AMCHAM LUXEMBOURG
AMERICAN CHAMBER OF COMMERCE IN LUXEMBOURG A.S.B.L.

Luxembourg, 18 October 2023

Parti Chrétien Social (CSV)
LUXEMBOURG
19 OCT. 2023
Réf.: ....

Elisabeth Margue
Luc Frieden
Laurent Mosar
Gilles Roth
CSV
4, rue de l'Eau
L-1449 Luxembourg

Re: Keeping Luxembourg's tax rules and environment competitive while remaining in harmony with new policy trends at the EU and OECD levels

Dear Mrs Margue and Messrs. Frieden, Mosar and Roth

On behalf of AmCham's Tax Committee, we would like to congratulate your party on your impressive performance in the recent election. Following the election, we would like to explore opportunities for collaboration and constructive dialogue with your party.

Our team is made up of tax executives from industry, tax professionals, and job creating entrepreneurs who know and respect the Grand Duchy for being one of the world's best places to do business. We are all deeply committed to keeping it that way. We would like to contribute our skills and expertise to further our objective to keep Luxembourg's tax rules competitive while remaining in harmony with new policy trends at the EU and OECD levels.

Luxembourg's financial center has developed notably as a result of its reputation for stability and legal and tax certainty, Luxembourg's ability to adapt quickly, innovate, anticipate, address the needs of economic players and implement EU Directives in a reasonable and business-friendly way (as opposed to verbatim). Although there have been few specific instances where this has been observed, detailed consultation with market players and tax professionals would have been very beneficial for (among others) the implementation of the many Eu Directives implemented over the past few years.

Indeed, an increasing number of regulations have been introduced or are being discussed at the OECD, EU and local levels that have (and will have) a significant influence on an open economy like Luxembourg. In addition, Luxembourg tax legislation, EU and domestic case law and administrative practice are changing. It is increasingly difficult for tax authorities, taxpayers and tax advisors to keep pace with the new rules in view of their increasing complexity.

We have identified in this letter four themes which we consider as the most pressing issues that should be discussed and addressed in your mandate. Unsurprisingly, those four themes are the **attractiveness of the Luxembourg marketplace to both talent and businesses, the need to rebalance the rights between the tax authorities and taxpayers and the experience with the tax authorities.** We have summarized the situation as it is experienced by taxpayers and tax advisors as well as suggestions for legislative changes to ensure Luxembourg remains a compliant yet competitive jurisdiction that is appealing for its stable legal environment. Most of the points briefly discussed in this paper have been developed at length in more detailed papers (including our longform letter in appendix). We would be pleased to share and discuss those papers with you. We would like to stress the importance of legal certainty for the business community and Luxembourgish economy as taxpayers need certainty in the application of the tax rules.

As representatives of different affected industries, we would be pleased to meet with you to discuss these topics if you require any additional background.

1) TALENT

The attractiveness of the Luxembourg marketplace to draw talent from abroad is not a new topic given the size of its population and the ambitions of the country. However, since the end of the COVID-19 pandemic, most employers are facing serious difficulties to attract talent to the point that some had to significantly downgrade their ambitions in terms of local developments. The current situation can be explained by a combination of unfavourable elements.

The first element is the desire of the workforce to rebalance its private and professional life. Homeworking has been highly appreciated by a significant portion of the Luxembourg based workers and Luxembourg is clearly not competitive in that respect given the various limitations of the current international environment in terms of tax and social security (although we note that the framework agreement on social security allowing cross-border workers to work from home up to 49% of their time is a positive development).

The second element is inflation which, combined with an ever-high cost of real estate in Luxembourg, makes it difficult to attract talent from abroad.

The third element is the progressive erosion of tax benefits previously available to the local workforce (e.g., warrants, heavier taxation of company cars, etc.). This is an area where clear efforts have been made by neighbouring countries to attract/retain the most talented workers.

