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**VALUE ADDED TAX COMMITTEE
(ARTICLE 398 OF DIRECTIVE 2006/112/EC)
WORKING PAPER NO 1051**

**NEW LEGISLATION
MATTERS CONCERNING THE IMPLEMENTATION
OF RECENTLY ADOPTED EU VAT PROVISIONS**

ORIGIN: Netherlands
REFERENCE: New Article 284(1)
SUBJECT: The new special scheme for small enterprises and fixed establishments

1. INTRODUCTION

Council Directive (EU) 2020/285¹ amended the VAT Directive² as regards the special scheme for small enterprises (hereafter: the SME scheme). In the context of the entry into force of the new provisions, which will apply from 1 January 2025, the Netherlands submitted to the VAT Committee a question arising during their preparation for the implementation of the SME scheme, and more specifically with regard to the interpretation of the notion of taxable persons established in the territory of a given Member State. For the sake of legal certainty, it is very important to reach a common and consistent position regarding this notion, which is one of the key concepts from the point of view of the functioning of the reviewed SME scheme.

The question and analysis submitted by the Netherlands are attached in annex.

2. SUBJECT MATTER

As stipulated in the new Article 284(1) of the VAT Directive, under the updated SME scheme, Member States may exempt the supply of goods and services made within their territory by taxable persons who are established in that territory and whose Member State annual turnover does not exceed the national exemption threshold. The latter is set by each Member State and may not be higher than EUR 85 000 or the equivalent in national currency.

The novelty of the scheme lies in the opening of the scheme to non-established SMEs. As stipulated in the new Article 284(2) of the VAT Directive, Member States that put in place the SME scheme must also grant exemption for the supplies of goods and services made in their own territory by taxable persons established in another Member State provided that neither the national turnover threshold nor the Union annual turnover threshold of EUR 100 000 is exceeded.

As therefore clarified in recital 9 of the preamble to Directive 2020/285, SMEs whose turnover in their Member State of establishment (hereafter: MEST) is below the national exemption threshold, may benefit from the exemption in the MEST irrespective of their Union annual turnover. When, however, SMEs established in another Member State want to benefit from the exemption in a Member State, in which they are not established (hereafter: MEX), their turnover must not exceed the national nor the Union turnover threshold.

For the application of the reviewed SME scheme, it is therefore of crucial importance to define the notion of an established SME. In particular, it is necessary to clarify, whether a taxable person having a fixed establishment should be regarded as “established” in a Member State for the purposes of the application of the special scheme for small enterprises.

¹ Council Directive (EU) 2020/285 of 18 February 2020 amending Directive 2006/112/EC on the common system of value added tax as regards the special scheme for small enterprises and Regulation (EU) No 904/2010 as regards the administrative cooperation and exchange of information for the purpose of monitoring the correct application of the special scheme for small enterprises (OJ L 62, 2.3.2020, p. 13).

² Council Directive 2006/112/EC of 28 November 2006 on the common system of value added tax (OJ L 347, 11.12.2006, p. 1).

3. THE COMMISSION SERVICES' OPINION

3.1. Definition of “fixed establishment”

As already pointed out in several Working papers³, for the purposes of the application of the VAT Directive, the concept of fixed establishment is defined only with regard to supplies of services as, in general, it is not relevant for determining the place where supplies of goods are made⁴.

Under the EU VAT legislation, there is one single definition of this concept, and it is provided for in Article 11 of the VAT Implementing Regulation⁵. This provision stipulates the following:

Article 11

1. For the application of Article 44 of Directive 2006/112/EC, a ‘fixed establishment’ shall be any establishment, other than the place of establishment of a business referred to in Article 10 of this Regulation, characterised by a sufficient degree of permanence and a suitable structure in terms of human and technical resources to enable it to receive and use the services supplied to it for its own needs.

2. For the application of the following Articles, a ‘fixed establishment’ shall be any establishment, other than the place of establishment of a business referred to in Article 10 of this Regulation, characterised by a sufficient degree of permanence and a suitable structure in terms of human and technical resources to enable it to provide the services which it supplies:

(a) Article 45 of Directive 2006/112/EC;

(b) from 1 January 2013, the second subparagraph of Article 56(2) of Directive 2006/112/EC;

(c) until 31 December 2014, Article 58 of Directive 2006/112/EC;

(d) Article 192a of Directive 2006/112/EC.

