

GROUP ON DISPUTE AVOIDANCE & RESOLUTION.

CO-COORDINATOR'S REPORT





Update

- The Co-Coordinators contributed to the work by the Subcommittee on Transfer Pricing on its workstream on dispute avoidance and resolution. 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.
- Further, the Co-Coordinators are monitoring the tax certainty elements in the Pillar 1 work (Both Amount A and Amount B), to determine whether it merits some action from the Committee, such as inclusion in the <u>UN</u> <u>Handbook on Avoidance and Resolution of Tax Disputes</u> as well as the work in the Subcommittee on Transfer Pricing and in Capacity Development work.
- The small group proposes, subject to Committee views, to continue monitoring this work.





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