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VIA EMAIL: taxtreaties@oecd.org

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RE: PwC Comments on BEPS Action 14: Make Dispute Resolution Mechanisms More Effective

Dear Ms. de Ruiter:

PricewaterhouseCoopers LLP ("PwC") welcomes the opportunity to comment on the OECD's *Public Discussion Draft on Action 14: Making Dispute Resolution Mechanisms More Effective* (the "Discussion Draft" or "Draft"). As a global professional services business with a network of firms throughout the world, we have extensive experience relating to the obstacles that prevent countries from resolving treaty-related disputes under the Mutual Agreement Procedures ("MAP").

We recognize the size and difficulty of the task being addressed in Action 14, and accordingly, we commend the Working Group for its preliminary (but considerable) efforts in identifying obstacles that preclude resolution of disputes through MAP and developing potential options to address those obstacles. We have concerns in a number of areas, however, in which we believe further consideration and effort should be undertaken. We are primarily concerned that global consensus has not been reached on mandatory and binding arbitration, a mechanism that has proven successful in resolving treaty-related disputes, and arguably, is an effective approach to ensure certainty and predictability for business in this area.

We appreciate your consideration of our comments on the Discussion Draft and we would be pleased to assist the OECD further in its efforts under Action 14. We also would like to indicate our desire to speak in support of our comments at the public consultation meeting on Action 14 to be held in Paris at the OECD Conference Centre on January 23, 2015.

1. General Comments on the BEPS Action 14 Discussion Draft

Bilateral income tax treaties are fundamentally based on the promotion of international trade and investments. Multinational corporations need to be confident that when they choose to operate in a particular jurisdiction, they will be treated fairly and will not suffer from excessive or double taxation. The operative rules in a tax treaty are intended to further this goal, but such rules work imperfectly when dispute resolution procedures are ineffective or

inefficient. Unfortunately, the existing platform for resolving treaty-related tax disputes is struggling under tremendous strain and immediate measures are required to ensure MAPs are more effective, efficient, and practical. The current global tax controversy environment requires improvements to dispute resolution procedures that will, in practice, prevent double taxation. Business needs predictability and certainty. Our hope is that the OECD's work on Action 14 will lead to significant improvements in the existing system for resolving cross-border tax disputes.

According to recent OECD statistics, pending treaty-related tax disputes are at record high levels. Recommendations from the base erosion and profit shifting ("BEPS") Action Plan will likely drive these numbers higher, as a significant rise in tax audits and disputes is widely expected. Taxpayers, tax administrations, and other stakeholders need a system that offers a definitive mechanism for settling disputes in an effective, efficient, and practical manner, and within a reasonable time frame. Justice delayed is justice denied. Stakeholders are frustrated with a system that provides, in certain cases, no definitive or conclusive way of resolving cross-border tax disputes, and that inevitably results in prolonged inequities. The international community needs a practical and definitive mechanism for resolving disputes; otherwise, some observers believe the business community is left with a system that is open ended, uncertain, and opaque.

The Action 14 Discussion Draft is an important first step in identifying obstacles that prevent countries from resolving treaty-related disputes through MAP and providing options to address these obstacles. We understand the Draft merely represents views and proposals for stakeholder analysis and comment, and accordingly, does not represent a consensus view of the Committee on Fiscal Affairs ("Committee"). We do, however, hope that the forthcoming "specific measures" and "minimum standards" to which participating countries can collectively commit will represent the consensus review of the Committee.

Overall, we support most of the options set forth in the Discussion Draft to address the identified obstacles that preclude the resolution of treaty-related disputes through MAP. We agree that the "complementary solutions" alluded to in the Draft must have a "practical, measurable impact" to improve overall dispute resolution procedures. This will inevitably require the widespread adoption and actual implementation of specific measures by individual countries. It is, however, disappointing that there is no consensus on movement toward universal mandatory and binding arbitration. The use of mandatory and binding arbitration has, to date, evidenced positive results in incentivizing competent authorities to reach a resolution in a timely manner (even before arbitration) and to definitively resolve MAP cases in certain countries. The work under Action 14 is inherently global in nature and it is the optimal time to, as a minimum, recommend adoption of mandatory and binding arbitration. Alternatives to mandatory and binding arbitration, such as an international tax tribunal or an international court of tax justice, or taxpayer "self-initiated adjustments" (although not mentioned in the Draft), seem difficult, if not impossible, to reach consensus on in the foreseeable future.

