

SIXTH COMMITTEE: ORGANIZATION

INFORMATION REQUESTED BY THE DELEGATE OF CZECHOSLOVAKIA  
CONCERNING THE FISCAL COMMISSION OF THE ECONOMIC AND  
SOCIAL COUNCIL.

Note by the Secretariat.

1. In connection with a proposed amendment to Article 69 paragraph (c) of the Draft Charter of International Trade Organization, the delegation of Czechoslovakia has asked in document E/CONF.2/C.6/12/Add.3, for information concerning the Fiscal Commission of the Economic and Social Council.
2. The Fiscal Commission was established and organized by the Council on 1, 2 and 3 October 1947. It submitted its first report to the Fifth Session of the Economic and Social Council on 24 July 1947. The Economic and Social Council requested the Secretary-General to undertake the comprehensive programme of studies and international consultations on fiscal questions in their various aspects set out in the Report of the Commission.
3. The parts of that programme which have the closest bearing on the provisions of Article 69 (c) of the Draft Charter, are the following:
  - (a) to build up a fiscal information service for the purpose of providing information on fiscal problems to Member Governments, the Economic and Social Council and its commissions, other organs of the United Nations, the specialized agencies, and non-governmental agencies in category A,
  - (b) to make available, on request, technical advice, information and assistance on fiscal matters to the Economic and Social Council, its other commissions, and other organs of the United Nations, the specialized agencies and Member Governments, with special reference in the case of economically less advanced countries, to means of facilitating their development and raising their standards of living.
  - (c) to review the work accomplished by the League of Nations on international tax problems, with particular reference to further action to be taken for the solution of such problems;
  - (d) to collect, publish and distribute the text of treaties for the prevention of double taxation, and for mutual assistance in the collection of taxes and the exchange of information;

(e) to compile

- (e) to compile information on their tax assessment and collection practices, so that Members negotiating tax treaties may know what techniques are available for securing and exchanging information, and for co-operating in the collection of taxes;
- (f) to collect information on tax laws, regulations and administrative practices which:
  - (1) result in a more burdensome taxation of foreigners than nationals or of international transactions than on domestic ones;
  - (2) make special concessions to foreigners, or as respects international transactions;
  - (3) have an extra-territorial application;
  - (4) apply to international travel, transport and communications;
  - (5) contain special clauses for foreign-held public debt;
- (g) to consult Members on the model bilateral tax conventions prepared at the Regional Tax Conference held in Mexico City in 1943 under auspices of the Fiscal Committee of the League of Nations and at the final session of the Fiscal Committee held in London in 1946;
- (h) to study tax problems from the point of view of their effects on international trade and investment;

4. In compliance with the above-mentioned requests of the Economic and Social Council, the Secretary-General on 2 September 1947, sent to Members of the United Nations a circular letter drawing attention to the services which the United Nations should furnish in the field of fiscal information and technical advice. This circular also requests Members to furnish documentary material and comment on the methods of solving the problems of international double taxation and fiscal evasion. Moreover, it asks for information on existing legislation and practices that govern the tax treatment of foreigners and international transactions.

5. The Secretariat of the United Nations is now engaged in the preparation of compilations and studies on these various problems. The result of this work will be circulated to Members in the course of 1948 and considered by the Fiscal Commission at its next session. The first publication that is to appear is a "Collection of International Tax Agreements, 1936-1947". It is now in the course of printing and contains in the text of most agreements relative to double taxations, reciprocal assistance between national tax administrations, and tax treatment of foreigners which were concluded during the last ten years.

6. During recent months, the Fiscal Division of the Secretariat, at the request of the Venezuelan Government, has given to that Government technical assistance in the organization and realization of far-reaching fiscal and administrative investigations and reforms.

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