3. The fact of having a VAT identification number shall not in itself be sufficient to consider that a taxable person has a fixed establishment.

It should be noted that even though the concept of fixed establishment appears also in other provisions of the VAT Directive and of the VAT Implementing Regulation, the only definition of this notion in the VAT field is contained in Article 11 of the VAT Implementing Regulation. That definition is derived from settled case law of the Court of Justice of the European Union (hereafter: CJEU).

³ See for example Working papers No 791 and 857.

⁴ With the exception of the supply of gas, supply of electricity and supply of heat or cooling energy through heating and cooling networks, referred to in Articles 38 and 39 of the VAT Directive.

⁵ Council Implementing Regulation (EU) No 282/2011 of 15 March 2011 laying down implementing measures for Directive 2006/112/EC on the common system of value added tax (recast) (OJ L 77, 23.3.2011, p. 1).

As a consequence, tax administrations and other interested parties can only conclude as to the existence of a fixed establishment if the conditions set out under Article 11 of the VAT Implementing Regulation are fulfilled, i.e. if a supplier has an establishment characterised by a sufficient degree of permanence and a suitable structure in terms of human and technical resources to enable it to either⁶ receive and use the services supplied to it for its own needs or to provide the services which it supplies.

3.2. Reasons for including fixed establishments in or excluding them from the notion of the “established enterprises”

The Netherlands in their submission analyse the reasons for including the fixed establishment of a taxable person in or excluding it from the definition of “taxable persons established” in the territory of a Member State.

They note that the term “established” is used in a number of provisions of the VAT Directive and that on many occasions it includes businesses with their seat of economic activity in the territory of a Member State as well as a fixed establishment within that territory. Among the reasons for including a fixed establishment in the definition of an established taxable person, the following are indicated:

- coherence with the current wording of Article 11 of the VAT Directive regarding VAT groups,
- coherence with the interpretation of Article 59c of the VAT Directive regarding the place-of-supply threshold,
- coherence with Article 369a of the VAT Directive concerning the e-commerce Union scheme, under which the notion of “established” includes both the business seat of economic activity and any fixed establishment.

Among the reasons for excluding a fixed establishment from the notion of “established” the Netherlands put forward the following arguments:

- If a fixed establishment were to be included in the notion of an “established” SME, a taxable person with a business seat in Member State A and a fixed establishment in Member State B would be able to escape taxation of their activities thanks to the exemption in both Member States, the availability of which would be independent of the size of the overall annual turnover of this taxable person in the internal market.
- The notion “established” in the new Article 284(1) of the VAT Directive not including the fixed establishment of a taxable person would be compatible with the term as used in Article 44 of the VAT Directive, under which it only includes the business seat of economic activity.

⁶ These two requirements should not be seen as creating different definitions of the concept of fixed establishment for ‘purchasing’ and ‘supplying’ establishments. There is only one single definition of the concept of fixed establishment requiring on the one hand a sufficient degree of permanence and, on the other hand, a suitable structure in terms of human and technical resources the existence of which, however, has to be assessed on a case-by-case basis having regard to the circumstances at stake. This is explained by the fact that in some scenarios the human and technical resources needed for receiving services may not be as important as the resources needed to provide these same services. See also Working paper No 791.

- Finally, it is pointed out that most provisions that include a reference to the fixed establishment within the meaning of an “established” taxable person, do so for specific systemic reasons. Such is the case of Article 3 of the Eighth VAT Directive⁷, Article 44 and Article 369a of the VAT Directive.

3.3. Anti-circumvention rule

While the arguments, be it for or against inclusion of a fixed establishment in the notion of an established taxable person, have their merit and are worth analysing, priority should be given to the systemic and teleological interpretation of the new Article 284(1) of the VAT Directive in order to ensure effective implementation of the new SME scheme.

The objective of the SME scheme is to provide simplification as regards VAT obligations to small enterprises, with limited turnover, whose huge economic and social importance in the internal market is reflected across different EU policies.

With the opening of the SME scheme to non-established SMEs it was necessary to prevent circumvention of the rules by enterprises that might artificially split up their turnover in order to benefit from the exemption in a number of Member States. The anti-abuse mechanism within the SME scheme is linked to the introduction of a Union annual turnover threshold, which according to the new Article 280a(1) of the VAT Directive covers the total annual value of supplies of goods and services made by a taxable person within the territory of the EU during a calendar year.

