The Taxcast, December 2022 transcript

Naomi: "Hello and welcome to the Taxcast, the Tax Justice Network podcast. We're all about fixing our economies so they work for all of us. I'm your host, Naomi Fowler. You can find us on most podcast apps. Our website is www.thetaxcast.com You can subscribe to the Taxcast there, or you can email me on naomi@taxjustice.net and I'll put you on the subscriber's list. Let me know what you think of the show – what do you want to hear more about, less about, I'm always happy to hear from you. Ok, so, in this month's Taxcast – it may not sound like it, but this is history being made at the United Nations:"

UN Chair: "The committee will now take action on draft resolution L11 rev 1. May I take it that the committee wishes to adopt draft resolution L11 rev 1? I hear no objection. Draft resolution L 11 REV 1 is adopted." [Bangs gavel]

Naomi: "We're going to give you our fly-on-the-wall take on what happened at the UN on November 24th 2022. We're going to look at the power plays around what really is the beginning of the end of the OECD's 60 year reign as the world's leading rule-maker on global tax:"

UN Chair: "I call to order the 25th plenary meeting of the second committee at the 77th session of the general assembly."

Naomi: "OK so usually a meeting with a title like that would make my eyes glaze over. And a vote on a resolution called 'L11 Rev 1' wouldn't exactly set me on fire either BUT, honestly, it's a *fascinating* meeting. It's all the more interesting because of the power dynamics. Because in many ways, we're witnessing a shift in power. I'll put a link to the video in the show notes, it kicks off at about 20 minutes in, it's worth a look. But let's start by understanding what this resolution is and what nations have just voted for. Here's Alex Cobham of the Tax Justice Network:"

Alex: "Look, this is a great resolution, and yet it is much less than it could have been, much less than the original proposal from the Africa Group. I think we should say, first of all, what a just fantastic job the Nigerian delegation have done to get this through. I think without Nigeria's leadership, it's not clear who else would've stood up, and that's been vital in, in getting this, this really unprecedented success. So even in the state that it went through, the resolution really is a kind of watershed moment. There's three main elements to it. So first of all, um, most concretely, it calls for the Secretary General Antonio Gutierrez to produce a report on the options for a framework at the UN for intergovernmental discussions and decisions on tax rules. Um, so looking at the options and over the next six months or so, delivering a, a report to the UN.

Secondly, it calls for the beginning of intergovernmental discussions, not negotiations - that got watered down to discussions - but this is still significant. Um, and that we'll see countries and regions, uh, coming together and starting to formulate their positions on these questions: to what extent do they want to see, uh, a full intergovernmental body on tax under UN auspices? What do they want it to cover? What issues, what aspects from, uh,

transparency measures through to rule setting and so on? And what form do they think that should take? So it will effectively begin informally the process of negotiations.

And then thirdly, the resolution calls for and establishes a session in the next general assembly, so from September, 2023 to discuss the Secretary General's report and to consider decisions, and that's where you'd expect to see a resolution of the form that this one originally took. That basically fires the starting pistol on formal negotiations, sets out a timetable for those meetings and a budget to support that negotiation process. So that's been delayed in a sense to next year, but what we've already got in place is very significant."

Naomi: "And the Nigerian representative makes it really clear at this UN meeting about the interference and attempts to water all this down, let's listen here:"

Nigeria rep: "Nigeria is happy to be taking this historic first step, but we are also troubled that this resolution could not be more ambitious. Most countries find it difficult to accept the legitimacy of international norms of forums that they have no effective voice in shaping. We also have not had a single globally inclusive forum on international tax cooperation. Unfortunately, the enormous pressure put on sovereign countries by the secretariat of another less inclusive international organisation is regrettable, but something we hope we can all move past as we forge ahead together."

Naomi: "She's talking here about the OECD, when she's mentioning pressure put on countries by 'another less inclusive international organisation'! The OECD does seem to have seen this vote as a paradigm shift that threatens their dominance in the area of international tax, or they wouldn't have tried so hard to stop, or weaken this resolution, right?"

Alex: "Yeah, it's funny to hear the Nigerian statements referring to the very significant extent to which, although they don't name it, the OECD has lobbied its absolute hardest to try to get this blocked. And yet the resolution in the end went through unanimously by consensus. That's quite a condemnation of the OECD. Uh, in fact, their lobbying was thought by some to be so extreme that it actually put people off voting against this resolution who might otherwise have been more sympathetic."

