

Editorial

Tax Technology for the European Union!

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Beyond the adopted Pillar 2 Directive, the European Commission has recently published several legislative initiatives, namely the Business in Europe: Framework for Income Taxation (BEFIT), the Head Office System of Taxation (HOT), the Fast Track Assured and Safer Tax Excess Refunds (FASTER), the VAT in the digital age (ViDA) as well as the DEBRA proposals. The proposals would, if adopted, add a whole new layer of far-reaching and complex substantive provisions to EU secondary tax law. At the same time, they would mark a decisive step towards digitized taxation processes. The article briefly sketches the corresponding provisions in the ViDA and FASTER proposals, which are particularly relevant in this context. It starts with the ViDA proposal, before turning to the FASTER proposal. It argues that in both cases there are some points that need to be addressed in the legislative procedure so as to fully reap the potential from digitized tax processes. Nevertheless, the proposals are highly welcome, as they promote EU digitized tax processing. These directives may well mark the transition to the age of EU tax technology.

Keywords: Tax technology, digitized tax processing, ViDA, e-invoicing, VAT reporting, FASTER, eCTR, residence certificates, tax treaty residence

The proposals in the Commission's VAT in the digital age (ViDA) package and the Fast Track Assured and Safer Tax Excess Refunds (FASTER) proposal contribute to the emergence of EU digitized tax processing. While the highly welcome proposals still may be modified in the legislative procedure so as to fully reap the potential from digitized tax processes, they might well trigger a breakthrough in EU tax technology.

1 INTRODUCTION

The field of European taxation has recently seen a flurry of legislative initiatives by the European Commission. In September 2023, the Commission presented the Business in Europe: Framework for Income Taxation (BEFIT) proposal for a common corporate tax base,¹ which replaces the now withdrawn Common Corporate Tax Base² and Common Consolidated Corporate Tax Base³ proposals. It equally launched the proposal for a directive establishing a Head Office Tax system for

micro, small and medium sized enterprises (HOT).⁴ The directive would give SMEs the option to apply the taxation rules of the head office Member State also for computing the taxable result of its permanent establishments. Going back just slightly longer, the Commission has also published the FASTER proposal in June 2023.⁵ The directive is to provide faster and safer relief from excess withholding taxes on cross-border dividends in the internal market. In December 2022, it issued its ViDA package,⁶ which addresses three key issues: Firstly, the VAT treatment of the platform economy, where the deemed supply rules are to be extended to supplies in online marketplaces and to short-term accommodation rental and passenger transport; secondly, the uniform VAT registration and the one-stop shop for importation; and thirdly, the digital reporting obligations combined with the new regulation of e-invoicing. Finally, the debt equity bias reduction allowance (DEBRA) proposal from May 2022 combines a deduction for new equity capital of companies, with a limitation of the deductibility of interest.⁷ While some of the proposals may appear as

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¹ European Commission, Proposal of 12 Sep. 2023 for a COUNCIL DIRECTIVE on Business in Europe: Framework for Income Taxation (BEFIT), COM(2023) 532 final.

² European Commission, Proposal of 25 Oct. 2016 for a COUNCIL DIRECTIVE on a Common Corporate Tax Base, COM(2016) 685 final.

³ European Commission, Proposal of 25 Oct. 2016 for a COUNCIL DIRECTIVE on a Common Consolidated Corporate Tax Base, COM(2016) 683 final.

⁴ European Commission, Proposal of 12 Sep. 2023 for a COUNCIL DIRECTIVE establishing a Head Office Tax system for micro, small and medium sized enterprises, and amending Directive 2011/16/EU, COM(2023) 528 final.

⁵ European Commission, Proposal of 19 Jun. 2023 for a COUNCIL DIRECTIVE on Faster and Safer Relief of Excess Withholding Taxes, COM(2023) 324 final.

⁶ See in particular Proposal of 8 Dec. 2022 for a COUNCIL DIRECTIVE amending Directive 2006/112/EC as regards VAT rules for the digital age, COM/2022/701 final.

⁷ European Commission, Proposal of 11 May 2022 for a COUNCIL DIRECTIVE on laying down rules on a debt-equity bias reduction

something of a long shot with uncertain prospects in the Council, the adoption of the Pillar Two-Directive⁸ suggests a greater than expected willingness on the part of Member States to agree to far-reaching steps.

