

# THE PLATFORM FOR COLLABORATION ON TAX PCT PROGRESS REPORT 2024



**WORLD BANK GROUP**

**IFC**

International  
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Multilateral Investment  
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This report has been prepared in the framework of the Platform for Collaboration on Tax (PCT) under the responsibility of the PCT Secretariat and staff of the four organizations. The work of the PCT Secretariat is generously supported by the Governments of France, Japan, the Netherlands, Norway, Switzerland, and the United Kingdom.

This report reflects a broad consensus among the staff of the four PCT organizations, but it should not be regarded as the officially endorsed views of those organizations, their member countries, or the donors of the PCT Secretariat.

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# TABLE OF CONTENTS

<b>ACRONYMS</b>	<b>2</b>
<b>I. INTRODUCTION</b>	<b>4</b>
<b>II. PCT ACTIVITIES AND WORKSTREAMS</b>	<b>8</b>
A. Workstream 1: Tax and the Sustainable Development Goals (SDGs)	9
B. Workstream 2: International Taxation	12
C. Workstream 3: Medium-Term Revenue Strategy (MTRS)	17
D. Workstream 4: Stakeholder Engagement, Dissemination, and Internal Exchanges	19
<b>III. BUDGETARY SUPPORT AND THE SECRETARIAT STAFFING</b>	<b>22</b>
<b>IV. FUTURE STEPS</b>	<b>24</b>
<b>APPENDIX</b>	<b>26</b>
APPENDIX 1: Examples of PCT Partners Collaboration	27

# ACRONYMS

ADB	Asian Development Bank
ATAF	African Tax Administration Forum
BEPS	Base Erosion and Profit Shifting
BCA	Border Carbon Adjustment
CATA	Commonwealth Association of Tax Administrations
CIAT	Inter-American Center of Tax Administrations
CBAM	Carbon Border Adjustment Mechanism
CREDAF	Exchange and Research Centre for Leaders of Tax Administrations
CWG	Country Working Group
DRM	Domestic Revenue Mobilization
EU	European Union
FfD4	4th International Conference on Financing for Development
GDP	Gross Domestic Product
GloBE	Global Anti-Base Erosion Rules
GPPF	Global Public Finance Partnership (IMF)
GTP	Global Tax Program
IDA	International Development Association
IDB	Inter-American Development Bank
IF	Inclusive Framework
IMF	International Monetary Fund
INFF	Integrated National Financing Framework
JDRMI	Joint Domestic Resource Mobilization Initiative
MDTF	Multi-Donor Trust Fund

MNRW-TF	Managing Natural Resource Wealth Trust Fund
MTRS	Medium-Term Revenue Strategy
OECD	Organisation for Economic Co-operation and Development
OIP	Online Integrated Platform
PCT	Platform for Collaboration on Tax
RMTF	Revenue Mobilization Thematic Fund
SDG	Sustainable Development Goal
TIWB	Tax Inspectors Without Borders
TPD	Tax Project Database
TWG	Technical Working Group
UN	United Nations
VAT	Value-Added Tax
WATAF	West African Tax Administration Forum
WBG	World Bank Group

# I. INTRODUCTION

Many developing countries face significant challenges due to mounting debt levels, geopolitical tensions, and supply chain disruptions. There is an urgent need for collaborative efforts to support governments and policy makers in boosting revenues, alleviating debt crises, creating appropriate incentives for economic and social development, and unlocking resources to advance the sustainable development goals (SDGs).

The Platform for Collaboration on Tax (PCT) Partners — the Staff and Secretariats of the International Monetary Fund (IMF), the Organisation for Economic Co-operation and Development (OECD), the United Nations (UN), and the World Bank Group (WBG) — continue their commitment to deepening their collaboration on revenue mobilization through the PCT, in order to help countries develop resilient tax systems and better fiscal policies in response to the rapidly changing global tax landscape.

The 2024 PCT work program is organized into four workstreams as follows:

- a) Tax and the Sustainable Development Goals (SDGs), including Environmental Tax
- b) International Taxation
- c) Medium-Term Revenue Strategy (MTRS)
- d) Stakeholder Engagement, Dissemination, and Internal Exchanges

The 2024 PCT work program builds on the progress made under the 2023 work program. The main focus since the last report has been on the review of tax incentives policies under the international tax workstream, with parallel activities under tax and SDGs, including environmental tax, MTRS and stakeholder engagement, dissemination and internal exchanges.

The key outputs delivered since the release of the [2023 Progress Report](#) include the following:

### Capacity-development guidance and tools

- The PCT has launched the review of its 2015 PCT report titled: [Options for Low Income Countries' Effective and Efficient Use of Tax Incentives for Investment](#) (*hereinafter*: 2015 tax incentives toolkit). The review is focused on how tax incentives are impacted by recent international tax developments, including the [Global Anti-Base Erosion Rules \(GloBE\)](#), and the introduction of a [global minimum tax \(GMT\)](#). In addition to analyzing the international tax developments, the PCT is also exploring how tax incentives can support countries in achieving their climate goals and transitioning to a green economy, with a particular focus on the unique needs of developing countries. The PCT has developed a workplan for this review process, which will span 2024 to 2025. As part of the initial phase, the PCT has finalized its first deliverable: the PCT Tax Incentives Principles Paper. This paper combines the agreed principles of the PCT Partners and was issued for public consultation in December 2024 on the PCT website. The public consultation provides an opportunity for stakeholders, including governments, policymakers, and experts, to contribute feedback and insights on the evolving role of tax incentives.
- The PCT has initiated a review of the [MTRS](#) approach, eight years after its inception. The primary goal of this review is to integrate the lessons learned from the last eight years of its implementation and use those insights to improve and strengthen the approach. The process will involve:
  1. *evaluating the effectiveness* - assessing how successful the MTRS has been in achieving its goals, such as increasing tax revenue, improving tax compliance, and promoting fairness and efficiency in the tax system;
  2. *identifying challenges* - understanding the obstacles and challenges faced during the implementation; and



3. *incorporating feedback* - gathering inputs from government agencies and stakeholders to ensure that the revised MTRS framework is more practical and responsive to the needs of developing countries.

### Technical seminars and ask-an-expert webinars

- The PCT held a Tax Incentives Technical Seminar & Retreat on March 25-26, 2024 in Washington DC to consult a broad range of stakeholders on the approach to the review of the 2015 tax incentives toolkit. The event brought together representatives from international and regional organizations, academia, and the business community. The insights and perspectives shared during these two days have informed the review of the toolkit, ensuring that it evolves in line with best practices and meets the specific needs of developing countries.
- The PCT organized an 'Ask-an-Expert' webinar titled [Border Carbon Adjustments: Considering Climate and Fiscal Implications for Developing Countries](#) on November 5th, 2024. The webinar aimed to inform policymakers on recent developments in border carbon adjustments (BCAs), using the European Union's (EU) newly introduced Carbon Border Adjustment Mechanism (CBAM) as an example, as it is the only comprehensive BCA that is currently operational. The session was designed to enhance understanding of the justification for, and design of, BCAs and their impact on developing economies, exploring the intersection of climate and fiscal policies, as well as global competitiveness.

