FROM NEW-YORK TO NAIROBI :

2025, A NEW CHAPTER FOR INTERNATIONAL TAX JUSTICE

CCFD TERRE SOLIDAIRE
Agir là où commence la faim

SOMMAIRE

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CCFD TERRE SOLIDAIRE Agir là où commence la faim

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2025, A PIVOTAL YEAR FOR INTERNATIONAL TAX JUSTICE

In 2025, while the international community had its eyes fixed on COP30 and the urgency of mobilizing billions to finance the climate transition, another equally decisive process was taking place amid relative media silence. In New York and then in Nairobi, all the States of the world embarked on one of the most structuring reforms of global economic governance in nearly a century: the ambition to overhaul the rules of international taxation, through the negotiations of a United Nations Framework Convention on International Tax Cooperation.

This initiative presents an unprecedented opportunity to address global tax injustice, which continues to deprive states of hundreds of billions of dollars each year. Global South countries are paying by far the highest price. Dependent on already limited tax resources, they see a considerable part of their wealth captured by a system that allows multinationals to massively shift their profits to tax havens and ultra-wealthy individuals to hide a growing part of their wealth through opaque financial arrangements. This massive erosion of public revenues permanently compromises their ability to finance development, respond to climate emergency and reduce social inequalities.

This tax injustice is not an accident. It is the product of an obsolete international tax system, shaped for nearly a century by a small number of rich countries, outside any universal multilateral framework. Designed for a world that no longer exists, these rules continue to structure a globalized economy to the benefit of the most powerful actors, while weakening the fiscal sovereignty of most states, especially the most vulnerable.

But the consequences of tax injustice do not stop at the borders of Global South countries. They also directly concern northern countries such as France. While the country is going through a deep fiscal crisis — marked by a high budget deficit, forced financial trade-offs and recurrent debates on austerity — it continues to lose tens of billions of euros each year due to tax evasion by multinationals and the wealthiest. This shortfall fuels a discourse of budgetary constraint that weighs directly on public services, social policies and international solidarity, while shifting the tax effort to households and small businesses.

This is where the French paradox lies. France presents itself as a defender of multilateralism, international justice and of a "new world financial order". However, in the UN negotiations, it adopts an ambiguous posture, seeking to limit the transformative ambition of the process and to preserve existing frameworks, in particular that of the OECD — even though France would be one of the direct beneficiaries of an ambitious and fair international tax reform.

The process undertaken at the UN is unprecedented. For the first time in nearly a century, international tax rules are being discussed in a truly universal space, where all countries, regardless of their level of development, economic weight or geopolitical influence, have an equal voice. Hard-won by the countries of the South, driven by a continuous mobilization of civil society, this shift breaks with decades of tax governance dominated by a small group of rich countries within the OECD, whose solutions have proven incapable of effectively fighting tax evasion, rebalancing tax rights between states or making taxation a credible lever for financing sustainable development.

Civil society played a decisive role in the birth of this process and remains today a key player in preserving its ambition, guaranteeing its transparency and holding States accountable. CCFD–Terre Solidaire is fully committed to this process. Mobilized for more than twenty years in the fight against tax evasion, present at all stages of the negotiations, it acts alongside its African, Latin American, Asian and European partners and allies, within the Global Alliance for Tax Justice (GATJ),[1] to make this Convention a central pillar of social, climate and economic justice. In France, CCFD–Terre Solidaire is also working to challenge public authorities to ensure that France's position is finally up to the budgetary, social and democratic challenges facing the country.

As France prepares to take over the presidency of the G7 in 2026 and as negotiations of this historic Convention will continue until 2027, the political choices made in the coming months will be decisive. France now has the opportunity to take a leading role and send a clear signal in favor of an ambitious reform of global tax governance, aligned with the requirements of tax justice, financing for development and just transition. Conversely, persisting in a cautious or wait-and-see stance would amount to remaining a spectator of a failing international tax system, with increasingly costly budgetary, social and democratic consequences – including for France itself.

This report looks back at the birth of this historic negotiation process, the key role of civil society, and France's ambiguous position. It also reviews the progress and resistance observed during this crucial first year of negotiations in 2025, and on the decisive issues that are emerging for 2026.

1 THE UN TAX CONVENTION, A NEW HISTORICAL CHAPTER FOR TAX JUSTICE

As a civil society organization, CCFD-Terre Solidaire participates in negotiations for the Tax Convention - Nairobi, November 2025

"IT IS ABOUT ESTABLISHING A FAIR, INCLUSIVE, TRANSPARENT, AND EQUITABLE INTERNATIONAL TAX SYSTEM THAT TRULY CONTRIBUTES TO SUSTAINABLE DEVELOPMENT, EFFECTIVELY FIGHTS ABUSES, AND FINALLY GIVES AN EQUAL VOICE TO EVERY COUNTRY

Ryad SELMANI,
Tax Justice Advocacy Officer, CCFD-Terre Solidaire

Every year,

40% OF MULTINATIONAL'S PROFITS

are transferred to tax havens.

SOURCE
Tørsløv, T. R., Wier, L., & Zucman, G. (2017).
600 € Billion and Counting : Why High-Tax Countries Let Tax Havens Flourish

1. International tax injustice: moving away from an unfair and outdated system that feeds inequalities

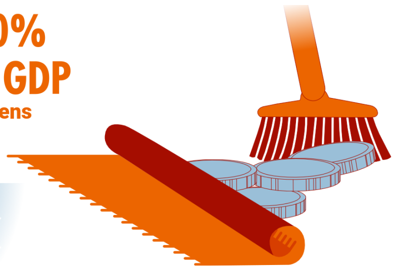
The international tax reform undertaken at the UN is not just a technical exercise. It is a political response to a deep and structural crisis, that of tax injustice that structurally weakens states, particularly those in the South, fueled by an outdated international tax system that is incapable of responding to the economic, social and climate challenges of the twenty-first century, nor to the reality of a globalized, digitized and financialized economy.

An obsolete system whose principles date back to the beginning of the twentieth century, which allows multinationals to artificially shift their profits to low-tax jurisdictions, regardless of where real economic activity takes place. This system is based on two principles that allow multinational companies to minimize their tax liability in a quasi-systematic manner: **the principle of permanent establishment,** under which a State can only tax a company if it has a physical presence on its territory, and **the arm's length principle,** whereby subsidiaries of multinational enterprises are considered independent entities. Thus, multinationals can easily manipulate the prices of transactions between their subsidiaries – called **transfer pricing** – to minimize their taxation and artificially shift their profits to tax havens. **Each year, multinationals artificially transfer more than 40% of their profits to tax havens** [2], largely limiting the ability of sovereign states to impose taxing rights on multinationals operating on their territory.

This system thus feeds destructive tax competition, in which states find themselves forced to lower their rates or multiply exemptions to remain attractive, to the detriment of their fiscal sovereignty, in particular that of the countries of the South by far the most harmed by this competition in proportion to their tax revenues. **Since the 1980s, this dynamic has led to a precipitous drop in corporate tax rates, which have fallen on average from more than 40% to less than 25% today, further eroding the tax bases of States, and ultimately further encouraging the phenomenon of tax evasion** [3].

AROUND 10% OF GLOBAL GDP
is hidden in tax havens by the wealthiest individuals.

= That is four times France's GDP



SOURCE
Annette Alstadsæter, Niels Johannesen, and Gabriel Zucman, "Who Owns the Wealth in Tax Havens? Macro Evidence and Implications for Global Inequality" NBER Working Paper 23805 (2017)
https://doi.org/10.3386/w23805

The world's richest individuals also benefit greatly from this flawed international tax system. They can move their assets in complex financial structures in complete opacity, organize their tax residence according to opportunities, or use trusts, shell companies and holding companies that allow them to dissociate economic and legal ownership. The ultra-wealthy thus pay proportionally much less tax than more modest households, allowing their wealth to reach unprecedented levels. **In 10 years, the richest 1% have captured half of the new wealth created worlwide, while the total wealth of billionaires has exploded, increasing by $2 trillion in 2024 alone** [4].

Moreover, a substantial part of this wealth, that of billionaires in particular, is directly based on the activities of multinationals in which they own shares, operating in countries of the South, according to economic models often based on the intensive extraction of resources and labour, even though the profits generated largely escape taxation in these countries. **It is estimated that in 2023, at nearly $30 million per hour, the amount of wealth "drained" by the richest 1% of the world, in Global South countries** [5].