The proposals would, if adopted, add a whole new layer of far-reaching and complex substantive provisions to EU secondary tax law. At the same time, they would mark a decisive step towards digitized taxation processes. In the following, we will briefly sketch the corresponding provisions in the ViDA and FASTER proposals, which are particularly relevant in this context. We start with the ViDA proposal (2.), before turning to the FASTER proposal (3.). We will argue that in both cases there are some points that need to be addressed in the legislative procedure so as to fully reap the potential from digitized tax processes. Nevertheless, the proposals are highly welcome, as they promote EU digitized tax processing. Or in other words: With these directives, we might well enter the age of EU tax technology!

2 DIGITAL PROCESSES IN THE ViDA-PROPOSAL

The digital processes in the ViDA proposal have to be seen against the background of frantic activities by Member States. In the last years, a number of them have introduced the obligation to issue digital invoices (e-invoicing) and obligations to report transactions to the tax authorities.⁹ Seminally, Italy introduced the mandatory transmission of VAT invoices via the *sistema di interscambio* as a central government platform a few years ago.¹⁰ The system represents a deviation from the EU legal requirements of the VAT System Directive and therefore had to be approved under Article 395. Subsequently, other Member States have introduced or are about to introduce their own systems.¹¹

allowance and on limiting the deductibility of interest for corporate income tax purposes, COM/2022/216 final. On this, see e.g., Roland Ismer, *A Zebra or a Donkey? The European Commission's Proposal for a Debt-Equity Bias Reduction Allowance (DEBRA)*, 31(4) EC Tax Rev. 164–170 (2022), doi: 10.54648/ECTA2022017; Eric C. Kemmeren, *Taxing Interest in the Debtor State as an Alternative to DEBRA*, 32(2) EC Tax Rev. 43–53 (2023), doi: 10.54648/ECTA2023010 as well as Dieter Bettens, *The DEBRA Directive and Its Interplay With Pillar 2*, 50(12) Intertax 907–922 (2022), doi: 10.54648/TAXI2022097 and Tibor Schober, *Der Kommissionsvorschlag für einen Freibetrag als Anreiz gegen eine Bevorzugung der Fremdgegenüber der Eigenkapitalfinanzierung v. 11.5. 2022 (DEBRA) – Überblick und erste offene Fragen*, 104(19) FinanzRundschau 874–881 (2022), doi: 10.9785/fr-2022-1041903.

⁸ Council Directive (EU) 2022/2523 of 14 Dec. 2022 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union, OJ L 328 (22 Dec. 2022), at 1–58.

⁹ This section draws on Roland Ismer & Quirin Jackl, *Die Mehrwertsteuer im digitalen Zeitalter: Deutschland auf dem Weg zur verpflichtenden elektronischen Rechnung bei der Umsatzsteuer*, 72(16) UmsatzsteuerRundschau 632–636 (2023), doi: 10.9785/ur-2023-721603.

¹⁰ See e.g., Roland Ismer, *Towards Mandatory E-Invoicing for VAT and a Common Clearance System: Rich Pickings from Embracing Technology!*, 30(3) EC Tax Rev. 82–85 (2021), doi: 10.54648/ECTA2021010.

As the differing invoicing requirements between the Member States risk fragmenting the internal market, the European Commission presented a proposal for a directive in December 2022.¹² The proposal pursues a two-fold aim: On the one hand, the VAT gap should be reduced and VAT fraud combated. On the other hand, efficiency advantages for the economy are to be achieved and the danger of fragmentation of the internal market is to be averted. Accordingly, two instruments are envisaged, namely (1) standards for e-invoices and (2) a new digital reporting system. The proposal for a directive also seeks to achieve a carefully balanced compromise between harmonization and Member State autonomy. Against this background, it distinguishes between intra-Community transactions, on the one hand, and domestic transactions, on the other. The proposed ViDA directive makes far-reaching mandatory requirements for intra-Community transactions. By contrast, it treads more cautiously for purely domestic transactions. In that respect, Member States retain some leeway for purely domestic transactions, while the proposal also seeks to promote a certain degree of standardization.