### Communications and knowledge management

- On October 30th, 2024, the PCT published a blog titled [Taxation and Sustainable Development Goals. The Role of the PCT](#), authored by the Principals of the four Partner organizations. The blog examines how taxation can support developing countries in achieving the SDGs

and was written in the context of the preparations for the [Fourth International Conference on Financing for Development \(FfD4\)](#), set to take place in July 2025.

- A new resource tab on [tax incentives](#) was added to the PCT website. It showcases curated knowledge resources relevant to tax incentives including policy reports, technical assistance notes, guidelines, academic papers, and statistics from the PCT Partners and selected external sources. The list is updated regularly.
- The PCT has begun developing an e-learning course on tax treaty negotiations. This course is designed to complement the [PCT's tax treaty negotiation toolkit released in 2021](#), transforming its key insights into an engaging, interactive learning experience.

### Technical exchanges and outreach

- The PCT Partners continued to provide guidance to the Secretariat on the implementation of the PCT's workplan and on-going activities under the main workstreams and their relevant subgroups (see hereafter). They also convened regularly to facilitate exchanges on key issues, including updates on the Inclusive Framework (IF), progress on the work of the UN Committee of Experts on International Cooperation in Tax Matters<sup>1</sup>, updates on the work of the Ad Hoc Committee to develop the terms of reference for a UN Framework Convention on International Tax Cooperation, and preparations for the FfD4 to be held in 2025.
- The PCT has established two new expert subgroups: one focused on Tax Incentives and the other on MTRS, comprising representatives from partner organizations. These subgroups meet regularly to advance the review of the 2015 Tax Incentives Toolkit and the MTRS Framework, respectively. Additionally, the PCT's Tax and Environment Expert Subgroup, established in 2022, continued to hold

<sup>1</sup> The [UN Tax Committee](#) is a subsidiary body of the Economic and Social Council (ECOSOC) comprising 25 tax experts nominated by UN Member States and selected by the UN Secretary-General to act in a personal capacity to produce practical guidance on domestic and international tax matters, as well as to strengthen international tax cooperation. It has a broad mandate, and in all its work it is mandated to give special attention to the unique needs of developing countries.

regular meetings to promote knowledge exchange and explore areas where the PCT can provide resources and guidance to support countries.

- The PCT maintained active engagement with the development partners throughout the year, holding a meeting on June 27th, 2024, to provide an update on the PCT workplan and discuss ongoing activities across its main workstreams. Development partners were also involved in the Technical Seminar on Tax Incentives in March 2024 and the 'Ask-an-Expert' webinar on CBAM in November 2024.

The following sections of the Progress Report provide an update on the work of the PCT since the [2023 Progress Report](#): Section II details each of the PCT's four workstreams, highlighting objectives, activities, outcomes, and next steps for each; Section III reports on the budgetary support provided by PCT's development partners; and Section IV notes potential future steps and opportunities for continued delivery of the PCT workplan. This Progress Report is part of the PCT's commitment to operating transparently and making its workplan and outputs widely available to governments, capacity development providers and their donors, civil society organizations, and the general public, through its publicly accessible website.

# II. PCT ACTIVITIES AND WORKSTREAMS



## A. WORKSTREAM 1: TAX AND THE SUSTAINABLE DEVELOPMENT GOALS (SDGs)

### 1.1 Objectives

Taxation plays a significant role in achieving the SDGs. Beyond generating revenues to finance the SDGs, tax policy and administration also impact growth and equity and influence taxpayers' behavior. Equitable and fair tax systems help strengthen the social contract between governments and taxpayers. Under this workstream, with a particular focus on environmental taxation, the PCT aims to raise awareness on the interlinkages between taxation and the SDGs and to identify key areas and topics where countries could benefit from potential collaborative support by the Partners.

### 1.2 Activities

#### 1.2.1 Tax and SDGs

The PCT partner organizations are actively preparing for the UN's FfD4, scheduled for July 2025 in Seville, Spain. The conference will focus on mobilizing resources for sustainable development, addressing both emerging challenges and the financial barriers that impede progress toward achieving the SDGs. As part of their engagement, the Partners, both individually, and in varying combinations, are contributing to the formal preparatory process through thematic submissions, consultations, and ongoing exchanges within the PCT.

In this context, on October 30th, 2024, the PCT published a blog titled: [Taxation and Sustainable Goals: The Role of the PCT](#). Authored by the Principals of the four partner organizations, the blog explores how strengthening tax systems can help to close the SDG financing gap and support equitable growth. It highlights

the crucial role of taxation and domestic revenue mobilization (DRM)<sup>2</sup> in advancing the SDGs, especially for low-income and emerging economies that are facing significant fiscal challenges. The blog argues that, with public finances strained due to the pandemic, economic downturns, and geopolitical challenges, countries are struggling to close a widening SDG financing gap. The gap is particularly large in low-income countries, which require substantial investments in areas like health, education, infrastructure, and climate resilience. The UN estimates that the annual financing gap has grown to USD 4 trillion, with low-income countries needing about 16.1% of Gross Domestic Product (GDP) for SDG-related investments, compared to just 4.8% in emerging economies and 0.2% in advanced ones. Improving tax collection is seen as a vital solution to help fill this gap, with the IMF and WBG highlighting that tax revenues of at least 15% of GDP can significantly boost economic growth and reduce inequality. To increase revenues, the blog suggests tax reforms focused on broadening tax bases by better taxing consumption, income, and wealth while improving tax compliance. Closing value-added tax (VAT) compliance gaps and improving corporate tax collection can also have redistributive effects, benefiting the poorest if coupled with targeted social spending.

The blog also discusses the critical role of international tax cooperation as an essential complement to domestic tax capacity-building efforts. It highlights progress on efforts to improve tax transparency and mitigate profit shifting through initiatives like the OECD/G20 GMT, while noting ongoing discussions on a UN Framework Convention on International Tax Cooperation. It also emphasizes the role of the PCT in developing guidance and tools to support developing countries in reforming their tax systems. Looking ahead to the FfD4 in July 2025, the blog stresses the need for international collaboration to support domestic tax capacity, close financing gaps, and meet the SDGs. The Partners of the PCT are committed to helping countries strengthen their tax systems and mobilize resources for development building on the messages that emanated from May

<sup>2</sup> The report uses the terms "DRM" and "Domestic Revenue Mobilization" to refer to countries' public revenue mainly in the nature of taxes. Where it uses the broader notion of "domestic resources", which includes other sources of public funds such as public debt, this is specifically noted (such as, for instance, in relation to JDRM); see Appendix I).

2024 Inclusive Framework meeting in which the four Partners participated.

## 1.2.2 Tax and Environment

In September 2023, the PCT Secretariat published a report: [Carbon Pricing Metrics: Analyzing Existing Tools and Databases of PCT Partners](#) which aims to inform policymakers, businesses and other stakeholders of different carbon pricing metrics of the four partner organizations [and others]<sup>3</sup>. The release of the report was accompanied by an Ask-an-Expert [webinar on carbon pricing](#). The webinar provided an opportunity to share the key messages of the report, highlighting experiences with carbon pricing in several case study countries, accompanied by an expert panel discussion and questions from the online audience.