It is therefore urgent for Luxembourg to react. In this context we have described below a few initiatives to consider. Technical details can be found in the long-form letter enclosed.

- **Introduce an employer-led rent subsidy scheme.**

An employer-sponsored rent subsidy scheme modelled on the current interest subsidy scheme would have a direct impact on the purchasing power of households with a level of income too high to access the existing rent subsidy but too low to acquire a property in Luxembourg.

- **Overhaul of the "Prime Participative" regime**

Amend the regime to (i) include salary costs in the employer's results that serve as a basis for calculating the total amount that can be paid to employees as "*prime participative*" (ii) increase the employer and employee's ceilings and (iii) not restrict the group concept to situations of fiscal unity but use a broader group definition.

- **Modify carried interest regime.**

A competitive carried interest regime would increase tax revenues by contributing to the attractiveness and competitiveness of Luxembourg as a jurisdiction of choice for investment funds. Many EU jurisdictions have introduced a carried interest regime and there is a clear benefit of having one considering the upcoming election in the UK. Our previous paper details (see enclosure) what needs to be done. One very important change to be introduced is related to the optionality for a final taxation at grant or vesting which should also be extended to all type of stock option plans to avoid/reduce dry taxes[1] and leave the option to subscribers which model they want to apply. Similar models exist notably in the US and in the UK.

- **Extend deductions to Pillar 2 amounts allocated to pension schemes.**

Introduce a tax scheme allowing public and private sector employees to contribute to pillar 2 pension funds via a salary or bonus "sacrifice" to contribute to the attractiveness of Luxembourg. The amount of the employee contribution would not exceed a certain percentage of his/her gross annual remuneration and would be subject to progressive rates (increasing gradually from 0% for low incomes to 20% for high incomes). The scheme would maintain the full deductibility of the employer's contribution up to 20% of the employee's total annual gross remuneration.

- **Teleworking 2 days a week for cross-border workers**

The agenda of the negotiation projects with France, Belgium and Germany should include the possibility for cross-border workers to telework two days a week without any tax, social security or labor law impact. The agreement between France and Switzerland could be used as an example.

2) ATTRACTIVENESS OF THE MARKETPLACE FOR BUSINESSES

A competitive economy and well-paid jobs obviously require strong companies which must be treated with great care even if they do not vote in the various elections. An increasing number of businesses are complaining about the loss of competitiveness of the Luxembourg marketplace linked to the rushed introduction of recent EU Directives without sufficient consultation with the business community. This situation is creating **double taxation that is not in line with the spirit of the EU Directives. The principle of neutrality of the investment fund industry is impacted**. For that reason, we are suggesting below a series of very technical changes aiming at correcting the current issues while still fully respecting the EU Directives. **Some of those changes should not create loss of revenues to the State so they should be implemented without any further delay.**

We have listed below suggested legislative changes that would in our view address the issues listed above. Technical details can be found in the long-form letter enclosed.

- **Investment in start-ups/scale-ups**

The bill amending the law of 4 December 1967 on income tax to incentivize investment in sustainable and digital entrepreneurship[2] received very positive feedback. However, the relevant sector considers that the system should be more ambitious in order to have a significant beneficial impact, in line with what Belgium proposes. The bill should be amended to increase the maximum allowance to €100,000 and provide for a maximum tax rate on dividends and capital gains of 15%.

- **Withholding on dividends**

Over the years the Luxembourg alternative investment industry has been built relying on the absence of withholding on dividends served to investors. No country cannot pretend to be an asset management center if the return paid to investors is 15% lower than what it would have been in the absence of

[1] i.e., a cash disbursement to fund a tax charge on the discounted subscription price on shares that may not pay out for some time.
[2] PL n°8047.

withholding tax (such as in the UK e.g.). The withholding tax on outbound dividends is also significantly penalizing Luxembourg as a place for Initial Public Offering leading to delocalization of Luxembourg successful businesses aboard when they need access to capital market. There is a growing level of legal uncertainty associated with Luxembourg withholding tax on outbound dividends. The issue is known by the Finance Ministry and the tax authorities for quite some time but no suitable solution has been implemented. This is probably the number one issue for the alternative asset management industry in Luxembourg.

