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Transparent administration of the tax system and the avoidance of double taxation further reduce risktor investors therebinfluencing investment decisions in the extractive industries. Governments should seek to balance creating or sustaining a supportive environment for large investment with the country's need for revenue streams that can be applied to their development efforts.

## Approval for Guidance Notes

At the tenth annual session, the UN Committee of Experts on International Cooperation in Tax Matters decided to focus its work in the area of taxation of extractives on areas considered the most pressing for developing countries. In addition to an (1) Overview Note that tries to summarize y

## Selected Double Tax Treaty Issues

Bilateral tax treaties play an important role in coordinating rules for transfer tax treatment and eliminating obstacles to crosseder trade and investment tractive activities usually havenumerous crossorder elements. They are undertaken by investors, license holders, service providers and suppliers who are often not residents invultive country. Additionally, natural resources, once extractere, typically exported. These elements raise several tax treaty iss

With this note, the Sub