Throughout 2024, the Tax and Environment Expert Subgroup continued to hold regular monthly workstream meetings and updated each other on the work of each partner organization on topics such as fossil fuel subsidies removal, carbon pricing, BCAs including CBAM, and other fiscal policies relevant to climate. Insights from these exchanges played a critical role in shaping the content and focus of the 2024 workplan, including the webinar on BCAs mentioned below.

At the PCT Tax Incentives Technical Seminar in March 2024, the Subgroup led a session focused on the role of tax incentives in advancing the climate change agenda. The discussion concluded that, while tax incentives can be a powerful tool in driving the green transition, their design and implementation require careful thought, particularly in the context of developing countries. It was emphasized that such incentives should be integrated into a broader policy framework that considers fiscal constraints, social benefits, and the trade-offs involved.

During the IMF/OECD/WB Partnership Week in June 2024 [further discussed in Section 4.2.1.], the Subgroup hosted

a panel to update donors and development partners on the ongoing activities under the PCT environmental tax workstream. The panel highlighted progress in areas of carbon pricing, BCAs, and outlined plans for future activities in the PCT work program.

On November 5th, 2024, the PCT hosted another Ask-an-Expert webinar focusing on [Border Carbon Adjustments \(BCAs\) and their potential implications for global trade and climate policy](#). Experts from, or involved in relevant work at, the European Commission, IMF, OECD, UN, and WBG shared insights on the complexities of BCAs, emphasizing key considerations for developing countries. The event explored how countries can navigate the evolving landscape of BCAs. It also highlighted strategies and resources available to help countries address the challenges posed by BCAs. The EU CBAM was used as an example, as it is currently the only operational comprehensive BCA. Following the expert presentations, the session featured an interactive Q&A, fostering peer-to-peer learning among policymakers eager to explore how fiscal policy can align with climate goals through well-designed, cost-effective policy packages. The webinar attracted 93 participants from 30 countries, creating a diverse platform for global dialogue on this critical issue.

## 1.3 Outcomes

The collective efforts by the PCT partners have raised awareness about the role of taxation in empowering countries to address the critical challenges they face and in supporting their progress towards achieving the SDGs. Enhanced discussions among the Partners have facilitated internal exchanges on the Partners' priorities and work as well as exploring opportunities for synergies and potential collaborative work. Identifying and presenting convergent key messages and approaches on critical issues has improved outreach and strengthened communication about the PCT's role, as well as its capacity development guidance and tools, particularly to governments in developing countries.

<sup>3</sup> The report and its key takeaways are discussed in detail in the 2023 Progress Report.

## 1.4 Next steps

The PCT partner organizations will remain actively involved in the preparatory process leading up to next year's FfD4, emphasizing the crucial role of taxation and DRM in advancing the SDGs and supporting the reform of the international financial architecture.

The Tax and Environment Expert Subgroup will continue to explore potential PCT environmental tax outputs that could benefit from further collaboration by the Partners. Potential themes for the upcoming work are being discussed and evaluated against multiple criteria, including data availability, potential environmental impact, clients' and stakeholders' needs, and synergies in existing environmental tax workstreams across the four partner organizations.

## B. WORKSTREAM 2: INTERNATIONAL TAXATION

### 2.1 Objectives

Under this workstream, the PCT aims to facilitate exchanges on the rapidly evolving international taxation landscape. The workstream also aims to identify key international tax issues relevant particularly to developing countries, and devise ways for the PCT to provide practical guidance and toolkits as part of capacity development for countries on those issues. This aids the countries' participation in discussions on those topics at global, regional, and national levels, their consideration of options, as well as the implementation of changes they decide to make as a result of the discussions and their outcomes.

### 2.2 Activities

#### 2.2.1 PCT toolkits and e-learning modules

The PCT toolkits serve as valuable resources that provide guidance on complex international tax issues for governments, particularly those with low capacities. The toolkits also serve as resources for the PCT Partners to use in their capacity building efforts and training. The development process of each toolkit includes public consultation on discussion drafts with stakeholders and direct dialogue with relevant stakeholders, all of which are facilitated by the PCT Secretariat. Table 1 lists the five PCT toolkits, with their dates of release.

**TABLE 1**

#### PCT Toolkits on BEPS and Related Tax Matters

TOOLKIT	RELEASE DATE
<a href="#">Options for Low-Income Countries' Effective and Efficient Use of Tax Incentives for Investment</a>	October 2015
<a href="#">Addressing Difficulties in Accessing Comparables Data for Transfer Pricing Analyses</a>	June 2017
<a href="#">Taxation of Offshore Indirect Transfers</a>	June 2020
<a href="#">Practical Toolkit to Support the Successful Implementation by Developing Countries of Effective Transfer Pricing Documentation Requirements</a>	January 2021
<a href="#">Tax Treaty Negotiations<sup>4</sup></a>	March 2021 Updated in May 2021 and May 2022

In 2024, the PCT began developing e-learning courses to complement the existing toolkits. The first module will focus on tax treaty negotiations, building upon the 2021 PCT Tax Treaty Negotiation Toolkit by transforming its key insights into an interactive learning experience. Work is underway to develop additional modules in the future.

<sup>4</sup> Beyond the downloadable PDF version, the Toolkit on Tax Treaty Negotiations also has an [online version](#). The numbers provided under Table 1 refer strictly to the PDF version.

## 2.2.2 Review of the 2015 tax incentives toolkit

In 2024, the PCT began reviewing its 2015 tax incentives toolkit in light of recent international tax developments, particularly the introduction of the GMT under the GloBE rules. The review also examines the potential role of tax incentives in achieving climate targets and supporting the green transition, focusing on the needs of developing countries.

To facilitate this process, the PCT Partners organized a technical seminar and retreat in Washington D.C. on March 25-26, 2024. The event aimed to discuss the impact of these developments on tax incentives and provide input in the review of the 2015 PCT tax incentives toolkit. Approximately 50 participants attended, including 25 in person. These participants included staff from the PCT Partners, internal and external experts, other international and regional organizations, including Asian Development Bank (ADB), African Tax Administration Forum (ATAF), Commonwealth Association of Tax Administrations (CATA), Inter-American Center of Tax Administrations (CIAT), Exchange and Research Centre for Leaders of Tax Administrations (CREDAF), Inter-American Development Bank (IDB), academia, the private sector, and donors.

Five technical panels were held during the event, covering the following topics:

- i) tax incentives in light of latest international tax developments – international and regional perspectives;
- ii) tax incentives and the GMT – policy considerations for developing countries;
- iii) tax incentives and broad tax policy reforms, including MTRS;
- iv) tax incentives and the investment climate – business perspectives; and
- v) the potential role of tax incentives within the climate change agenda.

