



IOTA Forum

**Implementation of Measures to Counter Base
Erosion and Profit Shifting (BEPS)**

**Group Discussion 1
Pillar 2 Implementation**



Question 1

Does your tax administration participate in any international initiative regarding Pillar 2 implementation? (EU – Fiscalis Groups, OECD/ LBIP – Amsterdam Dialogue, regional initiatives, etc.). Have you established a dedicated Pillar Two task force within your administration?

Have you utilized, or do you plan to request, any external capacity-building programs or technical assistance?

Are you going to follow the toolkit steps? Please elaborate further on your reply.

FEEDBACK FROM GROUP 1 (red)

Cooperation Platforms and Cross-Functional Teams

International Cooperation Platforms

Global initiatives enable sharing of practical experience and benchmarking for effective Pillar Two implementation.

Amsterdam Dialogue Toolkit

The toolkit supports reviewing steps, identifying gaps, and improving communication with senior management.

Cross-Functional Task Forces

Dedicated teams combine legal, IT, audit, and tax expertise to coordinate Pillar Two compliance and IT development.

Sustainable Implementation Readiness

External cooperation and internal organisation form the foundation for ongoing Pillar Two implementation success.

Question 2

Has an impact assessment been conducted? If so, what were the primary data sources (e.g., CbCR, financial statements) and main challenges?

Have you estimated the expected top-up tax revenue (as a range or precise amount)?

Does this assessment include the impact on existing national tax incentives?

FEEDBACK FROM GROUP 1 (red)

Uncertain and Often Modest Revenue Impact

Preliminary Revenue Estimates

Many administrations use initial data sources but face limitations for precise Pillar Two revenue calculations.

Uncertain Revenue Outcomes

Expected additional revenues may be limited due to high tax rates and few in-scope multinational enterprises.

Implementation Challenges

Implementation demands significant financial, human, and technical resources, especially for smaller administrations.

Data-Driven Refinements

Some jurisdictions plan to update assessments using real GIR filings to refine revenue and planning.

Question 3

What are the main concerns raised by stakeholders (e.g., administrative burden, data availability, or legal uncertainty, legal uncertainty)?

Have you organised consultations, webinars, or working groups with taxpayers, advisors, and software providers? Were there any dialogue or meetings held with them?

Has your tax administration launched any tools to facilitate implementation (e.g., FAQs, guidance, helpdesks, FAQs, webinars, pilot programmes, or cooperative compliance approaches)? If yes, please provide a few examples.

FEEDBACK FROM GROUP 1 (red) Engaging Taxpayers to Reduce Uncertainty

Critical Taxpayer Concerns

Taxpayers worry about legal certainty, administrative burden, data quality, and unresolved technical issues.

Engagement Approaches

Jurisdictions use bilateral talks, cooperative programs, forums, and targeted campaigns for large taxpayers.

Importance of Early Communication

Early engagement before filing reduces confusion and lowers compliance risks significantly.

Communication Tools and Trust

Websites, online Q&A, and dedicated mailboxes build taxpayer trust and support compliance.

Question 4

How are you managing IT needs? (e.g., hiring specialists, reallocating internal staff, or outsourcing the development of digital reporting tools)? Do you believe that there is room for a common approach in order to facilitate IT challenges such as: introduction of CTS 3.0, exchange of GIR, harmonization of DAC 9 with IT infrastructure, etc.?

What are the main hurdles regarding DAC9, GIR exchanges, and data standardization?

FEEDBACK FROM GROUP 1 (red)

Digital Capacity as a Key Pressure Point

Complex IT Implementation

Pillar Two's digital needs involve complex filing, data validation, and risk analysis requiring robust IT solutions.

Collaborative IT Capacity

Jurisdictions combine internal teams and external providers to enhance IT capacity for tax and audit processes.

Challenges of Standardization

Differences in laws and IT maturity limit the feasibility of unified digital solutions across jurisdictions.

Need for Flexible Systems

Flexible, modular system design is essential to adapt to evolving legislation and operational demands.