

# **AUTOMATIC FOR THE PEOPLE**

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Automatic information exchange, tax justice and developing countries

## Introduction

The journey towards curtailing illicit financial flows is gaining momentum. 2013 has seen a significant shift in international tax cooperation, with the G8 and G20 making new pledges to ensure that countries will automatically share information on taxpayers. If and when these commitments are realised, it will signal a major step forward in enabling tax authorities to catch up with the pace of globalisation and digitalisation of finance. For while money can be shifted at the mere click of a button, the exchange of information between authorities – to combat tax abuse on such transfer flows – has moved at a much slower pace, if at all.

This year's statements from the 2013 G8 and G20 summits – as well as from the European Union<sup>1</sup> and the Organisation for Economic Cooperation and Development (OECD: a group of 34 developed countries) – are clear that this situation needs to, and will, change. However, questions remain on how this will actually happen, and how countries outside the G20 and OECD will fit into this process. The G20 has promised rapid action, but while this is welcome for the G20 countries, it raises questions around whether the changes will work for developing countries and how easily they will be able to integrate themselves into this new system.

That developing countries need to benefit is clear: the volume of illicit financial flows from developing countries is estimated to be over \$850bn a year.<sup>2</sup> The lost tax revenue to developing countries on assets held overseas by individuals alone is estimated to be \$156bn.<sup>3</sup> This pool of revenues held offshore is depriving developing countries of the vital capital needed for essential public services. It should be evident that richer nations have a duty to help remedy this problem: these funds are invariably held in developed countries, in tax havens linked to them and in banks headquartered within their borders.

While both the G8 and G20 have made clear reference to the need to ensure developing countries are included in automatic information exchange (AIE), there have been no details on how that might work.

This paper examines the current situation, the challenges facing developing countries' participation in AIE, the options for meeting these challenges, and the risks of not addressing the integration of developing countries at the start of this process. It concludes by recommending actions that can help to guarantee this global problem has a truly global solution.

Among the paper's recommendations are proposals highlighting the need to include developing countries and their needs in the process for formulating a new AIE standard, to ensure a global commitment to multilateralism with open access to all, to provide for asymmetry in the approach so that developing countries can focus on maximising the benefits, and to include assurances for data transparency and accountability.

## The current situation

This year, the G8, G20 and OECD all committed to developing AIE as the new standard for information exchange.<sup>4</sup> It is set to replace the current standard of information on request,<sup>5</sup> which suffers from three intrinsic problems: i) quite often, in order to know what information to request, you will already need to know a significant amount of information – and indeed, what you receive may simply confirm what you already know;<sup>6</sup> ii) the process is exceedingly slow; iii) it is manpower/resource intensive.

This year, it was also made clear that AIE is envisaged to be a global standard, and that developing countries must be able to share in the benefits. At the G8, there was reference to this in both the Declaration and Communiqué:

'Tax authorities across the world should automatically share information to fight the scourge of tax evasion.'

'Developing countries should have the information and capacity to collect the taxes owed them – and other countries have a duty to help them.'<sup>7</sup>

Similarly, at the G20 the issue was referred to in the Declaration, Tax Annex and Development Working Group report. The Declaration was particularly clear:

'Developing countries should be able to reap the benefits of a more transparent international tax system, and to enhance their revenue capacity, as mobilizing domestic resources is critical to financing development. We recognize the importance of all countries benefitting from greater tax information exchange. We are committed to make automatic exchange of information attainable by all countries, including LICs [lower-income countries], and will seek to provide capacity building support to them. We call on the Development Working Group in conjunction with the Finance Track, to work with the OECD, the Global Forum and other IOs [international

organisations] to develop a roadmap showing how developing countries can overcome obstacles to participation in the emerging new standard in automatic exchange of information, and to assist them in meeting the standard... The Working Group should report back by our next meeting.<sup>8</sup>

Both the Tax Annex<sup>9</sup> and Development Working Group (DWG) report<sup>10</sup> made similar references, with the DWG introducing a new action to identify and address the obstacles to automatic information exchange for developing countries.

