

20 June 2024

Mr. Ramy Youssef
Chair, Ad Hoc Committee to Draft Terms of Reference for a United Nations Framework Convention on International Tax Cooperation

Dear Mr. Youssef,

The **International Tax and Investment Center** (ITIC) is an independent, nonprofit research and education organization founded in 1993 to promote tax reform and public-private initiatives to improve the investment climate in transition and developing economies. ITIC serves as a clearinghouse for information on best practices in taxation and investment policy, bringing business, government and academia together in a “neutral table” approach.

ITIC appreciates the opportunity to review and provide comments with respect to the **Proposed Zero Draft Terms of Reference for UN Framework Convention on International Tax Cooperation**.


We support this document as a general plan forward. We do, however, offer the following suggested minor revisions.

- **Principles** (paragraph 9): We recommend inclusion of two further guiding principles:
 - Encourage approaches which promote economic development.
 - Ensure compatibility to the extent practicable with similar efforts by other International Organizations (i.e., OECD Inclusive Framework).
- **Specific priority areas** (paragraph 14): We further recommend inserting as an additional priority the following bracketed language currently presented under **Substantive elements of the Framework Convention** (par. 10): [fair allocation of taxing rights, including equitable taxation of multinational enterprises...]

We believe these amendments will enhance the scope of the Terms of Reference by keeping a focus on these fundamental aspects of tax reform.

We look forward to participating in consultations on what the protocols should be and how we may be able to contribute further to this process.

Respectfully,



Daniel A. Witt
President