Global tax injustice has become a main driver of the inequality crisis and a major brake on the public investment capacities of States, in public services, in development, in the financing of the ecological transition, and in the Sustainable Development Goals. Worse still, the substantial lack of fiscal resources is forcing many low-income states to resort to massive borrowing to finance their public spending, plunging some of them into an unprecedented debt crisis**. The consequences are colossal: at least $500 billion dollars evaporate each year from the coffers of states, according to conservative estimates, including nearly $200 billion for the countries of the South alone** [6].

$500 BILLION
that's the cost of tax evasion worldwide each year

of which $200 BILLION is lost by countries in the Global South.

= Global official development assistance in 2024.

SOURCE
Tax justice: State of affairs 2024, November 2024
https://taxjustice.net/reports/the-state-of-tax-justice-2024/

These figures relate to tax evasion by multinational corporations and the wealthiest individuals. They represent a conservative estimate, as estimates of tax evasion are inherently hampered by a lack of tax transparency. They are based on existing tax data used by the Tax Justice Network in 2024.

2. From the failure of the OECD to the UN Tax Convention: two decades of upheaval in global tax governance

The negotiations for a United Nations Framework Convention on Tax Cooperation are **the culmination of more than 15 years of crises, scandals and political failures that have gradually laid bare the limits of global tax governance dominated by the OECD, but also more than fifteen years of civil society mobilization and advocacy for tax justice.** In the wake of the 2008 financial crisis, the gap between the discourse on tax justice and the reality of practices became impossible to ignore. Successive revelations — from *LuxLeaks to the Panama Papers* and then the *Paradise Papers* — have exposed a system that allows multinationals and the wealthiest to evade taxes on a massive scale, to the detriment of States and populations and to the benefit of tax havens.

Under continuous pressure from civil society, the OECD and the G20 have tried to respond with successive reforms, known as BEPS (*Base Erosion and Profit Shifting*), presented as a global response to tax evasion. But by avoiding any questioning of the central principles of the system — notably transfer pricing **— these reforms have failed to curb profit shifting and tax evasion.** More recent developments, grouped under BEPS 2.0, in particular the agreement on the "minimum taxation of multinationals at 15%" have confirmed this failure.

It is in this context of political deadlock and the failure of the reforms carried out under the aegis of the OECD, that the Global South countries, supported by a constant mobilization of international civil society, have gradually challenged the legitimacy of a global tax system decided by a small circle of rich countries. This protest has found a major political expression from 2022, paving the way for an unprecedented process: the negotiation of a United Nations Framework Convention on International Tax Cooperation. For the first time in nearly a century, the overhaul of international tax rules is taking place within a universal framework, where each state has an equal voice.

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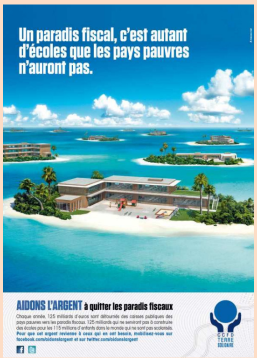
THE FOLLOWING TIMELINE TRACES THE MAIN STAGES OF THIS HISTORICAL SHIFT.

2008–2010 | Global Financial Crisis: taxation at the heart of the financial crisis



The global financial crisis is causing an explosion in public debts and putting pressure on government budgets. In this context, tax evasion and tax havens are increasingly emerging as a major political problem: while populations suffer from austerity, hundreds of billions of dollars escape taxation every year, as financial globalization facilitates tax evasion by multinationals and large fortunes, thanks to tax rules designed for a world based on physical presence and no longer adapted to a globalized economy.

Postcard created as part of the campaign 'Let's help money leave tax havens' led by CCFD-Terre Solidaire in 2010

2014 | LuxLeaks : tax evasion revealed at the heart of the European Union

The first international tax scandals are revealed. The LuxLeaks revelations reveal hundreds of secret tax agreements between Luxembourg and multinationals, allowing them to artificially reduce their taxation. The scandal shows that tax evasion is organized legally, with the complicity of certain European states, and that it is not marginal but structural and institutionalized.

Mobilization of French civil society for tax transparency and in support of whistleblowers following the LuxLeaks scandal, with CCFD-Terre Solidaire.

2015 | BEPS 1.0 (OECD): a limited reform in the face of a failing system

Under pressure from public opinion and civil society following the first international tax scandals, the G20 entrusted the OECD with the reform of the international tax system through the BEPS (*Base Erosion and Profit Shifting*) project. Adopted in 2015, excluding a majority of countries in the South, BEPS 1.0 improves certain technical rules but does not call into question the foundations of the international tax system, particularly transfer pricing, which allows multinationals to move their profits between subsidiaries.

2015 | Addis Ababa (FfD3): the South calls for a democratic fiscal space

At the 3rd Conference on Financing for Development, the G77 countries, supported by many civil society organizations, call for the creation of an intergovernmental tax body at the UN. They denounce a system in which global tax rules are decided without them, while they suffer the most serious consequences. The proposal is blocked by the countries of the North and the OECD. The North-South divide over tax governance becomes explicit.

Mobilization of the Global Alliance for Tax Justice, of which CCFD-Terre Solidaire is a member, in Addis Ababa during the 3rd Conference on Development Finance for aa Global Tax Body

2016–2017 | Panama Papers & Paradise Papers: the failure of adjustments laid bare

New tax scandals erupt, including the *Panama Papers* and then the *Paradise Papers*, which reveal the continuing extent of tax evasion by multinationals and the ultra-rich, despite the adoption of BEPS 1.0. They show that opaque financial arrangements and shell companies remain widely used and that the reforms carried out by the OECD have not changed the reality of tax abuse.

2019–2021 | BEPS 2.0 (OECD): promises of reform, status quo preserved

Under pressure from tax scandals and public opinion, the OECD launches BEPS 2.0, presented as a major reform of the international tax system. Two pillars structure this response. Its Pillar 1, which is supposed to better tax digital multinationals, is quickly bogged down in political deadlocks, becoming obsolete. Its Pillar 2, which establishes a global minimum rate of 15%, appears to be a minimum compromise: a rate that is too low, weakened by numerous exemptions, which above all protects the interests of the countries where the headquarters of multinationals are located.

2022 | The countries of the South impose the UN: a major political turning point

The Africa Group, on behalf of the G77 + China, submits a resolution to the UN calling for inclusive international tax cooperation [7]. Adopted by consensus, it marks the official recognition of the UN as a legitimate framework for rethinking global taxation. This moment marks a major political shift: for the first time, the international community collectively recognizes that tax governance can no longer remain in the hands of a select club of rich countries

2023 | Official launch of the UN process

Through resolution 78/230 [8], the General Assembly establishes an Ad Hoc Intergovernmental Committee to develop the *Terms of Reference (ToR)* for a future United Nations Framework Convention on International Tax Cooperation. With this act, the Member States explicitly entrust the UN with the task of establishing an international tax system for sustainable development. This is the first time in nearly a century that such a project has been opened in a truly universal framework.

2024 | The Terms of Reference of the Convention: the mandate is set

The whole of 2024 is devoted to the negotiation and the vote on the *Terms of Reference* of the UN Tax Convention [9], the real political framework of the future Convention. They define the negotiating mandate, objectives and commitments of the Convention, including the central one to establish *an "inclusive, equitable, transparent, efficient international tax system at the service of sustainable development"*. The Terms of Reference are adopted in December 2024 by a majority, despite the abstention of European countries, including France.

2025-2027 | The negotiation of the Framework Convention

Following the adoption of the December 2024 Terms of Reference, the United Nations General Assembly has officially launched the negotiation phase of the Framework Convention on International Tax Cooperation. An Intergovernmental Negotiating Committee [10], chaired by Egypt, has been established with a mandate to draft, by 2027, a Framework Convention accompanied by two additional protocols Between 2025 and 2027, States meet in three formal negotiating sessions per year, held alternately in New York and Nairobi.

2025 | Start of negotiations: New York – Nairobi

The year 2025 marks the entry of the process into its decisive phase: the formal negotiations of the UN Framework Tax Convention open in New York in August and then in Nairobi in November. The discussions are organized around three central axes: the Framework Convention itself, intended to lay down the architecture of the future global tax system; a protocol on the taxation of the digital economy and cross-border services; and a protocol on the prevention and resolution of tax disputes. In this context, France is adopting an ambiguous position. While it is actively involved in technical exchanges, it continues to defend the existing OECD framework and struggles to generate political momentum for structural reform.

