

From: QUEST Stephen (TAXUD)
Sent: 23 November 2017 17:41
To: TAXUD DG
Subject: FW: Meeting with [REDACTED], PWC

From: [REDACTED] (TAXUD) [[mailto:\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)]
Sent: Wednesday, November 08, 2017 12:24 PM
To: [REDACTED] (TAXUD); [REDACTED] (TAXUD); [REDACTED] (TAXUD)
Cc: [REDACTED] (TAXUD); TAXUD DG; MOUTARLIER Valere (TAXUD)
Subject: Meeting with [REDACTED], PWC

Dear all,

Fyi the summary of the meeting today. [REDACTED]
[REDACTED]
[REDACTED]

Meeting with [REDACTED], PWC

Participants

Stephen Quest (SQ), [REDACTED] (TAXUD)
[REDACTED] (PWC)

Summary

The meeting discussed the current discussion on the taxation of the digitalized economy. SQ explained the state-of-play as set out in the Commission's Communication and emphasized that the political pressure does not allow inaction. [REDACTED] reported about his participation in the public OECD consultation of US companies in Berkeley last week. The analysis of value creation is in his view a core aspect and needs more time. He thinks that a modified profits attribution based on such an analysis might be a way forward. An example is the value of unprocessed raw data vs processed raw data which was briefly discussed. [REDACTED] was less convinced about solving the issues with a virtual PE which would come with a difficult threshold discussion. SQ explained that the political pressure is high and that measures have to be taken rather quickly. He emphasized that a positive engagement of businesses in the discussion would be useful.

Regarding CCCTB and digital, SQ explained the approach of targeted measures vs the broader CCCTB solution. [REDACTED] wondered whether this connection was clear to businesses and whether there was not a wrong perception about what the CCCTB could deliver in this context. A better understanding could improve business support for the CCCTB.

[REDACTED] was briefly discussed. [REDACTED]
[REDACTED]
[REDACTED]

