



**By Fax (2179 5848) & By Hand**

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Ms. Shirley Kwan  
Financial Services and the Treasury Bureau  
24/F, Central Government Offices  
2 Tim Mei Avenue  
Tamar  
Hong Kong

Dear Shirley,

**Potential Partners for Comprehensive Avoidance of Double Taxation Agreement and Tax Information Exchange Agreement**

Thank you for inviting the views of the Hong Kong Institute of CPAs on jurisdictions which the Hong Kong SAR Government should approach for negotiations on comprehensive avoidance of double taxation agreements or tax information exchange agreements (CDTA/ TIEA). We welcome this regular channel of communication with the business community, to provide feedback on potential treaty partners and priorities for specific negotiations.

Please find attached the Institute's current suggestions of potential partners and priorities. Our suggestions are mainly for CDTA negotiations, unless otherwise indicated. Where Hong Kong has concluded a TIEA with a particular jurisdiction, we believe that the government should continue its efforts to pursue a CDTA, where this is desirable, such as with the United States.

If you have questions please feel free to contact me on 22877084 or at [peter@hkicpa.org.hk](mailto:peter@hkicpa.org.hk)

Yours sincerely,

Peter Tisman  
Director, Advocacy and Practice Development

PMT/EC/sc  
Encl.

**Proposed Potential CDTA/TIEA Negotiation Partners**

<b>Jurisdictions</b>		<b>Priority (High / Medium / Low)</b>	<b>Any particular reasons for the need of a CDTA/TIEA</b>
1	Singapore	High	Facilitate intra-regional trade.
2	Australia	High	Major trade and investment relationship with Hong Kong.
3	Taiwan	High	Major trade and investment relationship with Hong Kong.
4	USA	High	Major trade and investment relationship with Hong Kong
5	Macau	Medium	Close business ties with Hong Kong
6	Turkey	Medium	Close business ties with China and Hong Kong can be used to facilitate outbound investment.
7	Other European countries: Greece, Norway (shipping)	Medium	Close business ties with China and Hong Kong can be used to facilitate outbound investment.

8	Other Asian countries: Cambodia, Myanmar, Laos	Medium	Facilitate intra-regional trade.
9	India	Medium	Growing economy with significant trade and investment relationship with Hong Kong and China
10	Brazil		Business ties with China and Hong Kong can be used to facilitate outbound investment.
11	African countries: Nigeria, Algeria, Egypt Ethiopia, Angola, Guinea and Congo, and West African countries	Medium	Close business ties with Mainland China, and Hong Kong can be used to facilitate outbound investment.
12	Cayman Islands, British Virgin Islands and Bermuda	Medium	Facilitate tax administration - Many Hong Kong listed companies are incorporated in Cayman Islands BVI, and Bermuda and BVI is a common location for setting up companies. In these cases, possibly TIEAs would suffice.

Other views (if any):