Mobilization of civil society, including CCFD-Terre Solidaire, its allies and partners, in front of the United Nations headquarters in New York in August 2025, following the first historic session of negotiations on the UN Tax Convention.

2026 | Intensifying negotiations

The negotiations are entering into a more substantial phase. States are called upon to submit detailed written proposals and to arbitrate the main orientations of the Framework Convention: degree of legal constraint, place of protocols, allocation of taxing rights, transparency and dispute settlement mechanisms. It is a pivotal year, in which the opportunity of an ambitious Convention or, conversely, the risk of a minimalist text that restricts the essential to optional agreements is clearly emerging.

2026 | France takes over the presidency of the G7

France will assume the presidency of the G7, placing it at a decisive moment in the face of its contradictions on tax justice. It can choose to make this G7 a mark of political support for the UN process and to send a strong signal in favour of a comprehensive tax reform, or to remain in a logic of defensive continuity, aligned with the OECD.

2027 | Towards the adoption of the UN Tax Convention

The year 2027 must mark the completion of the process. The negotiations converge on a final text of the Framework Convention and Protocols, submitted to the United Nations General Assembly at its 82nd session. The challenge is high: to finally provide international taxation with a universal, fair and evolving framework, capable of responding to tax evasion, global inequalities and development and climate financing needs.

3. What could a UN Framework Convention on International Tax Cooperation allow ?

In the face of the global scourge of international tax injustice, a tax revolution is possible. The United Nations Tax Convention today represents the most credible response to the impasse in the international tax system. It does not aim to correct flawed rules at the margins, but to fundamentally overhaul the way in which states cooperate to tax multinationals and large fortunes fairly, and to make taxation a major lever for sustainable development. The issue is not only technical. It is deeply political. It is a question of giving back to States – in particular those that suffer the most from tax evasion – the means to finance their public services, their development and the ecological transition. In concrete terms, an ambitious UN tax treaty could transform the global tax system on several key fronts.

Rebalancing North-South relations in tax matters

First, the Convention would correct a historical imbalance: that of a global tax system designed by and for a small number of rich countries, in which the countries of the South have never had any real decision-making power. The UN framework offers, for the first time, **a universal negotiation space where each State participates on an equal footing** in the definition of the fiscal rules that condition its budgetary room for maneuver. This break with the past is essential to restore the legitimacy of the global tax system and correct a historical imbalance that deprives the countries of the South of resources essential to their development and finally **place international tax cooperation back in a genuine multilateral logic, rather than one based on governance by exclusive clubs.**

Finally tackling the heart of tax evasion by multinational companies.

The UN Tax Convention offers the opportunity to tackle head-on the heart of international tax evasion: the artificial shifting of profits by multinationals. Today, multinational companies are treated as a mosaic of independent subsidiaries and can easily manipulate the prices of transactions between their subsidiaries – known as transfer pricing – to minimize their taxation and artificially shift their profits to tax havens.

An ambitious Convention would make it possible to move towards a **unitary taxation of multinationals with formulary apportionment,** which would make it possible to consider each multinational as a single and coherent entity and to distribute its overall profits between countries according to the real activity where it operates according to predefined factors (sales, jobs, production, etc.). This approach, combined with a truly ambitious minimum rate, would generate considerable revenues, while addressing the beating heart of global tax avoidance. The Convention could also allow for the creation of rules and a strengthened framework to allow for the taxation of digital activities, which are still largely untaxed due to the principle of permanent establishment.

Implementing coordination to effectively tax the ultra-rich:

The Framework Convention also opens up a field that has so far been largely absent from international discussions: the taxation of the ultra-rich. In a world where the wealthiest individuals can move their assets and arrange their tax residency globally, **the lack of international coordination fuels deep tax injustice and extreme concentration of wealth.** By allowing for the development of coordinated wealth tax mechanisms, the Convention would provide a powerful tool to combat inequality, increase tax revenues and enhance the progressivity of tax systems. This dimension is essential to restore the legitimacy of taxation and respond to an increasingly strong social demand, including in the countries of the North.

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> **FOR YEARS, AIDC, A PARTNER OF CCFD-TERRE SOLIDAIRE, HAS BEEN FIGHTING ALONGSIDE A GLOBAL COALITION OF EXPERTS, CIVIL SOCIETY ORGANIZATIONS AND PROGRESSIVE STATES TO END WIDESPREAD TAX EVASION AND ILLICIT FINANCIAL FLOWS BY LARGE CORPORATIONS AND THE ULTRA-RICH, BUT WE ARE STILL FAR FROM OUR GOAL. PIECEMEAL REFORMS OF AN OUTDATED INTERNATIONAL TAX SYSTEM HAVE ONLY REINFORCED TAX EVASION STRATEGIES.**
> **AS INEQUALITIES DEEPEN AND CRISES MULTIPLY, WE CALL ON ALL COUNTRIES TO RALLY BEHIND A COMPLETE OVERHAUL OF THE INTERNATIONAL TAX SYSTEM IN 2026, INCLUDING THE INTRODUCTION OF UNITARY TAXATION BASED ON THE REAL ECONOMIC ACTIVITY OF MULTINATIONALS, AND TO RECLAIM TAXATION AS A TOOL TO COMBAT THE POWER OF MULTINATIONALS, INEQUALITY AND EXPLOITATION**

Jaco Oelofsen,
Senior Programme Officer, Alternative Information and Development Centre (AIDC),
South African partner of CCFD-Terre Solidaire

Establishing comprehensive and binding tax transparency

No ambitious tax reform can succeed without tax transparency. The UN Tax Convention would go beyond existing fragmented mechanisms by establishing comprehensive and inclusive tax transparency mechanisms**, to finally combat international financial secrecy and fiscal opacity.** It would provide a framework to generalize **country-by-country reporting, greater transparency on beneficial ownership,** and move towards **global asset registries,** to allow for greater tax transparency for multinationals and the ultra-rich, and to fight more effectively against opaque tax evasion channels.

Aligning international taxation with sustainable development, climate and human rights

One of the strengths of the UN mandate lies in **its explicit articulation with the existing international commitments of States.** The Convention would align global tax governance with other commitments and obligations of governments, in particular those related to **human rights, gender equality, the UN Sustainable Development Goals, and climate and biodiversity protection.** By explicitly enshrining these principles in international tax governance, the Convention would contribute to strengthening the coherence of public policies and making taxation a tool for reducing inequalities, promoting social justice and respecting the rights of populations, particularly in the countries most affected by tax evasion and unfair tax competition.

Financing the fight against climate change through progressive environmental taxation

The UN Tax Convention also paves the way for **a strong articulation between international taxation and financing the ecological transition.** It would make it possible to develop progressive environmental taxation instruments based on the polluter-pays principle and on that of common but differentiated responsibilities. It would make it possible to go beyond the current voluntary and fragmented approaches by including binding international fiscal instruments in the service of sustainable development, such **as a surtax on the profits of fossil fuel companies and highly polluting sectors, with these revenues being directly allocated to multilateral funds under the aegis of the United Nations.** These mechanisms would provide governments with new, predictable, and sustainable resources to finance climate action, adaptation, and just transition, while ensuring a more equitable distribution of revenues among countries. In the context of massive unmet climate finance needs, international tax reform thus appears to be one of the most **credible levers to sustainably close the climate justice financing gap.**

Strengthening the taxation of extractive industries and protect affected communities.

The UN Tax Convention could **correct the deep tax injustices associated with extractive industries** by strengthening the taxing rights of countries where extraction takes place. It would provide a key lever **to combat illicit financial flows, abusive transfer pricing and harmful tax incentives specific to this sector, and to revise unfair tax treaties.** In economies where the exploitation of non-renewable resources leads to irreversible losses, lasting environmental degradation and low redistribution of wealth, such a rebalancing is crucial. It would allow states to recover much-needed revenues to finance development and just transition, while **ensuring full respect for the rights of workers, local communities and indigenous peoples, including the right to free, prior and informed consent,** as well as to effective redress for social and environmental harm caused by extraction.

