

To the kind attention of:

Ministers of Finance,

Ministers of Foreign Affairs,

Permanent Representatives and Permanent Observers to the United Nations in New York
United Nations Secretariat, Agencies and Programmes.

3 November 2023

Subject: UNGA Second Committee Draft Resolution on Promotion of Inclusive and Effective International Tax Cooperation at the United Nations (A/C.2/77/L.18)

Your Excellencies, Ministers and distinguished representatives of UN Member States,

We, the undersigned civil society organisations and trade unions, strongly support and welcome the United Nations General Assembly Draft Resolution on Promotion of Inclusive and Effective International Tax Cooperation at the UN (A/C.2/78/L.18). We commend the Africa Group for its excellent leadership on this issue, and we find that the draft captures and builds on the spirit of international cooperation that led to the adoption, by consensus, of last year's landmark Resolution A/RES/77/244 on the same topic. We now call on all governments to maintain and reinforce this spirit by supporting the draft resolution, and work actively to promote its adoption as a matter of highest priority and urgency.

As the negotiations progress in the 2nd Committee of the UN General Assembly, we specifically call on all governments to ensure that the level of ambition and key elements of the resolution are kept intact. In particular, we would like to stress the following elements, which we believe are crucial to maintain:

1. The establishment of a Member State-led, open-ended ad hoc intergovernmental committee to elaborate a comprehensive UN Tax Convention (paragraph 3).

Such a **UN Convention could never entail duplication**, because it would be the world's first truly global agreement on international tax cooperation. Until now, the world has never seen a fully inclusive intergovernmental body where all countries can participate on an equal footing, and this injustice is at the heart of the failure of the international tax system. None of the existing international tax agreements have ever been globally endorsed, and they are all too often biased against the interests and concerns of developing countries. Furthermore, not even OECD countries are currently in agreement as regards the global tax rules and principles. This situation has contributed to large-scale illicit financial flows through international tax loopholes; international tax conflicts; instability and deep inconsistencies between tax laws of different countries. All countries have paid a high price for this failure, but the impacts on developing countries have been particularly hard.

The UN remains the only truly universal body where all countries participate as equals, and the negotiation of a **UN Tax Convention entails a unique opportunity to build bridges** between governments. We applaud the Africa Group for issuing an invitation to all countries of the world to engage in such a negotiation, and urge all other governments to show a similar spirit of cooperation and support this crucial initiative.

2. **Approaching the issue of international tax cooperation as an issue of high priority and urgency – by aiming to finish the UN Tax Convention by June 2025** (paragraph 4).

The urgency of this matter cannot be overstated. In light of the Covid-19 pandemic, all-time high public debt service payments and the “*cost of living crisis*”, the fight to increase domestic resource mobilisation and combat illicit financial flows has never been more vital. *In the State of Tax Justice Report 2023*, Tax Justice Network has estimated that international tax abuse is costing countries US\$480 billion in lost tax income every year.¹ Faced with the challenges of financing the achievement of the Sustainable Development Goals and combatting the global environmental crises, it is clear that the international community must take urgent action to strengthen international tax cooperation and stop the immense bleeding of public resources.

3. **Pursuing a comprehensive UN Tax Convention with a holistic scope and sufficient flexibility and resilience to continuously ensure equitable results as the international tax cooperation landscape evolves.**

In line with the draft resolution proposed by the Africa Group, we believe that a UN Tax Convention should **comprehensively address key issues in urgent need of intergovernmental agreement**, including tax-related illicit financial flows and the taxation of income derived from the provision of cross-border services in an increasingly digitalized and globalized economy (paragraph 6(c)). The Convention should also incorporate other key needs and priorities of countries, and in particular developing countries (paragraph 6(a)), such as progressive taxation.

