

Mr Wopke Hoekstra  
Commissioner – Climate, Net Zero and Clean Growth  
Rue de la Loi 200  
BE – 1049 Brussels  
Belgium

23 May 2025

Dear Commissioner Hoekstra,

We are writing to encourage you to pursue the quick resolution of the discussions related to the implementation and application of Pillar 2 and its interactions with the US tax system. The quick resolution of these uncertainties is necessary to empower the Commission to deliver on its tax simplification goals.

Concerns about the implementation and application of Pillar 2 in relation to the US tax system are not new. These have existed since the beginning of the Global Anti-Base Erosion Rules (GloBE) project, which took inspiration from the US's minimum tax regime, and have compounded over the years as EU member states and other Inclusive Framework members have implemented and started to apply Pillar 2. Likewise, Member States' varying timelines for adopting the administrative guidance has created inconsistent interactions with the US tax system (for instance, a Member State has not yet enacted the Transitional Under-Taxed Profit Rule (UTPR) Safe Harbour).

Europe now has an exceptional opportunity to build a foundation for long-term competitiveness through simplifying the EU tax acquis. This Commission project has strong buy-in from Member States and business alike.

The US and Europe are each other's primary source and destination for foreign direct investment (FDI). Investment in each other's economies drives growth, supports 16 million jobs in the US and EU and creates some of the world's most vital technologies and ideas. Tax certainty in both the short and long-term is necessary to ensure that we continue to promote our companies, workers and ideas.

Resolving issues related to Pillar 2 would minimise uncertainty for the numerous European and American businesses operating across the Atlantic and maximise Europe's growth during this period. Likewise, it would level the playing field between the US and the EU.

Consistent with the competitiveness agenda, the quick resolution of these issues would also ensure that the Directorate-General for Taxation and the Customs Union (DG TAXUD) is able to pursue its decluttering project ambitiously and propose reforms that make a material impact on lowering the price-tag of doing business in Europe and maximise tax authorities' ability to work effectively.

We stand ready to support your work on this matter as well as the wider decluttering project.

Thank you for your consideration.

Yours sincerely,



Malte Lohan  
CEO