- **Ensure tax neutrality of investment funds with respect to ATAD 2 and ensure legal certainty**

See details in the long-form letter in the enclosure.

- **Limit double taxation under ATAD 2**

The mechanical application of the tax provisions tackling hybrid mismatches can lead to multiple juridical or economic taxation that are not consistent with the spirit of the EU Directive. This is due to an implementation of the EU Directive in Luxembourg law that has not been sufficiently considered.

The Luxembourg law should be amended to provide for the general principle of non-juridical and economic double taxation and the principle that no taxation should result from the anti-hybrid provisions unless it is justified by the objective of the EU Directive's anti-hybrid rules.

See details in the long-form letter in the enclosure.

- **Fix unnecessary restrictions embedded in the interest limitation rules**

Several unnecessary limitations were added to the Luxembourg Law implementing the interest limitation rule of the EU Directive. The interest limitation rules were simply added to the existing rules thereby cumulating existing interest deduction restrictions with the new restrictions. **These additional restrictions in Luxembourg law are neither justified nor in line with the EU Directive and have not been introduced by other Member States which have chosen the same options as Luxembourg**. This abnormal combination of old and new interest deduction restrictions makes it **more expensive for Luxembourg based companies to borrow money**, which is very odd for a financial center, especially in the current economic environment.

See details in the long-form letter in the enclosure.

- **Modification of the commercial law to increase substance in Luxembourg in anticipation of the Unshell Directive**

The EU Commission released in December 2021 a proposal for a Directive laying down rules to prevent the misuse of shell entities for tax purposes (the Unshell Directive). While we fully support the objective of combating tax avoidance, the current format of the Directive is clearly not considering the specificities of the fund industry. Consequently, it can negatively impact the Luxembourg marketplace. We therefore believe Luxembourg should urge the EU Commission to amend the current version of the Unshell Directive (see details on our longform paper).,

In parallel, Luxembourg should introduce in its commercial law the possibility of having legal compartments in joint stock companies without a specific tax regime or regulatory status as it would allow the segregation of investments, while easing the path to meeting substance requirements imposed by the future Unshell Directive

- **Super deduction**

On July 4, 2022, the Chamber of Commerce submitted a proposal to the Minister of Finance allowing certain taxpayers to claim a super deduction of an additional 50% to 100% on their eligible costs for research and development, digital transformation and ecological and environmental transition. This measure aims at providing an optional tax incentive to businesses and should help attract investment to Luxembourg. In addition, the Chamber of Commerce proposed to combine the super deduction with a net wealth tax exemption on the related assets. This project is important for Luxembourg's competitiveness as the jurisdiction of choice for innovative companies. In our view, this optional super deduction scheme would be much more efficient than the tax credit scheme recently proposed by the government. Should the upcoming Luxembourg government still favour a tax credit system over a super deduction it should extend the tax credit to the Luxembourg Municipal Business Tax and make it compliant with the upcoming Pillar 2 Directive.

- **Municipal business tax incentives for certain activities (e.g., treasury centers).**

Luxembourg can increase its attractiveness by leveraging from its dual taxation system (corporate income tax and municipal business tax). While reducing the corporate tax statutory rate is a challenging topic, the possibility to instead introduce municipal business tax reliefs[3] on certain activities such as treasury and finance centers – subject to a minimum standard of substance, assets, and functions – can be a valid competitive advantage to Luxembourg. Groups intending to relocate activities from jurisdictions below the OECD compliant 15% minimum rate of tax will likely look at candidate countries other than Luxembourg (e.g., Ireland and Switzerland) due to their lower but still OECD-compliant statutory rates. A minimum standard of substance and functions – in line with the Unshell Directive – should help finance the sustainability of said reliefs.[4]