If it were to be considered that SMEs having a fixed establishment in a given Member State could be seen as also established there, the introduction of the Union annual turnover threshold would be devoid of purpose, because SMEs seen as established may benefit from the exemption in the MEST irrespective of their Union annual turnover.

The Commission services are therefore of the opinion that an effective implementation of the new provisions of the VAT Directive governing the SME scheme requires the exclusion of fixed establishments from the notion of an established SME.

It should be pointed out that such an interpretation is in line with the more general principle confirmed by the established jurisprudence of the CJEU, that the provisions in the VAT Directive concerning exemptions, such as the special exemption scheme for small enterprises, constitute exceptions to the systemic principles of the VAT system and must be therefore interpreted restrictively⁸.

The consequences of the above conclusion in practical terms are that:

- the prior notification has to be sent only to the Member State in which the SME has established its business (and not to that where its fixed establishment is located),
- only the Member State in which the SME has established its business (and not that where its fixed establishment is located) issues and attributes the identification number required for access to the exemption to the SME.

⁷ Eighth Council Directive 79/1072/EEC of 6 December 1979 on the harmonization of the laws of the Member States relating to turnover taxes – Arrangements for the refund of value added tax to taxable persons not established in the territory of the country (OJ L 331, 27.12.1979, p. 11).

⁸ See e.g. judgment of 6 May 2010, *Commission v France*, C-94/09, EU:C:2010:253, paragraph 29.

It should be noted, however, that the above conclusion does not alter the obligation to include the supplies made by the fixed establishment within the calculation of the Union annual turnover of the SME.

3.4. Non-EU SMEs with an establishment in the EU

The only exception to the rule set out above, namely that the existence of a fixed establishment in a Member State does not in itself allow an SME to be considered an SME established in that Member State within the meaning of the new Article 284(1) of the VAT Directive, concerns non-EU SMEs with an establishment in the EU.

If an SME which has its business seat of economic activity outside the EU sets up a fixed establishment in one of the Member States, in accordance with the requirements set out in Article 11 of the VAT Implementing Regulation, then such an SME becomes established within the EU. Legally speaking, it would not be possible to deny it access to the SME exemption, provided that all the conditions for the application of the exemption are met.

For it to be seen to have a fixed establishment, the SME will obviously need to be characterised by a sufficient degree of permanence and a suitable structure in terms of human and technical resources to enable it to make supplies. The fact of holding a VAT identification number will not in itself be sufficient. For those supplies to be exempt, they would need to be made from that fixed establishment.

A further complication could arise in a situation, in which such a non-EU SME possesses more than one fixed establishment within the EU. Similarly to the solution applicable under the e-commerce scheme, such an SME should then have to designate the Member State of one of its establishments that would serve as the MEST in order to avoid circumvention of the rules regarding the Union annual turnover threshold.

One may expect that, given the maximum level of national exemption thresholds and of the Union annual turnover threshold, the number of cases in which SMEs entitled to the VAT exemption would have multiple fixed establishments within the EU, will be rather limited.

3.5. Conclusion

The Commission services are therefore of the opinion that in order to ensure the effective application of the new SME scheme opened to non-established SMEs, the notion of an SME established in a given Member State should not cover an SME having in that Member State a fixed establishment only while having its business seat of economic activity in another Member State.

The only exception to this rule would concern non-EU SMEs. The latter would be considered to be established in the Member State, in which they have set up their fixed establishment.

4. DELEGATIONS' OPINION

The delegations are requested to give their opinion on the issues raised and in particular, to indicate whether they agree with the conclusion that the notion of established SMEs within the meaning of the new Article 284 of the VAT Directive should not cover fixed establishments.

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QUESTION FROM THE NETHERLANDS

On February 22, 2022, the Dutch Ministry of Finance and the European Commission (hereafter: ‘EC’) had an exchange of e-mails regarding fixed establishments in the new special scheme for small enterprises (hereafter: ‘new SME scheme’). In this exchange, we requested the EC’s opinion on how fixed establishments should be treated in the new SME scheme. As a follow-up to this e-mail exchange, we hereby would like to submit this issue for the upcoming VAT Committee.

