Strengthening Public Resource Mobilization through Tax Justice

August 2026

Submission to the Call for Inputs on the Realization of Economic, Social and Cultural Rights, with a Special Focus on the Mobilization of Public Resources to Finance Sustainable Development (Human Rights Council Resolution 58/9)

TAX JUSTICE NETWORK

Contents

Question 1

What promising practices—including laws, policies and programmes—exist to ensure that the mobilization of public resources to finance sustainable development is consistent with economic, social and cultural rights, including the principles of non-discrimination, equality and the use of maximum available resources?

The *Principles for Human Rights in Fiscal Policy* recognise that fiscal policy should be designed and implemented with the realisation of human rights as a central objective.[1] This requires tax systems that mobilise the maximum available resources, distribute fiscal responsibilities fairly, reduce inequalities and enable States to finance quality public services without discrimination.

This framework has been further developed through recent human rights soft law. In its 2025 Statement on Tax Policy and the International Covenant on Economic, Social and Cultural Rights, the UN Committee on Economic, Social and Cultural Rights (CESCR) explicitly linked tax policy to States' obligations to mobilise the maximum available resources and to ensure equality and non-discrimination. The Committee called for, among other measures, human rights and distributional assessments of fiscal policies, meaningful participation by affected groups, progressive taxation and stronger measures to prevent tax evasion and avoidance.[2] These developments provide more concrete guidance on how the principles of maximum available resources, equality and non-discrimination can be operationalised in fiscal policy.

Promising practices therefore include progressive taxation, particularly of high incomes and extreme wealth,[3] as well as measures that strengthen tax transparency and accountability, including public country-by-country reporting, beneficial ownership transparency and effective exchange of tax information. These measures improve governments' ability to address tax abuse and protect the public revenues required to realise economic, social and cultural rights. Human rights and distributional impact assessments of tax measures, together with transparent and participatory fiscal policymaking, can further help

---

[1] Initiative for Human Rights Principles in Fiscal Policy, *Principles for Human Rights in Fiscal Policy* (New York: Center for Economic and Social Rights, 2021), https://www.cesr.org/sites/default/files/2021/Principles_for_Human_Rights_in_Fiscal_Policy-ENG-VF-1.pdf

[2] N Committee on Economic, Social and Cultural Rights, *Tax policy and the International Covenant on Economic, Social and Cultural Rights*, Statement, E/C.12/2025/1 (17 March 2025), https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=qRywbyGd%2BKkSlqaHVuiM3z7IykbBAw3%2FxVz6QXJ2W8cqQA1pBg2XiBaDq01VsrWRHsQJoCr3WzjVmy89v2cMPQ%3D%3D

[3] Tax Justice Network, *Beyond20: Strategic Framework* (Bristol: Tax Justice Network, May 2023), 17, https://taxjustice.net/wp-content/uploads/2023/05/Tax-Justice-Network-beyond20-Strategic-Framework-May-2023.pdf

ensure that the mobilisation of resources does not disproportionately burden groups experiencing inequality or disadvantage.

At the regional level, there has also been important recent progress. In April 2026, the Inter-American Commission on Human Rights (IACHR) adopted a Resolution on Fiscal Policies and Human Rights in the Americas, which provides guidance on taxation, budgets, public spending, debt and fiscal sustainability from a human rights perspective. The Resolution expressly addresses equality and non-discrimination, progressivity and non-regressivity, the mobilisation of maximum available resources, transparency, public participation and accountability.[4] This represents a further development of soft law on the application of human rights standards across the full fiscal policy cycle, rather than to taxation alone.

At the international level, the ongoing negotiation of a United Nations Framework Convention on International Tax Cooperation represents a significant opportunity to strengthen the institutional framework for international tax cooperation. The Terms of Reference adopted by the UN General Assembly in 2024 recognise the need for international tax cooperation to be aligned with States' obligations under international human rights law.[5] The Convention can therefore help establish more inclusive, transparent and effective global tax governance by ensuring that all States participate on an equal footing in the development of international tax rules. In doing so, it can support the Principles for Human Rights in Fiscal Policy by helping to create an international fiscal environment that enables States to mobilise the maximum available resources, reduce opportunities for cross-border tax abuse and financial secrecy, and promote greater coherence between international tax cooperation and States' human rights obligations under the International Covenant on Economic, Social and Cultural Rights.