The seminar resulted in the following key takeaways:

- **Tax incentives remain an important policy tool for many developing economies in attracting foreign and domestic investment.** This workstream provides a unique opportunity to provide countries with a framework for reviewing their tax incentives regimes with the objective of making them more effective, efficient, and transparent.
- **Tax incentives should be carefully designed.** They should have a clear economic, social, and political objective and benefit from an in-depth cost-benefit analysis and impact assessment to inform policy decisions.
- **Existing legal and administrative frameworks for tax incentives require further strengthening.** It is essential that tax incentives are provided through the law and in a non-discretionary manner and that the administration of tax incentives is coordinated and aligned with good governance practices.
- **While the availability of data and analyses of tax incentives has increased since the publication of the 2015 toolkit, granular and country-level data remains limited.** Many countries can do more to better monitor their tax incentives by improving their transparency and evaluation, sharing experiences, and strengthening regional coordination and harmonization.
- **Political commitment is essential to advance reforms on tax incentives.** There is a need for continued multistakeholder discussions on this issue, which should include policy makers, international and regional organizations, academia, and the private sector.
- **Countries are considering using tax incentives to support climate policies.** Such approaches, which can include both negative incentives (emissions penalties/carbon pricing) and positive incentives to



spur clean energy sources (green investment, clean energy), require careful policy consideration, taking into account the effectiveness of such incentives, countries' administrative capacity, and social benefit trade-offs.

During the event, the PCT also held an internal meeting to discuss how the insights and expertise from the technical sessions could contribute to this workstream.

Subsequently, the PCT Partners agreed on the tax incentives workplan for 2024-2025, which includes the following key initiatives:

- Establishing a PCT Tax Incentives Expert Subgroup to lead the review of the 2015 toolkit;
- Adopting a modular approach to the review that includes drafting of the PCT Principles document on tax incentives; developing practical tools and/or knowledge notes on tax incentives for investment and green tax incentives;
- Conducting consultations and outreach events seeking inputs into the process from key stakeholders, including developing countries, regional and international organizations, academia, and the private sector;
- Establishing a tab on the PCT website with curated knowledge resources on tax incentives.

Consequently, the Tax Incentives Expert Subgroup was established in May 2024 to lead the work. The Subgroup comprises expert staff from the four partner organizations and, is supported by an external consultant. The Subgroup and the consultant meet monthly, together with the PCT Secretariat to advance the work.

In June 2024, the Subgroup hosted a panel during the IMF Partnership Week (further discussed in Section 4.2.1.), where it provided an update to donors and development partners on the ongoing activities within the tax incentives workstream. The panel highlighted the rationale for reviewing the 2015 tax

incentives toolkit, discussed the approach, and outlined plans for future activities.

In November 2024, the Subgroup finalized its first deliverable: the PCT Tax Incentives Principles. The paper highlights key common principles of the PCT Partners encompassing such areas as tax incentives' justification, design, international considerations, legislation, implementation, and assessment. The paper was made available for public consultation in December 2024 on the PCT website as an opportunity for stakeholders, including governments, policymakers, and experts, to contribute feedback and insights on the evolving role of tax incentives in DRM and sustainable development context.

Additionally, a new tax incentives resource tab has been added to the PCT website. It showcases a curated selection of knowledge resources related to tax incentives, including policy reports, technical assistance notes, guidelines, academic papers, and statistics from PCT Partners and selected external sources. The list is regularly updated.

### 2.2.3 Exchanges and updates on the international taxation landscape

During 2024, the PCT Partners regularly shared updates on the developments in the international taxation landscape and deliberated on the potential role of the PCT in the evolving context. These discussions took place during regular and ad hoc meetings of the Technical Working Group (TWG). Key areas of discussion included the following:

(a) The IMF, UN, and WBG are all observers to the [Inclusive Framework \(IF\)](#). The [Inclusive Framework on Base Erosion and Profit Shifting \(BEPS\)](#) brings together over 140 jurisdictions to collaborate on combatting tax base erosion and profit shifting; this includes the [15 BEPS Actions](#) and the negotiations on the [Two Pillar Solution on Addressing the Tax Challenges of the Digitalizing Economy](#). PCT Partners participate, to a greater or lesser extent, in the various working parties, which are developing and monitoring the BEPS Actions and Two Pillar

Solution, as well as the Task Force on the Digital Economy, and the IF plenary. PCT Partners are regularly invited to present at the IF meetings, both individually, and as representatives of the PCT. This year, the PCT Partners attended the IF meeting held in Paris, between 28-30 May 2024 with the four partners participating in a high-level session on mobilizing domestic revenues to achieve the SDGs. This session was well received by member countries of the IF demonstrating the role that the organizations can play in supporting countries.

(b) PCT Partners collaborate through various UN platforms, for example, work related to various subcommittees of the UN Tax Committee<sup>5</sup>, as well as the Inter-Agency Task Force on Financing for Development (IATF)<sup>6</sup>. The Committee regularly updates the UN Model Tax Convention and is updating/developing guidance on matters as diverse as transfer pricing, extractives industries taxation, avoidance and resolution of tax disputes, environmental taxation, wealth and solidarity taxation, indirect taxation, the relationship of tax with trade and investment agreements, tax transparency, digitalization and other improvements to tax administration and taxing the digitalized and globalized economy, among others.

In many of the subcommittees producing draft guidance for Committee consideration, staff members from PCT Partners have played an integral, informative, and constructive role. Particular examples include the work on indirect taxes, health taxes, transfer pricing, environmental taxes, wealth and solidarity taxes, tax transparency, and taxation of the extractive industries. In this context, the PCT Partners also participated as observers in the [28th Session](#) and [29th Session of the Committee of Experts on International Cooperation on Tax Matters](#), held from 19-23 March, 2024 in New York and 15-18 October, 2024 in Geneva, respectively. The two sessions focused on critical issues across the workstreams mentioned above and others. Notably, the October session, among other things, approved key updates to the UN Model Convention, including a

new “Article XX” to streamline and consolidate the taxation of cross-border service fees—an important step towards taxing services in an increasingly digitalized and globalized economy.

In 2024, the IMF, OECD, and the World Bank participated as observers in the meetings of the UN Ad Hoc Committee established to [draft the terms of reference for a UN Framework Convention on International Tax Cooperation](#). The PCT Partners provided inputs into the process during the [first session](#) (26 April-8 May 2024) and [second session](#) (29 July 2024-16 August 2024) held at UN Headquarters in New York. In December 2024, the General Assembly adopted a resolution establishing an ad hoc intergovernmental committee to draft a UN framework convention on international tax cooperation, including a protocol on the taxation of income derived from cross-border services and a second to be determined later. Further details on this process can be found on the [UN website](#).

(c) The PCT structures offer an avenue for enhancing information sharing and coordination among PCT Partners in the dynamic tax and development landscape. The PCT Secretariat and individual PCT TWG members support this by providing briefings on developments that may not be closely tracked by all Partners, as well as creating opportunities to discuss plans ahead of events where multiple Partners will participate. For instance, such updates are regularly provided on the discussions at the World Bank-IMF’s [Spring Meetings](#) and [Annual Meetings](#), this year held between 15-19 April 2024 and 21-26 October, 2024 respectively in Washington D.C.

