Covid-19: Tax measures across Europe



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	Belgium	France	Germany	Italy	Luxembourg	Netherlands	Poland	Russia	Spain	Turkey	Ukraine	United Kingdom
What tax measures is the government taking for businesses?	The support tax measures concern VAT, withholding tax, personal tax, corporate income tax and legal person tax. Regarding those taxes a payment plan, an exemption from penalty interests and/or a waiver of fines for non-payment are the different tax measures the government can take. To apply for such measures, the company must submit an application with the tax authorities by 30 June 2020 at the latest. Furthermore, for payments to the Belgian National Social Security Office ("NSSO") in the first and second quarter of 2020, businesses can apply for an amicable payment plan. Support tax measures, from the Federal Public Service Finance or the NSSO, can be requested by any natural or legal person with a Belgian company number who is inconvenienced by the spread of COVID-19. The inconveniences have to be demonstrated, e.g. a decrease in profit, a significant decrease in orders and/or reservations, etc.	 Global tax deferral (until 15 June) for direct taxes due in March (corporate income tax, payroll tax, local taxes including CFE and CVAE). A request without justification will suffice. Taxes already paid may be refunded. Penalties will not apply. General deferral (up to 3 months) for social contributions, by request without justification. Penalties will not apply. Employee personal income tax withheld by employers is not covered and will have to be withheld by companies on due dates. Tax rebate for companies in distress after review of claims (at the discretion of the Administration). Acceleration of repayment for claims on the government (ex: tax credit, VAT). Possibility to claim the repayment due on 2020 (after offsetting on the 2019 CIT). More details and more measures to come in the coming days (after the adoption of the bill authorizing the government to take the necessary measures). 	The Federal States have agreed on unified tax reliefs, which apply to the most important taxes such as personal income tax, corporate income tax, trade tax and VAT: • Upon request: facilitation of the granting of deferrals for personal income tax, corporate income tax and VAT and other taxes (but not for trade tax). Also, the tax authorities can waive deferral interests in that context. • Upon request: Reductions of advance payments for personal income tax, corporate income tax and trade tax, • waiver of enforcement measures for personal income tax, corporate income tax and VAT and other taxes (but not for trade tax), • waiver of late payment penalties for personal income tax, corporate income tax and VAT and other taxes (but not for trade tax), which accrued from 19 March 2020 until 31 December 2020, All tax reliefs are restricted to taxpayers directly and not only insignificantly affected by the effects of coronavirus. For the exemptions for trade tax mentioned above, no unified approach is possible, since the respective municipalities are competent and each municipality may decide on their own treatment of these cases.	The Italian Government adopted some tax measures to support the liquidity of businesses. Deferral of terms for tax obligations and payments. For all the Italian taxpayers, all tax obligations other than payments expiring between 8 March and 31 May 2020, are deferred up to the end of June, without the application of penalties. For businesses operating in the economic sectors highly affected from the current situation (e.g. tourism companies, travel agencies, tour operators, transport companies), the payment of withholding taxes on employment income, social security contributions and the premium for mandatory insurance on employment are suspended until 30 April 2020. It is also suspended the VAT payment due in March 2020. These payments shall be carried out by 31 May 2020. No penalties and interests applies. For businesses and self-employed artists and professionals that registered in 2019 revenues or fees not exceeding €2 million, the following payments falling due between 8 March 2020 and 31 March 2020 are deferred: • withholding taxes and regional and municipal surtax on employees; • value added tax; • social security and welfare contributions, and premiums for compulsory insurance. With reference to the same taxpayers that have the fiscal domicile, the registered office or place of business in the provinces of Bergamo, Cremona, Lodi and Piacenza, the suspension relating to value added tax applies regardless of the volume of revenues or compensation received. These payments shall be carried out, without the application of penalties and interests, as a lump sum by 31 May 2020 at the latest or by instalments up to a maximum of five equal monthly instalments starting in May 2020. Italian taxpayers, that registered in 2019 revenues or fees not exceeding €400,000, can ask their customers to be paid gross of withholding tax for revenues and fees paid between 17 March and 31 March 2020, provided that, in the previous month, they did not incur in expenses for employees or similar work. Taxpayers who wishes to	Upon request, the taxpayers may have: a cancellation of their quarterly advances of the corporate income tax and of the municipal commercial tax for