These statements contain both reasons to be cheerful, and reasons for concern. On a positive note, we see a clear commitment to including developing countries, and to identifying and addressing the obstacles –

commitments to which we can hold G8 and G20 governments to account. There are even some commitments to timetables, at least insofar as a report and roadmap outlining how developing countries can participate in AIE must be presented to the G20 next year.

However, there are also reasons to be concerned. Firstly, while a report to the G20 in 2014 is welcome, there is a risk that this could be too late. The G20 has committed to a rapid schedule (see box, below) and, as a result, the main issues and technicalities are due to be finalised some months before any report on the challenges faced by developing countries will be made to the 2014 G20.

This seems to suggest that no attention is being paid towards the possibility that making AIE work for

### OECD/G20 priorities and issues

**The G20 Leaders' Summit in St Petersburg offered the clearest statement yet on priorities and issues: 'The G20 has now endorsed the development of a new global tax standard – to automatic information exchange of information.'<sup>11</sup> It also outlined the timetable:**

- i. The new standard (in a Model Competent Authority Agreement) to be presented to the G20 Finance Ministers' meeting in *February 2014*.**
- ii. The Global Forum to establish a mechanism to monitor and review the implementation of the new standard (the Global Forum will discuss this for the first time at the plenary on *21-22 November 2013*).**
- iii. G20 countries to begin to exchange information automatically by the *end of 2015*.**

Given the speed of this process, it seems likely that the new standard will be based upon that being implemented through existing mechanisms, such as the agreements to ensure compliance with FATCA (the Foreign Account Tax Compliance Act) and the EU Savings Tax Directive.<sup>12</sup>

While logical, these agreements – especially FATCA – were themselves developed quickly, and there

are some issues that require further attention in developing a global standard. For example:

- **Discretionary trusts – the mechanism for dealing with these needs to be closely monitored, as there is potential for a loophole in not identifying the beneficiaries and/or beneficial owners of these trusts.**
- **Currently, only electronic records need to be searched to identify foreign taxpayers. This should be changed to ensure paper records are also included; not only could significant older records be missed, but an obvious loophole would also be created.**
- **Any multilateral agreement must adopt a robust, relevant and fixed definition of beneficial ownership that does not incorporate the flaws inherent in the definition or application of beneficial ownership under the FATCA or FATF (Financial Action Tax Force) regimes, or as is generally conceptualised within current double taxation agreements.**
- **Translation into national law – to make the process efficient, and in anticipation of the standard being global, banks should be required to implement systems to identify and provide information on taxpayers from all countries, rather than on a country-by-country basis as they sign up to the new standard.**

developing countries will require any special consideration in the technicalities and rules. Indeed, the language used appears to imply that the only way to ensure that developing countries benefit will be through capacity building in these countries to implement the rules devised for the OECD/G20.

That there needs to be technical capacity in place to utilise the information provided is not in doubt. However there are concerns that to focus solely on capacity building is to miss the point that developing countries, presently, are different from developed countries. In pure numerical terms, developing countries are very distinct: for instance, in order for sub-Saharan Africa to have the same ratio of tax officials to population as the OECD average, it would require more than 650,000 new tax officials.<sup>13</sup> That is not a gap that can be bridged in a short period of time.

Given the differences that exist now, and the time it will take to close the capacity gap, it is surely beneficial to consider what should accompany capacity building efforts. Are there aspects that must also be considered to ensure the developing countries can benefit? Should the discussions revolve around both capacity building and capacity accommodating? In other areas of international affairs, the principle of differentiated responsibility/asymmetry/variable geometry is common: for example, developing countries are given special preferences in the field of international trade.

## The challenges

To fully participate in, and benefit from, AIE there are several things that are – generally speaking – necessary.