International tax cooperation cannot be built on guidelines and voluntary frameworks. It requires legally binding agreements between governments, and for over a century, governments have been signing such agreements bilaterally. But in order to establish an inclusive, effective, fair and coherent international framework, it is high time to negotiate a global agreement – in the form of a comprehensive UN Convention. Furthermore, in order to ensure **long-term sustainability and flexibility**, and with an aim to allowing a stepwise approach to building intergovernmental consensus (paragraph 6(b)), we also believe that the Convention must establish a fair, transparent and fully inclusive tax governance framework that allows for the negotiation of additional legally binding agreements (in the form of protocols) in the future.

¹ Tax Justice Network, ‘State of Tax Justice 2023’, 25 July 2023, <https://taxjustice.net/reports/the-state-of-tax-justice-2023/>

4. Establishing clear links between international taxation and other key UN agendas
(paragraph 6(b)).

In its draft resolution, the Africa Group has highlighted the importance of linking the issue of international taxation to other key areas, including **sustainable development, inequality, the environment, gender, health and intergenerational aspects**. We find this to be of utmost importance. For far too long, intergovernmental negotiations on tax have been absent from the UN space, and thus disconnected from the broader UN agenda. This, despite the fact that fair and progressive tax systems, supported by an inclusive and effective global governance system, are vital for the achievement of the Sustainable Development Goals, protection of human rights and the global fight against environmental crises.

5. Ensuring the full and effective participation of civil society in the intergovernmental UN tax process to develop a new UN Tax Convention
(paragraph 4).

We strongly welcome the emphasis on the importance of civil society participation, which the Africa Group has included in the draft resolution. Fair, effective and transparent tax systems are a central element of democracy, and vital for ensuring economic, social and environmental justice. We, the undersigned civil society organisations and trade unions, have a strong engagement on these issues at the national, regional and global levels, and believe that **inclusivity and active participation of observers in global negotiations is vital for ensuring fair, effective, legitimate and democratic global governance on tax**. We stand ready to make our contributions and bring in-depth knowledge from all regions of the world about the devastating impacts of the failure of international tax cooperation, including the continued bleeding of public resources in the form of illicit financial flows. We also bring concrete and specific proposals for solutions, including for how a future UN Convention on Tax could be designed.²

We remain at your disposal if you would like to receive more information or would like to meet to discuss this issue further.

Yours sincerely,

Civil Society Financing for Development Mechanism (www.csoforffd.org)

Signatories

- | | |
|--|---------------|
| 1. Civil Society Financing for Development (FfD) Mechanism | International |
| 2. Global Alliance for Tax Justice (GATJ) | International |
| 3. 11.11.11 | Belgium |
| 4. AbibiNsroma Foundation (ANF) | Ghana |
| 5. ACT Alliance | International |

² Global Alliance for Tax Justice and the European Network on Debt and Development (Eurodad), ‘Proposal for a United Nations Convention on Tax’, March 2022, https://www.eurodad.org/un_tax_convention

