

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

France's 2017/2018 peer report included a recommendation that France introduce a provision which would have an equivalent effect as the "deemed listing provision", i.e. ensuring that all entities that are not legally required to prepare Consolidated Financial Statements (whether under commercial / company law, or under regulations governing the relevant stock exchange / market, or other) be included in the scope of the parent entity filing obligation. France has since released guidance, which clarifies the requirement for such entities to file a CbC report, and this recommendation is therefore removed.¹

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.²

The exchange of information framework

Peer input was received for France about 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 in time for the next filing period. As France has taken steps to address this issue, no recommendation is required but this aspect will be monitored.

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

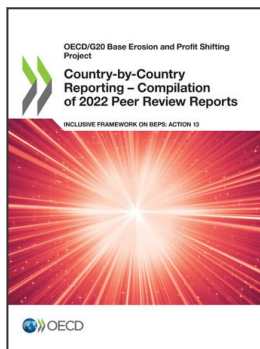
Appropriate use of CbC reports

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

Notes

¹ <https://www.impots.gouv.fr/la-declaration-pays-par-pays>.

² 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.



From:

Country-by-Country Reporting – Compilation of 2022 Peer Review Reports

Inclusive Framework on BEPS: Action 13

Access the complete publication at:

<https://doi.org/10.1787/5ea2ba65-en>

Please cite this chapter as:

OECD (2022), “France”, in *Country-by-Country Reporting – Compilation of 2022 Peer Review Reports: Inclusive Framework on BEPS: Action 13*, OECD Publishing, Paris.

DOI: <https://doi.org/10.1787/77072898-en>

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at <http://www.oecd.org/termsandconditions>.