Building a sustainable and scalable international tax system

Finally, the UN Tax Convention is not limited to a one-off agreement. It can allow for the **creation of a permanent intergovernmental body on tax matters under the aegis of the United Nations,** with monitoring, review and accountability mechanisms, including a **Conference of the Parties.** Like climate COPs, this framework would make it possible to adapt tax rules to economic and technological developments, while guaranteeing universal participation by States. Such a system would provide greater legal stability, continuous adjustment capacity and coherence between the different dimensions of global economic governance, and **a truly inclusive and universal multilateral decision-making space.**

2 FROM NEW YORK TO NAIROBI, A CRUCIAL YEAR OF NEGOTIATIONS

1. New York – The first negotiations: laying the foundations for a new global tax order

Historic first negotiations

In New York, in August 2025, two successive sessions marked the opening of substantive negotiations on the UN Tax Convention. This moment constitutes a historic break: never before have so many States been brought together to collectively discuss a refoundation of the international tax system. For many delegations, particularly from the South, this configuration already represented **a profound change compared to decades of concentrated tax governance within the OECD.** The diversity of the States present — G77 countries, European states, small island jurisdictions, emerging economies — highlighted the magnitude of the political challenge. The first discussions focused mainly on the construction of a common language and a shared understanding of the issues, an essential condition for tackling such a complex multilateral project.

The aim was not yet to enter into detailed technical drafting, but to lay the political foundations of the future agreement: to clarify the scope of the Framework Convention, to identify the subjects covered by specific protocols and to structure the work schedule. **From the opening, civil society — coordinated by the Global Alliance for Tax Justice — played a key role.** CCFD-Terre Solidaire took the floor in plenary to recall the ambition of the Terms of Reference and the need to integrate the central issues from the outset: tax transparency, unitary taxation of multinationals, taxation of the ultra-rich and the crucial link between taxation and sustainable development.

A geopolitical shift: a recomposition of international tax governance

The discussions quickly revealed a profound recomposition of international tax governance**. African countries, the driving force behind the process, maintained a clear political line, refocusing the debates on the initial ambition: fair reallocation of taxing rights, the fight against illicit financial flows, the taxation of extractive industries and the construction of a truly fair system.** Their cohesion confirmed **the leadership of the Global South** in this process. Conversely, Global North countries — particularly European countries — have often adopted a very technical approach to discussions, partly linked to the strong presence of tax administrations in their delegations. The withdrawal of the United States at the beginning of 2025 helped to calm the climate of exchanges, while **concentrating the main political resistance on the European side.** This configuration has highlighted a new fact: the **center of gravity of global tax governance has shifted from the OECD to the UN.**

Obstacles, blind spots and early warning signs

However, this initial phase revealed several limitations. **The excessive technicality of debates sometimes hindered the politicization necessary to a systemic reform.** Key issues — tax transparency, taxation of the ultra-rich —remained largely absent, while the links between taxation, sustainable development and climate were relegated to the background. Finally, a major risk has emerged since New York : that of excessive **"protocolization",** consisting of postponing most of the commitments to future protocols. **This approach would pose a real danger of emptying the Framework Convention of its substance and reproducing a fragmented architecture close to that of the OECD.** The absence of a working text accentuated these tensions, leaving uncertainty about the very nature of the future instrument: a real structuring treaty or a simple minimal political framework.

Plenary session during the third round of negotiations on the UN Tax Convention – Nairobi, November 2025

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2. Nairobi - Between assertive ambitions and persistent resistance: entering the political heart of the negotiations

Three months after New York, the Nairobi session in November 2025 marked a decisive turning point. **As the first intergovernmental tax negotiation organized on the African continent, it had a strong symbolic and political significance.** This choice confirmed the leading role played by African countries since the beginning of the process and confirmed the shift of the center of gravity of global tax governance to the UN and the Global South. Unlike New York**, Nairobi marked the beginning of a more substantial and conflictual phase.** For the first time, delegations worked on the basis of a draft text, drafted by the secretariat of the negotiating committee, which was supposed to serve as a basis for the future Framework Convention.

A first draft text: a basis for work... and a warning signal

Presented as a "minimum basis", the draft text immediately raised serious concerns. The central elements of the mandate – fair allocation of taxing rights, taxation of the ultra-rich, tax transparency, the fight against illicit financial flows, the links with climate and sustainable development – appeared in a very limited way. **For many delegations from the South, this text raised the risk of an "empty" Convention, reduced to a declaratory framework and postponing most of the commitments to uncertain future protocols.** Civil society has shared this warning: such an architecture would reproduce the fragmented and optional logics that led to the failure of the reforms led by the OECD.

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Civil society organizations at Nairobi UN headquarters for the third round of negotiations on the UN Tax Convention – Nairobi, November 2025

> **"THE MANDATE FOR THESE NEGOTIATIONS IS CLEAR: TO BUILD AN INTERNATIONAL TAX SYSTEM FOR SUSTAINABLE DEVELOPMENT, NOT A CATALOGUE OF GOOD INTENTIONS TO BE POSTPONED UNTIL LATER. THIS IS NOT A DREAM BUT A QUESTION OF POLITICAL WILL ON THE PART OF STATES,WHICH TODAY, AT THE UN, HAVE THE POWER TO END INTERNATIONAL TAX INJUSTICE**
>
> **Tove Maria Ryding,**
> **Policy and Advocacy Manager at Eurodad,**
> **European ally of CCFD-Terre Solidaire)**

An "empty Convention": a major political risk

The debates quickly crystallized a clear political opposition. On the one hand, the countries of the South, led by the African Group, defended **a substantial Framework Convention, directly integrating the structuring rules of the future global tax system.** In their view, the protocols should complement the Convention, not replace it. On the other hand, several European countries advocated **a minimalist approach, confining the Convention to general principles and transferring binding content to protocols.** This vision, close to the OECD model, raises fears of the return of "opt-in/opt-out" logics and a dilution of the political ambition of the process. **The political risk is clear: if the Convention were limited to general principles, it would become an essentially declaratory instrument, lacking the normative force necessary to truly transform global tax governance.** Such an architecture would recreate the asymmetries that the UN process intends to overcome.

Nairobi, the scene of assumed African leadership

In the face of this resistance, **the leadership of African countries has asserted itself strongly.** They recalled that the Terms of Reference adopted by the General Assembly require the construction of an international tax system that is **"inclusive, fair, transparent and at the service of sustainable development".** Such an ambition cannot be achieved by a hollow Convention. African delegations constantly refocused discussions on structuring issues: reallocation of taxing rights, questioning the principles of arm's length and permanent establishment, taxation of extractive industries, the fight against illicit financial flows and taxation of the ultra-rich. They also underlined the **inextricable link between tax justice, climate justice and social justice.** This African leadership, widely praised by civil society, has helped to maintain the political course of the process in the face of attempts to minimize it.

Persistent resistance: slowness, technicality, fragmentation

While Nairobi confirmed the strength of the UN multilateral framework, it also revealed persistent resistance. The technicality of debates, attempts at fragmentation and procedural slowness remain real obstacles. In the absence of the United States, the European Union has emerged as the main pole of resistance to the proposals put forward by the Global South. **Nairobi was a political highlight, but also a warning: the historic window opened in 2022 could close if states are unable to come up with ambitious, concrete and legally sound commitments.**

From Nairobi to Belém, uniting tax and climate justice

The Nairobi negotiations took place in an international context marked by the climate emergency. At the same time, in Belém, the States gathered at COP30 were faced with a question that has become central and still unresolved: how to mobilize the necessary financing to face the scale of climate change and guarantee a just transition? This parallelism has not escaped the attention of the delegations of the South or of civil society. It highlighted a political evidence that is too often evaded: **without a profound reform of international taxation, there will be neither climate justice nor sustainable development.**

Yet, the needs are clearly identified. Global South countries would need at least **$1,3 trillion per year** to finance climate change adaptation, energy transition and loss and damage repair. However, these amounts remain largely beyond the reach of current financing mechanisms. At the same time, tax evasion by multinationals and the ultra-rich continues to deprive governments of hundreds of billions of dollars each year — public resources that could be mobilized to respond to the climate emergency. **It is in this context that the United Nations Tax Convention appears to be a missing link between climate commitments and their effective financing.**

In Nairobi, many delegations from the South, supported by a strong mobilization of international civil society, recalled that the countries most exposed to climate impacts are also those that suffer the hardest from tax injustice. The issue of the taxation of polluting and extractive industries has thus emerged as a structuring issue for the future international tax system. **The debates have shown that tax justice and climate justice are not separate fields, but part of the same political struggle.** The Global Alliance for Tax Justice (GATJ), together with its regional networks and member organizations, has put forward concrete proposals for increased taxation of fossil fuel and high-emitting industries, based on the principles of polluter pays and common but differentiated responsibilities. The magnitudes illustrate the potential of these measures: **a 20% surtax on the profits of the 100 largest oil and gas companies alone would have generated more than $1 trillion since the Paris Agreement** [11]**.** Such resources could be a decisive lever for financing climate action and sustainable development.