Naomi: "So it backfired! Even though the resolution did get passed, afterwards a load of countries, (largely OECD members) then complained about how they weren't happy about it after all!"

Alex: "Yes I think, you know, from the OECD's point of view, they'd be pretty disappointed that although these countries are so unhappy, none of them was willing to actually go the whole way and object."

Naomi: "Ha, no, interestingly they weren't willing! Joining us to analyse the vote on this historic UN resolution is the Tax Justice Network's Rachel Etter-Phoya in Malawi. Rachel, what did you make of this UN meeting?"

Rachel: "Naomi, it was absolutely incredible to watch the proceedings at the UN to see what was like a boxing match where the underdog Nigeria, representing the Africa group at the

UN, alongside all other countries that have really been cut out of the international tax discussions to stand up and say, 'this is the time to change the rules of the game, to start negotiations on international tax'. It was so incredible because it is so different from how we've seen international tax negotiations over the last few years. The OECD, so the club of the richest nations, former imperial powers, they've been setting the rules for the last 60 years. They've had their banquet and they've been eating at it. They did in the last couple of years try to bring in a few more, but it wasn't to the banquet table, it was really around it, catching the scraps. And in this so-called inclusive framework, countries were pressured to sign up to things that they maybe wouldn't have signed up to otherwise. And the African Tax Administration Forum called out political pressure and coercion of members in these negotiations."

Naomi: "Yes. What's really striking to me straight away, just visually when you watch this UN meeting is that nations are *all there*, seated in alphabetical order, so you get Cameroon sitting next to Canada, Nepal sitting next to the Netherlands and New Zealand. Because if you compare that to the OECD, that's not the case at all for, let's say, Malawi is it?"

Rachel: "Malawi doesn't have a seat at this banquet table. It's not even in the room getting scraps. And there are other countries like this, so you cannot talk about inclusivity if you are not talking about the entire world. And you have to look at the power dynamics in the room and who actually is calling the shots. And even though there are challenges with the UN system, at least every country is sitting side by side."

Naomi: "Yes! And the African Group of nations have really led the way throughout the process, all the way to the successful passing of this resolution:"

Rachel: "Sorting out the international tax system is really important for everyone and it's really important for Africa. Africa is a net creditor to the world because of illicit financial flows, flows of money that flow out of the continent illicitly. You might assume that the greatest flows are from criminal and corrupt activity, but actually the high level panel report from a few years back that assessed the scale of illicit financial flows by the African Union saw that 60% of the illicit flows out of the continent are actually through trade. And unless we sort out the international tax system, this is not going to change. Countries have already committed to curbing illicit financial flows, which requires a change in the international tax rules in signing up to the 2030 agenda for development, known as the sustainable development goals. And part of the Addis Ababa action really explicitly states that we need to curb illicit financial flows if we're gonna be able to finance the development that we need across the world. And this is also really explicit in Africa's own continental blueprint for development, the Africa we want, which is the Africa Union 2063 agenda. And delegates mention this as a reason for the resolution - that we need to change the tax system to tackle illicit flows. So that's why it's so important to hear South Africa reminding all the other UN members in the room that they have an obligation to implement the Addis Ababa action agenda on financing the development goals. And part of that is tackling illicit financial flows, which requires a shake up to the international tax rules because multinational companies are at the moment able to exploit the rules so that they can shift the profits out of the

countries where they're actually doing business, where they're employing people, where they have the most customers, where they're extracting resources."

Naomi: "Yes, and for particularly the smaller, less economically powerful nations, plundered nations, the OECD really hasn't delivered. Just one example is with the minimum global corporate tax rate of 15% - a while back we saw countries like Nigeria rejecting that for many reasons – not least that it actually *undercut* their corporate income tax rate of 30%! Here's the South African representative making a statement strongly supporting Nigeria's tabling of this UN resolution:"