- **Implementation of Council Directive (EU) 2022/2523 dated 14 December 2022 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the European Union (Pillar 2)**

Luxembourg being an open economy, it would be prudent and advisable to look at the draft Pillar 2 legislation of other countries to ensure that the implementation of the Pillar 2 EU Directive into Luxembourg law is aligned and at least not more stringent than other countries' Pillar 2 legislations. **We have made some basic suggestions which would increase the level of Corporate Income Tax and Municipal Business Tax while still being fully compliant with the spirit of the Pillar 2 Directive.** For reasons we do not fully understand our suggestions do not seem to get traction from the Luxembourg Tax Authorities.

See details in the long-form letter in the enclosure.

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[3] This could be in the form of a reduced municipal tax rate, partial or full exemption.

[4] See for instance Singapore treasury and finance incentives compliant with OECD https://www.mof.gov.sg/news-publications/press-releases/Singapore-s-Tax-Incentives-Meet-International-Standards-on-Countering-Base-Erosion-and-Profit-Shifting-(BEPS)-Activities.

- **Align application of "recapture" rules with the lifespan of carried forward losses**[5]

Since 2017, the modification of the tax legislation restricts the carry forward of net operating losses to 17 years. The duration of other carry forwards (e.g. recaptured deductions) has however not been amended accordingly for reasons we struggle to understand. This situation is clearly creating intra Luxembourg double taxations.

The law must be amended to have a consistent tax system.

- **Modernise art. 166 LITL in alignment with Pillar 2 legislation.**

With the expected adoption of Pillar 2 across more than 135 countries from the OECD G20/Inclusive Framework for the introduction of a minimum 15% corporate tax, the historical reasons for maintaining a minimum tax test for the qualification of non-EU subsidiaries will become largely moot. On that basis, the adoption of an explicit qualification for capital companies tax resident in non-EU jurisdictions which have implemented a minimum 15% corporate tax substantially following OECD Pillar 2 rules will help modernising Luxembourg participation exemption rules and provide certainty to taxpayers avoiding unnecessary subjective analysis when comparing foreign tax regimes.

- **Introduce a real estate and infrastructure investment company regime (SIII)**[6]

To support the recent generalization of local SIII structures across the EU and the United States and allow the creation of a platform allowing to hold and manage those structures jointly, the introduction of a Luxembourg SIII regulatory and tax regime would allow Luxembourg to remain an attractive jurisdiction for alternative investors/investments, with a particular focus on real estate and infrastructure. It would also allow investors and asset managers to expand their footprint in Luxembourg.

There is a draft law that is almost in its final form following discussions between different public authorities and in discussion with the CSSF and the Ministry of Finance. The regime will need to be aligned with the objective of the recently introduced 20% real estate withholding tax to prevent the misuse of the vehicle for Luxembourg investors/investments and to ensure that everyone pays a fair amount of tax.

This project is important for the competitiveness of Luxembourg as jurisdiction of choice for alternative investment funds.

- **Redesign the Net Wealth Tax Law**

Net Wealth Tax (NWT) represents a predictable source of revenue for the Luxembourg State which is less dependent on the performance of the economy in general. In difficult economic circumstances faced by many businesses over the past few years, further exacerbated by an increase of the borrowing costs it would seem all logical not to further penalize those who decide to take further risk and invest in equity to reduce their interest borrowing cost. NWT is clearly anti-economic[7]. NWT also prevents the establishment in Luxembourg of well-funded treasury centers. It further creates additional complexities to the many holding companies massively used in the alternative industry where Luxembourg is clearly

[5] Please refer to the document entitled *"Dix mesures de modernisation du système fiscal"* proposed by the Luxembourg Chamber of Commerce.
[6] Société d'investissement immobilier et d'infrastructure.
[7] As is any type of tax not levied on profit (i.e. tax paid even in loss making situations)

penalized vis à vis the UK and Ireland (e.g.). In other words, it is not a tax a financial center should levy. Options to mitigate the issue are known and listed in our long-form paper.

