# TAX INSPECTORS WITHOUT BORDERS

**Extending TIWB to Tax Treaty Negotiation and Administration** 

TTN Toolkit Webinar

4 November 2020

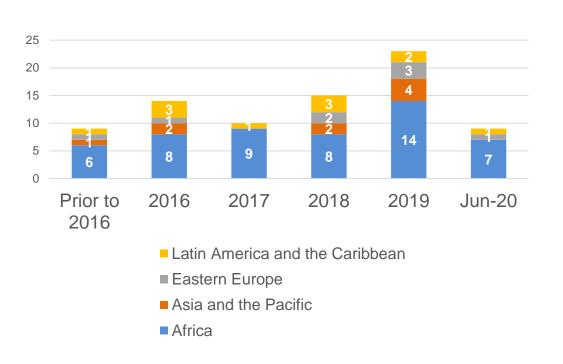
Rusudan Kemularia, Head of TIWB Secretariat, OECD Andrew Dawson, Adviser, OECD



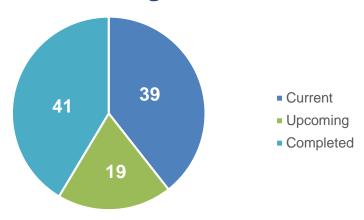


#### **TIWB** to date

# Regional Distribution Programmes Commenced by Year



# 80 completed and current programmes out of initial goal of 100



Support to current and completed TIWB programmes provided by:	No. of programmes supported
ATAF/ISF/OSF	9
OECD	20
Partner Administrations	39
UNDP (Roster of Experts)	12

Source: TIWB Secretariat as of 15/10/2020

### **Revenue Impact to Date**

USD 537 million in increased tax revenuesUSD 1 884 million in tax assessments

On average, in excess of USD 70 return on investment for every USD 1 spent on TIWB programmes

# Latin America and Caribbean

Collected: USD 122.1 million Assessed: USD 131.8 million

#### Eastern Europe

Collected: USD 1.6 million
Assessed: USD 66.1
million

#### **Africa**

Collected: USD 354.1 million Assessed: USD 1 587.8 million

#### Asia

Collected: **USD 58.7 million** Assessed: **USD 58.9 million** 

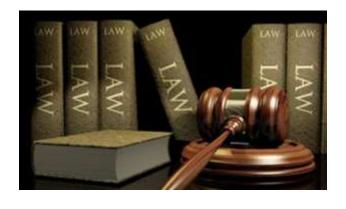
## Impacts Beyond Revenue

# In addition to increased tax revenues, TIWB Host Administrations report other **positive outcomes**



# Transfer of Skills and Confidence Building

Leading to new mentee Experts



#### Organisationnel Effectiveness

- Legislative Changes
- Creation of special Transfer Pricing teams



#### **Tax Compliance**

- Improved tax payer bahaviour
- Voluntary compliance

## **COVID-19 Implications**



Enhanced Confidentiality



All on-site missions are currently suspended

Despite the travel constraints TIWB is 'open for business'

 Guidance on the secure transmission of confidential information provided to Host Administrations and TIWB Experts Flexible approach

Remote assistance insufficient for new programmes

## **Expanding TIWB to New Tax Areas**

## TIWB is expanding its hands-on assistance in new areas:

- Tax Criminal Investigations
- Effective Use of AEOI
- Tax Treaty Negotiation & Administration
- Taxation and Natural Resource Contracts
- Taxation and Environment



## Tax Treaty Negotiation and Administration

#### How does it work?

- Host Administrations request tax treaty negotiation and administration assistance by initially completing an online Assistance Request Form.
- The TIWB Secretariat matches an appropriate Expert from its network of Partner Administrations or the TIWB Roster of Experts.
- Tax treaty experts work directly with local tax and other government officials involved in tax treaty negotiation and administration
- TIWB experts are not a substitute for local staff.
- Tax treaty negotiation and administration programme generally involve periodic on-site assistance, composed of several one or two-week missions over a span of 18 to 24 months, providing remote assistance when required.

## Tax Treaty Negotiation and Administration

- ☐ The scope of TIWB could be extended to supporting developing countries in the following ways:
- Providing assistance in treaty policy formulation and negotiation.
- Providing support to developing countries in correctly administering treaties and auditing improper use where taxpayers attempt to obtain unintended benefits from those treaties.
- Providing support for developing countries in resolution of double taxation disputes.

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