2.1 E-invoicing

If adopted as originally envisaged, electronic invoices could be sent without the consent of the recipient as early as 2024.¹³ In addition, a structured format would be specified for electronic invoices, as is already the case for B2G transactions.¹⁴ Other forms of invoices would remain possible in principle. The Member States may, however, make electronic invoicing mandatory. If they choose to do so, they must then allow invoices in accordance with the European Committee for Standardization (Comité Européen de Normalisation; CEN) format.¹⁵ From 2028 onwards, electronic invoices in the structured data format would become mandatory for cross-border transactions. In any case, transmission in CEN format¹⁶ would also be admissible for domestic transactions. Invoices on paper or other electronic formats.

¹¹ See International Observatory on Electronic Invoicing, <https://www.observatori.net/en/research/active-observatories/international-observatory-on-electronic-invoicing>.

¹² COM(2022)701 final v. 8 Dec. 2022, Proposal for a Council Directive amending Directive 2006/112/EC as regards value added tax provisions for the digital age (hereafter referred to as proposed ViDA directive). S. on this the accompanying Impact Assessment SWD(2022)393 as well as, e.g., Madeleine Merckx, John Gruson, Naomie Verbaan & Bart van der Doef, *VAT in the Digital Age Package: Viva la ViDA or Livin'la ViDA Loca?*, 32(3) EC Tax Rev. 127–141 (2023), doi: 10.2139/ssrn.4437300.

¹³ Compare the deletion of Art. 232 VAT Directive by Art. 1 (9) of the proposed ViDA directive.

¹⁴ Compare Art. 1 (6) of the proposed ViDA directive for a definition of electronic invoices in Art. 217 VAT Directive to this effect.

¹⁵ Compare Art. 1 (7) of the proposed ViDA directive on the amendment of Art. 218 VAT Directive.

¹⁶ The European standard on e-Invoicing (EN 16931) was developed and published by the CEN. It is already applicable to e-invoicing B2G transactions under Directive 2014/55/EU of the European Parliament and of the Council of 16 Apr. 2014 on electronic

however, would only be possible where permitted by the respective Member State.

Moreover, five points appear noteworthy: Firstly, from 2028, a two-day deadline for issuing the invoice is envisaged for cross-border intra-Community services.¹⁷ Although this serves to accelerate the procedure and safeguard the reporting system, it would mark a considerable change from the previous system, where there are no explicit requirements for the time of issuing the invoice. Secondly, as of 2028, summary invoices pursuant to Article 223 VAT Directive would no longer be permitted, both for domestic and cross-border transactions.¹⁸ Thirdly, the draft directive explicitly states that prior clearance could no longer be required. The meaning of this provision is not yet entirely clear, especially in view of the system of invoice transmission via the sistema di interscambio introduced in Italy.¹⁹ Fourthly, it is surprising that the proposal calls for an extension of the information on invoices and in particular would require the provision of bank details.²⁰ Fifthly and finally, the proposal for a directive does not contain any specifications on the transmission channel of the electronic invoice. In particular, it does not provide for any transmission protocols.

2.2 Reporting System

From 2028, additional provisions on a reporting system would come into force. Under these rules, which would be contained in a separate section of the VAT Directive, Member States would have to introduce a *near-real-time* reporting system for intra-Community supplies, intra-Community acquisitions and cross-border reverse charge transactions based on the invoice information. Businesses would be obliged to report such transactions to the Member State in which they are established or registered within a maximum period of four days. The reporting system on transaction data would replace the previous recapitulative statement. It would contain all the data that already has to be transmitted, but would break it down to transaction level. The payment information, which would become mandatory billing information in the future, would also have to be reported. For purely domestic transactions, on the other hand, Member States would be left with considerable leeway.

invoicing in public procurement Text with EEA relevance, OJ L 133 (6 May 2014), at 1–11.

¹⁷ Article 2 (13) of the proposed ViDA Directive provides for an amendment to Art. 222 (1) of the VAT Directive from 1 Jan. 2025 to the effect that the invoice must be issued no later than the fifteenth day of the month following the month in which the chargeable event occurred. However, Art. 4 (4) of the draft VAT Directive then shortens the deadline to no later than two days after the chargeable event has occurred.

¹⁸ Compare Art. 4 (5) of the proposed ViDA directive.

¹⁹ Compare Art. 218 (3) VAT Directive as of 1 Jan. 2028 as modified in accordance with Art. 4 (4)(3) of the proposed ViDA directive.