**International treaties** – these provide the legal basis to allow countries to exchange information, and can be on a bilateral or multilateral basis. Traditionally, information exchange agreements have been on a bilateral basis. However, recent years have seen progress on multilateral agreements, notably with the Multilateral Convention on Mutual Administrative Assistance in Tax Matters, which provides for the possibility of information on request among all treaty signatories. Multilateral conventions are the best route by which developing countries can gain the legal basis for information exchange, as many developing countries lack the political and economic leverage to successfully negotiate more advantageous information exchange agreements. There is also, however, evidence that some countries will use the desire for information

as leverage to demand unrelated concessions from developing countries; for example, Switzerland appears to be pressing for lower withholding tax rates on flows from developing countries in return for information exchange on request,<sup>14</sup> while the United States rejected calls from Argentina for an information exchange agreement, instead insisting on a double tax agreement that would require Argentina to surrender some of its taxing rights to the United States.<sup>15</sup>

The basis on which AIE will be instituted is not yet clear. The G20 made reference to both bilateral and multilateral AIE,<sup>16</sup> and while the existing multilateral convention allows for this, it requires a separate agreement between the countries seeking AIE.<sup>17</sup> It must be made clear that there will be a multilateral instrument for AIE, and that access to that multilateral instrument cannot be denied for subjective, political and/or collateral reasons. To keep up the pressure, the Global Forum on Tax Transparency and Exchange of Information for Tax Purposes should introduce criteria against which jurisdictions will be assessed – criteria such as signing the multilateral convention and making a commitment to multilateral AIE.

While there should be no subjective reasons for denying developing countries access, there are several ostensibly objective reasons that could be used, and careful attention must be paid to ensure that these are not drawn upon to discriminate against developing countries.

**Requirements to ensure confidentiality and security of data** – all treaties have clauses that require information being exchanged to be kept confidential; they make it clear that no obligation to exchange information exists if it is believed the information would be abused (contrary to public order).<sup>18</sup> The need for this is evident, and where developing countries face difficulties in being able to provide for these guarantees, there is also a clear need for capacity building. However, it must also be emphasised that many developing countries are already deemed to be meeting these standards, not least as many have signed (and have been encouraged to sign) both information exchange agreements and double tax agreements, as well the multilateral convention.

Given that the UK has signed 73 Double Tax Agreements (DTAs) and Tax Information Exchange Agreements (TIEAs) with developing countries, of which only 19 are deemed not to meet the standard for on-request information,<sup>19</sup> it would seem that the UK is confident that many developing countries do meet these requirements.

In spite of this, a consistent argument from non-developing country jurisdictions is that a key reason for developing countries' inability to access automatic information quickly is the existence of concerns over the security of this information.<sup>20</sup> This demonstrates a significant lack of consistency between words and actions.

**Requirements to provide reciprocal data** – the majority of information exchange treaties provide for reciprocal obligations; for AIE, this means that as well as receiving information automatically, signatories to agreements will also have to provide information automatically in return. This provision is vital to ensuring that a system of AIE works long term, but it does raise some challenges for developing countries. The capacity constraints of developing countries have been clearly identified, and while some developing countries will be able to, or will soon be able to, provide information to other countries, many will not have that capacity – perhaps for some time. On the one hand, a multilateral treaty is clearly the best way for developing countries, with their political and economic power constraints, to gain access to information. On the other hand, multilateral treaties – with reciprocity obligations to many other states – also raise the costs of participating for developing countries, together with the level of capacity building needed before they can join the standard.

**Ability to use the information received usefully** – this is arguably the most important step for developing countries. Again, capacity building is clearly needed in some countries, to assist them in using the information. Alongside capacity building, other steps can be taken to help ensure that the data received is used. For example, making sure that the data is in as standard a format as possible, with all the necessary information to make it possible to identify taxpayers meaningfully; this would enable the data to be used with domestic systems in the most simple and systematic way. Alongside this, the countries providing information must commit to cooperate and act on feedback to improve the provision and utility of information.<sup>21</sup>

In addition, while taxpayer data itself should clearly remain confidential, in order to help citizens ensure accountability for governments using data, there must be transparency over the scale and volume of data received (eg, number of pieces of information, number of people the information relates to, scale of assets involved, and so on) – all broken down on a country basis.<sup>22</sup>

There is also a need to consider whether there is additional information, beyond the level envisaged in the AIE standard, which would be useful: public registers of beneficial ownership, for instance. This would not only be likely to improve the quality of data being compiled and sent to developing countries, but would also provide a tool to complement the data received and identify gaps where further information needs to be requested.

