


Tax Commitments in the *Compromiso de Sevilla* – Critical Issues in Financing for Development

María Amparo Grau Ruiz

PhD, Professor, Financial and Tax Law, Faculty of Law, Complutense University of Madrid; Principal Investigator in the project DEVELOPING SUSTAINABILITY (FEI-EU-2023-02); correspondence address: Av. Complutense s/n, 28040 Madrid, Spain; e-mail: graurui@ucm.es

 <https://orcid.org/0000-0002-0482-2816>

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Abstract: Crucial financial topics have been debated during the latest International Conference on Financing for Development. After taking stock of different stakeholders' input, their contributions within the tax field are systematized, and the outcome document is critically assessed. The renewed framework for Domestic Resource Mobilization (DRM) comprises stronger tax policies and administrations, tax reforms based on smart use of context-specific data, and the improvement of specific categories of taxes. It addresses progressivity, solidarity and international tax cooperation, taking into consideration human rights. African countries have relied on their own efforts to strengthen DRM capacity but call for support in the fight against illicit financial flows. They are simultaneously working collectively to shape the UN Framework Convention on International Tax Cooperation and its protocols. In any reconfiguration of the domestic or international financial architecture, the oversight by audit institutions should be reinforced. Despite wishes to quickly put into practice several commitments with The Sevilla Platform for Action, the *Compromiso de Sevilla* may fall short regarding taxation.

1. Introduction

A recent UN SDG Progress Report shows that “extreme poverty rates have risen beyond pre-2019 levels, hunger has regressed to 2005 levels, and the financing gap for the [Sustainable Development Goals] SDGs has ballooned

from a pre-pandemic estimate of \$2.5 trillion to at least \$4.2 trillion annually.”¹ The 4th International Conference on Financing for Development (FfD4) has been held from June 30th to July 3rd, 2025, in Seville, Spain – building on the foundations laid by the Monterrey Consensus in 2002, the Doha Declaration in 2008, the Addis Ababa Action Agenda in 2015 and the Pact for the Future in 2024.²

Many tax issues have been debated in both special and side events. The following pages try to review the main contents in the agenda that have deserved attention from the stakeholders involved in taxation (tax officials, academia, representatives of non-governmental organizations, among others). This is an attempt at systematizing and critically assessing some of their contributions.³

2. A Renewed Framework for Domestic Revenue Mobilization

Since the Addis Ababa Action Agenda⁴ was adopted ten years ago, the Addis Tax Initiative (ATI) has driven political momentum for DRM, advancing the implementation of this Agenda and fostering cooperation to strengthen tax systems. ATI has proposed the introduction of the “Seville Declaration on Domestic Revenue Mobilization”⁵ in support of the SDGs. This Declaration outlines new commitments to advance fair and effective DRM with progressive fiscal systems, policy coherence, and reinforce the social contract between governments and their citizens through collaborative partnerships

¹ “Inter-Agency Task Force on Financing for Development, Financing for Sustainable Development Report 2024: Financing for Development at a Crossroads,” United Nations, New York, 2024, accessed July 28, 2025, <https://desapublications.un.org/file/20487/download>.

² According to the closing press release, there have been over 15,000 participants, including around 50 Heads of State and Government, and more than 470 side and special events, alongside the International Business Forum, the SDG Investment Fair, and the Sevilla Platform for Action.

³ The following section is based on the public information made available in the Conference app with the announcements of all the events (that included several items: abstract, description, objectives, expected outcome, program, etc.). Here, specifically, those related to important topics in taxation are analyzed, irrespective of their chronological order.

⁴ UNGA Resolution 69/313 of July 27, 2015, on the Addis Ababa Action Agenda of the Third International Conference on Financing for Development.

⁵ “Seville Declaration on Domestic Revenue Mobilisation,” ATI, accessed July 28, 2025, <https://addistaxinitiative.net/sites/default/files/resources/ATI%20Seville%20Declaration%20on%20DRM.pdf>.

and knowledge-building. The International Tax Compact (ITC)⁶ with the ATI Steering Committee and the co-hosting countries and organizations – such as the South Centre, Germany, Nigeria, Ghana and Senegal – have encouraged its endorsement by various countries and stakeholders – irrespective of them being ATI members.

2.1. Stronger Tax Policies and Administrations

The International Monetary Fund, the Organization for Economic Cooperation and Development (OECD), the United Nations (UN) and the World Bank Group joined efforts with the Platform for Collaboration on Tax (PCT) to strengthen public financing for sustainable development. At the FfD4, they have pointed out that improving tax revenues remains the most viable long-term strategy to cover SDGs spending needs, particularly in the recent context where Official Development Assistance (ODA) is declining, and international trade and investment patterns are increasingly uncertain. This Platform has recommended building on progress made since Addis to further strengthen tax policy and administration for an effective and equitable DRM. The PCT has also stressed that a significant number of developing countries remain with a tax-to-GDP ratio below 15% – which is definitively important for development and growth. It has highlighted some of its contributions regarding the Medium-Term Revenue Strategy or tax incentives, and the power of cooperative approaches to help countries build tax capacity.

