

Hi,

Thank you for UN to step up to the occasion in achieving international tax co-operation.

My Comments are follows:

1. Would have liked to include to limit unilateral measures by members until a co-operation is reached, as more and more countries are unilaterally imposing measures, it is resulting in double taxation.
2. Arbitration and MAP should be further strengthened as it is a co-operation among the nations, if a state implements the tax in spirit then it should not worry about its sovereignty in Arbitration and MAP. In a global co-operation you win some you lose some. This will boost investor confidence in terms of elimination of double taxation.
3. Harmonisation on Transfer Pricing on debt instruments, interest limitation and withholding tax Rules. As interest may not be deductible (even in case of third-party debts in cases of some countries), but one may be obliged to deduct Tax on the accrued tax expense and Transfer Pricing laws also mandates to charge interest. So, the rules are not harmonised and creates issues. So, Harmonisation of various anti abuse rules needs to be considered.
4. We could check if members agreeing to participate in this framework, would be willing to deferring implementation of OECD pillars by a couple years, till a understanding is achieved, currently several countries have already implemented measures unilaterally without a global consensus resulting in tax uncertainty.

Thanks & Regards,

Arpith Jain