---

[4] Inter-American Commission on Human Rights (IACHR) and Office of the Special Rapporteur on Economic, Social, Cultural, and Environmental Rights (REDESCA), *Resolution on Fiscal Policies and Human Rights in the Americas* (28 April 2026), https://www.oas.org/en/IACHR/jsForm/?File=%2Fen%2Fiachr%2Fmedia_center%2FPReleases%2F2026%2F081.asp

[5] UN Ad Hoc Committee to Draft Terms of Reference for a United Nations Framework Convention on International Tax Cooperation, *Terms of reference for a United Nations Framework Convention on International Tax Cooperation*, A/AC.298/2 (16 January 2025), reflecting the Terms of Reference adopted by the General Assembly in 2024, https://digitallibrary.un.org/record/4072621

Question 2

What measures have been taken to strengthen domestic mobilization of maximum available public resources (e.g. progressive taxation, combating tax abuses and illicit financial flows, improving governance, accountability, tax administration and public financial management) for the realization of economic, social and cultural rights? What have been the impacts of such measures on the enjoyment of economic, social and cultural rights by different population groups, including women, girls, older persons, persons with disabilities, migrants, refugees, peasants and other persons working in rural areas and Indigenous Peoples?

Recent efforts to strengthen domestic resource mobilisation have focused on increasing tax transparency and improving accountability. Important measures include the implementation of automatic exchange of tax information, beneficial ownership transparency, public country-by-country reporting, greater disclosure of tax expenditures and tax incentives, and stronger enforcement by tax administrations. Together, these measures improve governments' ability to detect offshore tax evasion, identify the beneficial owners of assets, increase transparency over multinational corporate taxation and strengthen compliance.[6]

There have also been some promising developments within the UN Committee of Experts on International Cooperation in Tax Matters to strengthen the analysis of the gender dimensions of taxation. The Committee has developed work through its gender subgroup to examine how tax policies can affect women and men differently. This is an important step towards recognising that domestic resource mobilisation is not gender-neutral and that the distributional effects of tax policies should be considered when designing and implementing tax measures.

There has also been some progress on the taxation of high-net-worth individuals. The UN Tax Committee’s Wealth Tax Subcommittee has considered proposals on the taxation of high-net-worth individuals, including a proposal for changes to the UN Model Tax Convention. While this work remains under consideration, its progression within the Committee represents a potentially important step towards strengthening the role of wealth taxation in domestic resource mobilisation and addressing the concentration of income and wealth.

These measures have also contributed to strengthening the relationship between taxation and human rights. Beyond raising revenue, stronger tax systems support redistribution, improve democratic accountability between governments and taxpayers, discourage socially harmful behaviour through fiscal policy, and can contribute to addressing

---

[6] Tax Justice Network, *Beyond20: Strategic Framework* (Bristol: Tax Justice Network, May 2023), 17, https://taxjustice.net/wp-content/uploads/2023/05/Tax-Justice-Network-beyond20-Strategic-Framework-May-2023.pdf.

historical and structural inequalities. Domestic resource mobilisation should therefore be understood not only as a means of financing public expenditure, but also as a broader instrument for advancing equality and strengthening the social contract.[7]

While these developments represent important progress, their overall impact has been constrained by persistent weaknesses in the international tax system. Cross-border tax abuse, financial secrecy and profit shifting continue to erode national tax bases and reduce the revenues available to finance public services. Existing international tax reforms have not substantially reduced these losses or adequately protected countries' tax bases, limiting the effectiveness of domestic measures to mobilise the maximum available resources.[8]

The consequences are felt most acutely by those who rely most heavily on publicly funded services and social protection, including women and girls, persons with disabilities, Indigenous Peoples, rural communities and people living in poverty. Strengthening domestic resource mobilisation therefore requires not only effective national tax policies and administrations, but also an international tax environment that enables all countries to protect their tax bases and raise revenues fairly and effectively.

The Tax Justice Network's **5Rs framework**[9] highlights that taxation contributes to human rights through five mutually reinforcing functions: raising **Revenue**, supporting **Redistribution**, enabling **Repricing** of harmful activities, strengthening democratic **Representation**, and supporting **Reparations** for historical and structural injustices.

