

The 4th Belt and Road Initiative Tax Administration Cooperation Forum

- Improving Tax Environment

Tbilisi Georgia 11-13 September 2023



Organizing the process of disputes



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Presentation based on:



THE DUTCH APPROACH Description of the Dutch Tax and Customs Administration

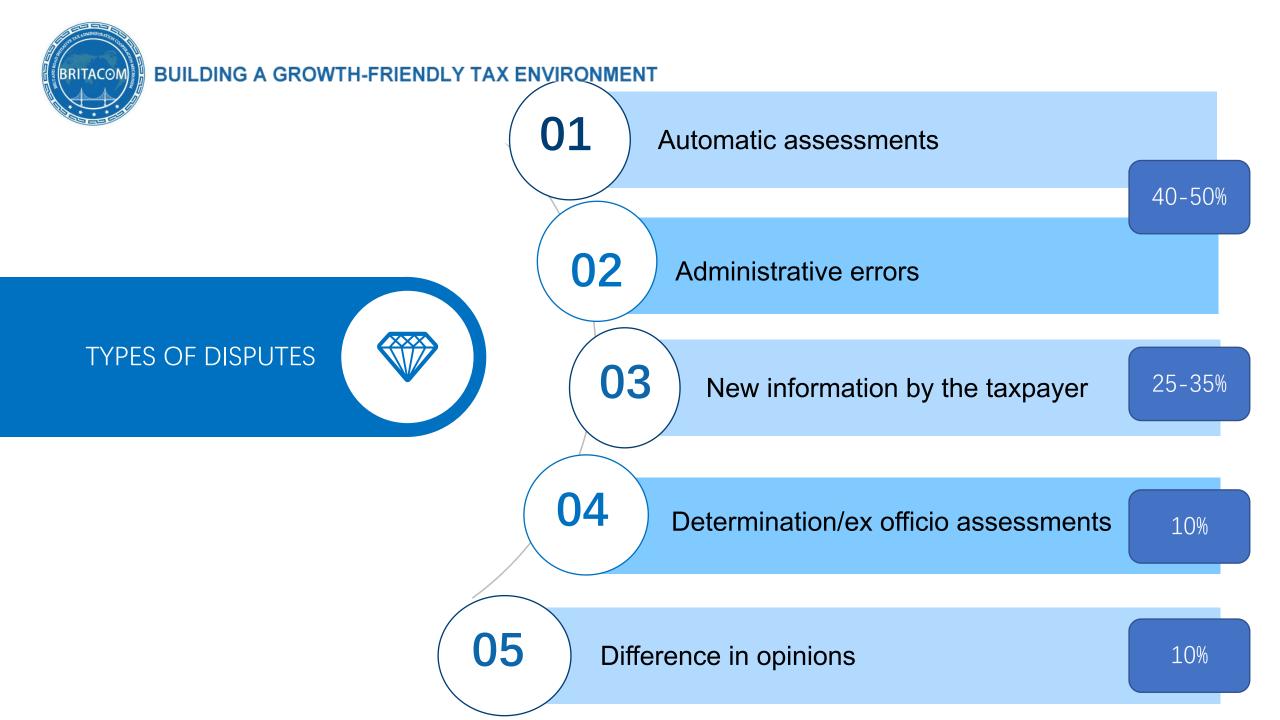


税收管理手册 - 世界税收管理理论与实践概览

IBFD

主戦の「行」何关え(Alink, M.) 科政(Kommer, V. V.) 類问の私志身 日本の主道州 冬

四中国社动出版社



01 | Receiving appeal

| 02 | Processing appeal

- **Re-assessment procedure**
- Communication with taxpayerdifferent channels
- $rac{1}{05}$ Taxpayer (dis-) or agrees
- I 06 Taxpayer appeals again higher level → repetition of process



Dispute processes

01 | First assessor (independent?)

| 02 | Second or independent assessor

Separate appeal department

□4 | Ombudsman

Courts

Increasing process time
Transfer of files
Multiple officers involved
Risk of mistakes



Disputes and levels

BRITACON

Production and Process time

	Production time	Process time	
Automatic assessment	Seconds	Seconds	
Automatic assessment with some checks	Minutes	Minutes	sts
Assessment with desk review	Hours	Days	ng costs time
Assessment with interviewing taxpayer	Day	More days	Increasi and
Field audit SME	3-5 Days	2-3 weeks	<u> </u>
Dispute	Weeks	Months	







Self Assessment

Reducing risks and more ownership taxpayer



Pre-populated tax returns

Sharing information at the beginning reduces disputes



Third party information

Data exchange with employers, banks, other public services



Communication

Information and education through many channels



COMPLIANCE

Organising the dispute channel to courts

Follower notice, case selection for legal ruling

Cooperative compliance

• Knowing the business, rely on admin, future agreements



Inflation and interest aspects

Succession issues and increasing process time, what leads to higher administrative costs and compliance costs Finally also collection issues Long process time undermines trust among taxpayers Dispute handled in < 3 months- 40% in favor TP If > 6 months 90% in favor TP It is all about timely communication with taxpayer and/or tax advisor





THANKS v.vankommer@ibfd.org

