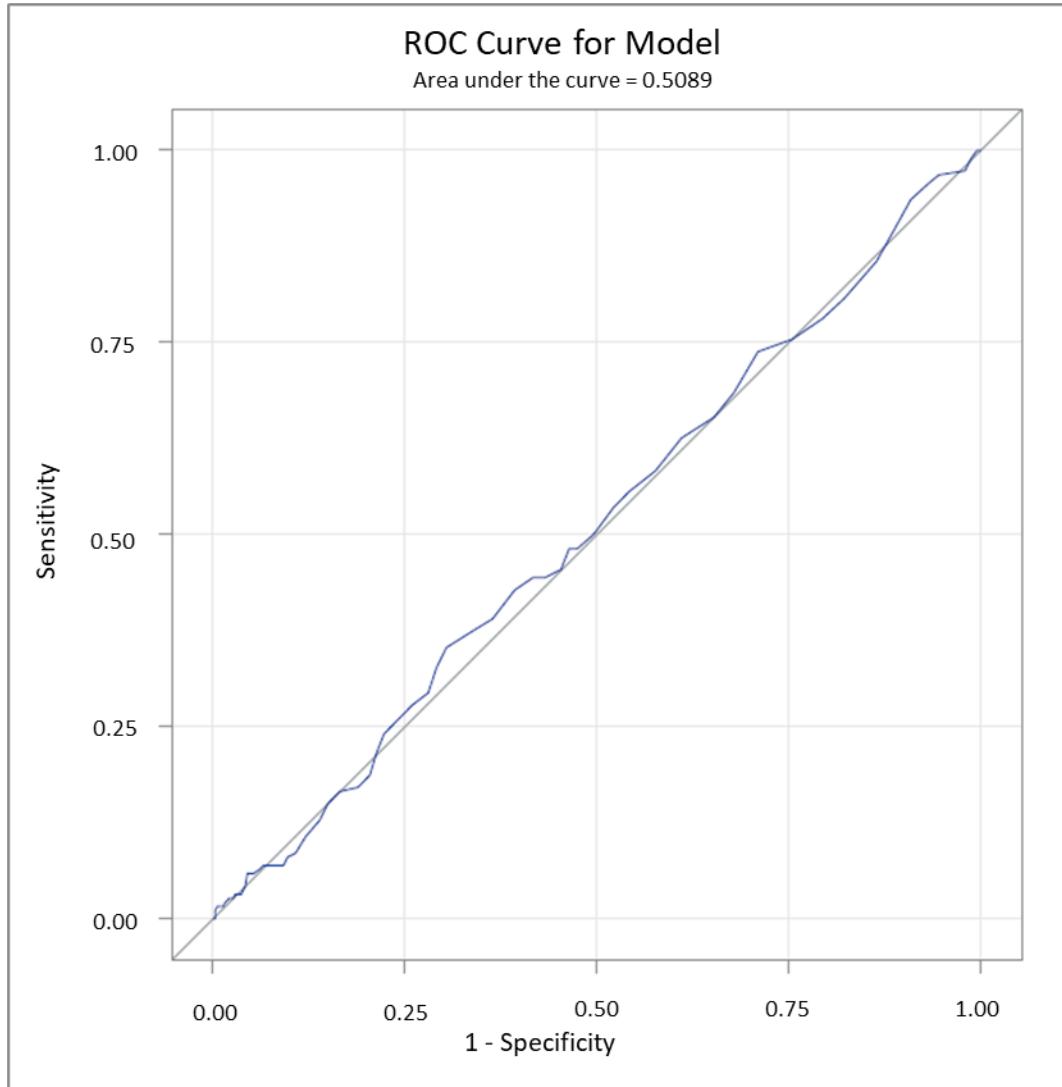


Figure 24: Effect of age on payment per group for Belgium.

### Gender

Although it is said that in general men are less compliant than women, no significant relation between gender and payment (or reaction) was found in the Belgium sample (see Figure 25 below).