$1 TRILLION

that is how much

A 20% TAX

ON THE PROFITS

of the 100 largest oil and gas companies

would have raised since the Paris Agreement was adopted in 2015.

SOURCE
Make polluters pay Proposal for a surtax on fossil fuel industries' profits, Markus Trilling (2025) - Eurodad & Global Alliance for Tax Justice
https://www.eurodad.org/fossil_fuel_surtax

These proposals are part of a broader critique of extractivism, which highlights the central role of extractive industries in the erosion of tax bases, environmental degradation and human rights violations. This work is carried out in a particularly structuring way by GATJ member organizations and partners of CCFD–Terre Solidaire, including Latindadd[12] in Latin America and the Alternative Information & Development Center (AIDC)[13] in South Africa, which articulate tax justice, climate justice and the defense of the rights of workers, local communities and indigenous peoples.

This convergence between taxation and climate echoes the mobilizations carried out by the partners and allies of CCFD–Terre Solidaire in Belém, particularly during COP30 and the People's Summit. From Nairobi to Belém, the same dynamic has emerged: **the struggles for tax justice, climate justice and social justice are deeply interdependent.** Taxing multinationals, polluting industries and the wealthy, and putting an end to the abusive tax practices of the extractive industries, is not only an economic justice requirement; it is an essential condition for States to meet their climate commitments and finance a just transition.

People's summit in Belém, Brazil
November 2025

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> **TAX JUSTICE, PARTICULARLY AT THE INTERNATIONAL LEVEL, IS NOT AN OPTION: IT IS THE COURSE OF HISTORY. WITHOUT IT, WE WILL NEVER BE ABLE TO MOBILIZE THE RESOURCES NEEDED TO RESPOND TO THE CLIMATE, BIODIVERSITY AND DEVELOPMENT CRISES. WE ARE NOT TALKING ABOUT CRUMBS, BUT TRILLIONS. WE NEED A DEMOCRATIC, INCLUSIVE AND TRULY FUNCTIONAL GLOBAL TAX SYSTEM.**

Gaïa Febvre,
Head of International Policy at Climate Action Network, French ally of CCFD-Terre Solidaire

3. The crucial role of civil society and CCFD-Terre Solidaire in the negotiations

A decisive mobilization at the origin of the UN process

The process of negotiating a UN tax treaty was made possible in large part thanks to **more than a decade of continuous engagement with civil society and the Global South.** Carried out at the global level by the Global Alliance for Tax Justice (GATJ), its regional networks and its member organizations – including CCFD – Terre Solidaire – this mobilization has made it possible **to keep alive the demand for a universal, inclusive and democratic multilateral tax forum, where existing frameworks had failed.** Through its analyses, campaigns and advocacy, civil society has contributed to the emergence **of a credible alternative to the OECD framework** and to preparing the political and technical ground for the UN process. It has thus played a structuring role in the recognition, by States, of the need for a systemic reform of international tax governance.

Ahead of the first session of negotiations for the UN Tax Convention - New York, August 2025

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Civil society plays a decisive role during negotiations - Nairobi, November 2025

CCFD–Terre Solidaire, a committed and recognized player

Committed for more than twenty years to fighting tax injustice, CCFD–Terre Solidaire plays an essential role in the negotiation process of the UN Tax Convention. In France and internationally, our organization contributes **to put international tax reform on the political agenda, supporting the leadership of Global South countries** and promoting ambitious tax solutions for **sustainable development** and the **reduction of inequalities.**

Given the ambiguities of the French position, national advocacy is a major strategic lever. **CCFD–Terre Solidaire coordinates the French civil society space committed to international tax justice** in order to structure common analyses, challenge the public authorities and highlight the gap between France's multilateralist discourse and its effective positions in the negotiations. Through regular dialogue with ministries, administrations and parliamentarians, as well as public statements, this advocacy aims **to politicize a debate that is too often reduced to technical issues and to push France to fully commit to an ambitious UN Framework Convention.**

Present at all stages of the UN process, CCFD–Terre Solidaire is **directly involved in the negotiations alongside the Global Alliance for Tax Justice.** It relays the priorities of its African, Latin American, Asian and European partners and allies, and contributes to maintaining the political ambition of the process in the face of attempts at dilution. This partnership-based work makes it possible to put the reform of international taxation back at the service of the populations most affected by tax evasion and unfair tax competition, and to **make the UN Tax Convention a concrete lever for social, climate and economic justice.**

> **“ THERE WILL BE NO FAIR AND EFFECTIVE INTERNATIONAL TAX REFORM WITHOUT THE STRONG PRESENCE OF CIVIL SOCIETY ORGANIZATIONS FROM THE SOUTH. IN LATIN AMERICA, WE KNOW THAT IT IS OUR COMMUNITIES THAT PAY THE HIGHEST PRICE FOR TAX EVASION AND ILLICIT FINANCIAL FLOWS. WHEN OUR VOICES ARE EXCLUDED FROM NEGOTIATIONS, THE RULES CONTINUE TO SERVE THE INTERESTS OF MULTINATIONALS, ELITES AND COUNTRIES OF THE NORTH. FOR THESE NEGOTIATIONS TO BE SUCCESSFUL, ORGANIZATIONS FROM THE SOUTH MUST BE AT THE HEART OF INTERNATIONAL TAX DECISIONS.**
>
> **Nathalie Beghin,**
> **Co-President of Latindadd, Latin American partner of CCFD-Terre Solidaire**

A structuring civil society presence in New York and Nairobi

In both New York and Nairobi, civil society was not just a mere observer of the negotiations. Under the coordination of the GATJ, **more than fifty in New York, and more than a hundred in Nairobi, members of international civil society participated in the sessions,** providing policy analysis, technical expertise and direct advocacy to the delegations.

Civil society organizations intervened during plenary sessions, held numerous meetings with delegations and the Secretariat, organized side events and disseminated a daily *Chronicle of the negotiations*, which was widely followed by delegates. Their action has made it possible **to recall the content and spirit of the *Terms of Reference,* to warn of the risks of technocratic drift and to refocus the debates on structuring issues:** taxation of multinationals, tax transparency, the fight against illicit financial flows, taxation of the ultra-rich and the articulation between taxation, climate and human rights. CCFD-Terre Solidaire intervened at the opening of the **sessions to defend an ambitious Convention,** to reject a minimalist approach and to recall that international taxation must be designed as a lever for sustainable development, and not as a simple technical exercise.

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Daily Civil Society Chronicle distributed each day to delegations. Here in Nairobi, Kenya, in November 2025 during the 3rd session of negotiations for the UN Tax Convention.

Decisive work between sessions: expertise and concrete proposals

An essential part of civil society's work takes place between formal sessions. During these intersessional phases, the GATJ and its members coordinated the production of **substantial written inputs to the Negotiations Committee Secretariat's appeals**[14]**.** Signed by nearly 200 organizations from all regions of the world, these submissions demonstrate the unprecedented broadening of the mobilization for tax justice. They **bring together development NGOs, trade unions, climate organizations, feminist movements and human rights actors,** around a shared observation: the reform of international taxation is a central lever for responding to social, climate and democratic crises.

CCFD–Terre Solidaire has been actively contributing to this work, particularly on unitary taxation of multinationals, tax transparency, taxation of the ultra-rich, environmental taxation and the integration of human rights into the Convention. This work has been consolidated in a key tool: **the *Catalogue of Civil Society Articles for the Framework Convention***[15], which proposes concrete article formulations, operational mechanisms and an architecture consistent with the UN mandate. This document, which has been widely circulated to delegations, should gradually **become a political and technical reference for the process.**

Civil society participation is still fragile

Although civil society played an essential role in the birth of this process, **its full participation is still not assured.** Thus, the participation of civil society remains **hampered by a worrying decision: the refusal of States to open intersessional working meetings to observers.** This approach — contrary to UN practice — weakens the transparency of the process and limits the ability of NGOs to make informed contributions. **This lack of transparency is not only a procedural problem: it risks reducing the quality of the future Convention, by depriving negotiators of the expertise and perspective of civil society,** which has largely fed political and technical reflection for more than a decade. In addition, there are recurrent material obstacles — visas, accreditations, travel costs — which still too often prevent organizations especially from the South from participating fully in the negotiations. **These obstacles are not neutral: they risk weakening the Convention's ambition and reproducing the imbalances that the United Nations process seeks to overcome.**

3 FRANCE CAN NO LONGER REMAIN A SPECTATOR OF TAX INJUSTICE

1. An ambiguous, cautious, even defensive position in the face of the of tax justice imperative

Frances's entry into the UN Tax Convention negotiation process could have been an obvious opportunity for France to embody the multilateral leadership that it regularly claims. However, since the launch of the process, **France has adopted an ambivalent, cautious, sometimes defensive attitude**, which contrasts with its multilateralist discourse on *"a new international financial architecture"*.