1. Situation

On 18 February 2020 the Council Directive (EU) 2020/285, that amends Directive 2006/112/EC (hereafter: ‘VAT Directive’) as regards the new SME scheme, came into force. According to the new SME scheme in the VAT Directive, Member States may exempt the supply of goods and services made within their territory by taxable persons who are established in that territory and whose annual turnover does not exceed the national turnover threshold.⁹ These taxable persons whose turnover in the Member State of establishment (hereafter: ‘MS EST’) is below the national threshold, are allowed to use the exemption in MS EST irrespective of their Union annual turnover.¹⁰ Taxable persons established in another Member State are also entitled to use the exemption, provided that the Union annual turnover threshold and the national annual turnover threshold are not exceeded.¹¹ In order for the taxable person to apply the exemption in a Member State in which he is not established (hereafter: ‘MS EX’), this taxable person needs to give a prior notification to MS EST and be identified for application of the exemption in MS EST. Furthermore, the taxable person applying the exemption in MS EX is obligated to quarterly report his turnover to MS EST.¹²

	MS EST	MS EX
National turnover threshold	Yes	Yes
Union turnover threshold	No	Yes
Prior notification procedure	No	Yes
Quarterly reporting	No	Yes

2. Background and issue

The Netherlands is currently preparing the implementation of new SME scheme. During the preparation of our implementation Act, we noticed that the Directive does not specify what should be covered by the definition ‘*taxable persons who are established in that territory*’ in Article 284(1) of the VAT Directive and whether the fixed establishment falls

⁹ Article 284(1) of the VAT Directive.

¹⁰ Recital 9 of the preamble of Council Directive (EU) 2020/285.

¹¹ Article 284(2) of the VAT Directive.

¹² Article 284b(1) of the VAT Directive.

within this definition. Subsequently, we believe that this may lead to discrepancies, as some Member States might and other Member States might not consider a fixed establishment as a taxable person who is established in their territory. We therefore believe it is necessary to discuss this issue at Community level to prevent discrepancies in the cross-border application of the new SME scheme.

3. Question

We wish to draw your attention to the following question:

- I. Can a fixed establishment be regarded as ‘established’ in a Member State for the purposes of the special scheme for small enterprises, which will apply as of 1 January 2025?

4. Effects

The essential effect when the definition ‘*taxable persons who are established in that territory*’ lacks clarity, is that taxable persons do not get an equivalent treatment in all Member States. This will undermine the very purpose of the new SME scheme, that is, to achieve greater effectiveness in reducing VAT compliance costs for small undertakings and creating a more level playing field. After all, if no equal treatment in all Member States is achieved, a taxable person still has to examine on a case-by-case basis whether a fixed establishment can independently opt in for the domestic SME scheme.

The words ‘*taxable persons who are established in that territory*’ can be defined in two different ways: by including or by excluding the fixed establishments. Both ways of defining the fixed establishment may bear specific challenges which should be addressed.

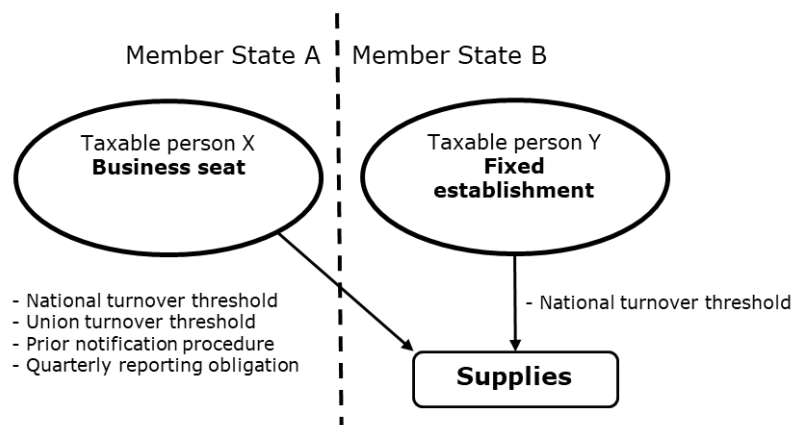
4.1. Effects of including fixed establishments