South Africa rep: "South Africa supports the resolution tabled by Nigeria on behalf of the African Group entitled 'Promotion of Inclusive and Effective International Tax Cooperation at the UN.' It is now seven years since the world adopted the first ever target to reduce illicit financial flows including corporate tax abuse following the report of the high level panel on illicit financial flows out of Africa, chaired by South Africa's former President Thabo Mbeki. This remains of critical importance for global efforts in support of sustainable development goals. Developing countries have for many years been calling for a global intergovernmental process to deal effectively with tax matters. Paragraph 29 of the Addis Ababa action agenda emphasises that member states will increase the engagement on tax matters with a view of enhancing intergovernmental consideration of tax issues. We therefore believe that the time is now to realise one of the important aspect of the Addis Ababa action agenda with a huge potential for scaling up domestic public resources. By supporting the adoption of the resolution before us, member states are indicating their support for an equitable and just world and expressing support for the right to development for all states. A UN tax convention will set global standards and create the mechanism for transparency and accountability to address illicit financial flows and corporate tax abuse amongst others. The UN is the most appropriate venue for this discussion due to its universal membership and all-inclusive character. We therefore call on all member states to support this resolution, thereby recommitting to strengthened international development cooperation. I thank you."

Naomi: "That's the South African representative there. In this UN meeting we're hearing so many representatives saying what a *great* process the OECD has for achieving better global tax rules for all nations, and how *inclusive* it's been!"

Alex: "Yeah, in the debate we are, we are hearing a lot from the core OECD member countries about how the OECD process is perfect and we don't need anything else, but they're arguing from a very weak position. You know, clearly the OECD process is not inclusive. The OECD is, you know, in its own articles of association, is required to prioritise the economic interests of its own members, but also the inclusive framework process itself has been widely criticised by pretty much all of the non-OECD member countries in it, because it doesn't give them a vote, it doesn't give them an effective voice, they're really almost just there to, to sign on the dotted line and that's become increasingly clear. But it isn't just that the OECD process hasn't been inclusive, it also hasn't been effective, so it hasn't delivered on its own timetable. So, even for the OECD members, I think they

themselves know it's quite a stretch to say that the OECD process has done anything other than really slowly fail and take up lots of people's time and resources."

Naomi: "And even though this resolution gets passed unanimously in the end, look what happens here – I mean, the United States makes a last ditch attempt to water it down *even further* by putting forward an amendment to the resolution for a vote. Here's the UN chair:"

UN Chair: "An amendment to operative paragraph two of draft resolution L 11 rev one was submitted by the United States of America and circulated in document A/C2/77CRP2. In accordance with rule 130 of the rules of procedure of the general assembly, the committee will take first a decision on the proposed amendment."

Naomi: "Check this out..."

UN Chair: "I now give the floor to the representative of the United States to introduce the draft amendment."

Naomi: "And now we get the vaguest explanation of this amendment from the US representative, I think they know it's going to fail and they're wasting their time:"

US rep: "Thank you Madame Chair and thank you to the facilitator of this resolution and fellow delegates. I will be brief. Hopefully all have had the opportunity to review the amendment we've put forward. Operative paragraph two calls for intergovernmental discussions at the United Nations in the spirit of undertaking a truly inclusive process to strengthen international tax cooperation. For this reason, the United States strongly feels that it is not in the spirit of beginning an inclusive process to prejudge the outcomes of these discussions - in this paragraph, our edit does not preclude any option from the discussions. It simply does not limit the conversation. We hope you'll consider our amendment. Thank you."

Naomi: "Erm, Alex, what's the US trying to do here?"

Alex: "This amendment was really very weak. What it tried to do was to water down the content of the intergovernmental discussions that will follow to make them so vague as to be almost meaningless, so it was sort of a pure wrecking amendment. Word on the grapevine, and, you know, you hear lots of things, so perhaps shouldn't put too much weight on this, but the word on the grapevine in New York was that the US had been very heavily lobbied by corporate lobbyists. And so they put this amendment down, you know, because they thought they, they should but then didn't push other countries as hard as the US sometimes does, but I think it's also there is an absolute clarity a very large majority of UN member states that want this to go ahead."

Naomi: "So they're going through the motions without conviction, that *is* what it sounded like! Er, let's listen to this – so all the country representatives are now voting on whether or not to accept this US amendment to Nigeria's resolution:"

UN Chair: "The committee will now commence the process of voting on the amendment on draft resolution L11 rev 1 contained in CRP2. Those in favour of the proposed amendments to draft resolution L11 rev 1 please signify. Can we have the voting screen up? Yep. Perfect.

So those in favour please signify, those against, and abstentions."

UN Secretary: "The committee is now voting on the proposed amendment draft resolution L 11 rev 1 entitled 'Promotion of Inclusive and Effective International Tax Cooperation at the United Nations contained in document CRP2. Will all delegations confirm that their votes are correctly reflected on the screen? The voting has been completed. Please lock the machine."

