



**International Fiscal Association**

**IFA 2020 Virtual Programme  
16-25 November 2020**

**SHORT DESCRIPTION**

**RECONSTRUCTING THE TREATY  
NETWORK**

**SUBJECT 1 | Monday, 16 November 2020 | 15.30 – 18.30**

**Chair**

Liselott Kana (Chile)

The Multilateral Instrument, or MLI, manifests a more comprehensive multilateral weave of connections to reconcile the harmonious application of countries' income tax regimes including existing bilateral tax treaties. This session will assess its impact on the prevailing treaty network and tax treaty policy in general.

The MLI's legal framework will be examined in light of its history. The experiences of countries with the MLI's format and interpretation will be considered, as well as whether its scope and the manner in which it applies besides bilateral treaties, present constitutional issues associated with its effective implementation. The role and involvement of the Inclusive Framework in setting standards that underlie the MLI and its application are also discussed.

In this light, the session will address the general tendencies of tax jurisdictions in selecting among various options for applying the MLI, informed by practical examples and insights about underlying policy considerations and concerns, and the extent to which they may be shared among affected and potentially affected tax jurisdictions including in this regard the implications of countries not participating or not participating fully in the MLI. The session will conclude by looking forward to anticipating what the MLI foreshadows for tax relations among countries and with present experience what new issues may emerge.