This caution was explicitly demonstrated by the **French abstention in the vote on the 2024 resolution** establishing the *Terms of Reference* for the Framework Convention. This ambivalence was also revealed in the organizational negotiations of February 2025, during which France defended a consensus-based decision-making mechanism, a provision that would have offered any state the possibility of blocking the entire process. This attempt at procedural lock-in was largely rejected by the majority of States, believing that the governance of such a global agreement could not be subject to a permanent right of veto. In reality, this stance illustrates **a persistent ambiguity** that raises questions all the more since France has been disseminating a discourse on the international scene for the past three years affirming the need for a "new global financial pact" and a recasting of global economic rules in the face of the climate and social crisis

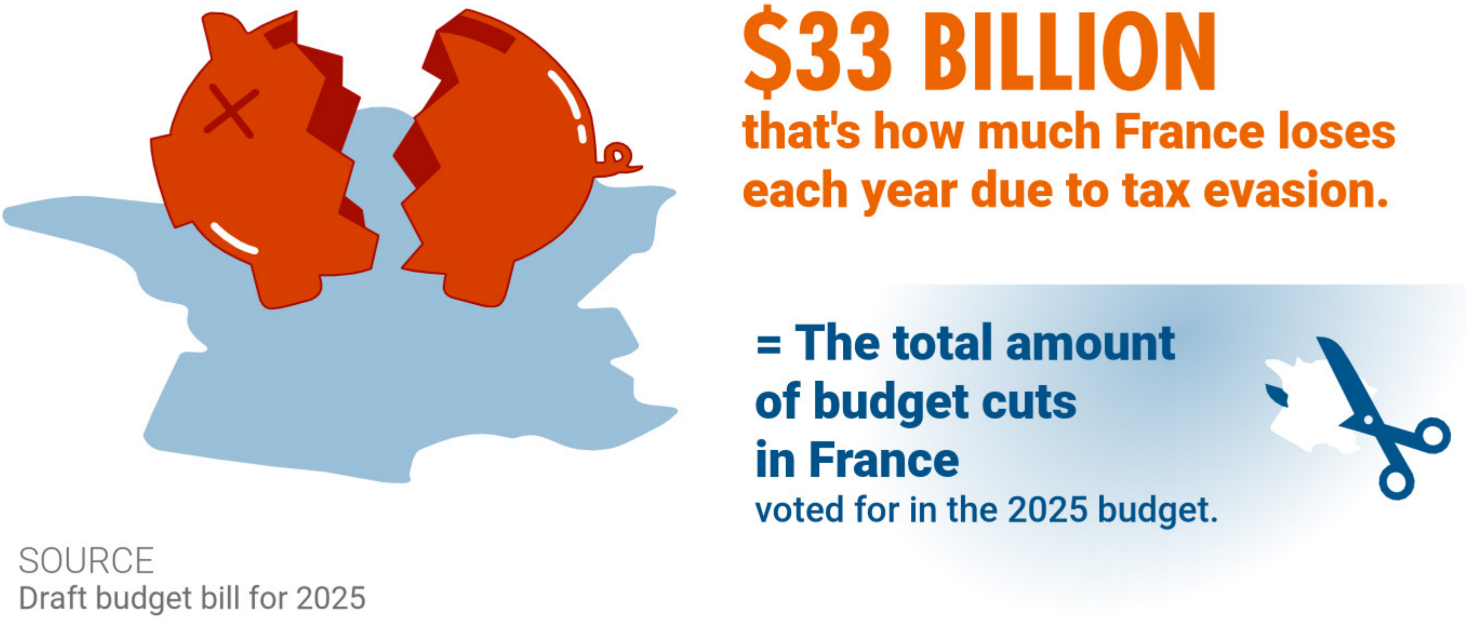
In its official positions, as well as in its written submissions of July 2025[16] and December 2025[17] sent to the Secretariat of the Negotiating Committee, France repeatedly insisted on the **need to preserve "complementarity" with existing frameworks,** in particular those of the OECD and the European Union. This line, presented as pragmatic, amounts in practice to **limiting the transformative ambition of the Framework Convention,** by confining it to an accessory role rather than that of a space for systemic refoundation of international tax governance. By refusing to endorse this moment of multilateral change, **France is taking the risk of remaining on the sidelines of a historic process from which it would be a major winner.**

Voting Started		11/27/2024	10:43:21 AM			
A/C.2/79/L.8/Rev.1 – as a whole - Promotion of inclusive and effective international tax cooperation at the United Nations [Item 16 (f)], 26th meeting						
AFGHANISTAN	+ CAMEROON	X FINLAND	+ KUWAIT	+ NEPAL	+ SAUDI ARABIA	X UKRAINE
X ALBANIA	− CANADA	X FRANCE	+ KYRGYZSTAN	X NETHERLANDS (KIN...	+ SENEGAL	X UNITED ARAB EMIR...
+ ALGERIA	+ CENTRAL AFR REP....	+ GABON	+ LAO PDR	− NEW ZEALAND	X SERBIA	− UNITED KINGDOM
ANDORRA	+ CHAD	+ GAMBIA	X LATVIA	+ NICARAGUA	+ SEYCHELLES	+ UNITED REP TANZA...
+ ANGOLA	+ CHILE	X GEORGIA	+ LEBANON	+ NIGER	+ SIERRA LEONE	− UNITED STATES
+ ANTIGUA-BARBUDA	+ CHINA	X GERMANY	+ LESOTHO	+ NIGERIA	+ SINGAPORE	+ URUGUAY
− ARGENTINA	+ COLOMBIA	+ GHANA	+ LIBERIA	X NORTH MACEDONIA	X SLOVAKIA	UZBEKISTAN
X ARMENIA	COMOROS	X GREECE	+ LIBYA	X NORWAY	X SLOVENIA	VANUATU
− AUSTRALIA	+ CONGO	+ GRENADA	X LIECHTENSTEIN	+ OMAN	+ SOLOMON ISLANDS	VENEZUELA
X AUSTRIA	X COSTA RICA	+ GUATEMALA	X LITHUANIA	+ PAKISTAN	+ SOMALIA	+ VIET NAM
+ AZERBAIJAN	+ COTE D'IVOIRE	+ GUINEA	X LUXEMBOURG	+ PALAU	+ SOUTH AFRICA	+ YEMEN
+ BAHAMAS	X CROATIA	+ GUINEA-BISSAU	+ MADAGASCAR	+ PANAMA	SOUTH SUDAN	+ ZAMBIA
+ BAHRAIN	+ CUBA	+ GUYANA	MALAWI	+ PAPUA NEW GUINEA	X SPAIN	+ ZIMBABWE
+ BANGLADESH	X CYPRUS	+ HAITI	+ MALAYSIA	+ PARAGUAY	+ SRI LANKA	
+ BARBADOS	X CZECHIA	+ HONDURAS	+ MALDIVES	+ PERU	+ SUDAN	
+ BELARUS	+ DEM PR OF KOREA	X HUNGARY	+ MALI	+ PHILIPPINES	+ SURINAME	
X BELGIUM	+ DEM REP OF THE C...	X ICELAND	X MALTA	X POLAND	X SWEDEN	
+ BELIZE	X DENMARK	+ INDIA	MARSHALL ISLANDS	X PORTUGAL	X SWITZERLAND	
+ BENIN	+ DJIBOUTI	+ INDONESIA	+ MAURITANIA	+ QATAR	+ SYRIAN ARAB REP...	
+ BHUTAN	DOMINICA	+ IRAN (ISLAMIC REP...	+ MAURITIUS	− REP OF KOREA	TAJIKISTAN	
+ BOLIVIA	+ DOMINICAN REPUB...	+ IRAQ	+ MEXICO	X REP OF MOLDOVA	+ THAILAND	
X BOSNIA-HERZEGOVI...	+ ECUADOR	X IRELAND	+ MICRONESIA (FS)	X ROMANIA	+ TIMOR-LESTE	
+ BOTSWANA	+ EGYPT	− ISRAEL	X MONACO	+ RUSSIAN FEDERATI...	+ TOGO	
+ BRAZIL	+ EL SALVADOR	X ITALY	+ MONGOLIA	+ RWANDA	+ TONGA	
+ BRUNEI DARUSSAL...	+ EQUATORIAL GUINEA	+ JAMAICA	X MONTENEGRO	+ SAINT KITTS-NEVIS	+ TRINIDAD-TOBAGO	
X BULGARIA	+ ERITREA	− JAPAN	+ MOROCCO	+ SAINT LUCIA	+ TUNISIA	
+ BURKINA FASO	X ESTONIA	+ JORDAN	+ MOZAMBIQUE	+ SAINT VINCENT-GR...	X TURKIYE	
+ BURUNDI	+ ESWATINI	+ KAZAKHSTAN	+ MYANMAR	SAMOA	+ TURKMENISTAN	
+ CABO VERDE	+ ETHIOPIA	+ KENYA	+ NAMIBIA	X SAN MARINO	TUVALU	
+ CAMBODIA	+ FIJI	KIRIBATI	NAURU	SAO TOME-PRINCIPE	+ UGANDA	