6. ActionAid International	International
7. Adamadeya ry	Finland
8. African Forum and Network on Debt and Development (AFRODAD)	Africa
9. AfroLeadership	Africa
10. AidWatch Canada	Canada
11. Akina Mama wa Afrika	Africa
12. All India Disaster Mitigation Institute	India
13. ALL INDIA WOMEN HAWKER FEDERATION	India
14. All Nepal Peasants federation	Nepal
15. ALLIANCE CONTRE LA PAUVRETE AU MALI/AP-MALI/GCAP-MALI	Mali
16. Alliance Sud	Switzerland
17. Amnesty International	International
18. APIT	Portugal
19. Armenian Constitutional Right - Protective Centre (ACRPC) NGO	Armenia
20. Asian Peoples' Movement on Debt and Development	Asia
21. Asociación Civil por la Igualdad y la Justicia	Argentina
22. Asociación Mujeres Emprendedoras de Alta Verapaz MEAV	Guatemala
23. Association de Développement Agricole Educatif et Sanitaire de Manono ADAES	Democratic Republic of Congo
24. Association For Promotion Sustainable Development	India
25. Association Nigerienne des Scouts de l'Environnement ANSEN	Niger
26. Attac Austria	Austria
27. Attac Finland	Finland
28. Attac Germany	Germany
29. Bangladesh Krishok Federation	Bangladesh
30. Bond UK	United Kingdom
31. Botswana Council of Churches	Botswana
32. Bread for the World/ Brot für die Welt	Germany
33. Bretton Woods Project	United Kingdom
34. Campaña Latinoamericana por el Derecho a la Educación	Brazil
35. Canadians for Tax Fairness	Canada
36. Candid Concepts Development	Caribbean
37. Carbone Guinée	Guinea
38. Caribbean Policy Development Centre	Caribbean
39. CCFD-Terre Solidaire	France
40. Center for Economic and Social Rights (CESR)	US/ International
41. Centre for Environment, Human Rights & Development Forum - CEHRDF	Asia
42. Centre for International Corporate Tax Accountability & Research (CICTAR)	Australia
43. Centre Régional Africain pour le Développement Endogène et Communautaire (CRADEC)	Cameroon
44. Centro de estudios de derecho, justicia y sociedad - Dejusticia	Colombia
45. Centro de Estudios Legales y Sociales (CELS)	Argentina
46. Cholistan Development council	Pakistan
47. Christian Aid	International
48. Christian Aid Ireland	Ireland
49. Christian Council Church	Mozambique
50. CIEDUR RED GENERO Y COMERCIO	South America
51. Civil Society SDGs Campaign GCAP Zambia	Zambia

52. Clean Air Action Group	Hungary
53. Climate Action Network Australia	Australia
54. Climate Action Network International	International
55. Coalition Nationale des Organisations Féministes pour la Génération Egalité du Gabon (CNOFGEG)	Gabon
56. COAST Foundation	Bangladesh
57. Collectif Sénégalais des Africaines pour la Promotion de l'Éducation Relative à l'Environnement (COSAPERÉ)	Senegal
58. Comisión Nacional de Enlace CNE	Costa Rica
59. Committee on Fiscal Studies	Kenya
60. Community service and Development Action COSDA	Somalia
61. Cooperation Committee for Cambodia (CCC)	Cambodia
62. Council of Churches in Namibia (CCN)	Namibia
63. CRASH - Coalition for Research and Action for Social Justice and Human Dignity	Finland
64. Creatura Think & Do Tank ry	Finland
65. Croatian Platform for International Citizen Solidarity (CROSOL)	Croatia
66. Crofter Foundation	Pakistan
67. DECIDAMOS, Campaña por la Expresion ciudadana	Paraguay
68. Defensores do planeta	Brazil
69. Democracy Forum Vasudhaiva Kutumbakam	Finland
70. Desk for Social Development of the Evangelical Lutheran Church in the Republic of Namibia (DfSD-ELCRN)	Namibia
71. DISABILITY PEOPLES FORUM UGANDA	Uganda
72. DUKINGIRE ISI YACU	Burundi
73. EcoEquity	United States of America
74. Economic Justice Network of FOCCISA	South Africa
75. Electra Energy	Greece
76. Enda Colombia	Colombia
77. Equidad de Género: Ciudadanía, Trabajo y Familia	Mexico
78. European Network on Debt and Development (Eurodad)	Europe
79. European Network on Independent Living	Europe
80. Fair Tax Foundation	United Kingdom
81. Felm	Finland
82. Feminist Legal Studies Queen's University	Canada
83. Financial Justice Ireland	Ireland
84. Financial Transparency Coalition	International
85. Finnish Development NGOs Fingo	Finland
86. Finnwatch	Finland
87. Food Sovereignty and Climate justice Network	South Asia
88. Forum for Women in Democracy	Uganda
89. Freedom from Debt Coalition	Philippines
90. Fundación Nacional para el Desarrollo	El Salvador
91. Fundacion SES	Argentina
92. Fundar Centro de Análisis e Investigación	Mexico
93. GCAP LAC	Latin America and the Caribbean
94. Genç Düşünce Enstitüsü	Turkey
95. Gender and Development Network (GADN)	United Kingdom
96. Gender and Economy Research Center NPGE	Brazil
97. Gestos (sorositividade, comunicação e gênero)	Brazil