²⁰ Compare the planned addition to Art. 226 (17) VAT Directive by Art. 4 (6) of the proposed ViDA directive.

They could introduce a comparable national reporting system. In this case, electronic invoicing would also be mandatory here. Otherwise, Member States could deviate from the electronic invoice as the default option for the purely domestic case.

2.3 Challenges for the Legislative Process

Speed is of the essence in the field of tax technology. Thus, a rapid adoption of the proposal would be more than welcome. However, it still faces certain challenges. First and foremost, the unanimity requirement of Article 115 TFEU must be observed. Compromises must therefore be found that take into account the specific needs of the individual Member States. In this context, particular mention should be made of Italy, which has earned considerable merit as a pioneer and has a very well-functioning system. Beyond this, it is also necessary to safeguard the interests of those companies that already exchange electronic invoices via existing data exchange systems (Electronic Data Interchange (EDI) systems). A form of grandfathering with or without time limits seems conceivable here, at least if these systems can provide the tax authorities with the data required under the reporting system.

3 THE FASTER PROPOSAL

The proposal for a FASTER Directive would introduce standardized digital certificates of residence and improve withholding tax relief for cross-border portfolio dividends from 1 January 2027.²¹ It would also create standardized reporting requirements for certified financial intermediaries and national registers on such financial intermediaries. Thereby, it would seek both to remove tax obstacles for (portfolio) investments in other Member States and to combat tax fraud and abuse.

The proposed directive would bring three major innovations: First, it would create standardised²² digital residence certificates. Secondly, it would accelerate withholding tax relief on cross-border dividend payments from publicly traded shares.²³ The obligation would be directed at Member States levying excess taxes on dividends paid to non-residents. Such excess taxes arise where the general domestic withholding tax rate is higher than the rate applicable to non-residents, either due to tax treaties or to specific national legislation.²⁴ The proposed directive would give

²¹ This section draws on Roland Ismer & Quirin Jackl, *Digitale Ansässigkeitsbescheinigung und verbesserte Quellensteuerentlastung – Der FASTER-Richtlinienvorschlag der Kommission zur Quellenbesteuerung*, 61 (41) Deutsches Steuerrecht 2249–2255 (2023).

²² European Commission, Report of expert group – Ways to tackle cross-border tax obstacles facing individuals within the EU, 2015, at 37 and 41.

²³ Compare Arts 1; 2(2)(1) of the proposed FASTER directive.

²⁴ For the definition, see Art. 3(1) of the proposed FASTER directive.

Member States the choice between immediate relief at source and a quick refund within fifty days of payment of the dividends. Member States would also be allowed to extend the scope to withholding taxes on interest payments from publicly traded debt securities.²⁵ Thirdly, the directive would create standardised reporting requirements for certified financial intermediaries and national registers on such financial intermediaries.

3.1 Digital Process on Residence Certificates

Residence certificates are issued by the tax authorities of the State of residence. They confirm that taxpayers are tax residents of that state and thus entitled to (treaty) benefits.²⁶ The tax authorities thereby confirm that they assume that the conditions for tax residency under the respective treaty are met.²⁷ However, they are binding neither for the non-residence state²⁸ nor for a later assessment in the state of residence.²⁹

The proposed Directive would replace the current paper-based system with a common EU digital tax residence certificate (electronic Tax Residence Certificates or eTRC).³⁰ Based on an automated process,³¹ all Member States would have to issue the certificates in the same digital form and with the same content.³² As a rule, they would have to do so within one working day of the submission of an application.³³ The certificates would be valid for at least the entire year in which they are issued.³⁴ Investors with a diversified portfolio in the EU would thus need only one digital residence certificate to apply for several refunds in the same calendar year.

The proposal lies at the intersection between tax law and tech. This suggests that the proposal does not just raise issues on the tech side, but can profit from input from the legal domain. Unfortunately, it does not yet sufficiently reflect the intricacies of residence under tax treaties. While the provisions corresponding to Article 4(1) OECD Model Convention (MC) build on domestic unlimited tax liability, they contain no full reference to national law. Rather, Article 4(1) OECD MC requires that the residence

determined according to domestic rules must be determined on the basis of the domicile, the habitual abode, the seat, the place of management or any other criterion of a similar nature. According to general opinion, similarity requires a territorial connecting factor.³⁵ Thus, an unlimited domestic tax liability is not always sufficient for claiming treaty benefits. For example, an unlimited tax liability implementing the CJEU's *Schumacher* case law³⁶ or an unlimited tax liability based on nationality or the place of incorporation³⁷ is not sufficient. Rather, there must be reasons for the unlimited tax liability that link the taxpayer, rather than the sources of income to the territory. Moreover, certificates certifying residency under the OECD MC would not be sufficient either. This is because residency is to be determined in accordance with the pertinent tax treaties. There is no general residency for all tax treaties, but only residency specific to each treaty. This becomes significant if the respective treaty (exceptionally) deviates from the OECD MC and provides for completely different criteria for residency, such as nationality.³⁸