Therefore, the use of mandatory and binding arbitration appears to be one of a very limited number of available treaty-based dispute resolution options that would provide a definitive mechanism for resolving MAP cases that are in deadlock – the occurrence of which is likely to increase as the BEPS reform unfolds. Accordingly, in addition to the many options for

improving MAP referenced in the Draft, we urge the OECD to strongly recommend the adoption of mandatory and binding arbitration.

2. Comments on Supplementary OECD Work under BEPS Action 14

The Discussion Draft indicates it represents the "preliminary result of work done to identify the obstacles" in resolving treaty-related tax disputes. As the work of the OECD moves forward in this area, we hope that the "specific measures" the OECD intends to constitute the "minimum standards" for participating countries to commit to will not only be obligatory, but also practical, so that member countries can easily adopt and build on those standards. It is imperative that the OECD not merely rely on a "political commitment" to implement the specific measures. Rather, the OECD should emphasize the need for policy officials at the highest levels of tax administrations to collectively adopt the specific measures contemplated and to be accountable for the results. This could be achieved by expecting tax authorities to meet specific targets and goals (for example, by exchanging position papers within six months after a MAP case has been filed).

The supplementary work to enhance MAP is just that – work remaining to be done, and it needs to be accomplished as soon as possible. This is necessarily multilateral work, and accordingly, it must be carried out through a multilateral body, inclusive of those directly responsible for the MAP programs that will be affected by the work (as opposed to a more remote, policy-oriented body). Further, it is work that will require extensive changes to tax administration processes and policies, so the work must have the unwavering support of tax policy officials at the highest levels. Given these requirements, we recommend that the MAP Forum, launched by the Forum on Tax Administration ("FTA") Commissioners in Moscow in May 2013, be viewed as critical to the implementation of Action 14, as opposed to a body engaged in "parallel work" as described in the Discussion Draft.

Finally, the Draft refers to a "monitoring process" that would evaluate the commitment of member countries to implement the forthcoming "specific measures." If not appropriately designed, this process could prove to be retrospective and an ineffective use of competent authority resources. Hence, we believe a monitoring process would only be effective if it is designed to ensure that the exercise of specific measures are transparent and accountable with the objective of improving taxpayer confidence in the dispute resolution processes and eliminating double taxation. If, within a set period of time (e.g., five years), the monitoring process demonstrates that those objectives have not been achieved, the OECD should commit to a new project that fundamentally improves the resolution of treaty-related disputes in the MAP processes, including, but not limited to, the endorsement of mandatory and binding arbitration (if not already undertaken) as an instrument to resolve deadlocked cases in an effective and efficient manner.

3. Comments on the Four Key Principles Identified in BEPS Action 14

Recent OECD MAP statistics show the highest pending inventory of MAP cases in history and a 94 percent increase over the numbers in 2006. These statistics are dramatic evidence of the surge in tax audits and treaty-related disputes among OECD member countries over the last eight years (all pre-BEPS). This trend is troubling and is compounded by the concern that some areas of the OECD BEPS Action Plan – such as permanent establishments and transfer

pricing – will introduce new controversial rules that may significantly alter the international tax system, and may lead to an even greater increase in audits and disputes (placing further extreme pressure on the MAP system). Accordingly, the dispute resolution process involving cross-border tax disputes is in need of immediate attention and material improvement to be an effective means of resolving controversy and preventing double taxation. The occurrence of double taxation as a direct result of a failed MAP system is unacceptable. In situations where countries fail to fully prevent double taxation in a reasonable amount of time, there must be a definitive mechanism in place that requires competent authorities to resolve the matter in question.