UN Chair: "I thank the secretary. The result of the vote is as follows: in favour 55, against 97, abstentions 13. The proposed amendment to operative paragraph two of draft resolution L11 rev 1 is rejected."

Naomi: "Ha ha ha, now THAT is something the US is probably not used to – they got voted down!"

Alex: "Yes, I'm sure the US is, is really not used to not getting its own way, including at the UN! It's also a quite significant sign, just how few countries were willing to back that."

Naomi: "Hmm. And now that's out of the way, before Nigeria's resolution gets voted on, a number of nations are wanting to make statements. Here's Singapore having its say:"

Singapore rep: "In the current climate, when the UN is expected to address ever more complex and evolving challenges, it is imperative especially for delegations from small states that we avoid duplication of efforts as far as possible and maximise the limited resources available to us. We are also mindful of the important work on this topic already being done at other forum such as the OECD G20 inclusive framework on base erosion and profit shifting and its two pillar solution. It is in this spirit that Singapore engaged in the negotiations in good faith and worked with like-minded delegations to put forward compromise proposals that reflect a delicate balance and diversity of views on this matter."

Naomi: "Alex, Singapore isn't an OECD member, why do they seem so against a more inclusive UN forum for deciding global tax rules?"

Alex: "Singapore is a funny one. I mean, it's kind of long been known that within the G77 group, which is 134, I think, countries of mainly with lower per capita incomes, former colonies and so on, Singapore has very often been the one that stood out on tax issues in particular, and tried to block unanimity. And the G77 operates by unanimity. What we've heard, although this hasn't been publicly confirmed, is that in this case, the OECD actively sought out high level policy makers in Singapore and asked them to prevent a G77 position in favour of the resolution. Now, with Singapore being by far the biggest corporate tax haven even within the G77, perhaps that's canny politics by the OECD, but it seems pretty destructive and, and really kind of puts the lie to any claim that they're fighting this because they care about ending tax abuse. You know, you choose your friends and your allies in this game, and they seem to have done that here."

Naomi: "Interesting! And now the UK's wanting to speak ahead of the vote on the final resolution. Let's listen:"

UK rep: "In recent years, we've collectively made significant progress at the OECD."

Naomi: "Er who's 'we'?!"

UK rep: "The global forum on tax transparency, the inclusive framework on base erosion and profit sharing and the OECD's two pillar solution are all significant steps in building a fairer international tax system for all, including developing countries. These initiatives are open to all. Non-OECD members, participate in them on an equal footing."

Naomi: "Er...I don't think so! And now the UK representative's making it clear they voted in support of the US's amendment, that's the one that just got voted down:"

UK rep: "On the present resolution, we voted in favour of the amendment because the original language prejudges new initiatives at the United Nations which could duplicate and potentially undermine existing OECD work."

Naomi: "A lot of nations use this word 'duplicate' over and over throughout the session, which is quite interesting. Time for the vote now, the *actual* vote on the *actual* resolution..."

UN Chair: "The committee will now take action on draft resolution L11 rev 1. May I take it that the committee wishes to adopt draft resolution L11 rev 1? I hear no objection. Draft resolution L 11 REV 1 is adopted." [Bangs gavel]

Naomi: "Now, you'd think that would be that right? This historic resolution is passed, it's passed by consensus, so it's unanimous. But then there are quite a lot of sulky, antagonistic statements from some countries which, after all, have just agreed to pass the resolution, right Rachel?"

Rachel: "So what I found fascinating at the proceedings was that after the US's blow didn't really land and didn't wipe out the strong resolution, and then all the nations by consensus passed the resolution that is going to pave the way for tax negotiations to happen at the UN, there was a series of speeches given like additional blows, as if the match hadn't ended. It was quite incredible, countries were laying their cards on the table. So we saw OECD member states talk a lot about duplication of efforts because they say that through their programme BEPS, which is base erosion and profit shifting, that they've been working on this and that the UN shouldn't duplicate the efforts, but as we know, these, these efforts at the OECD have not been inclusive. So you have countries that enable the most financial secrecy according to the Financial Secrecy Index, I mean the notorious tax havens like Singapore, the US, Luxembourg, coming out after the resolution has passed to sort of throw punches in the air and say, 'we don't like this because it might duplicate efforts' or 'it's gonna cost a lot of money' and still trying to defend their banquet table as inclusive, as effective. And you have to imagine the other delegates in the room who are not at that banquet table or maybe just around the edge of that table in the inclusive framework who are shaking their heads inside."