Measures that improve domestic resource mobilisation therefore have impacts that extend beyond increasing public revenues. By strengthening the fiscal capacity of States, reducing inequalities and reinforcing democratic accountability, they can improve the enjoyment of economic, social and cultural rights, particularly for groups that depend most heavily on accessible, well-funded public services and social protection systems.

---

[7] Tax Justice Network, *Tax Justice & Human Rights: The 4 Rs and the Realisation of Rights* (Bristol: Tax Justice Network, July 2021), https://taxjustice.net/wp-content/uploads/2021/12/Tax-Justice-Human-Rights-Report_July_2021.pdf.

[8] Tax Justice Network, *Litany of Failure: The OECD's Stewardship of International Taxation* (Bristol: Tax Justice Network, May 21, 2024), https://taxjustice.net/wp-content/uploads/2024/05/oecd_failures_2024.pdf

[9] Tax Justice Network, "What Are the Five 'Rs' of Tax?," accessed August 5, 2026, https://taxjustice.net/faq/what-are-the-four-rs-of-tax/

The 5Rs of Tax Justice

Revenue
to fund universal public services and sustainable infrastructure

Every second, a nurse's yearly salary is lost to a tax haven. Over $483 billion in tax is underpaid each year by corporate giants and the superrich that could be going to our public services.

Redistribution
to curb inequality between individuals and between groups

Women provide 71% of unpaid dementia care hours globally. Tax can fund public caregiving systems, redistributing and reducing care burdens.

Repricing
to limit public "bads" like carbon-intensive products and promote "goods", like sustainable local production

A lower VAT rate on public transport fares and a higher tax rate on vehicle ownership can increase use of public transportation. Higher taxes on ownership of private jets and other highly polluting transportation can disencourage their use by the superrich.

Representation
to strengthen democratic processes and improve democratic governance

Reliance of government spending on tax revenues is strongly linked to higher quality of governance and political representation.

Reparation
to redress the historical legacies of colonisation and ecological damage

Reprogramming the global tax system to protect people's needs and rights can help countries fund a transition to food systems that serve people and planet.

Question 3

What specific measures have been taken to seek, secure and deploy international public resources (e.g. official development assistance, concessional financing, debt relief, special drawing rights, or any other global financial safety net) to fulfil economic, social and cultural rights, and to align the use of such resources with State obligations under the International Covenant on Economic, Social and Cultural Rights? Furthermore, what measures have been adopted to ensure that policies, including tax, trade, investment and financial regulations, do not undermine the ability of other States to mobilize the maximum of available resources for the realization of economic, social and cultural rights?

Measures to strengthen international public finance have included debt relief and restructuring initiatives, concessional financing, and the allocation and voluntary reallocation of Special Drawing Rights to support countries facing debt distress and external shocks.[10] These measures can expand fiscal space and support investment in public services where they reinforce, rather than substitute for, domestic resource mobilisation.

The Committee on Economic, Social and Cultural Rights has affirmed that States' obligations under the Covenant extend beyond domestic action.[11] International cooperation is an essential component of the obligation to mobilise the maximum available resources, and States should ensure that their tax, trade, investment and financial policies do not undermine the fiscal capacity of other countries.[12] This is consistent with the principle that States have responsibilities not only to mobilise resources domestically but also to refrain from facilitating practices that erode other countries' tax bases.

Despite growing international cooperation, cross-border tax abuse and financial secrecy continue to deprive countries of substantial public revenues each year, USD492bi each year, reducing the resources available to finance economic, social and cultural rights.[13] Existing

---

[10] Tax Justice Network et al., *Joint Submission: International Financial Architecture, Debt and the Right to Education* (Bristol: Tax Justice Network, April 2026), https://taxjustice.net/wp-content/uploads/2026/05/Final_Joint_Submission-TaxEd_PEHRC-UNSR_financial-architecture_submission_April2026.pdf; Tax Justice Network et al., *Bled Dry: How Tax Abuse, Illicit Financial Flows and Debt Affect Women and Girls in Africa*(Bristol: Tax Justice Network, December 9, 2025), https://taxjustice.net/wp-content/uploads/2025/12/Bled-Dry-tax-abuse-IFFS-debt-women-and-girls-Africa.pdf

[11] *Committee on Economic, Social and Cultural Rights, Statement on Tax Policy and the International Covenant on Economic, Social and Cultural Rights, U.N.* Doc. E/C.12/2025/1 (February 28, 2025), https://www.ohchr.org/en/statements-and-speeches/2025/02/ec1220251-committee-adopts-statement-tax-policy-and-international.

