

Qatar's Written Comments on WSI Framework Convention Template (24 October 2025 Draft)

Dear Co-Leads and distinguished colleagues,

The General Tax Authority of the state of Qatar would like to thank the committee for sharing the draft Framework Convention and commend the considerable effort invested in shaping a text that aspires to strengthen international cooperation in taxation. Qatar supports the overarching objective of building a fairer and more coherent global tax architecture. In that spirit, we wish to offer comments that, while critical in nature, are intended to be constructive and to assist in refining the draft into a workable, balanced, and administrable instrument.

1. General Observations

1.1. The draft sets broad and ambitious obligations (e.g., “widest measure of mutual assistance,” universal taxing rights) but often lacks definitions, scope limits, and procedural safeguards. This risks uncertainty for both tax administrations (TAs) and taxpayers.

1.2. Several articles remain placeholders (“[To come]”), leaving institutional, procedural, and definitional gaps that hinder assessment of feasibility.

1.3. Many provisions overlap with standards already developed under other fora, in particular the Organization for Economic Cooperation and Development (OECD). Without explicit harmonization, duplication and fragmentation may result.

1.4. The breadth of obligations, especially in information exchange, monitoring of high-net worth individuals (HNWIs), and combating harmful tax practices, implies significant compliance and enforcement costs, particularly for administrations with limited capacity.

2. Specific Concerns

2.1. Articles 1–3 (Objectives, Principles, Definitions)

- Currently incomplete. The absence of definitions for key terms such as “business activities,” “value creation,” “high-net worth individuals,” “harmful tax practices,” and “illicit financial flows” undermines clarity and consistency.

- Recommendation: Populate these articles with precise definitions and guiding principles to anchor subsequent obligations.

2.2. Article 4 (Fair Allocation of Taxing Rights)

- The assertion that “every jurisdiction” where business is conducted, value created, or markets located has taxing rights is overbroad and risks multiple taxation.
- No nexus thresholds, ordering rules, or relief mechanisms are provided.
- Recommendation: Introduce clear nexus criteria, allocation keys, and double-tax relief provisions, aligned with existing treaty practice.

2.3. Article 5 (High-Net-Worth Individuals)

- Scope undefined: no threshold for HNWI status.
- Obligations on advisors and intermediaries to disclose “structures and techniques” lack boundaries and safeguards.
- Administrative burden: continuous expansion of asset coverage without materiality thresholds.
- Recommendation: Define HNWI thresholds, adopt risk-based exchange, and clarify disclosure obligations with due-process protections.

2.4. Article 6 (Mutual Administrative Assistance)

- “Widest measure” for “taxes of every kind” is open-ended.
- Mandated exchange of “any other relevant information” exceeds necessity and proportionality.
- Confidentiality protections rely on domestic law, without a harmonized minimum standard.
- Recommendation: Constrain scope by necessity/proportionality, standardize data schemas, and adopt common minimum data protection rules.

2.5. Article 7 (Illicit Financial Flows, Avoidance, Evasion)

- Conflates evasion (illegal) with avoidance (lawful but policy-sensitive), creating legal ambiguity.
- Recommendation: Distinguish clearly between categories, define illicit flows, and align reporting standards with established frameworks.

2.6. Article 8 (Harmful Tax Practices)

- “Harmful” is undefined; assessment criteria are absent.
- Country-by-country reporting (CbCR) obligations risk duplicating OECD CbCR standards.

- Minimum tax references lack parameters and coordination rules.
- Recommendation: Define harmful practice criteria, avoid duplicative CbCR, and clarify minimum tax principles.

2.7. Article 9 (Sustainable Development)

- Aspirational language without metrics or accountability.
- Recommendation: Introduce measurable indicators and reporting cycles.

2.8. Article 10 (Dispute Resolution)

No comments.

2.9. Articles 11–28 (Institutional and Procedural Architecture)

- Many remain “[To come].” Without these, implementation pathways, governance, and legal effect are indeterminate.
- Recommendation: Populate institutional mandates, financing, review cycles, amendment rules, and entry-into-force conditions.

3. Administrative Burden

3.1. For administrations:

Significant information technology (IT) investment, legal reforms, staffing, and continuous monitoring are required to implement expansive exchange and monitoring obligations.

3.2. For taxpayers:

Risk of duplicative reporting, increased compliance costs, and heightened exposure to disputes due to overlapping taxing rights.

3.3. Mitigation: Introduce materiality thresholds, phased implementation, reliance on existing standards, and capacity-based staging.

4. Overlap with OECD Standards

Several provisions, particularly on exchange of information (EOI), CbCR, harmful tax practices, and minimum taxes, overlap with standards already developed under the OECD. Without explicit coordination, this risks duplication, inconsistency, and unnecessary burden. We recommend inserting harmonization clauses and non-duplication principles, and where possible, adopting OECD templates and definitions to ensure compatibility.

5. Concluding Remarks

Qatar remains committed to constructive engagement. We respectfully suggest that the draft be redrafted to first anchor definitions, scope, and institutional architecture, then layer obligations with proportionality, materiality, harmonization with existing standards, and capacity-based staging. This will help ensure the Convention is coherent, fair, administrable, and complementary to existing frameworks.

We stand ready to collaborate on text proposals and technical annexes to achieve a workable instrument that safeguards fiscal sovereignty, legal certainty, and investor confidence while advancing sustainable development objectives.