

**Opening statement by Alexander Trepelkov
Director, Financing for Development Office, UN-DESA, at the
14th Session of the Committee of Experts on International Cooperation in Tax Matters**

On behalf of the Department of Economic and Social Affairs of the United Nations Secretariat, I am pleased to welcome you to the 14th

**14th session of the Committee of Experts on
International Cooperation in Tax Matters.**

This session has a special significance. This is the last session of the current membership of the Committee, which, as you know, expires at the end of June. Overall, you should have every reason to be proud of the Committee's recent achievements. The legacy of this membership will be rich in substance and impact. It will include the updated version of the United Nations Model Double Taxation Convention between Developed and Developing Countries (UN Model), an updated version of the United Nations Practical Manual on Transfer Pricing for Developing Countries (UN Transfer Pricing Manual), and the United Nations Manual for the Negotiation of Bilateral Tax Treaties between Developed and Developing Countries, as well as a new Handbook on Selected Issues in the Taxation of the Extractive Industries for Developing Countries.

This session is where all of the work of the past four years comes together, as members agree on the final text of the UN Model. We hope that the publication will be able to provide a solid, practical and tax system taking guidance for the interests of all relevant stakeholders, while bearing in mind the frequent resource, information and other limitations of developing countries, especially the least developed countries.

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Let me briefly outline key items on the agenda for this session of the Committee, against the backdrop of its work under the current very active and effective membership.

The revision of the UN Transfer Pricing Manual is complete. A digital copy of the new version of the Manual will be distributed to all the participants during the Special Meeting of ECOSOC on International Cooperation in Tax Matters, where its official launch will take place. Likewise, the Handbook on Taxation of the Extractive Industries has been translated and will be launched in October 2017, approved this week chapter on the key issue of

In its effort to finalize the update of the UN Model, the Committee will consider and evaluate an important body of work on the G20/OECD project on base erosion and profit shifting (BEPS) and its implications for developing countries. The draft documents to be presented include the BEPS, especially as it affects developing countries of Articles of the

Specific BEPS items for discussion include a possible limitation on benefits clause and other options such as a principal purpose test, to prevent those not intended to be covered by tax treaties from obtaining their benefits, as well as some procedural issues related to (i) possible changes to Articles and Commentaries; and (ii) possible treaty revisions to deal with subsequent changes in law. These changes are highly technical, but that should not obscure their practical importance to revenue bases and to development.

In addition, as you may recall, during the 13th session in New York, there were extensive discussions regarding characterization of certain activities in the context of international transport. This time, you will be deciding which, if any, of the changes to the OECD Model will be incorporated into the new version of the in tTJ 2 (ar) n.1]TJ -0.00U (.1]TN(ode)4 (

