The Place Of Africa In The Shift Towards Global Tax Governance:

Can the taxation of the digitalised economy be an opportunity for more inclusiveness?



AFRICAN TAX ADMINISTRATION FORUM PAPER



ABSTRACT

The paper provides an overview of the current international tax governance landscape and inroads towards inclusiveness. It argues that although the governance process is transparent, efforts to establish a true international tax governance through the Inclusive Framework for BEPS Implementation (IF) are foiled by challenges hampering African countries to participate on an "equal footing." It posits that setting international standards in the relatively new field of the taxation of the digitalized economy would be a natural test of a successful implementation of a framework in which international tax governance is conducted on an expanded multilateral basis, away from a "club structure" type of governance where initiatives are carried out and standards are set by a selected few, to an extended multilateral tax governance structure characterized by a broader distribution of leadership roles and responsibilities. Only such a structure would be seen by developing countries, and African countries in particular, as a driving force for increasing participation, inclusiveness and implementation of international tax reforms.

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LIST OF ABBREVIATIONS AND ACRONYMS

AEOI: Automatic exchange of financial account information AfDB: African Development Bank ATAF: African Tax Administration Forum ATAF CBT TC: ATAF Cross Border Taxation Technical Committee ATAIC: Association of Tax Authorities of Islamic Countries AU: African Union BEPS: Base erosion and profit shifting BO: Beneficial Ownership CATA: Commonwealth Association of Tax Administrators CREDAF: Centre de rencontre des administrations fiscales CFA: OECD's Committee on Fiscal Affairs CIAT: Centro Interamericano de Administraciones Tributarias COTA: Caribbean Organization of Tax Administrators DRM: Domestic resource mobilization ECOSOC: United Nations Economic and Social Council EU: European Union EOI: exchange of information EOIR: Exchange of information on request FfD: Financing for Development Global Forum: Global Forum on transparency and exchange of information for tax purposes ICT: Information and communications technology IF: Inclusive Framework for BEPS Implementation IFFs: Illicit financial flows IOTA: Intra-European Organization of Tax Administrations IMF: International Monetary Fund MAC: Convention on mutual administrative assistance in tax matters **MNEs:** Multinational enterprises M-Pesa: Kenyan mobile money system NTO: Network of Tax Organizations OECD: Organization for Economic Cooperation and Development PCT: Platform for Collaboration on Tax RTO: Regional Tax Organizations TPGs: Transfer Pricing Guidelines UN Tax Committee: United Nations Committee of Experts on International Cooperation in Tax Matters UNECA: United Nations Economic Commission for Africa

WATAF: West African Tax Administration Forum (WATAF)