### Meeting the challenges

The key challenges, on first glance, can be broken down into two areas:

- 1 Developing country policy and capacity building issues – meeting security concerns, providing reciprocal information, using information.
- 2 International/developed country policy and political issues – open access to international treaties, data standards and policies that complement AIE.

This basic distinction certainly appears to be how the G20 is conceptualising the issue, with the OECD/G20 leading on the second area and looking to support developing countries in the first. On closer inspection, however, it may be possible to see a greater crossover between the issues than is first apparent.

Looking at the capacity building issues, we see several potential challenges; however, they are not necessarily equal when it comes to the order of priority. The need to provide security and confidentiality of information is clearly of utmost importance, and is a priority for capacity building. Meanwhile, it is also clear that the need to be able to use and benefit from the information is of primary importance for developing countries, and similarly ought to be a priority for capacity building.

The need to provide reciprocity of information appears less important; for developing countries there is no real benefit to providing information, and many will also hold little information of significant interest in other nations. The only factors that turn this issue into one of high importance are that meeting this challenge is currently required in order to be able to join the treaties to access information, and that if no requirement for reciprocity existed, there would be a risk that developing countries could turn into tax havens, since those seeking secrecy would flock to countries still allowing it.

Given this, it seems there is scope for flexibility here. Many developing countries will have comparatively little information of interest to developed nations.<sup>23</sup> Consequently, and given that the alternative is likely to be that developing countries do not sign up to AIE in any case, if flexibility on reciprocity were granted there would be no effective loss of information being supplied from developing to developed countries, while it would enable a huge gain in useful information flowing to developing countries.

This flexibility could take the form of asymmetry in the multilateral agreement, with developing countries that sign up (most likely lower income and lower-middle income countries) being entitled to receive information automatically without having to reciprocate. They could be given a specified time in which to establish the capacity to provide reciprocity or other criteria could be used to assess when reciprocity would be required. There also ought to be a further qualification in that if a developing country signatory has a financial sector that is above a certain size (for example a high ratio of finance service exports to GDP),<sup>24</sup> then it would be required to provide reciprocity. Without this qualification, there would be a risk that developing countries might develop tax haven characteristics and facilitate tax evasion.

The direction of financial flows that are of interest are very one-sided: the vast amount of funds flow out from developing countries, invariably into accounts of banks based in developed countries, with very little if any flow into non-tax haven developing countries.<sup>25</sup> As such, it is surely right that the information flows focus on following the flow of money. It is also surely right that countries that have facilitated and benefitted from these illicit flows have a duty to provide the necessary information to help address any tax evasion being perpetrated.

Such asymmetry exists in other areas – for instance, in trade agreements – and it seems this would be a logical extension of the established international principal of differentiated responsibility. Asymmetry also exists to benefit powerful countries in some of the emerging information-sharing agreements; the UK, for example, is proposing non-reciprocal exchange with the Overseas Territories,<sup>26</sup> while it also appears that the United States is not yet able to provide full reciprocity in agreements that it is in the process of concluding.<sup>27</sup>

Asymmetry for developing countries would be a complement to capacity building. It would allow

capacity building to focus in the short term on providing for security and use of the information – meeting the minimum criteria for international participation, as well as securing the benefits of information exchange – before capacity building resources are expended on ensuring reciprocal exchange. Such an approach not only builds capacity, but also seeks to adapt the international rules to the capacity and circumstances of developing countries. Given the scale of the capacity gap, this is vital if the benefits of information exchange are not to be significantly deferred.

Alongside this, there are other aspects to the international agreements that may also benefit from considering developing countries more explicitly: for example, allowing transparency over the volumes of data to enable accountability of revenue authorities, and ensuring standards are at levels that provide easily useable information for developing countries.

There is also potential for developed countries to look at other areas where they could improve information exchange, such as by requiring greater disclosure of high-risk transactions. This would effectively help developing countries in their risk analysis, and help them focus on the taxpayers of greatest concern.<sup>28</sup>

Developed countries can also boost their support for capacity building; there are many good commitments to this principle, but less tracking of its delivery. In the UK, only around 0.2% of overseas development aid spending<sup>29</sup> goes towards supporting tax work, despite the significant return on investment.<sup>30</sup> Stronger commitments and monitoring of support for tax authorities, as well as coordination between donors, would clearly be a means of supporting domestic reform.