The Discussion Draft, along with the FTA's "*Multilateral Strategic Plan on Mutual Agreement Procedures: A Vision for Continuous MAP Improvement*" (the "Strategic Plan") are welcomed efforts to address the unprecedented levels of cross-border tax disputes and the resultant MAP caseload that confronts the global business community. Both papers expound upon historical proposals and recommendations presented in the *2004 Proposal for Improving Mechanisms for the Resolution of Tax Treaty Disputes* (now more than ten years old), and more recently in the *2007 Manual on Effective Mutual Agreement Procedures* ("MEMAP"). Recognizing that further progress remains to be achieved, the Discussion Draft and the Strategic Plan focus on a number of practical areas for improving MAP with the vision that the operation of MAP be made more effective and efficient through the collective and collaborative efforts of competent authorities around the world. To reiterate, however, the forthcoming "specific measures" and the "minimum standards" (to which participating countries are expected to commit) must be fully implemented to have any measurable impact. This, we urge, will require a firm commitment (with specific target goals) of the OECD, the FTA MAP Forum, and policy officials at the highest levels of tax administrations to ensure that obstacles to effective resolution of treaty-based disputes are overcome in a timely manner.

Principle 1: Good Faith Implementation of MAP Treaty Obligations

We agree with the Discussion Draft's identification of the two obstacles (and corresponding options) to ensure that treaty obligations related to MAP are fully implemented in good faith. We consider moving forward with both of these options to be important steps, making it clear that competent authorities have an obligation to resolve MAP cases (not just use "best efforts" to do so). That said, we suggest that the clarifying provision in Option 1 go one step further in addressing the absence of an obligation to resolve MAP cases. More specifically, we do not see a material difference between the phrase "shall endeavour to resolve" and the phrase "to seek to resolve." By definition, "to seek to resolve" is merely an "attempt to resolve," and to the extent competent authorities do not seek to resolve cases in a practical, fair, and objective manner, the pressures on MAP remain the same – with the threat of double taxation more acute. Accordingly, we recommend removing the words "to seek," which in our opinion, would sufficiently emphasize that competent authorities have an obligation to resolve MAP cases.

Principle 2: Improve Administrative Processes for the Prevention and Resolution of Treaty-related Disputes

The Discussion Draft appropriately identifies seven obstacles and corresponding options to ensure that administrative processes promote the prevention and resolution of treaty-related disputes. We fully agree with those proposed solutions and with the concept that administrative "best practices" are critically important to ensuring competent authorities are able to effectively and efficiently carry out their mandates and treaty obligations. Although we agree with each of the identified options, we provide below our recommendations on how to best implement specific measures as part of the OECD's supplementary work on implementing this principle.

Lack of MAP Resources. A focus on resources, both in quantity and quality, is a critical prerequisite because most competent authority teams around the world have under-staffed or inexperienced personnel. It is recognized that intra-administration competition for resources often results in dedicating resources to the audit or exam function and making adjustments to a taxpayer's reported income, as opposed to dedicating resources to the MAP function responsible for reconciling those adjustments with other governments. This is a challenge that cannot be addressed through a mere "commitment to the best practices set out in the MEMAP." Instead, we recommend policy officials at the highest levels of tax administrations commit to ensuring that MAP resources are experienced and are commensurate with the MAP workload. The FTA MAP Forum, under the proactive guidance of the FTA Commissioners, is the most appropriate body to lead this effort.

Competent Authority Independence. Ensuring the independence of resources is potentially the single greatest challenge faced by competent authorities around the world. Similar to the resource challenge, this is an issue that cannot simply be addressed by a political commitment, which historically has proven to be ineffective. Rather, the empowerment of the competent authority function can only be addressed through the dedicated work of policy officials at the highest levels of tax administrations, followed by the adoption of specific modifications to administrative practices and policies designed to remedy the problems identified.

The relational position between competent authorities and their tax administrations (and constraints imposed by those administrations) determines the competent authorities' ability to deviate from the positions of tax auditors and thereby dictates their willingness to be practical and objective and to reach a compromise based on international principles. Solutions must be identified and implemented through the concerted efforts of the FTA MAP Forum to bring about operational change. Accordingly, the work of the MAP Forum is central to Action 14 (as opposed to working "in tandem" with Action 14). We also strongly recommend that a business advisory council be established, as described in the Draft, that would work hand-in-hand with the MAP Forum to ensure that business perspectives on MAP difficulties are brought to fruition through performing benchmarking studies and developing common approaches to shared problems.