I. Inconsistency with the objectives of the new SME scheme

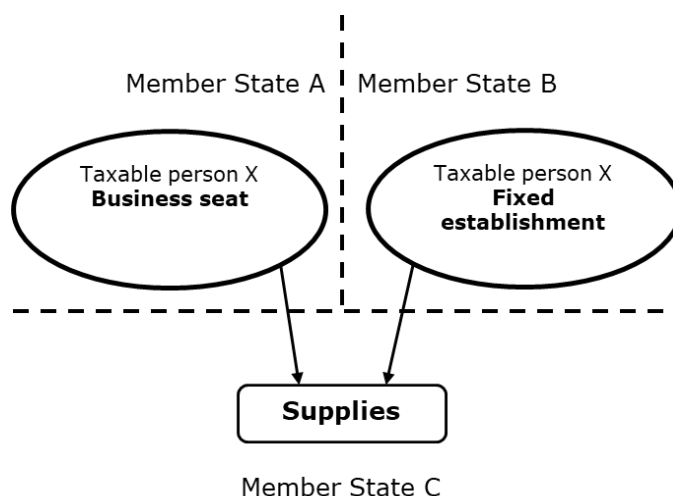
The inclusion of fixed establishments in the definition of ‘*taxable persons who are established in that territory*’ does not seem to be fully consistent with its objective (to reduce the administrative burden and help create a fiscal environment to facilitate the growth of small undertakings). The reasons for this are the following:

- Firstly, including fixed establishments might result in a distortion and negative impact on competition in the internal market for small undertakings who carry out supplies in MS EX. As mentioned in paragraph 1, a taxable person applying for the exemption in MS EST is not subject to the Union annual turnover threshold. Nor is this taxable person subject to a quarterly reporting obligation. On the other hand, a taxable person applying for the exemption in MS EX is subject to both the Union turnover threshold and the national turnover threshold of MS EX. This taxable person is also obligated to report its turnover every calendar quarter. In concrete terms, including the fixed establishment in the definition might mean that taxable person Y with his business seat in Member State A and a fixed establishment in Member State B can opt in for the exemption in both Member States without having to comply with the abovementioned conditions (Union turnover threshold etc.). By contrast, taxable person X with his business seat in Member State A and without any fixed establishments, can opt in for the exemption in Member State B, but has to comply with the abovementioned

conditions for the application of the exemption in Member State B. A schematic overview is included below.