(d) The PCT Secretariat and the WBG contributed to sessions on: i. the role of DRM in achieving SDGs and ii. the importance of international collaboration on tax during the [West African Tax Administration Forum](#) (WATAF) 6th High-Level Policy Dialogue held between September 11-13, 2024 in Bissau, Guinea Bissau. WATAF brings together fifteen West African countries, including: Benin, Burkina Faso, Cabo Verde, Cote d’Ivoire, The

<sup>5</sup> See footnote 1 for further details on the UN Tax Committee.

<sup>6</sup> The Inter-Agency Task Force on Financing for Development (IATF), convened by the United Nations Secretary-General to follow up on the Addis Ababa Action Agenda, is comprised of over 60 United Nations agencies, programmes and offices, regional economic commissions, and other relevant international institutions.

Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, and Togo. This year's meeting discussions focused on the need of improving tax systems to promote economic growth and social development in Africa. The meeting served as a venue to discuss the role of the PCT in the subject areas and highlight the work on toolkits, guidance, and other material that support developing countries with their DRM reforms.

### 2.3 Outcomes

Dissemination of the PCT's toolkits through the PCT website has facilitated distribution of relevant guidance to a wide audience across geographical regions, including many developing countries.

As part of the ongoing review of the 2015 Tax Incentives Toolkit, the PCT finalized a draft document outlining the PCT Tax Incentives Principles. This document represents the collective input and shared understanding of PCT Partners on the key principles for implementing and evaluating tax incentives. It also serves as a crucial reference for developing countries looking to design or refine their tax incentives policies.

As part of the review process, additional deliverables are planned for the coming year. These will provide further guidance and tools aimed at strengthening the capacity of developing countries to evaluate the impact of their existing tax incentive regimes, thereby improving the efficiency and effectiveness of these policies.

Finally, timely and frequent updates on the rapidly evolving international tax landscape have allowed discussions on the role the PCT and its Partners can play in facilitating a better understanding of the developments particularly for low-capacity countries. These exchanges also help explore the prospects for synergies and further collaborative work.

### 2.4 Next Steps

The PCT released the Tax Incentives Principles Document for public consultation in December 2024, seeking input from stakeholders including governments, policymakers, academia, the private sector, and other tax practitioners. The document will be officially launched in 2025 through a series of regional ask-an-expert events. In parallel, the PCT will continue to develop additional guidance on tax incentives as part of the ongoing 2015 tax incentives toolkit review. Finally, the PCT will closely monitor developments in international taxation and identify areas requiring further collaborative efforts.

## C. WORKSTREAM 3: MEDIUM-TERM REVENUE STRATEGY (MTRS)

### 3.1 Objectives

Medium-term revenue strategy (MTRS) is a comprehensive approach for undertaking tax system reform to increase tax revenues and improve the tax system over the medium term through a country-led, whole-of-government approach.

Under the MTRS workstream, the PCT aims to promote better understanding of the MTRS approach for countries, development partners (including the PCT Partners), and other stakeholders by conducting workshops, events, and exchanges that serve as platforms for developing better appreciation of the MTRS and its four interdependent components as an approach for undertaking comprehensive tax system reform.

Publicly accessible resources on the MTRS are made available through the dedicated [MTRS resource tab](#) on the PCT website.

#### BOX 1

##### The Four MTRS Components

The MTRS approach relies on four interdependent components for sustained tax reforms in a country.

1. The first component places the tax system reform in the context of a government's assessment of the overall medium-term expenditure needs for financing its development goals.
2. The second component relates to the process of tax system reform itself. Ideally targeting a period of about four to six years, this aims at designing a comprehensive program including tax policy and tax administration reforms and development of the necessary legal framework.
3. The third component calls for a sustained and whole-of-government commitment to reform involving not only ministries of finance and tax administrations, but also other line ministries, which are stakeholders in sector-specific tax reforms. It also calls for commitment at the highest political level to ensure the sustained pursuit of reform.
4. The fourth component of the MTRS approach is a coordinated and well-sequenced engagement of external development partners (providing technical assistance and/or financial support) with the government in designing and implementing a tax reform strategy.

## 3.2 Activities

### 3.2.1 Country engagement

Currently, approximately 30 countries are involved in discussing, formulating, and implementing an MTRS. These countries receive extensive support in this effort from the PCT Partners, in particular, the IMF and the WBG, which provide hands-on support through their respective country teams. Many countries are already fully engaged in tax administration, law and/or policy reforms domestically that provide a sound basis for adopting a holistic approach – particularly one integrated with, and based upon, an analysis of development spending needs. In some cases, these reforms are supported through intensive engagements financed, for example, under the IMF's [Revenue Mobilization Thematic Fund](#) (RMTF) and the [Managing Natural Resource Wealth Thematic Fund](#) (MNRW-TF) – in the course of being replaced by the [Global Public Finance Partnership](#) (GFPF), or the World Bank's [Global Tax Program](#) (GTP). In several other cases, the UN supports MTRS through its linkages with the [Integrated National Financial Frameworks](#) (INFFs), while the OECD provides support to some countries on the international tax dimensions of their MTRS by training and technical assistance on international tax, exchange of information, and, together with UNDP through the [Tax Inspectors Without Borders](#) (TIWB) program.

### 3.2.2 Review of the MTRS Framework

The MTRS concept was introduced in the 2016 PCT report on [Enhancing the Effectiveness of External Support in Building Tax Capacity in Developing Countries. Prepared for Submission to G20 Finance Ministers](#). Eight years after its inception, PCT partners now have a clearer understanding of the challenges faced by these countries, particularly those related to the political economy of reforms.

In this context, the PCT Partners have decided to examine the implementation of the MTRS across countries and revisit its conceptual framework. The primary objective of this review is to

integrate lessons learned over the past eight years and leverage these insights to refine and strengthen the approach. The review process will focus on the following areas:

- i) evaluating effectiveness*—assessing how successfully the MTRS has met its goals, such as increasing tax revenue, improving tax compliance, and promoting fairness and efficiency in the tax system;
- ii) identifying challenges*—examining the obstacles faced during implementation, particularly those tied to the political economy of reforms;
- iii) Incorporating feedback*—gathering input from government and stakeholders to ensure that the revised MTRS framework is more practical and responsive to the needs of developing countries.

To support this effort, the PCT established an MTRS subgroup in September 2024 to lead the review process. Led by experts from the IMF and the WBG, with contributions from the OECD and the UN, the subgroup is currently conducting a stock-taking exercise to inform revisions to the approach.

## 3.3 Outcomes

The PCT has officially initiated the review process with a stock-taking exercise, set to be completed in early 2025. Additional activities, including surveys and consultation workshops, are planned throughout the coming year.

## 3.4 Next steps

In the coming months, the subgroup will focus on the following activities:

- **Engaging with authorities and experts:** Conducting further stocktaking through an online survey with relevant authorities and organizing deep-dive exercises at the country or regional levels.

- **Internal discussions and brainstorming:** Synthesizing insights from the stock-taking process and documenting updates for the revised framework.
- **Validating new ideas with authorities:** Hosting a workshop with all MTRS countries to review and validate the proposed updates to the framework.
- **Review and launch:** Finalizing and launching the new MTRS concept note, which will include a revised approach.

