GLOBAL ALLIANCE FOR TAX JUSTICE

CIVIL SOCIETY FINANCING FOR DEVELOPMENT Mechanism

Session 4, UN Tax Convention Negotiations
February 6, 2026 – Article 10 - Exchange of Information
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Thank you, Co-Lead for this opportunity to speak and for the discussion on this important topic. I would like to raise one concern, on behalf of Greenpeace International and the Global Alliance for Tax Justice, which we hope can be addressed. This article is crucial for all the preceding commitments we've been discussing in the past days, but in particular **Article 6 on high-net-worth individuals** and **Article 7 on illicit financial flows,** which we understand are implicitly referred to in paragraph 1.

We all know that -, for example - high-net-worth individuals structure their wealth in complex and evolving ways. We must recognize that the structures and techniques used today may change tomorrow in ways we cannot fully foresee. This brings us to a fundamental challenge that has in the past complicated the effective taxation of High net worth individuals.

Even where countries agree to exchange information, if tax administrations do not know what exists, they cannot know what to request. In practice, exchange-of information-on-request requires the requesting authority to already possess identifying details of the relevant account or asset.

For this reason, we are genuinely concerned that if we rely primarily on **exchange of information-on-request**, we will struggle to meet the Convention's objectives of effectively taxing high-net-worth individuals and combating tax-related illicit financial flows. We therefore recommend that the article provide a clear mandate for **automatic** exchange of information.

Article 10 should give clear direction toward the development of a **system for identification of assets and beneficial ownership - what is commonly described as a Global Asset Register -**, supported by automatic exchange of information, agreeing on common data standards and secure exchange mechanisms that can be agreed on in Para 2. The Conference of the Parties should periodically evaluate the effectiveness of such systems.

Of course it is important to be aware of **capacity, as laid out in paragraph 6**. We recommend that the paragraph include **commitments to technology transfer and recognize the need for temporary non-reciprocal automatic exchange**, so that developing countries can fully benefit. In practice, some countries may initially be receivers of information before becoming full providers, and this should be seen as a feature of an inclusive system, not a weakness.

Article 10 should not only lay out the ways of exchange of information, but provide direction on the mechanisms required to make transparency effective, equitable, and future-proof. Without such direction, we risk perpetuating the very information asymmetries this Convention seeks to address.

Thank you for your attention.