Therefore, the precise reason for the unlimited tax liability should be included in the certificates. This would allow the authority applying the treaty to rely on the certificates in order to check whether the conditions of the respective tax treaty, which might diverge from the OECD MC, are met. Ideally, in order to avoid problems in triangular constellations, the certificates could also be linked in such a way that it could be verified if a person is resident of more than one State.

3.2 Improved Relief Procedures

The proposal further contains improved relief procedures for Member States that levy excess withholding taxes. The relief would require a request by certified financial intermediaries, which they have to make when the registered owners authorise them to do so on their behalf. The certified financial intermediaries would have to verify³⁹ in particular the digital residency certificate of the registered owner or, in case of tax residence in a third country, an appropriate proof. They must also verify the registered owner's right to a specific reduced

²⁵ Compare Art. 2(2)(2) of the proposed FASTER directive.

²⁶ Roland Ismer & Katharina Blank, *Article 4 (Residence)*, in *Klaus Vogel on Double Taxation Conventions* m. no. 70 (Ekkehart Reimer & Alexander Rust eds, 5th ed. 2022); Yohanes Janitra Jaya, *Administrative Requirements for Claiming Treaty Entitlement: Problems and Solutions*, 70(5) *Bull. Int'l Tax'n* (2016); Raffaele Russo, *Administrative Aspects of the Application of Tax Treaties*, 63 (5) *Bull. Int'l Tax'n* 482–488 (2009).

²⁷ Similarly Russo, *supra* n. 26, at 483, according to whom the declarations are made 'to the best of their knowledge'.

²⁸ German Supreme Tax Court, *Bundessteuerblatt II* 2005, 835.

²⁹ Thus explicitly HMRC, *International Tax Manual*, INTM162040, <https://www.gov.uk/hmrc-internal-manuals/international-manual/intm162040>.

³⁰ Recital 4 of the proposed FASTER directive.

³¹ Compare Arts 2(1); 4(1) of the proposed FASTER directive.

³² For the information, see Art. 4(2)(2) of the proposed FASTER directive.

³³ Article 4(2)(1) in conjunction with Art. 4(4) of the proposed FASTER directive.

³⁴ Article 4(3) of the proposed FASTER directive.

³⁵ Roland Ismer & Michael Blank, *Article 4 (Residence)*, in *Doppelbesteuerungsabkommen* m. no. 110 (Klaus Vogel & Moris Lehner, 7th ed. 2021), with further references.

³⁶ CJEU of 14 Feb. 1995, C-279/93, ECLI:EU:C:1995:31 – *Schumacher*.

³⁷ See Roland Ismer, *History and Emergence of the Corporate Residence Concept in Europe: A Comparative Approach*, in *Corporate Tax Residence and Mobility*, 27 at 44, 56f, 60–67 (Edoardo Traversa ed. 2018).

³⁸ In some US tax treaties, citizenship establishes residence under the treaty (cf. Art. 4 (1), sentence 1 US Model Convention). Moreover, in the case of legal persons, however, some tax treaties are based on the place of incorporation, such as the tax treaties between Germany and Bulgaria, Finland, the Netherlands and Hungary (cf. the treaty overviews in Ismer & Blank, *supra* n. 35, Art. 4 m. no. 140).

³⁹ Compare Art. 11 (2) of the proposed FASTER directive.

rate of withholding tax under the relevant tax treaty or national legislation of the source Member State.

