

## Tax transparency can go backwards, as Belgium is provin...

Published: January 13, 2026, 5:27 am

---

The OECD has just published its new peer review on the state of automatic information exchange with Belgium. As the [OECD says](#):

*In its new peer review report, the Global Forum found Belgium to be Largely Compliant with the international standard on transparency and exchange of information upon request over the review period (1 October 2013 to 30 September 2016). This deterioration compared to the previous peer review report — Belgium had been rated Compliant in 2014 — mainly results from an unfinished implementation of the strengthened international standard on beneficial owners and reversals of case law regarding some features of the access powers of the tax administration. These led to legislative changes, the implementation of which should be monitored to ensure full availability and access to information to be exchanged. That said, Belgium remains a country widely open to exchange of information and that provides timely replies and qualitative information to its many partners.*

The report is important for a number of reasons. First, it shows that the OECD is willing to record a failure to progress.

Second, it shows that promises are not enough: action must follow.

Third, it shows the vital importance of beneficial ownership data, which is now a European Union requirement meaning Belgium should be getting its act together and not going backwards.

Fourth, it shows the importance of getting legislation on this issue right so that courts cannot over-rule intention.

The report is useful for all these reasons. And Belgium needs to take note. It's in amongst some tax havens right now.