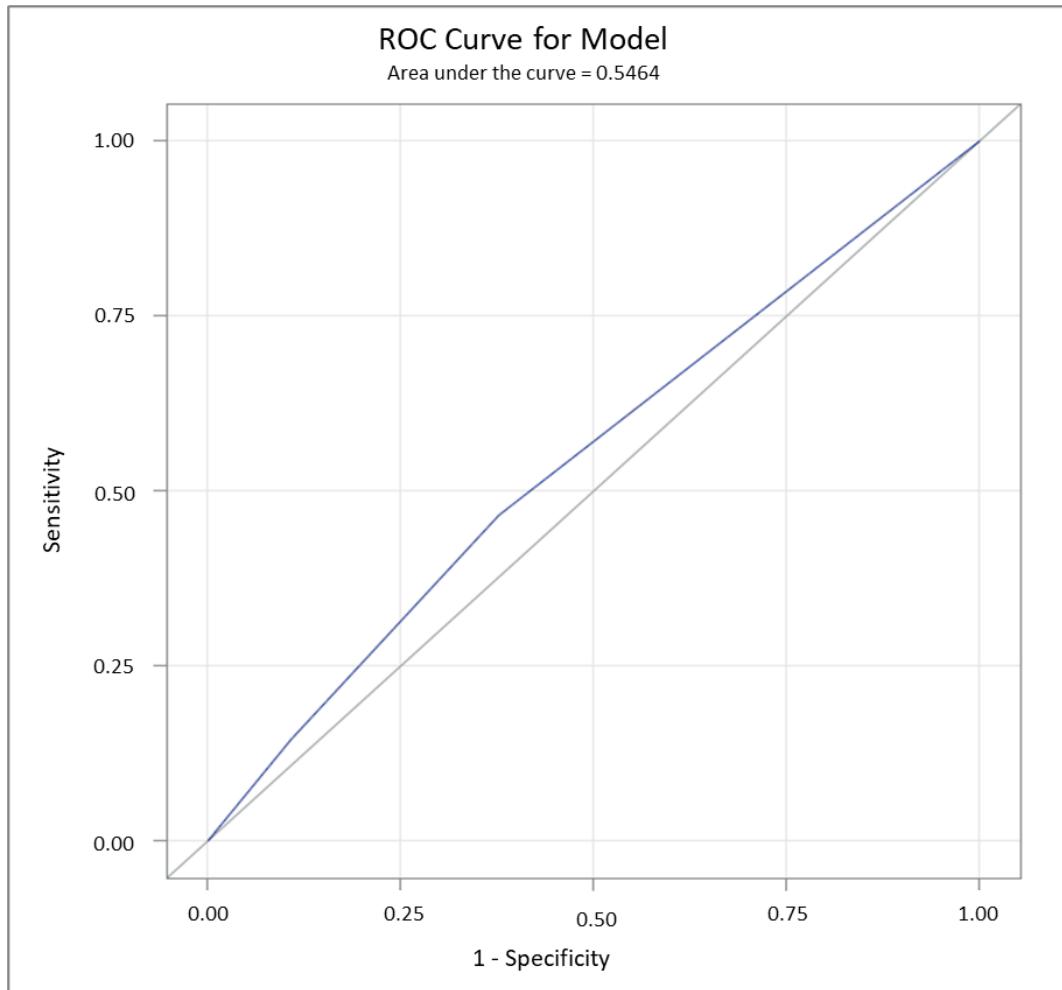


Figure 25: Effect of Gender on payment per group for Belgium.

## Annex II – nudging letters in different languages

Letter: International - English

This translation is attached as an extra service and for readability for Member States where the other languages are not used.

### Nudging letters of the NTA<sup>52</sup>

*Kenmerk:*

Laatste betaalherinnering openstaand bedrag Belastingdienst Nederland

Beste [voornaam + naam],

We stuurden u eerder een brief waarin staat dat u nog een openstaande schuld heeft bij de Belastingdienst in Nederland.

We stellen vast dat u nog een bedrag van €(**bedrag**) hebt openstaan {aan belasting of teveel ontvangen toeslagen}. In de bijlage vindt u een specificatie van dit bedrag.

