

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

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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)