3) REBALANCING OF RIGHTS BETWEEN TAX AUTHORITIES AND TAXPAYERS[8]

Procedural tax rules in Luxembourg have not changed for many years. However, the relationship between the Luxembourg tax authorities and taxpayers has evolved considerably and in a negative way. While the imbalance in the procedural rights was not problematic in the past as it was possible to have upfront discussions with the Luxembourg tax authorities, it has become a real problem in the current environment. Tax payors no longer look for a minimal level of taxation. What they want is to pay **a predictable and reasonable amount of tax**. They also want to know (sooner rather than later) if their tax position is not shared by the Luxembourg tax authorities. Finally, in case of challenge from the Luxembourg tax authorities they appreciate the ability to defend their position in fair and transparent manner as would be the case in all major financial centers in Europe. The remedy to current situation we have suggested a series of urgent actions in our long-form document.

4) EXPERIENCE WITH LUXEMBOURG TAX AUTHORITIES

In an environment where tax laws are introduced at an ever-increasing speed and tend to become increasingly complex, international players tend to favour countries which combine two essential elements: i) a clear and smart implementation of new tax laws (often inspired by EU Directives) and ii) receptive, dynamic and responsive tax authorities that help them navigate the new complexity.

In Luxembourg, against the backdrop of an evolving and uncertain legal environment, the relationship between the Luxembourg tax authorities, taxpayers and tax professionals has evolved negatively over the past few years. The situation has evolved from an environment where legal certainty prevailed (through upfront consultation and dialogue and confirmations of technical positions and interpretations) resulting in little litigation and case law to a situation with a lack of dialogue, greater legal uncertainty than in neighbouring countries and a growing number of disputes. This also results in court rulings for the first time on subjects that have been part of the Luxembourg tax legislation for many years. The reason for this situation has probably to do with the size of the tax authorities which are clearly struggling with the waves of law changes to introduce in a very short time frame.

This has created and contributes to increasing legal uncertainty, jeopardising Luxembourg's reputation as a stable and reliable country and consequently its attractiveness for economic players and in particular alternative investment funds.

Market players who have been present on the Luxembourg market for many years (i.e., banks, insurance companies, multinationals, etc.) as well as alternative funds that plan to set up or to massively increase their presence in Luxembourg, seek consistency and predictability for the tax position of the entities they set up in Luxembourg. Above all, these market players need consistency and clarity in the application and interpretation of the tax legislation. While changes in the administrative practice are possible over time, such changes must be communicated to the market, and only apply prospectively. A challenge on one or more tax positions that have been applied for years or an uncertain or unexpected interpretation, which would give rise to a material adjustment of the tax base of one of these players, will certainly generate a 'domino' effect on the Luxembourg financial center, given the geographical mobility of the market players and the assets managed in an increasingly competitive environment. This

[8] Please refer to the document entitled "*Dix mesures de modernisation du système fiscal*" proposed by the Luxembourg Chamber of Commerce.

may result in a massive departure to one or more other jurisdictions appearing as a better alternative (e.g., the UK, Ireland, Singapore, etc.).

In our longform document we are detailing three situations (tax audit, tax ruling and guidance on technical positions) where the experience of taxpayers with the Luxembourg tax authorities can only improve. We are also suggesting solutions to improve the current experience. This is also an urgent matter to be managed as **a positive reputation built over the years can be destroyed very quickly and we think we are now at a moment of truth.**

Yours sincerely,

Paul Schonenberg
Chairman & CEO
AMCHAM

Bernard David
Tax Committee Chairman
AMCHAM

Encl.