Tot nu toe hebben we het uitblijven van deze betaling beschouwd als een onoplettendheid. Als u nu niet reageert, zien we dat echter als uw bewuste keuze.

We houden in de gaten of uw betaling binnenkomt. **Als u niet betaalt, kunnen we samen met de Belgische collega's van de FOD Financiën verdere acties ondernemen om deze schuld in te vorderen. De kosten en invorderingsrente die daarbij komen, zijn dan voor uw rekening. Om dit te voorkomen is het belangrijk dat u nu actie onderneemt.**

#### Wat moet u doen?



**Het openstaande bedrag vóór datum naar rekening van de Belastingdienst. Gebruik daarvoor de gegevens in het kader.**



**Als u vragen heeft kunt u contact opnemen door te bellen met**

**Mijn collega's zijn speciaal voor u bereikbaar tijdens 08.00 uur tot 17.00 uur.**



Door u te betalen:

**€ bedrag**



Betaal vóór:

**datum \***

Op rekeningnummer:

IBAN: NL49INGB0000441070

BIC: INGBNL2A

Op naam van:

Belastingdienst

**XXX.**

Als u de betaling ondertussen heeft uitgevoerd, bedanken wij u hiervoor.

Met vriendelijke groet,

[naam medewerker]

De ontvanger

*1st nudging letter, in Dutch, from NTA to taxpayers in Belgium*

<sup>52</sup> In addition to the nudging letters of the NTA, they also include an appendix with a current debt statement.

**Aktenzeichen:**

Letzte Zahlungserinnerung für den ausstehenden Betrag bei der niederländischen Steuer- und Zollbehörde

Sehr geehrte Dame, sehr geehrter Herr,

wir haben Ihnen vor Kurzem einen Brief geschickt, in dem angegeben wird, dass Sie noch eine offene Schuld bei der niederländischen Steuerverwaltung haben.

Wir stellen fest, dass bei Ihnen noch ein Betrag in Höhe von **{bedrag}** € {an Steuern oder zu viel erhaltenen Auszahlungen} aussteht. In der Anlage finden Sie eine Aufschlüsselung dieses Betrags.

Bis jetzt haben wir die Nichtleistung dieser Zahlung als Versehen betrachtet. Wenn Sie nicht reagieren, betrachten wir das aber als Ihre bewusste Entscheidung.

Wir werden im Auge behalten, ob Ihre Zahlung eingeht. **Wenn Sie nicht zahlen, werden wir zusammen mit den belgischen Kollegen des FÖD Finanzen weitere Maßnahmen vornehmen, damit diese Schuld beigetrieben wird. Die Kosten und die anfallenden Verzugszinsen gehen zu Ihren Lasten. Wenn Sie dies vermeiden möchten, ist es wichtig, dass Sie jetzt handeln.**

**Wie müssen Sie handeln?**


Den ausstehenden Betrag vor dem {date} auf das Konto der Steuer- und Zollverwaltung überweisen. Verwenden Sie dafür die Angaben im Textkasten.



Wenn Sie Fragen haben, wenden Sie sich bitte an xxxx. Meine Kollegen sind in der Zeit von 08.00 bis 17.00 Uhr speziell für Sie erreichbar.

Haben Sie die Zahlung bereits geleistet, möchten wir Ihnen dafür danken.

Mit freundlichen Grüßen,

Der Berater-Einnehmer



Der Betrag, der von Ihnen zu zahlen ist:

**Menge €**



Zahlen Sie bitte vor dem:

**Datum**

Auf das Konto mit der Nummer:

**NL86INGB0002445588**

Auf den Namen von:

**Belastingdienst**

Gerne mit Angabe des Zahlungsvermerks:

1st nudging letter, in German, from NTA to taxpayers in Belgium

Référence :

Dernier rappel de paiement de la somme due à l'Administration fiscale et douanière des Pays-Bas

Madame, Monsieur,

Nous vous avons récemment envoyé une lettre indiquant que vous avez toujours une dette fiscale non apurée auprès de l'Administration fiscale et douanière des Pays-Bas.

