

Proposed CDTA partners to be accorded with priority

Jurisdictions		Reasons for the need to accord priority to the proposed jurisdiction
1	Australia	<ul style="list-style-type: none"> • Australia reduced withholding tax on dividends and other distributions. • A CDTA is important to provide clarity on rules around permanent establishments and facilitate talent movements between Australia and Hong Kong. This issue manifested in situations such as Covid-19 and in response, the ATO provided specific guidelines to address the Covid-19 situation. Taxpayers would require similar guidance in other non-Covid situations via a CDTA. • Welcome any efforts by IRD to ensure: <ul style="list-style-type: none"> ○ A consistent application process for certificates of residence. ○ That treaty partners honor the provisions of the existing treaty network for eligible Hong Kong residents. • One of Hong Kong's top 20 principal trading partners in 2019.
2	Singapore	<ul style="list-style-type: none"> • Singapore is important due to the increasing cross-border services and investment. • It could provide treaty protection for Hong Kong funds, employees and firms independent of the comprehensive Singapore rules. • One of Hong Kong's top 20 principal trading partners in 2019.
3	USA	<ul style="list-style-type: none"> • USA reduced withholding tax on dividends and interest. • Welcome any efforts by IRD to ensure: <ul style="list-style-type: none"> ○ A consistent application process for certificates of residence. ○ That treaty partners honor the provisions of the existing treaty network for eligible Hong Kong residents. • One of Hong Kong's top 20 principal trading partners in 2019.
4	Taiwan	<ul style="list-style-type: none"> • One of Hong Kong's top 20 principal trading partners in 2019.
5	Philippines	<ul style="list-style-type: none"> • One of Hong Kong's top 20 principal trading partners in 2019.
6	Other selected African jurisdictions	<ul style="list-style-type: none"> • Enhancing HK as a regional gateway for China's investments and trades with African nations. To make this case, though HK would need to have a number of jurisdictions covered.

Other views (if any):