Performance Indicators. Experience has shown that performance metrics and goals associated with the audit functions of the tax administration may serve to impair the objectivity of competent authorities by placing limitations on their ability to reach appropriate resolution of treaty-related disputes. These types of harmful metrics and goals need to be identified and addressed in connection with ensuring the independence of the competent authority function. We also encourage the OECD to consider developing a MAP

negotiation training program for participating countries. This type of training could be designed to ensure that competent authority resources approach the negotiation table with the mind-set to completely eliminate double taxation in the most efficient manner possible.

Encourage Use of APAs. We are pleased to see the Discussion Draft embraces implementation of bilateral Advance Pricing Agreements ("APAs") as an important alternative dispute resolution option to increase certainty, decrease double taxation, and proactively prevent transfer pricing audits and disputes. We also agree with the recommendation to potentially apply APA methodologies (and MAP results) in certain situations to other taxable years not formally under consideration in the APA (or the MAP case). In the current environment, we suspect that domestic barriers to access into the APA program may increase, resulting in further treaty-related disputes. Thus, the OECD should reinforce the benefits of APAs and the need for all participating countries to embrace actual implementation of bilateral APA programs, including the use of dedicated resources. In addition to the APA alternative, we strongly encourage the OECD to recommend that countries develop and improve other domestic dispute resolution mechanisms for resolving assessments involving tax disputes (such as, pre-filing agreements, administrative appeals, domestic mediation, and domestic arbitration). The availability of effective and efficient domestic law remedies would help to resolve many cross-border disputes even before the need to proceed to MAP.

Principle 3: Improve Taxpayer Access to MAP

The Discussion Draft identifies eight obstacles (and corresponding options) to ensure taxpayers can access MAP when eligible. For the most part, we agree with each of the solutions offered by the Draft. We do, however, make the following additional recommendations for options and processes that may help ensure measures are appropriately adopted worldwide.

Impediments to Accessing MAP. Auditors in certain countries are increasingly raising inappropriate roadblocks where a taxpayer indicates a desire to pursue MAP – an approach that is totally unacceptable. If the various options set forth by the Draft to improve taxpayer access to MAP are implemented by participating countries, then we suspect that denial of access to MAP would be largely reduced. Nevertheless, rather than rely on policy commitments to MEMAP practices to address this fundamental problem (as suggested in Options 10 and 11), we recommend that competent authorities develop and adopt consensus guidelines for addressing practical and legal impediments to MAP access.

Anti-abuse Provisions. There is tremendous uncertainty as to the interpretation and application of Article 25 in regards to MAP access where domestic laws or treaty-based general anti-avoidance rules are applied. As an example, most of the Commonwealth countries limit the scope of their treaties with respect to enabling domestic legislation, which in turn, can result in non-compliance with international treaty obligations to the detriment of taxpayers. Thus, we welcome the Draft's attempt to clarify, as part of Option 12, the availability of MAP access where domestic rules or anti-abuse provisions are applied. There is, however, an acute need to create clear and objective standards on the application of such provisions. Therefore, it is critical to adopt language in the Commentary to Article 25 clarifying that all instances in which any country believes its domestic laws preclude the

application of a treaty benefit should be made known to the competent authority of the treaty partner, and that "[t]he interpretation and/or application of that rule would clearly fall within the scope of the MAP." This clarification is even more important given the wide-spread use of domestic anti-abuse rules to deny treaty benefits that may result from the work on Action 6 of the BEPS Action Plan. We also recommend that the denial of the discretionary grant of treaty benefits be within the scope of MAP (contrary to the recommendation in the *Public Discussion Draft Follow up Work on BEPS Action 6: Preventing Treaty Abuse* to make this issue outside the scope of MAP). This could be formally included in Article 25 or through a commitment in the Limitations on Benefit article, but, in either case, should be a bilateral resolution of a proposed denial of treaty benefits under the discretionary grant provision. Further, Commentary related to Article 25(2) should make clear that the interpretation and application of domestic laws are subject to full MAP negotiations based on the overarching purpose of Article 25 to eliminate double taxation or taxation not otherwise in accordance with the treaty.