the 1st and 2nd quarter of 2020; It can be requested by using the following form: https://impotsdirects. public.lu/dam-assets/fr/formulaires/covid/annulationavances.pdf a payment deadline for the corporate income tax, the municipal business tax and the net wealth tax. Only taxes that are due after 29 February 2020 are covered. It can be requested by using the following form: https://impotsdirects.public.lu/dam-assets/fr/formulaires/covid/delaipaiement.pdf The forms contain a small justification statement, a straightforward explanation shall be sufficient as the Luxembourg Tax Authorities state that requests for cancellation of advances and payment deadlines will be automatically accepted. These requests shall be sent either by post or by email to the appropriate tax office after being filled and signed by the taxpayer. If the applicant does not know the competent tax office, he can send his request to: divinsimp@co.etat.lu.	As a special measure, affected businesses can apply for a special deferment of payment of tax. The Dutch Tax Authorities will immediately stop the collection of tax once such a request for deferment has been received. This applies to personal income tax, corporate income tax, wage tax and turnover tax (VAT). As a temporary measure, default penalties for late payment do not have to be paid. Interest for tax underpayments and interest for the late payment of tax will temporarily be reduced to 0.01%.	Drafts of COVID-19 toolkit legislation, released to the public during the 21/22 March 2020 weekend, include a number of tax (and social security) measures. These include, inter alia, tax loss carry-back (2020 loss deductible, up to PLN 5 million/6.11 million, from 2019 income through 2019 tax return adjustment), delay until 20 July 2020 of commercial properties tax for March-May 2020 period, exemption of debtors in 2020 from income tax bad debt rules (which would otherwise require them to essentially tax the amounts which they deducted for tax purposes, but defaulted to pay within 90 days of the deadline), the right for employers to retain until 1 June 2020 the payroll tax for March and April 2020, waiver of the prolongation fee in case of individual tax payment reliefs applied for during the outbreak period or within 30 days of its termination (such waiver being applicable also to individual reliefs in payment of social security contributions), delay until 1 July 2020 for large enterprises (as has already been the case for SMEs) of entry into force new electronic VAT forms combining and replacing separate SAF-Ts and standard VAT returns submittable so far, delay until 1 July 2020 of entry into force of the new VAT rates and goods and services VAT classification system (originally planned to launch as from 1 April 2020), exemption from 0,5% stamp duty of loans obtained by 31 August 2020 by businesses suffering from impaired cash flow due to the COVID-19 situation, additional options for municipalities to provide for business properties, for a part of 2020, real estate tax exemptions relating to the COVID-19 situation (and/or to extend, by 30 September 2020 at the latest, deadlines for April - June 2020 real estate tax payments). The exemption from bad debt rules and delay in payment of the commercial properties tax, mentioned above, shall be available only to taxpayers facing at least 50% plunge in their revenues as compared with the relevant period in the past. Moreover, 2020 donations made for COVID-19 mitiga	Russian Federal Tax service announced that all control measures which assume direct communication between people would be suspended (field tax audits, inspections in the premises of the taxpayers, holding interrogations of the employees and other actions). Also there is a discussion to move the deadline for submitting personal income tax declarations from April 30 to another date, so that fewer people come to tax inspections. The Moscow courts, which resolve the tax disputes, move the dates of the proceedings.	As a general rule, the obligation to file and pay quarterly/monthly tax returns (VAT, withholdings, PIT, CIT, etc.) remains unchanged. However, those taxpayers whose volume of operations (2019) is lower than €6,010,121, could request the deferral of payment of tax returns (aggregate amount of tax debt could not be higher than €30,000) which deadline to file and pay is between 12 March 2020 and 30 May 2020 (both included), subject to certain requirements and conditions. This possibility to request the deferral of payment also applies to tax returns corresponding to withholding taxes (PIT, CIT, etc.), taxes that should be charged (VAT) and CIT pre-payments. The deadline to pay tax assessments (i.e. tax assessments derived from tax procedures) is extended until 30 April 2020. This rule applies to tax assessments that have been already notified (so they are in voluntary payment period or under enforcement procedure), provided that the deadline to pay was not finished at 17 March 2020. In case the deadline to pay tax assessments is notified from 18 March 2020, the deadline to pay them is extended until 20 May 2020, unless the legal deadline is longer.	 