## D. WORKSTREAM 4: STAKEHOLDER ENGAGEMENT, DISSEMINATION, AND INTERNAL EXCHANGES

### 4.1 Objectives

This crosscutting workstream aims to strengthen PCT's engagement with its various stakeholders, including governments, development partners, development banks, regional tax organizations, civil society organizations, academia, media, and the general public. It aims to improve dissemination of the PCT products and activities, through the PCT's website, workshops, webinars, events, and social media outreach. While technical assistance is delivered by the PCT Partners themselves, the PCT Secretariat plays a primary role in coordinating public availability and sharing information on PCT events. The workstream also arranges for timely exchanges among the PCT Partners with a view toward reviewing and updating the PCT workplan and its accompanying activities.

### 4.2 Activities

#### 4.2.1 Regular and ad hoc meetings

The PCT Partners continue to meet to allow exchanges at both the technical working level and the senior management level. The Technical Working Group (TWG), comprised of senior technical experts from each of the partner organizations, meets twice a month. Between December 2023 and November 2024, TWG met 23 times. During those meetings, the TWG members exchanged information and shared views relevant for the execution of the PCT workplan under the four workstreams and briefed each other on their respective organizations' priorities.

Building on the success of its subgroup working structure, the PCT established two new expert subgroups in 2024—on Tax Incentives, and on MTRS—comprising thematic experts from the partner organizations. These are in addition to the Environmental Tax Subgroup established in 2022. Each subgroup meets monthly to discuss the work of the respective organizations and advance the joint PCT initiatives, and reports to the TWG.

The PCT Principals, who are senior managerial staff of the PCT Partners at the director level, provide strategic vision and guidance and approve the PCT work program. The most recent meeting of the Principals was held on September 6th, 2024, during which the Principals endorsed the work plan and ongoing activities across the four workstreams, including on international tax, taxation and the SDGs (with a focus on environment taxation), and MTRS. Further, they were supportive of the PCT contributing inputs to the preparatory process of the FfD4 to be held in Spain in 2025 including through the blog which was published in late October 2024.

The Principals, together with the development partners to the PCT (France, Japan, Norway, Switzerland, the Netherlands, and the United Kingdom), and representatives of other countries and regional tax organizations as observers, comprise the Partnership Council. The Partnership Council meets once a

year and endorses the work plan and budget for implementing the PCT activities. It also monitors the progress of PCT activities, identifies complementarities with other initiatives implemented by other stakeholders working on tax issues, and provides feedback to the PCT Partners on setting PCT priorities. The Partnership Council met on 12th December 2023 and most recently on 10th December 2024.

The PCT held a half-day meeting with its development partners on June 27th, 2024, as part of the [IMF/OECD/WB Partnership Week event on Domestic Resources for Sustainable Development](#), which took place in the last week of June 2024 in Washington, D.C. This meeting provided an opportunity for the PCT to update partners on its ongoing activities, with a particular focus on the international tax workstream, including tax incentives, as well as environmental taxation in the context of the SDGs. Additionally, development partners participated in a technical seminar on tax incentives in March 2024 and an ask-an-expert webinar on BCAs in November 2024. On November 4th, 2024, the PCT Secretariat and TWG representatives convened an informal ad hoc meeting with development partners to discuss preparations for the upcoming 2024 Partnership's Council meeting. This session also provided an opportunity to address any ongoing questions related to the PCT's activities and to ensure alignment on key priorities.

#### 4.2.1 Regular and ad hoc meetings

The [Tax Project Database](#) (TPD)<sup>7</sup> is a publicly accessible database on DRM activities and projects executed by the PCT Partners. The TPD lists and describes relevant projects and activities of the Partners and enables searches for both country- and regional-level data. The TPD provides interactive, user-friendly tools to aid the user experience. An interactive map provides an overview of the country projects and technical assistance activities of the Partners, which can be accessed by clicking on a country on the map. The TPD also affords an organization-based view of activities supporting DRM efforts and insights into current and

future opportunities for global collaboration. Since its launch in March 2020, the TPD has been used extensively by experts from the four PCT organizations and beyond. The TPD was updated in May 2024. The PCT Secretariat will continue to release new rounds of data updates, with next year's iteration expected to be released in Spring 2025.

As part of its efforts to improve stakeholder engagement and knowledge dissemination, the PCT website serves as a useful vehicle for transparency and communication of information on the PCT and its Partners' activities in areas of DRM. The website resources are updated with new information regularly. Where useful, new tabs are also added to improve navigation. As mentioned in Section 2.2.2., a dedicated resource page on [tax incentives](#) was added in May 2024. The [news](#) and [events](#) tabs on the PCT website share information on upcoming events; recordings, resources, and summaries of recent events; and the activities and achievements of the PCT. Through providing information on all ongoing, and foreseeably planned activities the TPD is the most up-to-date publicly available database of activities of DRM from any technical assistance providers.

Finally, to enhance PCT visibility and communication, the PCT conducts digital and social media outreach through communication channels. The publication of Principals' blog on the PCT website was accompanied by a dissemination campaign via PCT Partners communication platforms.

#### 4.3 Outcomes

The PCT has established itself as an effective platform for Partners to exchange views and discuss new initiatives among themselves and with other various stakeholders. Regular meetings among the Partners have contributed to more effective relationships among the four organizations on tax-related activities [see Appendix 1].

<sup>7</sup> Formerly Online Integrated Platform (OIP).

The quality and impact of the PCT's work is ensured through enhanced outreach, which, in turn, enables countries to access and use PCT-developed guidance that is relevant to their needs and circumstances. Outreach activities allow the PCT to share with a wider audience the lessons learned from country experiences across various activities of the four workstreams.

#### 4.4 Next steps

The PCT will continue to engage with donors and development partners through regular meetings. The PCT will continue to update its website resources regularly and plans to revamp its communication strategy. The Tax Incentives Principles Paper was released for public consultation on the PCT website and through targeted outreach by PCT Partners. The PCT will also host virtual seminars, including a series of ask-an-expert regional webinars on tax incentives planned for 2025. The PCT Partners will maintain regular meetings, with the three expert subgroups leading the work on the tax incentives, MTRS, and environmental tax workstreams. The PCT will further engage with donors and development partners through ongoing meetings.



# III. BUDGETARY SUPPORT AND THE SECRETARIAT STAFFING

The PCT Multi-Donor Trust Fund (MDTF) dedicated to supporting the PCT Secretariat and its work program is funded by contributions from Japan, France, Norway, Switzerland, the Netherlands, and the United Kingdom. The majority of the technical activities and analyses, however, continue to be undertaken by the staff of the four PCT Partners, funded from each organization's own budget.



# IV. FUTURE STEPS

**Continuation of the PCT.** Recognizing the usefulness of the PCT as a unique mechanism for exchange and collaboration to support countries in their tax and domestic resource mobilization efforts to build resilience and promote effective and efficient tax systems, the PCT Partners and development partners have agreed to extend the PCT MDTF (which funds the PCT Secretariat) until June 2028. To this end, the PCT and its Partners will develop PCT Secretariat’s future workplan and explore financing options to secure a new mandate for a period of three years until June 2028.