Voting table at the United Nations General Assembly on the adoption of the Terms of Reference of the United Nations Framework Convention on Tax Cooperation 2024, showing France's abstention

2. A central paradox: France is one of the biggest losers under the current system

France's caution in the UN negotiations contrasts sharply with its own budgetary interests. While Global South is, in proportion to their resources, the hardest hit by international tax injustice, **France is one of the structural losers** of the current global tax system among the rich countries. According to the Tax Justice Network, France loses nearly $28 billion each year due to the artificial transfer of profits by multinationals alone. **This amount rises to about $33 billion if tax evasion by the wealthiest individuals is included, or nearly 4% of the country's annual tax** [18] revenues. Few comparable economies have such a high level of exposure. Additional estimates from the European Tax Observatory show that **large French multinationals contribute significantly to these losses, being responsible alone for more than €10 billion in profit shifts each year to low-tax jurisdictions, causing a loss of around €4 billion in revenue** [19].



SOURCE
Draft budget bill for 2025
https://www.economie.gouv.fr/actualites/un-cap-clair-et-des-efforts-supplementaires-pour-redresser-les-finances-publiques#:~:text=En%202025%2C%20les%20budgets%20de,milliards%20pour%20les%20collectivit%C3%A9s%20locales.

This observation is all the more striking as France is going through a major budgetary and social crisis. In 2025, with a public deficit exceeding 5% of GDP, the 2025 budget bill[20] was largely based on massive cuts in public spending, including a historic 35% cut in official development assistance. **The paradox is clear: the estimated amount of losses linked to tax evasion is of the same order of magnitude as the cuts in public spending voted in France for 2025: €33 billion.** In other words, money exists. Not getting it back is a conscious political choice: to make ordinary taxpayers pay for austerity rather than multinationals and the ultra-rich, who benefit from a failing system.

This shortfall is fueling a budgetary trajectory that shifts the tax effort to households and small businesses, while accentuating the regressivity of the French tax system. At the same time, past tax choices have reduced the contribution of large companies and the richest: reduction of the corporate tax rate from 33% to 25%,[21] measures favorable to asset holdings, and almost no effective taxation of billionaires.

In this context, a fairer international tax framework — based on a fair reallocation of taxing rights, an effective fight against profit shifting and better taxation of the wealthy — would not only be an act of international solidarity. **It would also constitute a major budgetary opportunity for France, likely to strengthen its public finances, reduce inequalities and loosen the constraint that currently weighs on social, climate and international solidarity policies.** Also, France's ambiguous position in the rewriting of international tax rules, that are currently largely detrimental to its interests, appears not only politically inconsistent with its multilateralist discourse, but also economically counterproductive.

3. From New York to Nairobi: a strong difficulty acknowledging the OECD's impasse

From New York to Nairobi, the French position is one of strict diplomatic continuity, **largely aligned with the OECD framework.** However, this apparent coherence masks a major political denial: the failure of the international tax reforms carried out for more than a decade by the G20 and the OECD. Neither in its interventions during the sessions nor in its written submissions, France explicitly acknowledges the impasse of the central pillars of the BEPS framework. Pillar 1, which is supposed to adapt taxation to the digital economy, is now politically dead. Pillar 2, touted as a historic step forward with a minimum rate of 15% on multinationals, has proven largely ineffective, weakened by numerous exemptions and an architecture that continues to favor low-tax jurisdictions, and weakened politically by the withdrawal of the United States. **In France, this reform is reflected in a significant budgetary disappointment: the expected return for 2026 would not exceed €500 million, compared to €1.5 billion initially announced[22].** France is thus investing politically in a system whose real impact remains marginal, fuelling a growing paradox between its stated ambitions in terms of tax justice and the defense of a framework that neither corrects artificial profit shifting nor structural imbalances in the system.

This **logic of the status quo is found in the French approach** to the UN Framework Convention on Taxation. France insists on "stability" and "legal certainty", pleading for strict complementarity with OECD instruments, which amounts to de facto freezing a system that is nevertheless recognized as failing. It avoids any questioning of the heart of the problem: the transfer pricing system, the non-recognition of multinationals as single entities and the rejection of new criteria for the allocation of taxing rights based on real economic activity.

In New York, this posture has resulted in a marked technicization of the debates. While France has demonstrated recognized expertise on certain subjects, particularly digital taxation, it has remained on the sidelines on the central issues of the UN mandate: tax transparency, taxation of the ultra-rich and fair reallocation of tax rights. In Nairobi, this restraint was confirmed, with **France supporting a minimalist reading of the Convention and encouraging the referral of structuring commitments to optional protocols,** at the risk of emptying the text of its substance.

Finally, the French submission of December 2025 **illustrates a selective approach to the link between taxation and sustainable development.** While the link between taxation and sustainable development is mentioned, France limits itself to promoting existing initiatives that it is already piloting, **without promoting global, progressive fiscal instruments that are really aligned with the principles of polluter pays and common but differentiated responsibilities,** necessary to mobilize fiscal resources at the scale for the fight against climate change. In short, from New York to Nairobi, France is struggling to accept that the OECD framework that it has historically defended has reached its limits. By seeking to preserve existing standards, it paradoxically **contributes to slowing down an ambitious multilateral reform of which it would nevertheless be one of the main beneficiaries.**

4. A political opportunity to be seized: France can still contribute to changing the course of tax history

The negotiations on the United Nations Tax Convention now present France with a clear political choice. Behind the technical discussions, it is the coherence of its economic, diplomatic and climate policy that is at stake. At a time when the government justifies austerity policies in the name of budgetary constraints, **continuing to slow down an ambitious international tax reform amounts to accepting a system that deprives France** — like the countries of the South — of **considerable revenues each year.**

By persisting in an ambiguous posture, aligned with an OECD framework that is now running out of steam, France is contributing to **the maintenance of a costly, inefficient and socially unjust status quo.** Conversely, clear and assumed support for the UN Framework Tax Convention would make it possible to reconnect the French discourse on tax justice and multilateralism with concrete political choices. It would also make it possible to recognize that an ambitious reform of international taxation would be a direct lever to loosen the budgetary noose, finance public services, the ecological transition and international solidarity, rather than placing the burden on households and small businesses.

France has major political assets. As a member of the G7, the G20 and the European Union, the host country of the OECD and a central player in the international financial institutions**, it has the capacity to influence the balance of the UN process.** In a context marked by the withdrawal of the United States and the constant weakening of the reforms led by the OECD, his positioning can shift the momentum towards a truly universal and effective multilateralism. The French presidency of the G7 in 2026 is a major political event in this respect. It offers a concrete opportunity to send a strong signal: that of a country ready to move away from half-measures, to recognize the impasse of the current framework and to support a refoundation of global tax governance that is commensurate with the social, climate and democratic crises.

Fully supporting the UN Tax Convention does not mean renouncing national tax sovereignty. On the contrary, it is to admit that, in the face of multinationals and ultra-rich people capable of organizing tax evasion on a global scale, only a collective and ambitious response can regain control. France can still choose to be on the side of a reform that protects the general interest and restores the capacity of States to act. Or it can remain a spectator of a failing system, whose political, social and budgetary cost is constantly increasing.