Submission and payment date of VAT declarations which must be submitted until 26 March 2020 are extended to 24 April 2020. Submission date of "Form Ba" and "Form Bs" declarations relating to the period of February 2020 which must be submitted until 31 March 2020 is extended to 30 April 2020. Preparation and signing date of e-books which must be prepared and signed until 31 March 2020 and submission date of "Electronic Book Certificates" which must be submitted until 31 March 2020 to the Revenue Administration Data Processing System are extended to 30 April 2020. Taxpayers which fall into scope of force majeure for the period of 1 April 2020 to 30 June 2020 taxpayers with income tax liability in terms of commercial, agricultural and professional earnings, all taxpayers directly affected by COVID-19 and operates on real estate and construction sectors (e.g. retail trade, shopping centers, logistics, transportation, cinema and theater, accomodation, food and beverage services, organization, health services, construction and more) in terms of main field of activity and taxpayers operating in terms of their main field of activity in the sectors in which workplaces are temporarily suspended due to the measures taken by the Ministry of Domestic Affairs 2) Deferred tax obligations for above taxpayers The period of submission of withholding and value added tax (VAT No.2 and No.1) declarations, Ba-Bs forms, submission of electronic book certificates of months March, April and May for taxpayers seth forth above are postponed. Accordingly, the declarations of withholding and value added tax periods of March, April and May are postponed to 27 October 2020, 27 November 2020 and 28 December 2020, respectively. The application of accommodation tax (1%) is postponed until 1 January 2021 which was to be effective as of 1 April 2020. The VAT rate on domestic air transportation is reduced from 18% to 1% for the period of 01.04.2020-30.06.2020	Tax payers shall be exempt from financial penalties, if they failed to comply with the tax laws and/or to pay taxes that shall be paid\ withhold in the period from 1 March to 31 May 2020. This relief does not extend to VAT other indirect taxes and tax liens. Ukrainian deadline for filling of a personal tax return for 2019 is extended to 1 July 2020. Deadline for payment of personal income tax for 2019 is extended till 1 October 2020.	All businesses and self-employed people in financial distress, and with outstanding tax liabilities, may be eligible to receive support with their tax affairs through HM Revenue and Custom's (HMRC) Time To Pay service. These arrangements are agreed on a case-by-case basis and are tailored to individual circumstances and liabilities. This service allows businesses/indviduals to pay their taxes in installments over a period of time. For those who are self-employed, Income Tax payments due in July 2020 under the Self-Assessment system will be deferred to January 2021. This deferral is automatic and no application is necessary.
Can tax pre-payments be adjusted?	The provisions setting out the conditions that have to be met for reductions and exemptions of tax pre-payments can be found in Title VI of the Belgian Income Tax Code of 1992. However, no specific support tax measures concerning the adjustment of tax pre-payments in the light of COVID-19, are taken yet by the government.		As described above, this is possible on application, which must be substantiated.	Not at the present time.	Cancellation of prepayments under special procedure set up for current events: As mentionned here above, it is possible to request for a cancellation of their quarterly advances of the corporate income tax and of the municipal commercial tax for the 1st and 2nd quarter of 2020. Adjustment of prepayments under standard procedure which is still available: • the taxpayer that only request a reduction of the advances shall act as usual by contacting the competent tax office and sending an email with supporting documentation justifying a reduction of the current year taxprofit (usually interim Balance Sheet and Profit and Loss).	Taxpayers can request a reduction of tax pre-payments, if a taxpayer expects lower profit due to the Coronacrisis. This applies to preliminary tax assessments that have been imposed for personal income tax or corporate income tax.	Under the general rules of Polish tax procedure applicable already prior to the COVID-19 situation tax authorities may, upon request of a taxpayer, mitigate its tax advance payments provided that the taxpayer can demonstrate that these payments, if calculated under standard rules, would be disproportionately high in comparison with the anticipated tax due for the entire tax year concerned. Consequently, subject to those conditions, businesses affected by the COVID-19 situation may already apply for adjustment of their tax pre-payments. In addition to the above, the proposed COVID-19 toolkit is supposed to allow, albeit small businesses only, to withdraw from simplified tax advance payments regime. This simplified regime essentially permits taxpayers to calculate their income tax pre-payments based on income reported in a relevant past period. However, since in the current economic context this could lead to pre-payments manifestly diverging from actual profits (or losses), small businesses will be expressly allowed to abandon that methodology and revert to standard calculation based on their actual financial outcomes.	No special tax measures	No announcement on this topic yet.	No announcement on this topic yet.	N/A	No announcement on this topic yet.