**Review of the Work Program** (PCT 2024 Retreat). On November 13th and 14th, 2024 the PCT TWG held a programmatic retreat in Washington, D.C., with full participation from all TWG members over the two-day event. Members of the PCT Expert Subgroups—Tax Incentives, MTRS, and Environmental Tax—as well as relevant staff of the four partners, took part in selected sessions.

During the retreat, PCT Partners engaged in in-depth discussions on the PCT’s key workstreams to assess progress and determine the next steps, including in such areas as: International Tax (with a focus on Tax Incentives), Environmental Tax, MTRS, and Tax and SDGs.

PCT Partners also agreed to establish a new workstream dedicated to monitoring and evaluation, which will focus on the strategic use of PCT Partners’ data for analysis and reporting. Additionally, PCT Partners have committed to strengthening stakeholder engagement and enhancing external communication to enhance PCT visibility and outreach.

# APPENDIX

# APPENDIX 1: EXAMPLES OF PCT PARTNERS COORDINATION

## BOX 2.A

### Joint Domestic Resource Mobilization Initiative (JDRMI)

The **Joint Domestic Resource Mobilization Initiative (JDRMI)**, launched in 2024 as a collaboration between the International Monetary Fund (IMF) and the World Bank Group (WBG), focuses on enhancing the tax systems and public financial management of developing countries. It focuses on strengthening the capacity of developing countries to mobilize domestic resources for development, particularly by improving revenue generation, spending efficiency, and domestic debt markets. This initiative is designed to help countries unlock the necessary resources to foster growth and achieve SDGs.

The initiative operates through two key pillars:

**Pillar I: Coordination Mechanism.** The first pillar emphasizes coordination at both the global and country levels:

- **Global level coordination:** The IMF and World Bank will sign a Memorandum of Understanding to exchange information, ensuring streamlined and synchronized efforts.
- **Country level coordination:** At the country level, collaboration will be anchored in Country Working Groups (CWGs), which will consist of local authorities, development partners, and other stakeholders.

**Pillar II: DRM Workstreams.** The second pillar centers around a programmatic approach to DRM, integrating the three key workstreams: Public Revenue: Focus on increasing tax revenue, including broadening tax bases and improving tax administration.

- **Spending Efficiency:** Ensuring that public spending is effective, reducing inefficiencies and waste, and increasing the impact of expenditures on development outcomes.
- **Domestic Public Debt Markets:** Strengthening domestic debt markets to support sustainable borrowing and financing of development needs.

**BOX 2.A** *continued***Joint Domestic Resource Mobilization Initiative (JDRMI)****Country-Led Approach**

The JDRMI follows a country-led approach, meaning that the initiative is tailored to each country's specific needs and national strategies for resource mobilization. It aims to align the initiative's support with the goals and reforms identified by the country.

**Focus on IDA Countries**

Particular attention will be given to IDA (International Development Association) countries—those that are the most in need of financial assistance. In the medium term, the JDRMI will assist these countries in strengthening their DRM frameworks.

**Operational Steps of the Initiative**

The operational process for the JDRMI unfolds in several stages:

**Joint Matrix of Reforms:** Country authorities and CWGs will agree on a set of reform priorities, identifying the critical policy changes needed to advance DRM efforts.

**Multiannual Plan:** A comprehensive, multi-year plan will be developed, outlining specific milestones, synergies across the three DRM workstreams, and mechanisms for coordinating reforms.

**Country-level Counterparts:** Key coordination across central government agencies will be vital for successful implementation and alignment with broader national goals.

**Technical Assistance and Outreach:** The initiative will provide technical assistance to support the design and implementation of reforms. It will also focus on capacity building and collaboration with other development partners to maximize impact.

**Periodic Monitoring:** Regular monitoring will track the progress of reforms against the joint matrix, enabling course corrections and ensuring reforms remain aligned with the country's priorities.

**Next Steps**

In the initial stage, four pilot countries have been confirmed, and JDRMI is being operationalized in Bangladesh, Côte d'Ivoire, Pakistan, and Paraguay. Sierra Leone is also being considered as an additional pilot country.

**BOX 3.A****PCT Partners Collaboration on Global Minimum Tax**

The WB and the OECD have been closely collaborating to address challenges and opportunities in international taxation, particularly in the implementation of the Global Minimum Tax (GMT).

**Joint Efforts on the Global Minimum Tax**

The implementation of the GMT, a key element of Pillar Two of the OECD/G20 Inclusive Framework on BEPS, has significant implications for corporate income tax policies worldwide. WB and OECD are working together in Jamaica and Peru to assist implementation, and the OECD participated in a WB mission to Costa Rica in August 2024. Arising from these pilots, the OECD/WB team has been developing a “how-to” note on impact assessment for the Qualified Domestic Minimum Top-up Tax which can assist a range of countries considering implementation options.

In June 2024, under the Brazil G20 Presidency, the WB, in partnership with Receita Federal do Brasil and the IDB, co-organized a Seminar on International Taxation in Brasília, Brazil. The event gathered nearly 60 tax officials from 15 jurisdictions across the Latin America and the Caribbean region, including Argentina, Brazil, and Mexico. The OECD’s participation was particularly relevant due to its role in shaping and implementing global tax standards, and their presence enriched the discussions with insights drawn from global experiences and technical expertise. The WB has actively participated in a recent OECD meeting to shape administrative guidance for the GMT including a seminar in Amsterdam in October 2024 including presenting at a side event focused on the challenges for tax administrations in emerging markets and developing economies.

These initiatives represent the WB and OECD’s commitment to ensuring that tax officials are equipped with the knowledge and tools to navigate the evolving global tax landscape, fostering more equitable and sustainable tax systems.

**BOX 4.A****PCT Collaboration on Regional and Global Workshops****Practical Workshops on Negotiation of Tax Treaties**

Since 2014, the UN and the OECD, with support from the Austrian Ministry of Finance, have jointly organized a series of week-long negotiation workshops for developing countries at the Ministry’s tax training center in Vienna. The workshops consist of a mock negotiation between fictitious developed and developing countries and follow a learning-by-doing approach. The background materials are



**BOX 4.A** *continued***PCT Collaboration on Regional and Global Workshops**

regularly updated to reflect emerging issues, such as the addition of provisions on offshore indirect transfers to Article 13 of the [2021 UN Model Tax Convention](#). The workshops have been facilitated by tax treaty experts from both developed and developing countries. While the workshops initially included government officials from developing countries only, since 2022, participants have also included a few government officials from OECD countries, enhancing diversity and enabling the creation of mixed teams, which enriched the analysis and discussions with different perspectives and experiences in a no-stakes, supportive environment. The 2024 joint workshop on tax treaty negotiations was successfully delivered on July 22-26, in Vienna, where 28 officials (54 percent women) participated from 23 countries. In 2024, the same workshop was presented for the first time in Asia, through a collaboration by the UN, the OECD and the Korean Tax Center, with support from the Asian Development Bank. The five-day workshop took place in Seoul, Korea and was attended by 34 tax officials (35% women) from 33 countries.

