

France

Overview of CbC reporting requirements

First reporting fiscal year: Commencing on or after 1 January 2016

Consolidated group revenue threshold: EUR 750 million

Filing deadline: 12 months following the end of the reporting fiscal year

Local filing required: Yes

Surrogate parent entity filing permitted: Yes

First review of the domestic legal framework: 2017/2018

Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	It is recommended that France ensure that local filing only occurs in the circumstances contained in the terms of reference.
Exchange of information framework	None.
Appropriate use	None.

The domestic legal and administrative framework

It is recommended that France ensure that local filing only occurs in the circumstances contained in the terms of reference. This recommendation remains in place since the 2017/2018 peer review.¹

The exchange of information framework

France confirms that its rules have not changed and continue to be applied effectively. France continues to meet all terms of reference.²

Appropriate use of CbC reports

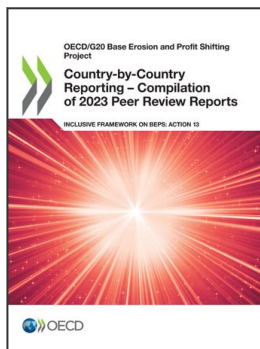
France confirms that its rules have not changed and continue to be applied effectively. France continues to meet all terms of reference.

Notes

¹ France's 2017/2018 peer review included a monitoring point with respect to the limitation of local filing to the instances of "Systemic Failure" as defined in paragraph 21 of the terms of reference. France confirms that its legislation implies that the obligations under the CbC MCAA are complied with (in particular the obligation for a prior

consultation between Competent Authorities under Section 6 of the CbC MCAA) and will only apply local filing if there is a “Systemic Failure”. This monitoring point remains in place.

² France’s 2021/2022 peer review included a monitoring point with respect to missing or incomplete information in CbC reports sent to another jurisdiction. France has since introduced changes to its IT systems to ensure such missing or incomplete information will be identifiable in advance, and these changes will be effective for future filing periods. This monitoring point remains in place.



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