

# LETTER FROM THE EDITORS

Dear Reader,

We open this edition by noting the bold announcement from Curaçao regarding its implementation of the Global Minimum Tax (Pillar Two). With parliamentary treatment concluding just last month in January 2026, the jurisdiction has proceeded unperturbedly, even amid the turbulent period marked by the OECD's presentation of the Side-by-Side (SbS) Package.

While the immediate implications of the SbS Package for Curaçao may appear limited at first glance, they offer Curaçao an important opportunity to reconsider its strategic position, not only regarding the design of Pillar Two in the country, but also with respect to the future of corporate income tax incentives. This is a crucial moment considering the position of the country in the region and its strategic investment coming from the United States.

In this edition, Lucas de Lima Carvalho sheds some light on the Global Minimum Tax in Latin America, in particular Colombia, Brazil and Uruguay. He concludes that Pillar Two is less about sovereign control of domestic tax policies and more about the reputational gains of joining such a big, sprawling policy initiative alongside developed countries.

In his contribution, Leopoldo Parada offers an interesting perspective on the impact of the SbS regime in developing countries and how this can be perceived as an opportunity to reshape their strategic landscape, predicting a selective defection from QDMTT as a dominant strategy worldwide.

Leaving the topic of the OECD Pillar Two aside, Ria Mohammed presents in this edition of the CTLJ a case analysis on the recent JCPC decision in *Methanex Trinidad Unlimited vs The Board of Inland Revenue*, a case where the themes of reality and illusion take centre stage in the context of corporate tax law.

In her contribution, Remke Beerens analyses the tax measures currently applied in Curaçao, Aruba and Sint Maarten to address youth brain drain. She examines the limitations imposed by the OECD and the UN Model Conventions and concludes that push measures are largely ineffective. Beerens calls for a better alignment with the dynamics of youth brain drain by strengthening the link between local education and early employment.

Finally, Germaine Rekwest elaborates on Curaçao's struggle for fiscal legitimacy and international recognition. Prioritizing its international position and staying out of any list of non-cooperative jurisdictions may contribute to shaking off its image of tax haven.

We trust that this edition provides both the technical depth and the strategic perspective necessary to navigate these uncertain times. As the world digests the SbS Package, certainly, the conversation is far from over.

Sincerely,

*Germaine Rekwest*

*Leopoldo Parada*

Editors of the Caribbean Tax Law Journal