Domestic Law Remedies. In Option 16, the Discussion Draft suggests that it may be preferable to pursue MAP as the "first option" for resolving treaty-related disputes (with suspension of domestic law remedies) as MAP would provide a comprehensive resolution of the case. We are concerned with this proposition for at least two reasons. First, this approach would significantly (and needlessly) increase the competent authority caseload and inventory because every treaty-related dispute, including positions that may not be meritorious, would need to involve the competent authority function. It is an overly burdensome approach to resolving cross-border disputes. In fact, in certain countries, many potential treaty-related disputes never need to reach the competent authority level because the assessments are withdrawn due to a lack of merit (or other justifiable reasons). Second, and more importantly, it should be the option of the taxpayer to proceed with either domestic law remedies or MAP (or pursue both simultaneously). The taxpayer should have the fundamental right to pursue domestic law remedies, and to the extent the threat of double taxation remains after pursing those options, the taxpayer should be allowed to pursue competent authority as a means to eliminate double taxation. In the alternative, taxpayers may prefer to first pursue MAP to stay collection of taxes in certain jurisdictions. In either case, the taxpayer should not be limited to one dispute resolution option. Accordingly, supplementary work is required on this solution, and the Commentary to Article 25 should be amended to set forth appropriate processes for governments to follow in modifying local procedural rules and to encourage, in appropriate cases, resolution of cross-border disputes at the administrative level prior to proceeding to MAP, including early involvement of the competent authority function to eliminate audit assessments that are not supported by the facts of the case or applicable legal principles and economic analysis.

Principle 4: Ensuring Cases are Actually Resolved Once in MAP

The Discussion Draft identifies six obstacles and issues that prevent the resolution of treaty-based disputes once a case is in MAP (and correspondingly sets forth options to remedy those problems). We commend the OECD in its efforts to identify options to address obstacles that preclude the resolution of treaty-related disputes in MAP. These options would have a practical and measurable impact if individual countries commit to the "minimum standards" the Draft envisions. Nevertheless, we are disappointed that there is no consensus on movement toward universal mandatory and binding arbitration.

We elaborate below on the Draft's proposed options to improve MAP processes. In particular, we expound on our recommendation that the OECD recommend mandatory and binding arbitration while simultaneously embarking on an initiative to more thoroughly identify the obstacles that countries identify as barriers to adopting mandatory and binding arbitration and develop a process to eliminate those obstacles.

Principled Approach. At the outset, we strongly agree that competent authorities should approach the resolution of MAP cases employing a "fair and principled" approach. This is the bedrock of competent authority negotiations. It is critically important that each MAP case be decided on the merits, without reference to the results of other MAP cases. Competent authorities must take consistent approaches on the same or substantially similar issues from one MAP case to another and not consider factors that are irrelevant to factual or legal issues (such as revenue considerations). Therefore, we welcome and support Option 20, but suggest that best practices also be addressed through the commitment of the MAP Forum.

Cooperation, Transparency, and Good Working Relationships. The Discussion Draft and the Strategic Plan emphasize the need for competent authorities to be responsible and accountable for ensuring effective and efficient MAP processes so that taxpayers are not subject to double taxation, or taxation that is not in accordance with the applicable tax convention. Individually and collectively, competent authorities must take responsibility to ensure the proper functioning of MAP. This requires the development of collegial relationships and the cohesive implementation of specific measures to ensure fully transparent MAP processes. We believe accountability for the implementation of specific measures and adherence to minimum standards should not rely merely on policy commitments (as suggested in Option 21), but rather, must be emphasized through the dedicated work of the MAP Forum and policy officials at the highest levels of tax administrations. Specific measures should include procedures and protocols (including specific targets and goals) to set appropriate expectations amongst competent authorities and taxpayers, such as project management and timetables, thereby instilling transparency and confidence in the MAP process.

Absence of a Mechanism to Resolve Unagreed MAP Cases. Following the inclusion of mandatory arbitration in paragraph 5 to Article 25 of the OECD Model Treaty in 2008, a number of countries have included mandatory arbitration in their bilateral income tax treaties. The provision in the OECD Model Treaty, however, does not mandate the adoption of mandatory *and binding* arbitration. That said, the U.S. (and other countries) are increasingly including mandatory and binding arbitration provisions in their bilateral income tax treaties, which have been recognized as an important tool to incentivize resolution of MAP cases in certain countries. Indeed, there is support for the proposition that the mere existence of an arbitration mechanism has made traditional MAP processes more efficient and effective where the mechanism exists.