In addition, the OECD and UN also collaborate on a series of virtual workshops titled “**Getting Ready for Tax Treaty Negotiations;**” initially developed during the COVID-19 pandemic, these virtual workshops followed a learning-by-observing approach. These workshops have proved popular, filling a gap between, on the one hand, the more theoretical information provided in the online or in-person courses on tax treaties offered by both organizations, and, on the other, the intensive in-person tax treaty negotiation workshops held in Vienna. Each year, the virtual workshops focus on a different set of treaty articles of relevance to developing countries. Since the publication of the [PCT Toolkit on Tax Treaty Negotiations](#), the workshop also has specific sessions to discuss sections A, B, and C of the toolkit and new set of tools developed for the toolkit through its updates.

**Workshop on Services**

On December 4-8, 2023, the UN and IMF delivered a five-day regional workshop on the treatment of services in the UN Model in Addis Ababa. This long-form workshop included discussions on recent key additions to the [UN Model](#), notably fees for technical services and the taxation of income from automated digital services. These provisions were added to the UN Model in 2017 and 2021 because of the risk to developing countries from multinational enterprises (MNEs) providing services remotely. The workshop also covered in depth a number of other provisions that are usually covered quickly in many tax treaty workshops. The enthusiastic response from participants reflected the importance of the topic to their countries. Thirty-three participants (27% women) came from 31 developing countries in Africa.

**BOX 4.A** *continued***PCT Collaboration on Regional and Global Workshops****Workshop on Select International Tax Issues for Portuguese-speaking African Countries**

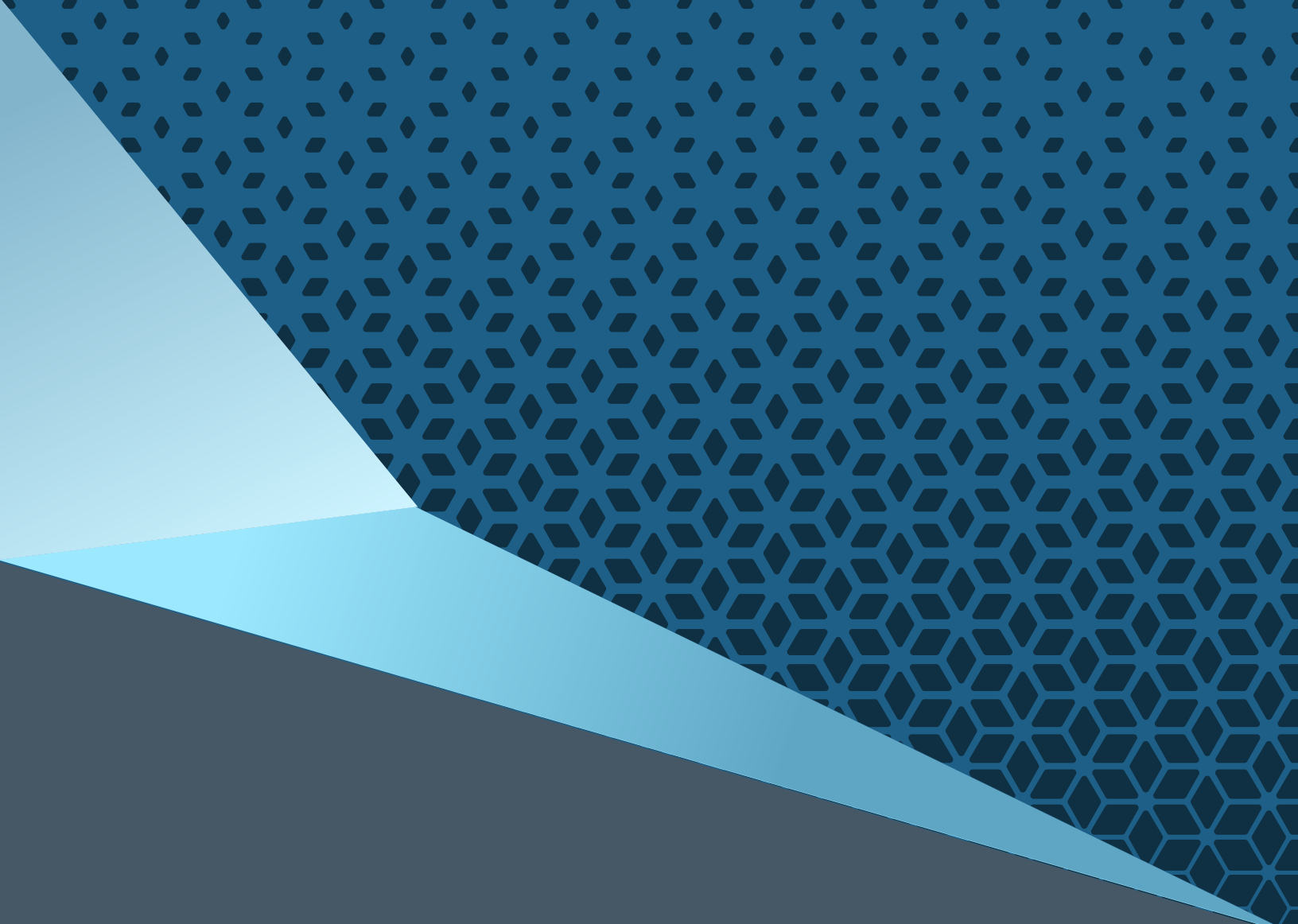
From December 2-6, 2024, the UN held a subregional workshop in Luanda, Angola, focusing on select international tax issues for Portuguese-speaking African countries. This five-day event aimed to strengthen participants' capacity in domestic resource mobilization, particularly in key areas like double tax treaties, transfer pricing, taxation of extractive industries, and tax incentives<sup>8</sup>. The workshop emphasized the role of taxation in protecting and broadening the tax base to support the Sustainable Development Goals (SDGs).

The training drew on practical policy guidance from the UN Tax Committee, including the [UN Model](#), the [UN Practical Manual on Transfer Pricing](#), and the [UN Handbook on Extractive Industries Taxation](#). The [2015 PCT Tax Incentives Toolkit](#) served as a key reference for the discussions on tax incentives as well as impact of recent international tax developments, including the GMT. Participants were briefed on the ongoing revision of the Toolkit.

The event brought together 20 officials from Angola, Cape Verde, Guinea-Bissau, Mozambique, and São Tomé and Príncipe, representing finance ministries and tax administrations. Participants engaged in discussions on key tax issues, complemented by practical case studies, debates, and peer learning, fostering South-South cooperation.

The training was delivered by UN's Department of Economic and Social Affairs and Financing for Sustainable Development Office staff in collaboration with experts from the UN Tax Committee, the World Bank, and the International Bureau of Fiscal Documentation. The workshop was hosted by the Government of Angola, whose efforts ensured its success.

<sup>8</sup> The training drew on practical policy guidance from the UN Tax Committee, including the UN Model, the UN Practical Manual on Transfer Pricing, and the UN Handbook on Extractive Industries Taxation. The 2015 PCT Tax Incentives Toolkit served as a key reference for the discussions on tax incentives as well as impact of recent international tax developments, including the global minimum tax. Participants were briefed on the ongoing revision of the Toolkit.



**WORLD BANK GROUP**

**IFC** International Finance Corporation

**MIGA**

Multilateral Investment Guarantee Agency