AMCHAM LUXEMBOURG

AMERICAN CHAMBER OF COMMERCE IN LUXEMBOURG A.S.B.L.

Parti Chrétien Social (CSV)
LUXEMBOURG
23 OCT. 2023
Réf.: ....

October 16, 2023

Dear Mr. Frieden,

I was very pleased to have the opportunity to personally congratulate you on your strong election win at the RTL post-election event last Sunday evening. My expat and business-focused constituents in AMCHAM have confidence in your wisdom and ability to shift the political agenda slightly to the right and create a pro-business government which will efficiently and seriously return Luxembourg to prosperity and keep it there for the years to come. We fully understand you do not have an easy task with much to accomplish, but we have confidence in you, wish you all success and offer our fullest support.

Attached please find a wish list of gentle recommendations which reflect our suggestions to correct problem areas impacting the economy and advocating equitable and justified treatment for our constituency which is loyal to Luxembourg and adds significant economic benefit. Thank you in advance for considering our recommendations/ points of view and hopefully including them in your agenda for change. My colleagues and I are at the disposal of you and your team to clarify and further discuss these issues and recommendations at your convenience.

With all respect and very best wishes,

Paul Schonenberg

Chairman and CEO

AMCHAM.lu

Copie: Laurent Mosar

Eight things international companies and their working employees would appreciate from the New Luxembourg Government (and two things our constituents hope will not happen!):

To be clear, AMCHAM does not speak for the entire foreign community of Luxembourg. By and large, our constituency is mostly composed of first and second-language English speakers who are professionally experienced university graduates with executive or high-level technical jobs, and their families, who live and work in Luxembourg as salaried employees, entrepreneurs, or business owners. Since AMCHAM has been quite active in organizing election roundtable events and speaking out about business-related concerns of the international community, I have received quite a few requests to clarify what our community would like to see the new government enact as legislative agenda issues.

The 10 suggestions which follow come from a consensus distilled out of conversations with persons of this identified constituency. We hope these suggestions will stimulate the recently elected political leaders to take wise positive actions for the purpose of making Luxembourg a more agreeable pro-business environment with a more robust and successful economy.

Here goes:

1. Action: Reduce the corporate tax rate from the present level of just under 25% to at least the EU average corporate tax rate of 21%, with 20% being even better, to restore Luxembourg's taxation attractiveness as a preferred corporate location.

2. Action: Review to eliminate, simplify and uncomplicate policies impacting residents and companies, reducing paperwork, costs and administrative burden impacts.

3. Action: Empower legally existing Luxembourg ASBL charitable not-for-profit organizations to develop and manage government-subsidized micro-housing projects for utilization by single young legally resident working professionals and single retired Luxembourg legal residents. Properly done this action will encourage the release into the market of presently underutilized privately owned family housing while simultaneously making greatly needed single resident housing available for young employees freshly seeking to become employed in Luxembourg and older single workers interested in downsizing and reducing their living costs as they enter into a new phase of their lives, perhaps living at reduced incomes then they had while working.

4. Action: Guarantee state banks issue saving accounts and credit cards to all legal residents of Luxembourg on demand. As local bank accounts are critical for so many

AMERICAN CHAMBER OF COMMERCE IN LUXEMBOURG A.S.B.L.
6, rue Antoine de Saint-Exupery – L-1432 Luxembourg
Phone: (+352) 43 17 56 – Website: www.amcham.lu – E-Mail: info@amcham.lu
IBAN LU66 0030 7231 2322 0000 – BIC/SWIFT: BGLLLULL

things, ensuring bank account access will be greatly appreciated by new inhabitants immediately upon their arrival.

5. Action: Make English an official legal Luxembourg language to aid new residents in assimilating more rapidly and with less confusion and stress. As an additional benefit, encouraging increased English language fluency will help young Luxembourgers be better prepared for employment opportunities in the global economy within which English is the dominant global language.