Is it possible to reclaim Value Added Tax (VAT) already paid to the tax authorities for invoices that are not paid by customers?	Reclaiming VAT already paid to the tax authorities for invoices that are not paid by customers, is possible. The reclamation of VAT is possible if the customer is bankrupt or in a procedure set out in the Act of the Continuity of Enterprises. In other cases (e.g. customers cannot pay the invoice for reasons related to COVID-19), one must prove that the claim is actually irrecoverable (i.e. one has done everything possible to obtain payment). In principle, a simple reminder will not suffice. If the client does not respond to a formal notice from a lawyer or bailiff, one will have sufficient evidence to justify the refund of VAT.	No specific measures for indirect taxes. TBC, possibility to claim that VAT payment cannot happen due to cash shortage.	Not at the present time.	No, it is excluded by law.	The chamber of commerce has announced that the VAT authorities ("Administration de l'enregistrement, des domaines et de la TVA") will reimburse from last week all VAT credit balances below €10,000. This is a measure that will make it possible to meet the liquidity needs of around 20,000 companies established in the Grand Duchy.	Taxpayers can reclaim VAT on invoices that are not paid by customers provided certain conditions are met.	Poland has applied a VAT bad debt relief already prior to the COVID-19 outbreak. The relief essentially allows a supplier to adjust output VAT in case a debtor defaults more than 90 days (if the supplier does not transfer receivables within that deadline). In addition, it is required for the relief to apply that the purchaser cannot be subject to any insolvency/restructuring procedures at the time of the supply nor at the time of the adjustment, which has been considered as an impediment to effective application of the relief.	No special tax measures	No announcement on this topic yet.	No announcement on this topic yet.	N/A	HMRC have deferred Valued Added Tax (VAT) payments for 3 months. This deferral is automatic and no application is necessary. HMRC have provided the number for a helpline that can be used by affected business. HMRC are able to discuss provisions to help businesses by agreeing an instalment arrangement, suspending debt collection proceedings, cancelling penalties and interest where the business has administrative difficulties contacting or paying HMRC immediately.
Is it possible to claim a provisional carry back of tax losses?	Tax losses cannot be provisionally set off against profit from previous years.	N/A.	Not at the present time.	No. Under certain circumstances, it is possible to convert into a tax credit the deferred tax assets ("DTA") relating to tax losses and NID, calculated based on the amount of the impaired receivables sold.	Luxembourg tax rules do not provide for carry back of losses (only carry forward).	Taxpayers who expect to incur a loss can request that this loss be provisionally set off against the profit for the previous financial year (provisional carry-back).	Currently not. The COVID-19 toolkit is supposed to allow for tax loss carry-back (2020 loss being deductible, up to PLN 5 mln/€1,1 mln, from 2019 income through 2019 tax return adjustment and the balance being available for a carry-forward into subsequent tax years under the standard rules).	No special tax measures	No announcement on this topic yet.	No announcement on this topic yet.	N/A	No announcement on this topic yet.
