

# **United Kingdom response to the call for input on Workstream I (Framework Convention) for the First and Second Sessions of the Intergovernmental Negotiating Committee on the United Nations Framework Convention on International Tax Cooperation**

21 July 2025

## **ABSTRACT**

The work should start with identifying the overarching objectives and principles before moving on to the commitments. The language of the Framework Convention should be kept high-level to avoid pre-empting the development of the Protocols, and the commitments drafted to be future-proof and with aim to secure the widest consensus.

There should be more focus on the Convention at this stage rather than the early protocols. Prevention and resolution of disputes involving the Convention itself should be dealt with in the Convention.

High quality legal and economic analysis should be undertaken to support the discussions, including in particular impact on international trade and interaction with other international agreements, and we would also like the process to plan to bring in expertise from other relevant international and regional organisations.

## **DETAILED COMMENTS**

The UK is committed to working in partnership with other jurisdictions to create an ever stronger and more inclusive international tax system, building on existing international cooperation. A UN Framework Convention could have an important role to play in supporting this ambition, and we welcome the opportunity to participate in shaping this new global instrument.

### **Scope of Initial Work**

The issues note says that “The work plan prioritizes drafting of the commitments by the end of 2025, as many of the other provisions will flow naturally from them.” While we recognise that this is the current direction of travel, we would note that we think it would be more productive to begin with the overarching objectives and principles, as the commitments would follow from those earlier elements.

We would also highlight that provisions regarding the structure of ongoing cooperation will be pivotal for its effectiveness in advancing international tax cooperation, and so must be given ample time for discussion.

We believe that, particularly where potential commitments [set out in the Terms of Reference] are intended to be the topic of an early or future protocol, it would be appropriate to keep the language in the convention at a high level, to avoid pre-empting the development of the protocols. We also expect that there may be multiple ways for signatories to meet the commitments in the Framework Convention, and this will of course be necessary given the protocols are intended to be optional.

More broadly, it is crucial that the commitments are drafted at an appropriate level so as to be future-proof, given that the Framework Convention is intended to establish the framework for ongoing cooperation, and aim at securing the widest possible consensus, while leaving discretion for countries to choose which Protocols to commit to.

### **Commitments that might be presented at the August 2025 Sessions**

We note that there is additional difficulty created by the simultaneous discussion of the commitments and the protocols. We think a relative focus on the Convention would be sensible in this phase, with greater attention shifted to the protocols as the negotiations progress.

We agree that, as well as discussions around dispute prevention and resolution with regards to tax disputes, it is important for the Framework Convention to consider the best way to prevent and resolve disputes with regards to the Framework Convention itself.

We agree that sustainable development is a key consideration in international tax cooperation. We also think it is important to acknowledge other considerations, such as sovereignty and human rights.

### **Other considerations**

As this work develops further, we think it is crucial that high-quality economic and legal analysis is carried out to support the discussions, including with regards the interaction between commitments in this Framework Convention and those in other international agreements, and with regards the impact on global trade. We encourage the committee to commission such work during 2025.

We are also keen that the process both brings in the respective expertise of all relevant international and regional organisations such as the Platform for Collaboration on Tax, the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting, the Global Forum on Tax Transparency and Exchange of Information and the African Tax Administration Forum. We encourage the committee to set out a plan for how to achieve this join-up before the end of 2025.