Nous constatons qu'un montant de EUR. {montant} concernant {les impôts ou le trop-perçu de suppléments} est resté impayé. Vous en trouverez le détail dans l'annexe.

Jusqu'à présent, nous avons considéré le fait que vous n'ayez pas réglé cette somme comme un oubli. Mais si vous ne répondez pas à la présente, nous considérerons qu'il s'agit d'un choix délibéré de votre part.

Nous surveillons si votre paiement est effectué. Si vous ne payez pas cette somme, nous prendrons des mesures supplémentaires avec nos collègues belges du SPF Finances pour le recouvrement de cette dette. Les frais afférents et les intérêts seront alors à votre charge. Pour éviter cela, il est important que vous agissiez.

#### Que devez-vous faire ?



Virez la somme due avant la date sur le compte de l'Administration fiscale et douanière. Utilisez pour cela les données se trouvant dans le cadre.



Si vous avez des questions, vous pouvez nous contacter en téléphonant au numéro {numéro}. Mes collègues sont joignables spécialement pour vous entre {heures}.

Si vous avez effectué le paiement entre temps, nous vous en remercions.

Cordialement,

[nom du fonctionnaire]

Le conseiller - receveur

Montant à payer :



EUR Montant

Payer avant le :



date \*

Sur le compte numéro :

NL86INGB0002445588

Au nom de :

Belastingdienst

Mentionner la référence :

1st nudging letter, in French, from NTA to taxpayers in Belgium

Uw bericht van	Uw kenmerk	Dossier	Ons kenmerk	Bijlage(n)
x	y	z	x	y

### Ultieme betaalherinnering openstaande belastingschuld Belastingdienst Nederland

Beste [Voornaam + Naam],

We zijn door de Nederlandse collega's van de Belastingdienst op de hoogte gebracht dat u nog een belastingschuld heeft openstaan. Zij stuurden u hier eerder al een brief over. Ter herinnering: Het gaat om €{bedrag}, aan {inkomstenbelasting/toeslagen} met referentie {kenmerk}.

Volgens onze gegevens is er nog geen betaling ontvangen\*. We houden actief in de gaten of uw betaling binnenkomt. **Als u niet betaalt, zullen we hier in België het dossier overnemen waardoor we rechtstreeks verdere acties kunnen ondernemen om deze schuld bij u in te vorderen.** De kosten en invorderingsrente die daarbij komen, zijn dan voor uw rekening.

Om dit te voorkomen, is het belangrijk dat u nu actie onderneemt.

#### Wat moet u doen?



**Het openstaande bedrag overmaken vóór 28-05-2023 naar rekening van de Belastingdienst. Gebruik hiervoor de gegevens in hun brief.**



**Als u (nu) niet kunt betalen, kunt u contact opnemen door te bellen naar XXX. Mijn collega's zijn speciaal voor u bereikbaar tijdens 08.00 uur tot 17.00 uur.**

\* Het is mogelijk dat uw betaling deze brief heeft gekruist. Indien u al betaald heeft, bedank ik u hiervoor en kunt u deze brief als niet verzonden beschouwen.

Met vriendelijke groet,

De Adviseur-Ontvanger


**Door u te betalen:**

€
**bedrag**


**Betaal vóór:**

datum \*

Op rekeningnummer:

IBAN: NL49INGB0000441070  
BIC: INGBNL2A

Op naam van:

Belastingdienst

Vermeld het betalingskenmerk:

Sehr geehrte Dame, Sehr geehrter Herr,

Kollegen der niederländischen Steuerverwaltung haben uns darüber informiert, dass Sie noch eine Steuerschuld haben. Sie haben Ihnen vor Kurzem darüber einen Brief geschickt. Zur Erinnerung: Es handelt sich dabei um {menge} € an {Steuern / Zuschlägen} unter Verweis auf {kenmerk}.