6. Action: Adjust the current social security retirement policies to allow workers to voluntarily continue to contribute into the social security retirement system beyond age 65 if they have accumulated less than 30 years of social security retirement contributions in the Luxembourg system. Delaying retirement on a purely voluntary basis and allowing the accumulation of additional pension payment entitlements for those with less than 30 years of working contribution entitlement will especially help foreigners who come into the Luxembourg system later in their lives, to have a higher quality of life and avoid poverty in old age caused by insufficient levels of social security income.

7. Action: Adjust the current tripartite indexation policy to increase support for high performing younger employees eager to achieve high levels of career success and reduce the current impact of Indexation as a driver of inflation. The current practice as implemented leads to prices throughout the economy being increased simultaneously with the start of each indexation increase, thereby driving inflation as an unintended but unacceptable consequence. Likewise, mandatory indexation across the board for all employees at the same level largely decimates the salary budgets of companies and largely eliminates funds which would be targeted towards rewarding high performing employees, most especially young people just starting their careers. We recommend the currently identified level of the gross indexation money pool be retained as at present, but only 60% of this amount be allocated for distribution to all employees with the remaining 40 % earmarked for discretionary distribution to employees' below senior executive level. We leave to the government to discourage companies from using indexation implementation as justification for companies to raise prices, but believe it would be a positive signal for tax authorities to adjust tax rates to ensure that indexation implementation does not increase tax revenue to the state by driving employees into higher tax brackets.

8. Action: Support education through increased subsidies and tax deductions. The education of our young people to help them be optimally prepared to be successful members of society and lifelong learning of persons needing or looking to acquire additional capabilities, are initiatives worth supporting for the long-range good of

AMERICAN CHAMBER OF COMMERCE IN LUXEMBOURG A.S.B.L.
6, rue Antoine de Saint-Exupery – L-1432 Luxembourg
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IBAN LU66 0030 7231 2322 0000 – BIC/SWIFT: BGLLLULL

society both now and in the future. We would be pleased for the government to make tuition at primary private schools, at universities and lifelong learning fees be considered allowable tax deductions. Additionally, considering parents are struggling by making significant sacrifices to send their children to the ISL , St Georges and other private schools, we would appreciate for the government to raise the level of subsidy to those students to a higher level (Currently this subsidy equals 40% of the cost of a student attending the Luxembourg public schools, which means that the state saves money off its own costs when compared to the costs if the state has to provide the education. While we very much appreciate the existence of a state private schooling subsidy, we believe doubling the subsidy to 80% of the cost of a public school's student education would be a very supportive gesture to help companies recruit appropriate staff to come to Luxembourg and helping the staff to afford to live in Luxembourg with their family members.)

As mentioned at the beginning of this advocacy essay, there are two things that our international community would very much oppose as policy initiatives of the new government currently being formed. These are:

1. We oppose any form of increased taxation on companies or individuals including a national wealth tax, all of which we believe will make Luxembourg less attractive as a business location and all of which we believe will reduce rather than increase governmental revenue.
2. We oppose any government-mandated adjustment of the current 40-hour working week requirements, and we especially oppose any suggestions to consider any such changes while retaining current salary levels. We do not oppose flexible working arrangements as agreed between individual employees and their employers.

The people of Luxembourg appear to have given a solid mandate to the CSV and the early Indications are that the CSV is motivated to form a coalition with the DP which will result in a pro-business coalition which is motivated to create a smaller, harder working, more efficient, lower cost government which reduces and simplifies bureaucratic processes and is more user friendly to individuals and companies. We fully support these objectives and wish this new government all success and a long life of service to the nation, the people and the resident companies.

Paul Schonenberg
Chairman and CEO
AMCHAM.lu

AMERICAN CHAMBER OF COMMERCE IN LUXEMBOURG A.S.B.L.
6, rue Antoine de Saint-Exupery – L-1432 Luxembourg
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