[12] Tax Justice Network, *Litany of Failure: The OECD's Stewardship of International Taxation* (Bristol: Tax Justice Network, May 21, 2024), https://taxjustice.net/wp-content/uploads/2024/05/oecd_failures_2024.pdf

[13] Tax Justice Network, *State of Tax Justice 2025* (Bristol: Tax Justice Network, November 2025), https://taxjustice.net/wp-content/uploads/2025/11/State-of-Tax-Justice-2025-report-Tax-Justice-Network.pdf.

international tax arrangements have not effectively addressed these challenges or ensured that all countries are able to participate on an equal footing in shaping international tax rules.[14] African States have also highlighted the particular challenges that cross-border tax disputes and existing international tax arrangements pose for developing countries, including prolonged disputes, revenue losses and unequal access to technical expertise. In the UN negotiations on the Framework Convention, the Africa Group has proposed measures including structured joint audits, capacity-sensitive advance pricing agreements and cooperative compliance frameworks, as well as dispute-resolution arrangements that take account of differences in countries' technical capacities.[15]

Strengthening policy coherence therefore requires measures that prevent financial secrecy, tackle cross-border tax abuse and profit shifting, discourage harmful tax competition, and promote fairer allocation of taxing rights. A more inclusive system of international tax cooperation would better support States in fulfilling their obligation to mobilise the maximum available resources while ensuring that national tax and financial policies do not undermine the realization of economic, social and cultural rights in other countries.

---

[14] Tax Justice Network, *Corporate Tax Abuse: The Elephant in the Room of Business & Human Rights* (Bristol: Tax Justice Network, July 17, 2025), https://taxjustice.net/wp-content/uploads/2025/07/BHR_taxation_ireland_kenya_2025.pdf.

[15] African Group, *Written Input on Workstream III: Dispute Prevention and Resolution*, UN Framework Convention on International Tax Cooperation negotiations, July 2025, https://financing.desa.un.org/sites/default/files/2025-07/Africa%20Group%20%28WS%20III%29.pdf

Question 6

What are the main challenges in mobilizing and using public resources effectively, equitably and transparently for the realization of economic, social and cultural rights, and how can States overcome these challenges in line with their obligation to use the maximum available resources?

The main challenges to mobilising and using public resources are structural. Financial secrecy, cross-border tax abuse, profit shifting, weak tax transparency and enforcement, and harmful tax competition continue to erode public revenues and undermine States' ability to mobilise the maximum available resources. At the international level, international tax rules remain unfit for purpose, allowing multinational corporations to continue shifting profits across jurisdictions.[16] At the same time, global tax governance does not yet provide an inclusive and representative framework in which all countries participate on an equal footing.[17] At the domestic level, inadequate transparency, under-resourced tax administrations and the continued underuse of progressive taxation weaken both revenue collection and public trust in tax systems.

Addressing these challenges requires a comprehensive programme of reforms across domestic and international tax policy. The Tax Justice Network's **ABC to G_3 of tax justice** provides such a framework.[18]

The first set of reforms (**ABC**) focuses on tax transparency. Automatic exchange of tax information enables tax authorities to identify offshore financial assets and income. Beneficial ownership transparency prevents individuals from concealing assets behind anonymous companies, trusts and other legal vehicles. Recent progress includes the expansion of beneficial ownership transparency to real estate: the Tax Justice Network's 2026 analysis of beneficial ownership of real estate assesses which countries require information on the beneficial owners of real estate and identifies countries with stronger real estate registration and transparency infrastructures.[19] Public country-by-country reporting by multinational enterprises improves accountability by revealing where profits are generated, where taxes are paid and where profit shifting

---

[16] Tax Justice Network, "G7 Take Big Step to Recover Tax but Just for Themselves," press release, June 5, 2021, https://taxjustice.net/press/g7-take-big-step-to-recover-tax-but-just-for-themselves/

[17] Tax Justice Network, *The Last Chance: Why 2026 Is the Critical Moment for Governments to End Appeasement, and Stand Up for Our Tax Sovereignty* (Bristol: Tax Justice Network, February 2, 2026), https://taxjustice.net/wp-content/uploads/2026/02/The-last-chance-Tax-Justice-Network-2026.pdf.