98. Global Call to Action Against Poverty (GCAP)	International
99. Global Campaign for Education (GCE)	International
100. Global Initiative for Economic, Social and Cultural Rights (GI-ESCR)	International
101. Global Peace and Development Organization	Liberia
102. Global Policy Forum	International
103. Global Redistribution Advocates	International
104. Global Social Justice	International/Switzerland
105. Global South Coalition for Dignified Menstruation	International
106. Greenpeace	International
107. Groupe de Réflexion et d'Initiative pour l'Avancement de la Grand'Anse (GRIAG)	Haiti
108. Growthwatch India	India
109. GRUPO NACIONAL DE PRESUPUESTO PUBLICO	Peru
110. GT Agenda 2030 (CS working group for the 2030 Agenda)	Brazil
111. Halley Movement Coalition- Mauritius	Mauritius
112. HIMALAYA NITI ABHIYAN	India
113. IMAL Initiative for Climate & Development	Morocco
114. IMCS Pax Romana	Mexico
115. Independent Living Institute	Sweden
116. Indian Social Action Forum (INSAF)	India
117. Inesc - Instituto de Estudos Socioeconômicos	Brazil
118. Iniciativa por los Derechos Humanos en la Política Fiscal	Latin America
119. Initiative Citoyenne pour l'Environnement et le Développement Durable (ICED)	Burundi
120. Initiative for Social and Economic Rights (ISER - Uganda)	Uganda
121. INPADE	Latin America
122. Institute for Economic Justice (IEJ)	South Africa
123. Instituto Centroamericano de Estudios Fiscales (ICEFI)	Guatemala
124. Instituto Justiça Fiscal	Brazil
125. International Association of Charities	International
126. International Budget Partnership	International
127. International Federation of Social Workers	International
128. International Network of Liberal Women	The Netherlands
129. KASYANO	Democratic Republic of Congo
130. Kissan Kerkela	Pakistan
131. Kopin	Malta
132. KOTHOWAIN (vulnerable peoples dev. org)	Bangladesh
133. Labour Education Foundation	Pakistan
134. LATINDADD - Red Latinoamericana por Justicia Económica y Social	Latin America
135. Loss & Damage Collaboration	International
136. Malawi Economic Justice Network MEJN	Malawi
137. MenaFem Movement for Economic, Development and Ecological Justice	Mena
138. Mines mineral and people	India
139. Misère Option Zéro	Togo
140. Movimiento Tzuk Kim-pop	Guatemala
141. MyRight	International
142. Nash Vek Public Foundation	Kyrgyzstan
143. National Campaign for Sustainable Development Nepal	Nepal
144. National Ethical Service	United States of America
145. NATIONAL HAWKER FEDERATION	India

