

Distr.: General  
5 March 2024

Original: English

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**Committee of Experts on International  
Cooperation in Tax Matters  
Twenty-eighth session**

New York, 19-22 March 2024

Item 3(h) of the provisional agenda

**Dispute Avoidance & Resolution.**

**Co-Coordinator's Report**

***Summary***

This report is presented to the Committee for *information* at the Twenty-eighth Session. It appraises the Committee of the group's progress in delivering on the group's mandate to monitor developments in the work on taxation of the digitalized economy as well as feedback received from capacity development work by the Secretariat that may necessitate update of the United Nations Handbook on the Avoidance and Resolution of Tax Disputes.

The report also appraises the Committee of the group's collaboration with the Subcommittee on Transfer Pricing.

## Background and Subcommittee Mandate

1. At the Twenty-third Session of the Committee in October 2021, the Secretariat provided a paper on Dispute Avoidance and Resolution [E/C.18/2021/CRP .27](#). That paper provided an outline of the work of the previous Subcommittee on Dispute Avoidance and Resolution. At that Session, the Committee established a small group on dispute avoidance and resolution to monitor the developments in the digitalization work; consider any feedback received from the capacity development work; and determine the necessary action.

2. As noted in the [Report on the Twenty-fourth Session](#), the [Report on the Twenty-fifth Session](#), [Report on the Twenty-sixth Session](#) and the [Report on the Twenty-seventh session](#) the group continues to monitor developments in this area. The substantive focus of the group remains highly relevant to strengthening domestic resource mobilization and supporting the achievement of the Sustainable Development Goals.

## Update

3. The Co-Coordinator, Mr. Aart Roelofsen and Mr. Carlos Protto, participated in discussions on the Subcommittee on Transfer Pricing's workstream on Dispute Avoidance & Resolution. Specifically, the Subcommittee is addressing the issue of Advance Pricing Agreements with a particular focus on developing countries and their concerns. A paper on this issue has been submitted by the Subcommittee on Transfer Pricing for a first reading.

4. It is observed that the workstream on dispute avoidance and resolution included in the work on digitalization undertaken in other fora is still ongoing and that, so far, there have been no significant developments that call for new guidance or input from the Committee. The capacity development work, disseminating the [United Nations Handbook on the Avoidance and Resolution of Tax Disputes](#) produced by the Committee and subsequently published in 2021 (and now available in English, French and Spanish) is also ongoing.

5. Feedback from the capacity development activities and from the work in the Subcommittee on Transfer Pricing will help determine whether there will be output that warrants any update of the Handbook. Any such update would likely be the work of the next Committee Membership.

## Next Steps

6. The small group proposes, subject to Committee views, to continue monitoring the relevant work undertaken in other fora, as well as the feedback from capacity development activities, in line with its mandate.

7. As part of its monitoring, the group will continue consulting with the Subcommittee on Transfer Pricing on relevant developments in that area, including in relation to the Subcommittee's workstream on dispute avoidance and resolution.