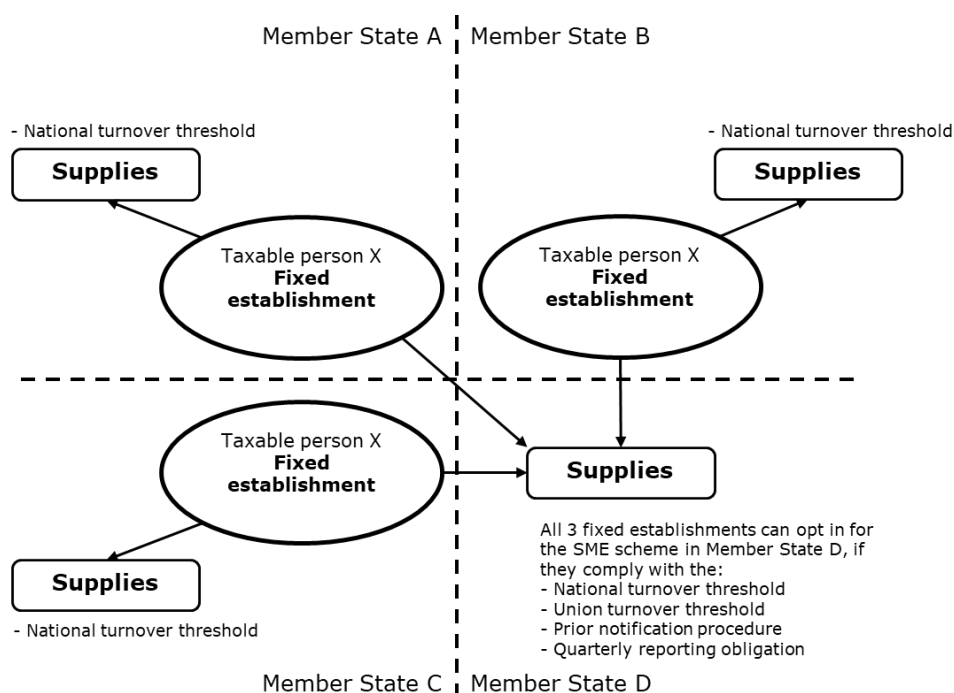


- Secondly, the abovementioned distortion is even greater if fixed establishments themselves can opt in for the exemption in another Member State than the Member State in which they are situated. The text of the VAT Directive does not explicitly exclude a fixed establishment from independently starting the prior notification procedure for the exemption in MS EX. An example: taxable person A has his business seat in Member State A and a fixed establishment in Member State B. This taxable person can opt in for the exemption in both Member States without having to comply with the Union turnover threshold etc. However, this taxable person can also opt in for the exemption in Member State C through the notification procedure in MS EST. Both Member State A and Member State B are considered MS EST as the taxable person is considered to be established in both Member States. The question even arises to what extent taxable person A can use the exemption in Member State C through the notification procedure in Member State A and the fixed establishment through the notification procedure in Member State B, and thus enjoying the exemption (twice) for activities carried out by the fixed establishment and those carried out by the business seat. A schematic overview is included below.



- Thirdly, in isolation or in conjunction with the abovementioned, a taxable person with its business seat in a third country may also opt in for the new SME scheme in a Member State in which it has a fixed establishment. Thus, this taxable person

can enjoy the new SME scheme without having to comply with the Union turnover threshold and the quarterly reporting obligation. An example: taxable person X has his business seat in third country X and multiple fixed establishments in Member States A, B and C. Taxable person X is considered to be established in all those Member States and can therefore opt in for the new domestic SME scheme. Taxable person X only has to comply with the annual national turnover thresholds of the Member States concerned. A schematic overview is provided below.



II. Uncertainty about turnover attribution

An item for consideration is the attribution of turnover. In this regard the question arises whose annual turnover is relevant when determining the Union or annual turnover. It is unclear if the taxable person should include in his prior notification the turnover that is attributable to both the business seat as well as the fixed establishment, or the turnover that is attributable to the fixed establishment or business seat that starts the prior notification procedure. This also effects the assessment of the Union turnover threshold and the assessment of the national annual turnover threshold.

III. Conceptual differences of 'fixed establishments'

A conceptual difference of what constitutes a 'fixed establishment' might occur. This could result in a situation in which a specific presence in one Member State might be considered a 'fixed establishment', but the same presence might not fulfill the conditions of qualifying as a 'fixed establishment' in another Member State. For example, this might occur when dealing with so-called call-off stock warehouses. From the Guidelines from the 113th meeting it can be gathered that the VAT Committee did not unanimously agree that a warehouse can be considered as a fixed establishment if it is owned and directly run by the supplier with his own means present in the Member State where the warehouse is located.

4.2. *Effects of excluding fixed establishments*

The consequences of excluding the fixed establishment are, so far, primarily observed when a taxable person has his business seat of economic activity established in a third country. In the scenario that Member States only qualify the business seat of economic activity as ‘established’ in their respective territories for the purposes of the new SME scheme, fixed establishments located in a territory of a Member State will not be considered ‘established’. Consequently, a taxable person with a business seat situated in a third country can never opt in for new SME scheme in any Member State, as the fixed establishment is not included in the notion ‘established’.

5. Causes

The main cause of the issue is that the directive does not specify what should be covered by the definition ‘*taxable persons who are established in that territory*’. That fact that there are arguments on both sides, creates even more uncertainty.

5.1. *Reasons to include fixed establishments*

Member States might believe that, based on a directive-technical point of view, the fixed establishment should be considered as ‘established’ for the purposes of the new SME scheme. The concept ‘established’ has been used by the legislator in multiple provisions of the VAT Directive and includes businesses with their seat of economic activity in the territory of the Member State as well as fixed establishments in the territory of the Member State. There are several provisions that support such an interpretation:

- Firstly, it is in line with the current wording of Article 11 of the VAT Directive regarding the VAT group. This provision contains a territoriality criterion. The VAT grouping scheme can only be applied by persons established in the territory of that specific Member state. From settled case-law of the CJEU it is clear that a ‘person established in the territory of that Member State’ also includes fixed establishments situated in the territory of the Member State implementing the VAT grouping scheme. Accordingly, both businesses with their seat of economic activity or fixed establishments of such businesses that are physically present in the territory of the Member State are considered ‘established’.
- Secondly, the notion ‘established’ within the meaning of Article 284(1) of the VAT Directive corresponds to ‘established’ as it can be found in Article 59c of the VAT Directive regarding the place-of-supply-threshold and must therefore be interpreted in the same way. Just as in Article 284, Article 59c only contains the notion that “*the supplier is established (...) only in one Member State*”. Both provisions do not contain the notion ‘fixed establishment’, but it is common practice to include the fixed establishment within the meaning of ‘established’ in Article 59c.¹³
- Finally, the legislator has explicitly included or excluded fixed establishments from the notion ‘established’ in various provisions. Articles 369a to 369k of the VAT Directive regarding the Union scheme are a case in point. Article 369a provides a concept of ‘*taxable person not established in the Member State of consumption*’. This provision explicitly defines ‘*taxable person not established in*