Naomi: "Yeah, we saw one nation after the other, overwhelmingly OECD member states, using this UN forum to kind of parrot very similarly worded objections about a resolution they all just reluctantly passed, it was like they were all reading from the same page!"

Alex: "This point we are hearing about, you know, the potential duplication of the OECD process, about the scarcity of resources. I mean, this is really, it's not a question for UN member states, it's a question for the G20 to consider. It gave this mandate to the OECD to set these rules in 2019, even after the OECD had effectively failed in the first attempt from 2013 to 2015. The G20 countries have given the OECD an enormous amount of resources to do this, while at the same time, the core members of the OECD have repeatedly starved the UN system, including the UN tax committee of any resources to do *its* job. Oh, and let's not forget the inclusive framework member countries have been required to pay the OECD for their membership at a table where they don't have an effective voice or vote. Um, you know, so we should be thinking about *their* scarce resources, and we should very much be encouraging them to allocate those scarce resources to a process where they do have the chance of an effective voice and effective vote. And that's only gonna happen, uh, at the UN. So this isn't an argument that that really holds any water at all."

Naomi: "No. And after the resolution is passed, the US representative gives a pretty strong and disappointed statement, listen to this:"

US rep: "The United States joins consensus, but wishes to clarify its position on critical issues related to this resolution. We disagree with the notion implied by this resolution that there is not presently a highly inclusive forum working to strengthen international cooperation on tax. A United Nations intergovernmental process proposes a process that will tear down much of the progress that has been made in international tax cooperation since the 2008 to 2009 financial crisis and will undermine the inclusive framework at the OECD through which so much progress is being made. For that reason, the United States must dissociate itself."

Naomi: "Ouch! Sore losers! Remember that part of the resolution calls for the UN Secretary General to make a report on the next steps to enhance tax rule setting leadership at the UN, something the Secretary General has supported. The US doesn't like that:"

US rep: "We feel calls for a new report by the Secretary General at this time are inappropriate. Establishing a UN-headquartered open-ended ad hoc intergovernmental committee to recommend new actions will undermine efforts both to stabilise the international tax system and help it become fit for purpose for the 21st century. Thank you."

Naomi: "Hmmm. And as for what the Liechtenstein representative says, I really can't take this seriously:"

Liechtenstein rep: "Madame Chair, the strengthening of international corporation on taxation matters has been a longstanding priority for Lichtenstein. As a member of the global forum on transparency and exchange of information for tax purposes as well as the OECD G20 inclusive framework on base erosion and profit shifting, Lichtenstein is committed to international collaboration to tackle tax avoidance, ensure a more transparent tax environment and strengthen the rule of law."

Alex: [Laughs] "Yeah, Liechtenstein, I mean, Liechtenstein has for a long time at the UN, been very much at the forefront of European jurisdictions fighting any kind of tax or transparency progress. To hear them say, you know, 'we are against this because we are

really strongly with the OECD's efforts against tax abuse,' you know, really confirms just how far jurisdictions like that, that are so heavily involved in facilitating tax abuse see the OECD process as being on their side, you know, the rest of us can draw our own conclusions!"

Naomi: "And Rachel, your personal favourite – or I should really say *un*favourite statement after the resolution was passed is from South Korea?"

Rachel: "I found it quite astonishing to hear South Korea in quite a patronising manner, say that the Africa group had not followed the correct process in drafting the resolution. They even explicitly stated, this delegate from South Korea, that they do not agree that an inclusive discussion can take place only at the UN. I mean that's convenient to say when you're sitting at the OECD's banquet table, isn't it?!"

Naomi: "Ha, exactly! Let's hear what the representative of the Republic of Korea has to say on the drafting of the resolution:"

Korea rep: "It was deeply unfortunate to see in the first place a draft simply tabled to establish a new legally binding mechanism without any preparatory work to accommodate different views and identify common ground. The draft, which was supposed to serve as a basis of the negotiations only referred to unrealistic promises to create a new mechanism and ignored all relevant achievements, efforts and progress accumulated over a very long time. This year's process should not constitute the precedent for our future process and must not ever be repeated again. The Republic of Korea agrees on the need for ensuring more inclusiveness and effectiveness in international tax cooperation. My country, however, does not agree that an inclusive discussion can take place only at the UN. The discussion should be guided by a pragmatic and effective approach instead of a political and simplistic one. We may have to ask ourselves if such a rush to launch of the UN consultations could promote and advance the relevance of the UN and ensure genuine inclusiveness. It might be convenient and easy to rely only on binary views like developed and developing when we see the world, but especially for tax matters, with such an approach we are certain that we'll not be able to reach any meaningful outcome."