We urge the OECD to recommend, as a minimum, the adoption of mandatory and binding arbitration which would set the appropriate foundation for broader acceptance. As part of the OECD's supplementary efforts on Action 14, the OECD should work with participating countries to engage in transparent discussions to identify the objections that are asserted by certain countries and to develop solutions to eliminate those objections.

The most significant obstacle, as recognized by the Draft, is that some countries believe mandatory and binding arbitration would result in a relinquishment of "national sovereignty." This obstacle increasingly may become less of a roadblock. The recent State Aid cases make it clear that countries in the European Union ("EU") have already ceded a substantial amount of sovereignty regarding tax rules in the EU. Further, participating countries already have agreed to a form of mandatory arbitration (albeit not the "baseball" approach) as part of their membership in the World Trade Organization ("WTO"), or in free trade agreements. Thus, the concept of mandatory arbitration does not appear to be *per se* objectionable.

The use of mandatory and binding arbitration would be an effective approach to resolve disputes for competent authorities that are unable to reach an agreement as it compels a process that is binding on both governments, constituting a resolution by mutual agreement under the treaty. The U.S. (amongst other countries) has executed income tax treaties with mandatory and binding arbitration that employs the "baseball" type of formal decision making (otherwise known as the "final offer" approach). The Draft also references the "independent opinion" type of formal decision making in arbitration. We encourage use of the baseball type of arbitration as it incentivizes competent authorities to abandon positions that an arbitrator would be unlikely to uphold, which in turn, has the effect of encouraging settlement during competent authority negotiations before the case needs to be presented to an arbitration panel. In short, under this approach, many cases may never reach arbitration because the competent authorities are encouraged to resolve the dispute prior to taking that ultimate step.

Alternatively, mandatory *non-binding* arbitration may be a suitable approach where policy or practical concerns preclude use of mandatory and binding arbitration. The non-binding nature of this model would leave the option of litigation on the table – providing a "method of last resort" to the taxpayer and preserving the sovereignty rights of individual countries. In such cases, the arbitration decision may become part of the record in judicial proceedings, and in fact, may weigh heavily in a court's final resolution of the tax matter. Moreover, this model would allow countries to experiment with arbitration and overcome the obstacles that prevent the use of mandatory and binding arbitration.

Finally, we also believe that taxpayers should have a material role in the arbitration process. In certain cases, the taxpayer may be in the best position to assist the arbitration panel in understanding the relevant facts and economic analyses. For example, the role of the taxpayer's participation in the arbitration process has been recognized under the U.S.-France treaty whereby the Memorandum of Understanding and the Arbitration Board Operating Guidelines explicitly provide that the taxpayer is permitted to submit its positions to the arbitration panel. We agree with the Draft's recommendation in Option 30 that taxpayers should be allowed to submit a brief setting forth its position (excluding new facts) for consideration by the arbitration panel, subject to review and comment by the participating competent authorities. We do, however, encourage the OECD to more explicitly embrace the role of the taxpayer in the arbitration process. Further, we also believe there is an appropriate role for greater taxpayer participation in general in the overall MAP process. Specifically, in more complex MAP cases, recognizing the final decision is made by the competent authorities through private negotiations, we urge the OECD to recommend that

taxpayers be allowed to attend competent authority meetings to present the facts and relevant analyses and to respond directly to any questions or inquiries presented by the parties.

4. Conclusion

We appreciate the OECD's considerable efforts in addressing the difficult task presented by Action 14. We are prepared to assist the OECD in further developing efficient, effective, and practical dispute resolution options that prevent tax controversies from arising in the first instance, and to eliminate double taxation once assessments are asserted.

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These comments are presented on behalf of the global network of PwC member firms in response to the OECD's *Public Discussion Draft on Action 14: Making Dispute Resolution Mechanisms More Effective*. We would like to reiterate our desire to speak in support of our comments at the public consultation meeting on Action 14 to be held in Paris at the OECD Conference Centre on January 23, 2015.

For any clarification of this response, please contact the undersigned (or any of the contacts below).

Respectfully submitted,

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