### **Risks of inaction**

Making sure that developing countries can benefit from AIE is evidently useful, but alongside the potential benefits, there are also a number of risks to ignoring these issues now, as the global standards are being set.

### **Pricing developing countries out**

The more countries that join a multilateral system on AIE, the higher the threshold to entering the convention will be, as regards the requirement for reciprocal AIE. This will mean that the amount of investment that needs to be made in building capacity will continue to increase while, once the initial political focus on AIE has

died down, the support available to capacity building on information exchange may well decrease. As a result, the cost to developing countries in meeting the minimum requirements to allow them to participate will increase the longer the issue is ignored.

### **Blacklisting developing countries**

As multilateral information exchange develops into the global standard, it is likely to follow that there will be penalties for transactions with countries outside the system. Many countries have blacklists of non-cooperative jurisdictions where transactions are to undergo extra scrutiny and/or penalties, and it is likely that being outside multilateral information exchange will become a criterion for inclusion on such lists. While this is understandable as a tool to ensure change in reluctant jurisdictions, it could also unfairly punish developing countries that would, in principle, wish to join information exchange, but who are unable to meet all the requirements immediately.

### **Encouraging new tax havens**

Political pressure has made sure that some of the current tax havens have agreed to participate in AIE. While this has yet to be delivered, this is significant progress. However, there will continue to be those who wish to benefit from secrecy, and developing countries that are outside AIE agreements will be a prime candidate for such unscrupulous individuals. We have already witnessed Gambia promoting its new offshore centre as not having FATCA information-sharing agreements,<sup>31</sup> and others may well follow if AIE evolves without developing countries. This would particularly be the case if developing countries outside AIE agreements were to be blacklisted: the temptation to engage in tax haven practices to offset the costs of blacklisting may, as a result, be irresistible.

### **The time to act is now**

These risks, while not guaranteed, are considerable. They pose challenges not only to developing countries but to all countries – and to the likelihood of making AIE a truly universal standard. However, as this paper suggests, the risks are certainly manageable – but it requires them to be addressed now, as the system is being set up, rather than as an afterthought.

The G20 has set an ambitious timeline on AIE: the first draft of the new standard is due in February 2014, to be finalised by mid-2014, and G20 countries are due to implement it by 2015. While many developing countries may take longer to join, the legal and technical environments in which developing countries will expect to participate will be set in the next year. Consequently, now is the time to ensure they work for all countries, not just the G20. If the legal environment is not made to work now, it will be almost impossible to change in the future when a multilateral instrument is already in operation, and developing countries could be effectively excluded.

### **Recommendations**

- The working group designing the new standard should seek participation from developing countries, and should have the applicability of the new standard for developing countries as a criterion by which the standard is to be assessed.
- The new multilateral instrument should offer asymmetry on reciprocity of information for developing countries during a transitional period.
- The new multilateral instrument should be free for any willing entrant to join, with no conditions to surrender or alter any fiscal or economic policy unrelated to AIE in return for participation.
- There must be transparency over the scale and volume of data being exchanged, to enable accountability at country level.
- Donor countries should commit to a long-term coordinated capacity building programme.
- Capacity building should be focused on maximising benefits to developing countries – ie, on securing and using data before reciprocity.
- Developed countries should develop further their mechanisms to collect and share more useful information for developing country tax authorities (for instance, through public registers of beneficial ownership and declarations of high-risk transactions).