[18] Tax Justice Network, *Beyond20: Strategic Framework* (Bristol: Tax Justice Network, May 2023), 17, https://taxjustice.net/wp-content/uploads/2023/05/Tax-Justice-Network-beyond20-Strategic-Framework-May-2023.pdf.

[19] Andres Knobel et al., *Beneficial Ownership of Real Estate Around the World* (Bristol: Tax Justice Network, 2026), https://taxjustice.net/reports/beneficial-ownership-of-real-estate-around-the-world/

may be occurring. Together, these measures strengthen tax compliance, reduce opportunities for tax abuse and support more effective domestic resource mobilisation.

The second set of reforms (**DE**) strengthens domestic accountability and enforcement. Greater disclosure of tax expenditures, incentives and subsidies allows governments and the public to assess whether fiscal policies are delivering public value. At the same time, adequately resourced, independent and well-equipped tax administrations are essential to enforcing tax laws fairly and effectively. Weak enforcement disproportionately benefits those with the greatest capacity to avoid or evade taxation and undermines both revenue collection and confidence in the fairness of the tax system.

The international dimension (**FG$_2$**) addresses the structural weaknesses of the current global tax system. Reforming the taxation of multinational enterprises by allocating profits according to where real economic activity takes place would substantially reduce opportunities for profit shifting. Recent analysis further illustrates the potential revenue gains from such a reform: a study of global unitary taxation estimates that moving towards a unitary approach could increase tax revenues by around US$500 billion a year. The study highlights the potential of allocating taxing rights according to where multinational enterprises conduct economic activity, rather than relying primarily on the separate-entity principle.[20] More inclusive global tax governance, under United Nations auspices, would ensure that all countries participate on an equal footing in developing international tax rules. Complementing these reforms with a Global Asset Register would strengthen transparency over the ownership of wealth across jurisdictions, support the effective taxation of wealth and improve the enforcement of tax and other financial regulations.

Finally, **G$_3$** focuses on the design of tax systems themselves. Greater use of progressive direct taxation, including taxes on income, wealth, inheritances, land values and capital gains, can strengthen revenue mobilisation while reducing inequalities and reinforcing democratic accountability. Climate-related taxation should also form part of a broader progressive fiscal framework that reflects countries' different responsibilities and capacities. Together, the ABC to G$_3$ framework provides a coherent roadmap for enabling States to mobilise and use the maximum available resources in support of economic, social and cultural rights.

---

[20] Tax Justice Network, *A 500-billion-dollar decision for the world: the revenue impacts of global unitary taxation* (Bristol: Tax Justice Network, 2026), https://taxjustice.net/reports/a-500-billion-dollar-decision-for-the-world-the-revenue-impacts-of-global-unitary-taxation/

THE ABCs OF TAX JUSTICE

Automatic exchange of information

Exposes individuals hiding money in foreign banks

Beneficial ownership transparency

Brings transparency to owners of corporations and entities

Country by country reporting

Exposes corporations shifting profits into tax havens

The **ABC** of tax transparency is key to ending the financial secrecy which permits tax abuse and corruption.

Disclosure of data

Keeps tax rules and enforcement in the public eye

Enforcement

Equips tax authorities to stand up to the rich and powerful

The **DE** of domestic measures aims to ensure that tax authorities are both empowered to be effective, and made fully accountable to the public.

The **FG$_2$** of international elements would deliver effective taxation of multinationals, and offshore wealth, based on fair, global rule-setting.

Formulary apportionment

Taxes corporations where they create, not book, profits

Governance reform

Requires global tax rules to be set democratically

G$_2$ Global asset register

Brings transparency to the assets of the superrich

G$_3$ Good taxes

Uses tax as a tool for equality and human rights

Good taxes make up a progressive tax system addressing extreme wealth inequality and the climate crisis, and delivering on the full potential of tax as our social superpower.

TAX JUSTICE NETWORK