146. National Society of Conservationists - FoE Hungary	Hungary
147. Netzwerk Steuergerechtigkeit	Germany
148. NGO Federation of Nepal	Nepal
149. Nkoko Iju Africa	Kenya
150. Norwegian Church Aid	Norway
151. Norwegian Forum for Development and Environment	Norway
152. Norwegian Students' and Academics' International Assistance Fund - SAIH	Norway
153. O.C.A.M.E.	Ecuador
154. Oil Change International	International
155. Okogun Odigie Safewomb International Foundation	Nigeria
156. ONG Plus de Sida dans les Familles	Gabon
157. Oxfam	International
158. Pakistan Fisherfolk Forum	Pakistan
159. Pakistan Kisan Rabita Committee	Pakistan
160. Partners In Health	International
161. Povod institute	Slovenia
162. PRAKARSA	Indonesia
163. Progressive Labour Federation	Pakistan
164. Public Services Labor Independent Confederation (PSLINK-PUBLIK)	Philippines
165. Radha Paudel Foundation	Nepal
166. REACHOUT SALONE	Sierra Leone
167. Red de Justicia Fiscal de América Latina y El Caribe	Latin America and the Caribbean
168. Red Mexicana de Acción frente al Libre Comercio (RMALC)	Mexico
169. Re-Generation	Canada
170. Renafes	Senegal
171. RENICC	Nicaragua
172. Right to Education Initiative	International
173. Rural Area Development Programme (RADP)	Nepal/South Asia
174. Rural Reconstruction Nepal	Nepal
175. Samoa Umbrella for Non Government Organisations	Samoa
176. Save the Children	International
177. SENTRO LABOR	Philippines
178. Siemenpuu Foundation	Finland
179. SKOP - The National Platform of Maltese NGOs	Malta
180. SocDevJustice	Germany
181. Society for International Development (SID)	International
182. Solidarité des Femmes sur le Fleuve Congo	Democratic Republic of Congo
183. SOLIDARITÉ FÉMININE POUR LA PAIX ET LE DÉVELOPPEMENT INTÉGRAL "SOFEPADI"	Democratic Republic of Congo
184. SOMO	The Netherlands
185. South Asia Alliance for Poverty Eradication (SAAPE)	Nepal
186. Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI) Uganda	Uganda
187. Success Capital Organisation	Botswana
188. Sukaar Welfare Organization	Pakistan
189. Swera Foundation	Pakistan
190. Syndicat Chrétien des Travailleurs du Congo SCTC	Democratic Republic of Congo
191. TAFJA NEPAL	Nepal
192. Tameer e Nou Women Workers Organisation	Pakistan
193. Tax and Fiscal Justice Alliance	Nepal

194. Tax and Fiscal Justice-Asia (TAFJA)	Asia
195. Tax Justice Europe (TJ-E)	Europe
196. Tax Justice Italia	Italy
197. Tax Justice Netherlands	The Netherlands
198. Tax Justice Network	International
199. Tax Justice Network Africa	Africa
200. Tax Justice Network Australia	Australia
201. Tax Justice Norway	Norway
202. Tax Justice UK	United Kingdom
203. TaxEd Alliance	International
204. Taxmenow – Initiative für Steuergerechtigkeit e.V.	Germany / Austria / Switzerland
205. The Christian Council of Mozambique	Mozambique
206. The Lutheran World Federation (LWF)	International
207. Third World Network	International
208. TRADE JUSTICE PILIPINAS	Philippines
209. Transparency International Zimbabwe	Zimbabwe
210. Trend Asia	Indonesia
211. UNASCAD (Union des Amis Socio Culturels d'Action en Developpement)	Haiti
212. Unitarian Universalist Service Committee	United States of America
213. Uniting Church in Australia, Synod of Victoria and Tasmania	Australia
214. URGENCE CONTRE LA FAIM (UCF)	Chad
215. Vienna Institute for International Dialogue and Cooperation (VIDC)	Austria
216. VWA FANM AYISYÈN (VFA)	Haiti
217. War on Want	United Kingdom
218. Wemos	The Netherlands
219. WIDE - Network for Women's Rights and Feminist Perspectives in Development	Austria
220. WomanHealth Philippines	Philippines
221. Women Empowerment Against Poverty of Nepal (WEAPoN)	Nepal
222. Women Engage for a Common Future	Germany
223. Women's Environment and Development Organization (WEDO)	United States of America
224. World Economy, Ecology & Development - WEED	Germany
225. Youth For Tax Justice Network	Africa
226. ZIMBABAWE COUNCIL OF CHURCHES	Zimbabwe
227. Zimbabwe coalition on debt and development	Zimbabwe