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## Endnotes

- 1** [www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/ec/137197.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/137197.pdf)
- 2** *Illicit Financial Flows from Developing Countries: 2001-2010*, Global Financial Integrity, 2012, <http://iff.gfintegrity.org/iff2012/2012report.html>
- 3** Oxfam, 'Lost tax haven cash enough to end extreme poverty – twice over', May 2013, [www.oxfam.org.uk/blogs/2013/05/tax-haven-cash-enough-to-end-extreme-poverty](http://www.oxfam.org.uk/blogs/2013/05/tax-haven-cash-enough-to-end-extreme-poverty)
- 4** See [www.gov.uk/government/publications/g8-lough-erne-declaration/g8-lough-erne-declaration-html-version](http://www.gov.uk/government/publications/g8-lough-erne-declaration/g8-lough-erne-declaration-html-version), [www.g20.org/load/782795034](http://www.g20.org/load/782795034) and [www.oecd.org/ctp/exchange-of-tax-information/Background\\_Brief\\_AEOI\\_27082013.pdf](http://www.oecd.org/ctp/exchange-of-tax-information/Background_Brief_AEOI_27082013.pdf)
- 5** However, there will remain the need to provide for information on request, not least to support investigations triggered by the information provided automatically.
- 6** See section 3.3 of the report by France on information exchange on request: [www.performance-publique.budget.gouv.fr/farandole/2013/pap/pdf/Jaune2013\\_reseau\\_conventionnel.pdf](http://www.performance-publique.budget.gouv.fr/farandole/2013/pap/pdf/Jaune2013_reseau_conventionnel.pdf)
- 7** See note 4.
- 8** [www.g20.org/load/782795034](http://www.g20.org/load/782795034)
- 9** [www.g20.org/load/782804366](http://www.g20.org/load/782804366)
- 10** *Tax Annex to the St Petersburg G20 Leaders Declaration*, [www.g20.org/load/782802205](http://www.g20.org/load/782802205)
- 11** See note 10.
- 12** See, for example, <http://tinyurl.com/lp6yxsj>
- 13** Odd-Helge Fjeldstad and Kari K Heggstad, *The Tax Systems in Mozambique, Tanzania and Zambia: Capacity and constraints*, CMI, 2011, pg x, [www.cmi.no/publications/file/4045-taxation-mozambique-tanzania-zambia.pdf](http://www.cmi.no/publications/file/4045-taxation-mozambique-tanzania-zambia.pdf)
- 14** [www.alliancesud.ch/de/publikationen/downloads/dokument-24-2013.pdf](http://www.alliancesud.ch/de/publikationen/downloads/dokument-24-2013.pdf)
- 15** Martin Hearson, 'Why the US and Argentina have no Tax Information Exchange Agreement', September 2013, [www.martinhearsen.wordpress.com/tag/wikileaks](http://www.martinhearsen.wordpress.com/tag/wikileaks)
- 16** See note 9.
- 17** Article 6 of Multilateral Convention on Mutual Administrative Assistance in Tax Matters, [www.oecd.org/ctp/exchange-of-tax-information/ENG-Amended-Convention.pdf](http://www.oecd.org/ctp/exchange-of-tax-information/ENG-Amended-Convention.pdf)
- 18** See for example Articles 21 and 22 of the Multilateral Convention, Articles 7 and 8 of the OECD model TIEA, and Article 26 of the OECD model DTA.
- 19** Data taken from OECD Exchange of Information Portal: 19 were deemed not to meet the standard, 36 were unreviewed and 18 did meet the standard, <http://eoi-tax.org/>
- 20** See [www.alliancesud.ch/en/policy/tax\\_justice/switzerland-and-tax-evasion-from-the-south](http://www.alliancesud.ch/en/policy/tax_justice/switzerland-and-tax-evasion-from-the-south)
- 21** Some jurisdictions have poor records on cooperating under existing on request procedures: France, for example, has detailed how out of 308 requests for information to 19 states, only 195 responses were received – see [www.performance-publique.budget.gouv.fr/farandole/2013/pap/pdf/Jaune2013\\_reseau\\_conventionnel.pdf](http://www.performance-publique.budget.gouv.fr/farandole/2013/pap/pdf/Jaune2013_reseau_conventionnel.pdf). On the need for feedback, also see [www.tpa-global.com/files/StreamFile48987/130130\\_manualon-exchange-of-information.pdf](http://www.tpa-global.com/files/StreamFile48987/130130_manualon-exchange-of-information.pdf) pp48-49.
- 22** Currently, some countries claim that existing information exchange agreements prohibit disclosure of such data, despite no personal information being attached.
- 23** In 2012, for example, the UK made 342 requests to European countries but only 26 to African countries.
- 24** See IMF Working Paper 07/87 for a detailed discussion of the metrics that could be used to identify offshore financial centres: [www.imf.org/external/pubs/ft/wp/2007/wp0787.pdf](http://www.imf.org/external/pubs/ft/wp/2007/wp0787.pdf)
- 25** [http://www.gfintegrity.org/storage/gfip/documents/reports/absorption\\_of\\_illicit\\_flows\\_web.pdf](http://www.gfintegrity.org/storage/gfip/documents/reports/absorption_of_illicit_flows_web.pdf)
- 26** [www.hmrc.gov.uk/fatca/uk-crown-dependencies.pdf](http://www.hmrc.gov.uk/fatca/uk-crown-dependencies.pdf)
- 27** <http://about.bloomberglaw.com/law-reports/full-reciprocity-under-fatca-is-a-work-in-progress-irs-official-says>
- 28** See, for example, Action 12 of the BEPS Action Plan [www.oecd.org/ctp/BEPSActionPlan.pdf](http://www.oecd.org/ctp/BEPSActionPlan.pdf) (p44); recommendation II(4) of Harmful Tax Competition [www.oecd.org/tax/transparency/44430243.pdf](http://www.oecd.org/tax/transparency/44430243.pdf); and [www.actionaid.org.uk/sites/default/files/doc\\_lib/dotas\\_submission\\_aa\\_ca\\_ogb\\_stcuk.pdf](http://www.actionaid.org.uk/sites/default/files/doc_lib/dotas_submission_aa_ca_ogb_stcuk.pdf)
- 29** Current spending on tax work is £20m a year out of a DFID budget of £8.65bn: [www.publications.parliament.uk/pa/cm201314/cmhansrd/cm130904/text/130904w0001.htm#1309053000983](http://www.publications.parliament.uk/pa/cm201314/cmhansrd/cm130904/text/130904w0001.htm#1309053000983)
- 30** House of Commons International Development Committee, *Tax in Developing Countries: Increasing Resources for Development*, Fourth Report of Session 2012-13, [www.publications.parliament.uk/pa/cm201213/cmselect/cmintdev/130/130.pdf](http://www.publications.parliament.uk/pa/cm201213/cmselect/cmintdev/130/130.pdf) (especially paragraphs 72-75).
- 31** See iCommerce Registry: The Online Registry of The Gambia: [www.icommerceregistry.com/pdf/GBC2%20Comparison.pdf](http://www.icommerceregistry.com/pdf/GBC2%20Comparison.pdf)