4 WHAT ARE THE CHALLENGES AHEAD ? 2026 WILL BE A DECISIVE YEAR FOR THE FUTURE OF GLOBAL TAX JUSTICE

The year 2025 marked a turning point. After decades of deadlocks and failed reforms, the negotiations for a United Nations Tax Convention have entered a concrete and decisive phase. The sessions in New York and Nairobi made it possible to lay the political foundations of the process, to reveal the fault lines between States, but also to confirm the extent of the expectations placed in this new multilateral framework. However, nothing is certain. **The historic window opened in 2022 remains fragile, and the next few months will be decisive in determining whether the Convention will become a real instrument of transformation or a minimalist compromise with no real impact.**

The Nairobi session was an important turning point in opening the phase of the actual drafting of the Convention. This transition to writing marks a new stage: it is no longer just a question of exchanging positions of principle, but of confronting opposing visions of what the future international tax system should be. The 2026 negotiation sessions will be pivotal moments in this regard. They should make it possible to transform a draft text that is still largely insufficient into a substantial basis for negotiation, truly reflecting the mandate given by the United Nations General Assembly.

The central issue of these next sessions will be political. The question will be whether the Framework Convention will make clear and structuring commitments on the issues at the heart of global tax injustice — fair allocation of taxing rights, taxation of multinationals and the ultra-rich, tax transparency, link with sustainable development — or whether these subjects will be relegated to subsequent protocols, at the risk of emptying the Convention of its substance. Behind this debate lies a fundamental question: to build a coherent and universal international tax system, or to reproduce, in another form, the fragmented and optional logics that have characterized the frameworks dominated by the OECD.

These next sessions should also **clarify the overall architecture of the future system.** The relationship between the Framework Convention and the protocols, with existing tax treaties, the binding nature of commitments, as well as monitoring and long-term governance mechanisms will be at the heart of the discussions. The credibility of the process will depend on the ability of States to go beyond a purely technical approach to fully assume the political choices necessary for systemic reform.

In this context, **the responsibility of Global North Countries will be particularly scrutinized.** Their ability to move away from a logic of preserving the status quo, to recognize the failure of existing frameworks and to commit in good faith to a multilateral refoundation will largely determine the outcome of the negotiations. For countries like France, the year 2026 will be a decisive test: that of coherence between their discourses on multilateralism, social and climate justice, and their concrete positions in international tax negotiations.

Finally, civil society must remain a key player in this sequence, and play the role of watchdog, force of proposal and relay of the expectations of the populations most affected by tax injustice. **Its mobilization will be instrumental in preventing the Convention from being weakened by technical or procedural compromises,** and in maintaining the pressure for an ambitious, equitable agreement aligned with the Sustainable Development Goals.

International taxation has long been a reserved, opaque area dominated by a few players. The ongoing UN process opens up the possibility of a paradigm shift. 2026 will tell whether states are ready to seize this historic opportunity or whether they will choose to let it slip away.

CCFD-Terre Solidaire, alongside its partners and allies, will remain fully mobilized to ensure that this Convention becomes a real lever for fiscal, social and climate justice, up to the challenges of the 21st century.

5 RECOMMENDATIONS

CCFD-Terre Solidaire **calls on France to fully support and engage constructively in the process of negotiating a the UN Framework Convention on International Tax Cooperation, and to overcome its ambiguity in the effort to build a new international tax system that is truly fair and equitable.** It therefore calls on France to:

1. **Adopt a constructive position without hindering the negotiation process and its modalities in favor of an ambitious and binding Framework Tax Convention,** by promoting and facilitating the participation of countries of the South, parliamentarians and civil society in the negotiations.

2. **Support ambitious proposals in the negotiation process to address flaws in the international tax system,** including by:
    - The establishment **of unitary taxation of multinationals according to their real activities in the countries where they operate,** accompanied by an **ambitious minimum tax rate** allowing a fair allocation of taxing rights between countries,
    - The establishment of a **global mechanism for taxing the wealth of the richest individuals** contributing to a fairer distribution of wealth on a global scale,
    - The implementation **of progressive environmental taxation instruments based on the polluter-pays principle and on that of common but differentiated responsibilities,** in the service of sustainable development, such as a surtax on the profits of fossil fuel companies and highly polluting sectors, allowing States to **raise new, predictable and sustainable resources to finance climate action.**
    - The establishment of **effective and inclusive tax transparency mechanisms** (global register of beneficial owners, global register of assets and systematic publication of country-by-country reporting),
    - The **establishment of an intergovernmental body on tax matters, under the auspices of the United Nations,** to ensure that the different needs, priorities and capacities of all countries, in particular developing countries, are fully taken into account in tax matters, and to ensure universal participation of countries in tax matters and accountability of the member countries of the Convention,
    - Alignment **of global tax governance with other government commitments and obligations,** in particular those related to human rights, the UN Sustainable Development Goals, gender equality, and climate and biodiversity protection.

3. **Ensure that other initiatives on international taxation, particularly those promoted by France, align with the UN Framework Convention process** and do not seek to divert or weaken its framework and ambition.

4. **Use its G7 presidency in 2026 by relaying the demands of Global South coutries for structural reforms of the global economic and financial system,** in universal multilateral negotiation frameworks, particularly in tax matters. France must use this G7 in particular to **recognize the dysfunctional nature of the current international tax system and its inability to guarantee a fair and equitable distribution of wealth in the world,** and **to express a clear political support** for the negotiationof a binding and ambitious United Nations Framework Convention on International Tax Cooperation.

5. **To ensure that taxing rights or tax revenues from new taxes** under this Convention, including taxes on large fortunes and taxes related to the environment**, are equitably distributed among countries** and dedicated to **reducing inequalities** between and within countries, to achieving **the goals of sustainable development,** climate **justice** and the protection and **promotion of human rights.**

Find all the proposals of civil society in the Catalogue of proposals for articles for the new United Nations Framework Convention on International Tax Cooperation coordinated by the Global Alliance for Tax Justice (GATJ) in 2025, in which CCFD-Terre Solidaire participated.

ENDNOTES

1. The Global Alliance for Tax Justice (GATJ),
an umbrella South-led organization on global tax justice, of which CCFD-Terre Solidaire is a member
2. The State of Tax Justice Network
Tax Justice Network, 2024
3. A UN Tax Convention? Exploring the merits and feasibility of a new international convention on tax and financial transparency,
Norwegian Academy of International Law, 2022
4. The fortune of billionaires in the world has more than doubled in ten years
Les Echos, 2024
5. The art of taking without undertaking - The injustice of poverty in the face of undeserved wealth resulting from colonialism
Oxfam France, 2025
6. The State of Tax Justice Network
Tax Justice Network, 2024
7. Resolution 77/244 Promoting inclusive and effective international cooperation in tax matters at the United Nations, United Nations General Assembly, 2022
8. Resolution 78/230 Promoting inclusive and effective international cooperation in tax matters at the United Nations, United Nations General Assembly, 2023
9. https://financing.desa.un.org/sites/default/files/2025-01/n2501015_F.pdf
10. Intergovernmental Negotiating Committee for a United Nations Framework Convention on International Tax Cooperation
11. Make polluters pay Proposal for a surtax on fossil fuel industries' profits, Eurodad & GATJ, 2025
12. Latindadd, Latin American and Caribbean Network for Economic, Social and Climate Justice, partner of CCFD-Terre Solidaire
12. AIDC, Alternative Information & Development Center, South African partner of CCFD-Terre Solidaire
14. Joint submission of civil society and trade unions on the draft text of the Framework Convention, published on 24 October 2025
15. Catalogue of Proposed Articles for the New United Nations Framework Convention on International Tax Cooperation,
Global Alliance for Tax Justice (GATJ), 2025
16. Submission of France to the Negotiating Committee, Workstream I – Co-Leads' Draft Issues Note, July 2025
17. Submission of France to the Negotiating Committee, Workstream I – Co-Leads' Draft Issues Note, October 2025
18. Profile of France, Tax Justice Network, 2026
19. Shift or Share? Profit Shifting and Workers' Profit-Sharing, EU Tax Observatory, 2025
20. Finance Bill for 2025 , Ministry of Action and Public Accounts, 2025
21. The Missing Profits of Nations , Thomas Tørsløv, Ludvig Wier & Gabriel Zucman, 2022
22. Annex to the Finance Bill for 2026 , Ministry of Action and Public Accounts, 2025

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