Naomi: "Wow, she's being quite rude there in saying the African Group of nations brought this process forward in a rush, and in a simplistic way, they've been working on this for years!"

Rachel: "And some explicitly say that 'actually what you're saying isn't correct.' I mean, the Eritrean representative speaking on behalf of the Africa Group says that we need a space that has equal footing for tax negotiations, clearly meaning that the OECD's process and inclusive framework is *not* that."

Naomi: "Right, here's the Eritrean representative:"

Eritrea rep: "Tax-related illicit financial flows inclusive including tax evasion and avoidance are global problems and require global solutions and global cooperation, and no other multilateral fora is better than the United Nations to address such challenges and provide inclusive solutions. Effective international tax cooperation remains neglected in the global economic governance and needs concerted joint efforts to bridge that gap through a

comprehensive United Nations framework on tax. Developing and developed countries need to join forces in pursuit of just, global UN-led solutions. The African group stresses the need to promote tax cooperation and the establishment of a governance structure where all member states can participate on an equal footing, contrary to the structures that we have today. The group stress the need to reinforce the global fight against illicit financial flows, including tax avoidance and evasion by increasing transparency and cooperation between governments and by creating more coherent and less complex global tax rules, standards and structures that fully take into consideration the interests, concerns and needs of developing countries. This resolution is a milestone toward ensuring a high standard of transparency. The resolution aims to ensure cooperation among all member states to establish one coherent global system designed to work for all countries, and not just a few."

Rachel: "And I guess at the end of it all, after all is said and done, Nigeria's representative speaks so powerfully about how historic the resolution is and what it means to the sovereignty of African nations and other nations who finally have a place at an inclusive table."

Nigeria rep: "Madam Chair, Nigeria's presidency of the 74th General Assembly had jointly convened with Norway as President of Economic and Social Council, the high level panel on financial accountability, transparency and integrity for achieving the 2030 agenda. One of the recommendations made over a year ago was a need for a fully inclusive and effective international tax cooperation at the United Nations. Madam Chair, African ministers publicly have stated their desire for a United Nations tax convention six months ago. We look forward to taking further steps as urgently as possible. We have only eight years to realise our ambitious 2030 agenda. We will not achieve it unless we step up the pace of our efforts to reshape multilateralism for the 21st century. I thank you."

Naomi: "That's the Nigerian representative. Alex, will this resolution *really* help African and other nations do that? I mean we can hear in this session from the US and many others, that although this resolution *was* unanimously passed by consensus, things seem far from consensus, some of the world's most powerful countries don't like this at all - what are the battles ahead now, hopes and challenges?"

Alex: "This is such an important question. Again, I want to reiterate what a great job Nigeria has done with the full backing of the Africa group. And they're really right to say there's only eight years left, almost, you know, eight going on seven. The sustainable development goals were inaugurated in 2015 and included the first ever commitment to curb illicit financial flows, including from the panel chaired by Thabo Mbeki, the high level panel on illicit financial flows out of Africa, they're dominated by corporate tax abuse. So it's really crucial that we get policy progress in that area. We also have within the sustainable development goals, tax identified as the primary means of implementation. So, everything that the world has committed to in terms of the 2030 agenda really depends on effective progress against the international tax abuse that drains the world of perhaps half a trillion dollars in revenues every year and forces inequalities systematically higher.

The point I think now going into the discussions is whether in good heart, the EU, the US, the UK, Japan, Korea, Canada, Australia, and New Zealand, you know, whether this set of countries wants to carry on blocking to try to keep their disproportionate power at the OECD intact at the expense of making effective progress against tax abuse, they have to really decide and come out and say it. Do they want to keep a bit more power, power that they can't make effective? Or do they want to become part of a bigger and genuinely inclusive process that has the potential to finally deliver effectively against international tax abuse, against illicit financial flows? And for the 2030 agenda that they've all signed up to, we're starting to get to the point that countries have to make their positions clear and be judged accordingly. There's no more room to hide in the opacity of the OECD process."

Naomi: "You've been listening to the Taxcast from the Tax Justice Network. That's it for now, thanks for listening. We'll be back with you next month."