



AFRICAN TAX ADMINISTRATION FORUM

Leading Africa in tax administration

INTERNATIONAL COOPERATION IN TAX: AN ATAF PERSPECTIVE

A photograph of a conference table covered with a white tablecloth. Several small national flags are placed on the table, including the South African flag. A name tag with the text "SOUTH AFRICA" is visible. In the background, several people in business attire are seated at the table, some looking towards the camera and others looking away. The scene is brightly lit, suggesting an indoor conference room.

ATAF'S IMPACT ON GLOBAL STAGE

Giving Africa a voice on global matters

OUR APPROACH TO ENHANCING VALUE AMONG OUR MEMBERS

Adding African voice to international tax agenda

- Changes to OECD TPG
- Changes to Interest Deductibility rules
- African approaches and experiences

Review Member Countries' needs

- Low TP capacity
- Gaps in Legislations
- Aligning AMATM & DTA to TP

Strategy for Implementation

- Country CBT Programmes
- TP leg / Risk Model / Database
- EOI / treaty business process

Feed experience back into international tax agenda

ATAF'S IMPACT ON INTERNATIONAL TAXATION

ATAFs participation led to the following revisions:

01 INTEREST RULES

- The recommended approach to interest deductibility rules

02 TRANSFER PRICING

- Revised transfer pricing guidelines relating to pricing cross border commodity transactions



TRANSFER PRICING 03

- Revised transfer pricing guidelines relating to intra-group services

PERMANENT ESTABLISHMENTS 04

- Revision to Article 5 of the OECD Model Tax Convention



COLLABORATING WITH PARTNERS

Seeking the best for ATAF members

ATAF'S COOPERATION WITH INTERNATIONAL ORGANISATIONS

CBT COUNTRY PROGRAMMES

- Secondment of OECD official to ATAF
- Bolstering ATAF's TP capacity
- Train-the-trainer

TRANSFER PRICING

- Focussed on the ECOWAS region
- Working on introducing ATAF Model Legislation in TP
- ATAF Risk Assessment Tool

OECD

GLOBAL FORUM

WBG

UN

AFRICA INITIATIVE

- Country Programmes to develop Competent Authority Offices
- Beneficial Ownership
- 50 % Secondment of GF expert to ATAF activities

TRADE MISPRING / IFFs

- Consortium on IFFs
- Trade mispricing project – FIZ and ECA
- 4 country pilot commencing in 2017

ATAF'S COOPERATION WITH INTERNATIONAL ORGANISATIONS

TRANSFER PRICING

- Training of ATAF member countries
- 3 courses over 3 years
Co-facilitated by UN & ATAF TP experts

TRANSFER PRICING

- Focussed on the ECOWAS region
- Working on introducing ATAF Model Legislation in TP
- ATAF Risk Assessment Tool



AFRICA INITIATIVE

- Country Programmes to develop Competent Authority Offices
- Beneficial Ownership
- 50 % Secondment of GF expert to ATAF activities

CBT COUNTRY PROGRAMMES

- Secondment of OECD official to ATAF
- Bolstering ATAF's TP capacity
- Train-the-trainer
- TIWB

WHAT HAS WORKED: WHERE CAN WE IMPROVE?

- **UN-ATAF Transfer Pricing** Capacity Building Programme
 - Building the expertise of a tax official over 3 years
- **UN-ATAF Exchange of Information** Capacity Building Programme
- The **ATAF CBT Country Programmes** have already had a significant impact
 - TP – **increased revenue + new legislations**
 - EOI – Introduction of **business process** in 5 countries
- First **Africa to Africa** expert deployment under the TIWB programme Kenya to Botswana
- Use of **ATAF Products** on missions (ATAF Model DTA, AMATM, Model TP legislation)
- **Further work needs to be done to improve access to Ministry of Finance officials at appropriate level – Need for IOs to work closely to achieve this objective**

HOW COULD THE PLATFORM IMPROVE COOPERATION?

Coordination

1

ATAF is coordinating among the IOs on which programmes it leads and which are led by different partner. This should be done through a quarterly update

Leverage

2

IOs must leverage on the work already done by ATAF and not reinvent the wheel. ATAF products should be promoted as they have been developed by ATAF members in consultation.

Political Support

3

IOs can lend a hand in coordinating ministerial support for tax administrations.



THANK YOU FOR YOUR ATTENTION

MERCI POUR VOTRE ATTENTION

Questions & Answers