Any other special arrangements?	No other support tax arrangements. However, various other measures have been taken by the federal and competent regional authorities with regard to companies, e.g. 100 million EUR is provided as crisis guarantees, annoyance bonuses are provided to companies inconvenienced by the spread of COVID-19, etc.	 Commitment for up to €300 billion from government and Bpifrance to guarantee bank loans that companies may need because of the epidemic. The loan will have to meet conditions to be specified by the government. Extension of the regime of partial redundancy measures ("activité partielle"), whereby the State will fully cover up indemnities paid by companies to their workers (up to 70% of gross wages), with a cap of 4,5 times French minimum wage (publication of decree to come). Accelerated payment of bills by the state and local authorities. 	By the beginning of April, the rules on reduced hours compensation benefit will be adapted to suit current needs retroactively from 1 March 2020. As part of this, eligibility requirements will be loosened: Reduction of the minimum ratio of the employees in a company affected by shorter working hours to 10% Partial or complete waiver of the need to build up a negative balance in working hours Reduced hours compensation benefit will also be available to temporary/agency workers Complete reimbursement of social security contributions by the Federal Labour Office Furthermore, the German national development bank KfW offers various possibilities to provide companies with short-term liquidity.	Tax premium for employees: For employees with an annual gross salary lower than €40,000, is recognized by the employer a €100 tax-exempt additional salary for the month of March 2020 that is calculated in relation to workdays. Tax credit for workplace sanitization costs: It is recognized to businesses a tax credit equal to 50 per cent of the cost of sanitising workplaces up to a maximum of €20,000. Tax credit for shops and stores: Businesses whose activity have been suspended pursuant to the Prime Ministerial Decree dated 11 March 2020, are granted with a tax credit equal to 60 per cent of the amount of the rent, relating to the month of March 2020.	Direct Taxes: The deadline to file the 2019 tax return, either for individuals or for companies is extended to 30 June 2020 (instead of 31 March 2020 for individuals and 31 May 2020 for companies). This measure applies as well to taxpayers wishing to request, change or revoke their individual taxation choice. In addition, the standard procedure to request an extended deadline until 31 December year N+1 remain applicable. Cross border worker days count is suspended for French and Belgian crossborder workers who are working from home. Deferred amortizations may become relevant and be applied under certain conditions. VAT: No sanction will apply in case of late filling of a VAT return as from 18 March 2020 and this administrative tolerance will apply until new communication from the authorities.	Employers dealing with expected revenue loss of at least 20% can - for a three-month period - apply for a special compensation in wage costs of up to a maximum of 90%. The amount of compensation will depend on the percentage of the decrease in revenue. The Dutch government grants a prepayment of 80% of the requested compensation. The compensation is under the condition that no employees will be dismissed in the three-month period.	COVID-19 laws already applicable provide for the additional care leave benefit paid from the social security system to the parents of children aged up to 8 years, whose kindergarten or schools have been closed. The expected COVID-19 toolkit is supposed to provide multiple other instruments, such as extended public guarantees, partial public funding of remunerations paid to employees of affected firms, public benefits to those self-employed or providing services under civil law contracts, deferral or putting into instalments of social security contributions and sectoral instruments (such as public assistance to transportation companies in payment of leasing fees).	No special tax measures	Public deeds that formalize amendments of certain mortgage loans are exempt from Stamp Duty.	 Curfew Taxpayers subject to the curfew due to their age (65+) or their chronic illnesses fall into the scope of force majeure. Deferred Tax Obligations The last day of submission and payment of the taxes accrued accordingly are postoned until the end of the 15th day following the last day of the curfew for the abovementioned taxpayers. 	Self-employed individuals and private entrepreneurs are exempt from a monthly payroll tax due for March and April 2020. All tax payers are exempt from penalties for failure to pay, withhold or declare payroll taxes due in the period 1 March to 31 May 2020. Except for tax audits related to VAT refund, all other types of tax audits are restricted from 18 March until 31 May 2020. All on-going tax audits shall be temporary postponed till 31 May 2020. Payroll-related audits are postpone till 18 May 2020. Individuals and legal entities are exempt from payment of land taxes and real estates taxes due for the period of March-April 2020. If those taxes have been already prepaid, a tax payer can claim for tax return or is eligiable to transfer this prepayment to further periods.	