¹³ European Commission, *Explanatory Notes on VAT e-commerce rules*, September 2020.

the Member State of consumption’ as a taxable person who has not established his business or has a fixed establishment within the territory of the Member State of consumption. Thus, the notion ‘established’ within the meaning of the Union scheme includes both the business seat of economic activity as well as the fixed establishment. By extension, Article 369a also provides a concept of ‘*Member State of identification*’. The legislator explicitly excluded the fixed establishment from this notion in case the taxable person has a business seat in the Union.

5.2. *Reasons to exclude fixed establishments*

Member States might take the view that, based on a teleological and directive-technical point of view, fixed establishments should not be considered as ‘established’ for the purposes of the new SME scheme. There are a number of arguments in support of such an interpretation:

- Firstly, a taxable person with a business seat in Member State A and a fixed establishment in Member State B would be able to escape taxation of their activities, under the cover of exemptions in force in those Member states, even though those activities, taken as a whole, would objectively exceed the level of activities of a small undertaking. This would be irreconcilable with the need to encourage only small undertakings by means of exemption from the principle of taxation.
- Secondly, the notion ‘established’ within the meaning of Article 284(1) of the VAT Directive would correspond to ‘established’ as it can be found in Article 44 of the VAT Directive regarding the place of supply of services. Article 44 of the VAT Directive stipulates that the business seat of economic activity is ‘established’. The fixed establishment is, according to Article 44, ‘located’. Thus, from this point of view, the notion ‘established’ would only include the business seat of economic activity.
- Thirdly, most provisions that include the fixed establishment within the meaning of ‘established’, have an obvious reason to do so. For example, Article 3 of the Eighth Directive, Article 44 or Article 369a of the VAT Directive. Regarding Article 3 of the Eighth Directive, this article stipulates that the Directive is not applicable to any taxable person established in the Member State of refund. The taxable person is considered ‘established’ if its business seat or fixed establishment is in the Member State of refund. The main justification for including the fixed establishment within the notion ‘established’ is that the fixed establishment must submit VAT returns in the Member State in which it is located. In contrast with these provisions, there might not be an obvious reason to include the fixed establishment within the meaning of ‘established’ in the new SME scheme.

The main challenge of this point of view would be to substantiate whether this interpretation is in line with the principle of freedom of establishment as set out in Article 49 of the TFEU. In principle, article 49 of the TFEU enables fixed establishments of foreign businesses to benefit from the same tax opportunities as those provided to businesses governed by national law in the Member State concerned.

However, Member States might be of the opinion that fixed establishments and businesses in a Member State are not in equal circumstances that require equal treatment. Objectively, the fixed establishment is part of a legal entity and therefore it not only depends on its own performance, but also on how other components of the legal entity to which the fixed establishment belongs, perform. If the fixed establishment fails to comply with any obligation, creditors may seek recourse against the whole legal entity's assets. Vice versa, creditors of other components of the legal entity may also seek recourse on the assets of the fixed establishment. In contrary to fixed establishments, independent businesses in a Member State, such as small undertakings or subsidiaries (in principle), bear all economic risks associated with their activities. The Case C-210/04 *FCE Bank* supports this interpretation. In *FCE Bank* the CJEU ruled that a fixed establishment, which is not a legal entity distinct from the company of which it forms part, located in another Member State and to which the company supplies services, should not be treated as a separate taxable person. More specifically, the fixed establishment cannot be treated as an independent entity, as the branch itself did not bear any economic risk associated with the activities.

6. Conclusion

As a precaution against an incoherent application of the new SME scheme, we felt it was necessary to place this issue on the agenda for the upcoming VAT Committee. We trust that this is in accordance with your requirements and look forward to receiving the opinions of the VAT Committee. If you require further information or clarification, please do not hesitate to contact us.