

LETTER FROM THE EDITOR

Welcome to the fall edition 2023 of the Caribbean Tax Law Journal!

The publication of this 4th issue comes at a time of great turbulence in the international corporate tax landscape. The international agreement on a global minimum corporate tax rate is a tremendous change to global tax policies. Countries are struggling to enact the international tax rules in their domestic legislation to adopt the global minimum tax proposal. Yet, some are convinced that the global minimum tax will only benefit developed countries.

This edition presents articles from authors who seek to analyze the effects of evolving global power dynamics in the international and European, but also in the Caribbean tax scenery. Our Caribbean authors shed some light on a variety of issues, from the amendment to the real estate transfer tax of Aruba by Jourainne Wever to the tax incentives for non-resident remote workers offered by Sint Maarten by Quincy Lont. In my contribution 'Pillar-two solution: how should Caribbean SIDS respond?' I argue that the consequences of the OECD Global minimum tax are very interesting for the Caribbean jurisdictions such as Curaçao, Barbados and Bermuda because the economic model of these Caribbean SIDS is mostly based on tax-related financial services. Leopoldo Parada provides in his contribution a broader account of the impact of the OECD Global Tax Deal for developing countries. He disputes the narrative that the current international tax reforms under the OECD two-pillar solutions are a zero-cost option for any countries, and especially for developing countries. Later in this issue, Mees Vergouwen explores the effect of directives



on the application of tax treaties under public international law and European Union law, whilst Shu-Chien Chen's contribution focusses on how the EU Customs Reform Package will address the problem of under-levy of custom duties of imported goods, especially low-value goods from non-EU jurisdictions via online marketplace platforms, such as eBay.

Members of the Editorial Board are crucial in facilitating the Editors' desire to maintain high standards of excellence in the work we publish, and we are extremely grateful for the invaluable work of our Editorial Board in contributing both to our peer-review system and to the strategic development of the Journal. We are delighted to welcome Leopoldo Parada to our editorial board, whose experience across the breadth of disciplines related to international tax policy will allow us to reach a broader and more diverse audience with quality contribution. We would like to extend a big thank you to all the authors that contributed to this edition. A special word of thank you goes to Martijn Schippers and Wessel Geursen for peer reviewing the article(s) of this edition. To our readers, we hope you enjoy!

Germaine Rekwest