Nach unseren Angaben ist noch keine Zahlung eingegangen\*. Wir werden gut im Auge behalten, ob Ihre Zahlung eingeht. **Wenn Sie nicht zahlen, werden wir hier in Belgien den Vorgang übernehmen, woraufhin wir direkt weitere Maßnahmen ergreifen können, damit wir diese Schuld bei Ihnen beitreiben können. Die Kosten und die anfallenden Verzugszinsen gehen zu Ihren Lasten. Wenn Sie dies vermeiden möchten, ist es wichtig, dass Sie jetzt handeln.**

**Wie müssen Sie handeln?**



**Den ausstehenden Betrag vor dem datum auf das Konto der niederländischen Steuerverwaltung überweisen. Verwenden Sie dafür die Angaben in Tekstkasten.**



**Wenn Sie (jetzt) nicht zahlen können, wenden Sie sich bitte an XXX.**

**Meine Kollegen sind in der Zeit von 08.00 bis 17.00 Uhr speziell für Sie erreichbar.**

\* Es ist möglich, dass sich Ihre Zahlung mit diesem Brief überschnitten hat. Wenn Sie bereits bezahlt haben, möchten wir Ihnen dafür danken und können Sie diesen Brief als gegenstandslos betrachten.

Mit freundlichen Grüßen,

Der Berater-Einnehmer

Der Betrag, der von Ihnen zu zahlen ist:

**€ Menge**

Zahlen Sie bitte vor dem:

**Datum \***

Auf das Konto mit der Nummer:

NL86INGB0002445588

Auf den Namen von:

Belastingdienst

2nd nudging letter, in German, from FPS Finance to taxpayers in Belgium

Dernier rappel de paiement de la somme due à l'Administration fiscale et douanière des Pays-Bas

Madame, Monsieur,

Nous vous avons récemment envoyé une lettre indiquant que vous avez toujours une dette fiscale non apurée auprès de l'Administration fiscale et douanière des Pays-Bas.

Nous constatons qu'un montant de EUR. {montant} concernant {les impôts ou le trop-perçu de suppléments} est resté impayé. Vous en trouverez le détail dans l'annexe.

Jusqu'à présent, nous avons considéré le fait que vous n'ayez pas réglé cette somme comme un oubli. Mais si vous ne répondez pas à la présente, nous considérerons qu'il s'agit d'un choix délibéré de votre part.

Nous surveillons si votre paiement est effectué. Si vous ne payez pas cette somme, nous prendrons des mesures supplémentaires avec nos collègues belges du SPF Finances pour le recouvrement de cette dette. Les frais afférents et les intérêts seront alors à votre charge. Pour éviter cela, il est important que vous agissiez.

#### Que devez-vous faire ?



Virez la somme due avant le date sur le compte de l'Administration fiscale et douanière. Utilisez pour cela les données se trouvant dans le cadre.



Si vous avez des questions, vous pouvez nous contacter en téléphonant au numéro {numéro}. Mes collègues sont joignables spécialement pour vous entre {heures}.

Si vous avez effectué le paiement entre temps, nous vous en remercions.

Cordialement,

[nom du fonctionnaire]

Le conseiller - receveur

Montant à payer :



**EUR montant**

Payer avant le :



**datum \***

Sur le compte numéro :

NL86INGB0002445588

Au nom de :

Belastingdienst

Mentionner la référence :

*2nd nudging letter, in French, from FPS Finance to taxpayers in Belgium*



Federale  
Overheidsdienst  
**FINANCIEN**

**INNING EN  
INVORDERING**

Atz : AAI Team B(zondere) Invordering (TBI) Gent  
GASTON CROMMENLAAN 6 B 107, 9060 Ledeberg

uw bericht van      uw kenmerk      Dossier      ons kenmerk      bijlage(n)

Ledeberg, 03 april 2023

Laatste betaalherinnering openstaande belastingschuld FOD Financiën, België

Beste

We stuurden u eerder een brief waarin staat dat u nog een openstaande schuld in de Belasting niet-inwoners / nat.persoon aanslagjaar 2020 hebt bij de FOD Financiën in België.