Member States would then have the choice between two types of procedures, namely a relief procedure at source⁴⁰ and quick refund procedures.⁴¹ In the relief at source procedure,⁴² the tax rate according to the applicable provisions of the double taxation treaty would already be applied at the time of payment. In our context, the alternative quick refund procedure appears more interesting. Under the procedure, the excess withholding tax would initially be withheld, taking into account the withholding tax rate of the Member State in which the dividends or interest are paid. However, the Directive would guarantee a quick refund of excess tax paid. Within twenty-five days, the certified financial intermediaries would have to submit the refund application.⁴³ Within another twenty-five days after receipt of the complete application, the Member States would have to process the application.⁴⁴ The proposal contains a clause which empowers the Commission to adopt implementing acts laying down standard computerised forms, including the linguistic arrangements, and requirements for the communication channels for the submission of requests.⁴⁵

3.3 Reporting Obligations to Fight Tax Fraud

The directive would also create standardised reporting obligations for certified financial intermediaries in order to prevent tax fraud.⁴⁶ This would also apply to dividends to which neither the relief at source procedure nor the quick refund procedure apply. For these, too, certain mandatory information would have to be submitted to the tax authorities.⁴⁷

4 THE WIDER CONTEXT

Digitization is of course not new to the field of European taxation. For example, Article 8 of the Directive on Administrative Cooperation provides for the mandatory automatic exchange of information, but this primarily involves the tax authorities. While taxpayers do have to provide the authorities with information, there is no uniform standard for that.⁴⁸ The Central Electronic System of Payment Information (CESOP) Directive⁴⁹

has inserted Articles 243a ff. into the VAT Directive, obliging payment service providers to keep sufficiently detailed records and to report certain cross-border payments in a predefined standardized form with a view to combatting VAT fraud. Both the ViDA and the FASTER proposals go significantly further. They not only facilitate Union-wide digital standards, but contain rules on invoicing and certificates of residence that lie at the heart of tax procedures. Beyond that, Articles 57 et seq. of the BEFIT proposal, which deal with the filing the BEFIT information return, could be complemented by rules and standards on digital filing. Both the ViDA and the FASTER proposals still need some fine-tuning in the legislative procedure to fully reap the potential from digitized tax processes, e.g., through stating the precise reasons for the unlimited liability to tax in the certificate of residence under the FASTER proposal. Nevertheless, they will make a significant contribution to the emergence of EU digitized tax processing. Or in other words: Currently, we might well live the transformation to an era marked by EU tax technology. Certainly, such transition processes need to be managed carefully. In particular they must not overwhelm SMEs. Nevertheless, standardization promises a significant strengthening of the internal market. It is highly welcome and should not be unduly delayed. It might then be incumbent upon the next Commission to assemble the individually welcome pieces into a coherent and possibly even comprehensive whole.

Beyond that, EU rules prescribing the use of technology in the field of taxation require the management of such digital processes. This also has potentially wide-reaching implications for practice and education in the field of taxation. A growing focus on digital processes implies that tax practitioners will increasingly need a thorough understanding of the tech side. They may not need to acquire the full set of skills to implement the processes themselves. However, they will ideally need some kind of bilingualism in law and tech. Only when they have a sufficient understanding of the tech side of the processes, can they fully contribute their knowledge regarding the legal domain.

⁴⁰ Compare Art. 12 of the proposed FASTER directive.

⁴¹ Compare Art. 13 of the proposed FASTER directive.

⁴² Compare Art. 11 of the proposed FASTER directive.

⁴³ Article 13 (1) of the proposed FASTER directive. In the event of non-compliance, the sanction provisions to be created by the Member States according to Art. 17 of the proposed FASTER directive should apply.

⁴⁴ Article 13 (2) of the proposed FASTER directive.

⁴⁵ Article 13 (4) of the proposed FASTER directive.

⁴⁶ Article 9 in conjunction with Annex II of the proposed FASTER directive.

⁴⁷ Article 15 of the proposed FASTER directive. Furthermore, shares traded around the dividend record date would be excluded from the accelerated procedure.

⁴⁸ See however, the corresponding proposal by Bernhard Fiedler & Tino Duttiné, *DAC 6: Developing a Common Notification Platform*, in *Liquid Legal: Towards a Common Legal Platform*, 493–512 (Kai Jacob, Dierk Schindler & Roger Strathausen eds 2020).

⁴⁹ Council Directive (EU) 2020/284 of 18 Feb. 2020 amending Directive 2006/112/EC as regards introducing certain requirements for payment service providers, OJ L 62 (2 Mar. 2020), at 7–12.