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## Supporting organisations

ActionAid – UK	Latindadd (Latin American Network on Debt Development and Rights)
ActionAid – International	Methodist Tax Justice Network (UK)
Action for Economic Reforms (Philippines)	New Rules for Global Finance (USA)
Action Solidarité Tiers Monde (Luxembourg)	Oxfam
Alliance Sud, the Swiss Coalition of Development Organisations	Perkumpulan Prakarsa (Indonesia)
Berne Declaration	Plateforme Paradis Fiscaux et Judiciaires (France)
Canadians for Tax Fairness	Red de Justicia Fiscal de América Latina y El Caribe
CCFD-Terre Solidaire (France)	Red Nicaraguense de Comercio Comunitario (RENICC)
Centre for Budget and Governance Accountability (India)	Sherpa (France)
Christian Aid	Stichting Oikos (Netherlands)
CNCD-11.11.11, Centre National de Coopération au Développement (Belgium)	Tax Justice Network
Ethical Consumer Research Association (UK)	Tax Justice Network – Africa
Eurodad (European Network on Debt and Development)	Tax Justice Network – Australia
Financial Transparency Coalition	Tax Justice Network – Israel
Global Alliance for Tax Justice	Tax Justice Network – Norway
Global Financial Integrity (USA)	Tax Justice Network – USA
Global Policy Forum (Germany/USA)	Tax Research UK
IBIS (Denmark)	Uniting Church in Australia, Synod of Victoria and Tasmania
Institute of Global Responsibility (Poland)	Vienna Institute for International Dialogue and Cooperation (VIDC)
Inter Pares (Canada)	World Economy, Ecology & Development (WEED) (Germany)
Kairos Europe (Brussels Office)	
Kepa (Finland)	