We stellen nu vast dat u hiervan nog een bedrag van €  hebt openstaan. Op de keerzijde vindt u meer details.

Tot nu toe hebben we het uitblijven van deze betaling beschouwd als een onoplettendheid. Als u nu niet reageert, zien we dat echter als uw bewuste keuze.

We houden actief in de gaten of uw betaling binnenkomt. Als u niet betaalt, kunnen we samen met de Nederlandse collega's van de Belastingdienst verdere acties ondernemen om deze schuld in te vorderen. De daarmee gepaard gaande kosten en nalatigheidsintresten zijn dan voor uw rekening.

Om dit te voorkomen is het belangrijk dat u actie ondernemt.

**Wat moet u doen?**



Het openstaande bedrag overmaken vóór 28/04/2023 naar rekening van de FOD Financiën. Gebruik daarvoor de gegevens in het kader.



Als u vragen heeft, kunt u contact opnemen door te bellen naar [09 23 45 67 89](tel:09 23 45 67 89). Mijn collega's zijn speciaal voor u bereikbaar tussen 9u-12u. U kan ons ook per mail contacteren, gebruik hiervoor

Als u de betaling ondertussen hebt uitgevoerd, bedank ik u hiervoor.

Met vriendelijke groet,

	Door u te betalen: € <input type="text"/>
	Betaal vóór: 28/04/2023 *
Op rekeningnummer: BE42 6792 0000 0054	
BIC-code: PCHQBEBB	
Op naam van: <b>FOD Financiën</b>	
Vermeld het betalingskenmerk: +++                    +++ Of betaal op <a href="http://www.myminfin.be/">www.myminfin.be/</a>	
<small>* Het bedrag moet op deze datum bijgeschreven zijn op de rekening van de FOD FINANCIËN.</small>	

1st nudging letter, in Dutch, from FPS Finance to taxpayers in the Netherlands

Beste,

We zijn door de Belgische collega's van de FOD Financiën op de hoogte gebracht dat u nog een bedrag aan belastingschuld heeft openstaan. Zij stuurden u hier eerder al een brief over. Ter herinnering: Het gaat om € x aan Belasting Niet-Inwoners (natuurlijke personen).

Volgens onze gegevens is er nog geen betaling ontvangen\*. We houden in de gaten of uw betaling binnenkomt. **Als u niet betaalt of reageert, kunnen we samen met de Belgische collega's van FOD Financiën verdere acties ondernemen om deze schuld in te vorderen. De kosten en nalatigheidsintresten die daarbij komen, zijn dan voor uw rekening.**

Om dit te voorkomen is het belangrijk dat u nu actie ondernemt.

#### Wat moet u doen?

-  Het openstaande bedrag overmaken **vóór 28/05/2023** naar rekening van FOD Financiën. Gebruik hiervoor de gegevens in het
-  Als u vragen heeft, kunt u contact opnemen door te bellen naar ..... Mijn collega's zijn speciaal voor u bereikbaar tussen 9u-12u. U kan ons ook per mail contacteren, gebruik hiervoor ..... .

Door u te betalen:  
€ x

Betaalvóór:  
**28/05/2023 \***

Op rekeningnummer:  
BE42 6792 0000 0054  
BIC-code:  
PCHQBEBB  
Op naam van:  
**FOD Financiën**

Vermeld het betalingskenmerk:  
**\*\*\*200/7265/08345\*\*\***  
Of betaal op [www.myminfin.be](http://www.myminfin.be)

\* Het bedrag moet op deze datum bijgeschreven zijn op de rekening van de FOD Financiën.

\* Het is mogelijk dat uw betaling deze brief heeft gekruist. Indien u al betaald heeft, bedank ik u hiervoor en kunt u deze brief als niet verzonden beschouwen.

Met vriendelijke groet,  
De Adviseur-Ontvanger

Detail van de schuld (bedragen in euro):

Saldo hoofdsom	Interessen	Verhoging	Totaal openstaand bedrag
x	€ 0	€ 0	x

2nd nudging letter, in Dutch, from FPS Finance to taxpayers in Belgium

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