

**Opening statement by Alexander Trepelkov,
Director, Financing for Development Office, UN-DESA, at the
8th session of the Committee of Experts on International Cooperation in Tax Matters**

Geneva, 15 October 2012

Distinguished Members of the Committee,
Distinguished Observers,
Ladies and gentlemen,

It is my great honor and pleasure to welcome all of you to the 8th session of the UN Committee of Experts on International Cooperation in Tax Matters. The central issue on the agenda of this session is **the Practical Manual on Transfer Pricing for Developing Countries**. This useful tool will provide much needed assistance to developing countries in practical application of the arm's length principle reflected in both the UN Model Tax Convention and the OECD Model Tax Convention.

I wish to thank the Committee and, in particular, the **Subcommittee on Transfer Pricing**, coordinated by Stig Sollund of Norway, for its hard work on this important matter and its determination to finalize the Manual at the current session, as scheduled. The Committee may consider, after completing its mandate, that further work could be useful to deal in greater detail with issues such as the treatment of intangibles, including through an additional chapter, since the Manual should be a living document.

To support this area of work of the Committee, my office (FfDO/DESA) and the Friedrich-Ebert-Stiftung (FES) New York Office jointly organized

English-language version. It further requested that: (a) the Convention continue to be made freely available in downloadable form from the website of the Financing for Development Office; and (b) the Convention be translated into the other official languages of the United Nations and published in those languages as soon as possible.

Accordingly, the electronic version of the UN Model Convention is made available free of charge on our website. We also have an ample supply of paper copies, which are available to developing countries upon request.

area, such as the IMF, World Bank, OECD, the Inter-American Centre of Tax Administrations (CIAT) and the African Tax Administration Forum (ATAF).

In the same resolution, ECOSOC re-emphasized the importance for the Committee to enhance its **collaboration with other international organizations** active in the area of international tax cooperation, including the IMF, the World Bank and OECD. During the past year, the Secretariat continued intensifying its efforts in this area. In a major development, for the first time, UN participated as an observer in the OECD Committee on Fiscal Affairs and intends to participate in its Working Parties. UN observers also continued to participate in the OECD Global Forum on Transparency and Exchange of Information for Tax Purposes, the

In particular, I want to thank the Committee Chair, Mr. Armando Lara Yaffar of Mexico, for his highly effective leadership and commitment to this work. We are also grateful to the Vice-Chairs of the Committee, Mr. Tizhong Liao of China, Ms. Anita Kapur of India and Mr. Henry John Louie of the United States, as well as all Coordinators of the Subcommittees and Working Groups and those Committee Members who have fulfilled the important position of Rapporteur, for their hard work.

I wish you productive deliberations and a successful session.

Thank you.