

## Corrigendum

### Executive Summary, page 11:

Incorrect original text:

*“The focus group consisted of 22 jurisdictions: Australia, Canada, Colombia, Denmark, Finland, France, Germany, India, Ireland, Italy, Japan, Korea, Netherlands, Norway, China (People’s Republic of) China, Poland, Singapore, Spain, Switzerland, Thailand, the United Kingdom and the United States.”*

Corrected text:

*“The focus group consisted of 22 jurisdictions: Australia, Canada, Colombia, Denmark, Finland, France, Germany, India, Ireland, Italy, Japan, Korea, Netherlands, Norway, China (People’s Republic of) ~~China~~, Poland, Singapore, Spain, Switzerland, Thailand, ~~the~~ United Kingdom and ~~the~~ United States.”*

### Background, page 14:

Incorrect original text:

*“Unilateral APAs are solely domestic law instruments of jurisdictions and only provide tax certainty in relation covered transaction(s) in a single jurisdiction.”*

Corrected text:

*“Unilateral APAs are solely domestic law instruments of jurisdictions and only provide tax certainty in relation ~~to~~ covered transaction(s) in a single jurisdiction.”*

### Background, page 15:

Incorrect original text:

*“It should be noted that that the Action 14 Final Report (OECD, 2015[3]) included a best practice that stated that jurisdictions should implement BAPA programmes.”*

Corrected text:

*“It should be noted that ~~that~~ the Action 14 Final Report (OECD, 2015[3]) included a best practice that stated that jurisdictions should implement BAPA programmes.”*

### Background, page 17:

Incorrect original text:

*“As such, this Manual and its best practices have been developed to assist in achieving greater streamlining between individual jurisdiction’s BAPA processes and well as taxpayer engagement. Specifically, the best practices have been developed based on the survey responses.”*

Corrected text:

*“As such, this Manual and its best practices have been developed to assist in achieving greater streamlining between individual jurisdiction’s BAPA processes ~~and~~ ~~as~~ well as taxpayer engagement. Specifically, the best practices have been developed based on the survey responses.”*

**What makes an effective BAPA process, page 27:**

Incorrect original text:

*“However, finding the appropriate balance is important to ensure that BAPAs are adequately promoted as a tax certainty tool and are undertaken in a timely and efficient manner, as well ensuring the efficient use of tax administration resources.”*

Corrected text:

*“However, finding the appropriate balance is important to ensure that BAPAs are adequately promoted as a tax certainty tool and are undertaken in a timely and efficient manner, as well **as** ensuring the efficient use of tax administration resources.”*

**What makes an effective BAPA process, page 28:**

Incorrect original text:

*“While taxpayer responses did not necessarily disagree with these observations, it was frequently observed that in their view that in some situations these issues could be mitigated through closer competent authority and taxpayer interaction and the development of a mutual expectation as to the expected length of the BAPA process.”*

Corrected text:

*“While taxpayer responses did not necessarily disagree with these observations, it was frequently observed that in their view, ~~that~~ in some situations these issues could be mitigated through closer competent authority and taxpayer interaction and the development of a mutual expectation as to the expected length of the BAPA process.”*

**What makes an effective BAPA process, page 30:**

Incorrect original text:

*“Therefore, while in most cases a renewal of a BAPA required significant less resources than the original BAPA, it was neither guaranteed nor immediate in its operation. Therefore, longer BAPA periods are preferable to renewals.”*

Corrected text:

*“Therefore, while in most cases a renewal of a BAPA required significantly less resources than the original BAPA, it was neither guaranteed nor immediate in its operation. Therefore, longer BAPA periods are preferable to renewals.”*

**What makes an effective BAPA process, page 34:**

Incorrect original text:

*“Further, competent authority discussions were often prolonged as in many situations an issue had not been discussed until the relevant meeting (or in the position paper which often provided immediately before the competent authority discussion meeting).”*

Corrected text:

*“Further, competent authority discussions were often prolonged as in many situations an issue had not been discussed until the relevant meeting (or in the position paper which **was** often provided immediately before the competent authority discussion meeting).”*

**The BAPA Process in detail, page 43:**

Incorrect original text:

*“In some instances, taxpayers felt that that BAPA application filing requirements were overly detailed and voluminous, especially considering much of the information and analysis was either reinvestigated or required to be provided in another form as part of the information gathering stage.”*

Corrected text:

*“In some instances, taxpayers felt that ~~that~~ BAPA application filing requirements were overly detailed and voluminous, especially considering much of the information and analysis was either reinvestigated or required to be provided in another form as part of the information gathering stage.”*

**The BAPA Process in detail, page 46:**

Incorrect original text:

*“Early collaboration between treaty partners is important to not only streamline the BAPA process through ensuring steps are aligned but also ensure the efficient and adequate use of each competent authorities’ resources.”*

Corrected text:

*“Early collaboration between treaty partners is important to not only streamline the BAPA process through ensuring steps are aligned but also ensure the efficient and adequate use of ~~each~~ competent authorities’ resources.”*

**The BAPA Process in detail, page 56:**

Incorrect original text:

*“The second, being a shorter position paper that is used for less-complex BAPA applications and merely contains the information outlined in paragraph 148 above.”*

Corrected text:

*“The second, being a shorter position paper that is used for less-complex BAPA applications and merely contains the information outlined in paragraph ~~148~~ 139 above.”*

**The BAPA Process in detail, page 56:**

Incorrect original text:

*“However, when competent authorities are required to meet, it is important that position papers be circulated well in advance of any proposed competent authority discussions with enough time and sufficient information to allow the treaty partner to evaluate the positions before discussion take place.”*

Corrected text:

*“However, when competent authorities are required to meet, it is important that position papers be circulated well in advance of any proposed competent authority discussions with enough time and sufficient information to allow the treaty partner to evaluate the positions before discussions take place.”*

**The BAPA Process in detail, page 57:**

Incorrect original text:

*“Taxpayers should always provide competent authorities with the latest financial information available and competent authorities should proceed based this information.”*

Corrected text:

*“Taxpayers should always provide competent authorities with the latest financial information available and competent authorities should proceed based **on** this information.”*

**The BAPA Process in detail, page 58:**

Incorrect original text:

*“It was noted that where the discussion between competent authorities has stalled due to differing points of view, it often is helpful for the taxpayer to be involved in the discussion with both the competent authorities in one forum.”*

Corrected text:

*“It was noted that where the discussion between competent authorities has stalled due to differing points of view, it often is helpful for the taxpayer to be involved in the discussion with both ~~the~~ competent authorities in one forum.”*

**The BAPA Process in detail, page 61:**

Incorrect original text:

*“Where this mechanism of implementation in undertaken, both taxpayers and competent authorities noted that the process is timely.”*

Corrected text:

*“Where this mechanism of implementation ~~is~~ **is** undertaken, both taxpayers and competent authorities noted that the process is timely.”*

**The BAPA Process in detail, page 66:**

Incorrect original text:

*“However, audit personnel nor members of the audit function of a tax administration should be involved in the decision-making process in relation to a BAPA.”*

Corrected text:

*“However, **neither** audit personnel nor members of the audit function of a tax administration should be involved in the decision-making process in relation to a BAPA.”*

**The BAPA Process in detail, page 66:**

Incorrect original text:

*“Taxpayer’s experiences were positive in relation to the use of roll-backs and it was expressed that greater use of roll-backs would give more tax certainty.”*

Corrected text:

*“Taxpayer’s’ experiences were positive in relation to the use of roll-backs and it was expressed that greater use of roll-backs would give more tax certainty.”*