

2024 US Advance Pricing Agreement (APA) report – India tops Japan in executed bilateral APAs for first time, multilateral APA trends, and speedier processing of BAPAs

The Internal Revenue Service released Announcement 2025-13, the advance pricing agreement annual report dated March 27, 2025, covering the activities of the Advance Pricing and Mutual Agreement (APMA) Program during calendar year 2024. The annual report provides a summary of recent APA developments in the APMA Program and a statistical snapshot of the program's APA activities during 2024. During that year, the IRS executed a near record number of APAs and received a substantial number of APA requests.

URL: <https://www.irs.gov/pub/irs-drop/a-25-13.pdf>

Deloitte Tax LLP prepared an alert highlighting key findings from the 2024 APA annual report, including data on treaty partners involved in executed bilateral APAs (BAPAs), recent multilateral APA trends, and additional insights.

URL: https://dhub.deloitte.com/Newsletters/Tax/2025/TNV/250404_4_suppA.pdf

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