The Government has announced the following provisions to help businesses, particularly smaller businesses: a 12-month business rates holiday for all retail, hospitality, nurseries and leisure businesses in England small business grant funding of £10,000 for all business in receipt of small business rate relief or rural rate relief grant funding of £25,000 for retail, hospitality and leisure businesses with property with a rateable value between £15,000 and £51,000 the Coronavirus Business Interruption Loan Scheme offering loans of up to £5 million for SMEs through the British Business Bank a new lending facility from the Bank of England to help support liquidity among larger firms, helping them bridge coronavirus disruption to their cash flows through loans statutory sick pay relief for SMEs under the Job Retention Scheme, all UK employers with PAYE scheme will be able to access support to continue paying part of their employees' salary for those that would otherwise have been laid off during the crisis
Any impacts on ongoing tax audits, disputes or negotiations?		New tax audits would not be initiated. Suspension of ongoing tax audits and negotiations of settlement at least until the end of containment. Tax inspectors may still request documents or suggest a telephone call. Companies can reply that they are unable to answer such requests for the moment. Documents which would normally have to be sent by registered letter can be sent by email. A bill to freeze deadlines of ongoing tax audits may be voted.	Not at the present time.	From 8 March to 31 May 2020 the terms relating to audit, assessment, collection and litigation, granted to the Tax Administration, are suspended. For the same period are also suspended the terms to reply to rulings. For the period between 8 March and 31 May 2020, the payments regarding tax bills and tax assessment notices issued by the Tax Administration and other public Administrations are deferred.	The audiences in relation to the on-going tax disputes in front of the Luxembourg courts may be postponed on a case-by-case basis. In addition, in the coming days new measures may be taken to suspend some procedural deadlines.	No general policy in place. All cases before the Dutch tax courts are currently postponed until 6 April 2020.	Tax authorities will be able, on account of the COVID-19 situation, to suspend, out of their own initiative or upon request of a taxpayer, tax proceedings, inspections and investigations (without an option for the taxpayer to challenge such suspension); the Minister of Finance will also be able to suspend (by way of an implementing decree) entire categories of such proceedings, inspections and investigations. Moreover, the Council of Ministers will be authorized to suspend (by way of an implementing decree) entire categories of enforcement proceedings. In addition, the deadline to provide TP information is expected to be extended until 30 September 2020 (as regards reporting of tax years started after 31 December 2018, but closing prior to 31 December 2019). Furthermore, in the period from 31 March to 30 June 2020 deadlines for MDR reporting of national tax schemes shall be suspended (with cross-border schemes remaining MDR-reportable as usual). In addition, from the practical angle, most of activities that have typically required physical contact, such as meetings, file reviews or court hearings in tax matters, have been suspended until the situation improves. Moreover, delays in circulation of documents, in correspondence and in administrative and court procedures can be expected. However, authorities principally continue functioning and remain available through a number of online tools introduced already previously in various e-government programmes. In addition, various (assumingly) simplified procedures are being launched and template documents published in matters relating to COVID-19 response (e.g. in the area of social security contributions reliefs).	Not at the present time.	Mainly, deadlines to answer requests, to file pleadings regarding taxes and penalties procedures, if they did not end on 17 March 2020, are extended until 30 April 2020. If a notification is received as of 18 March 2020 in relation to any of the abovementioned procedures, the deadline to answer the same is extended until 20 May 2020, unless the legal deadline is longer. The deadline to file appeals and economic-administrative appeals begins on 1 May 2020 (or a later date in case of an extension). Judicial and administrative procedures have been suspended since 14 March 2020 (included) until the end of the state of emergency (currently scheduled for the 28 March 2020, although it is very likely that it will be extended beyond this date). This means that the calculation of the deadlines to submit lawsuits, pleadings, etc. will restart on 30 March 2020 (or a later date in case of an extension), taking into account the remaining days pending to elapse since 14 March 2020 until the end of the legal deadline.	All period of times related to occurence, use and end of a right including filing a lawsuit, application, objection, statute of limitation etc. in the Administrative Procedural Law No. 2577, Criminal Procedural Law No. 5271 and Civil Procedural Law No. 6100 and other period of times stated in other procedural laws will cease starting from 13 March 2020 till 30 April 2020 (including this date). The period of time which is 15 days or less than 15 days to expire by 30 April 2020, will be deemed to extend 15 days. No announcement for the ongoing tax audits.		