In 2025, several processes in the UN are converging and inequality is generally perceived as a major barrier to tackling global challenges. But it is not inevitable. Best practices and policy innovations targeting the reduction of domestic and global inequalities have been discussed (e.g., concrete strategies that can expand fiscal space for inclusive growth and protect vulnerable populations). It is stressed that the Ministries of Finance have a role in advancing policies to enhance equitable wealth distribution, strengthen social safety nets, and ensure sustainable economic resilience. Progressive taxes and targeted taxing of high-net-worth individuals and investing in social protection systems are seen as potential solutions.

⁶ The ITC, implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit, GIZ, GmbH, acts as the secretariat of the ATI.

2.2. Tax Reforms Based on Smart Use of Context-Specific Data

UNU WIDER has highlighted that in the next decade the nexus between data and capacity development around information technology (IT) systems can support evidence-based policymaking related to fiscal systems and DRM. Low- and middle-income countries face an enormous financing challenge to meet the goals of the 2030 Agenda,⁷ but data and digital capacity have a transformative potential. Many developing countries have already invested in IT systems that have generated vast amounts of administrative data. Their extensive use may produce useful insights for governments to improve policy design and evaluation for smarter, context-specific tax reforms. Some practical experiences with scalable data-driven models to measure the performance of DRM employing artificial intelligence and machine learning were shared.

2.3. Improvement of Specific Categories of Taxes

In the development finance sector, the trends of reduced funding from multilateral and bilateral donors globally have amplified the need for domestic resources, and the idea of leveraging of specific categories of taxes to better connect to resourcing and strengthening health system needs has arisen. The World Health Organization (WHO) and Development Gateway envision a way forward to improve tobacco tax policy in DRM for health system financing and to close the funding gap. The WHO has estimated that if all countries enacted an increase in tobacco taxes by 50% per pack, governments would earn an extra \$101 billion in revenue. But they should review tax rates and ensure their effective administration. In this area, evidence-driven tax policies may help raise funds for investments in health services, data, and key systems that deliver better health outcomes for citizens.

2.4. Progressivity, Solidarity and International Tax Cooperation

The widening financing gap for sustainable development is intensifying inequalities within and between countries. Tax revenue is pictured as the most sustainable source of financing for development, including as

⁷ UNGA Resolution 70/1 of 25 September 2015, Transforming our world: The 2030 Agenda for Sustainable Development.

a source of revenue for public services such as education, healthcare and environmental protection. International cooperation on mobilization of domestic public resources, including promoting fair taxation and democratic transparency, makes up a central part of the agenda in the Financing for Development process.

Strengthening international tax cooperation to advance fairer and progressive tax systems can mobilize new and additional resources to bridge it. At the COP28, the Global Solidarity Levies Coalition launched by France, Kenya and Barbados sought to mobilize resources for climate action and sustainable development. During the FfD4, the Brazil-Europe Dialogue on International Tax Cooperation and Solidarity for Climate Action and Sustainable Development explored the policy proposal on ultra-high-net-worth individuals,⁸ innovative levies and other fiscal tools aligned with principles of climate and social justice.

On the basis of several UN General Assembly resolutions,⁹ the Terms of Reference for a UN Framework Convention on International Tax Cooperation (UNFC) and two early protocols, to be finalized by the end of 2027, were adopted. In 2025, the Intergovernmental Negotiating Committee (INC) has started preparing these texts.

These Terms of Reference¹⁰ make it clear that the UNFC will include intergovernmental commitments on international tax cooperation for sustainable development that are related to other issues that have also come up in the FfD4 negotiations (e.g., equitable taxation of MNCs; effective taxation of high-net worth individuals; transparency and prevention of illicit financial flows (IFFs), including tax evasion and avoidance). Besides, it has been discussed how to incorporate cross-cutting issues such as human rights, gender equality, and environmental protection.

⁸ In 2024, Brazil, under its G20 presidency, introduced a proposal for the taxation of ultra-high-net-worth individuals – estimating that it could generate \$250 billion annually.

⁹ UNGA Resolution 77/244 of December 30, 2022; UNGA Resolution 78/230 of December 22, 2023, and UNGA Resolution 79/235 of December 24, 2024, on the promotion of inclusive and effective international tax cooperation at the United Nations.

¹⁰ María Amparo Grau Ruiz, “The United Nations Framework Convention on International Tax Cooperation in the Making. Debate and Approval of its Terms of Reference,” *Crónica Tributaria* 195, no. 2 (2025): 37–65, <https://dx.doi.org/10.47092/CT.25.2.2>.

2.5. Consideration of Human Rights

DRM to finance development needs to be rethought in the light of human rights. During the 58th session of the Human Rights Council, the Member States issued a joint declaration linking human rights and inclusive international tax cooperation.¹¹

International coordination for DRM can advance both social welfare and environmental resilience. The Skatteforsk – Centre for Tax Research has moderated a debate on bridging the global financing gap for shared prosperity with rights-based universal social protection floors, equitable healthcare, quality education, and the sustainable management of natural resources, and climate action, through progressive taxation measures – like wealth taxes, and global solidarity mechanisms. There are questions as to what extent international tax reforms and multilateral agreements can bolster DRM, and whether they compromise bold national actions.

Indeed, international human rights law mandates governments to raise and deploy the maximum of their available resources to realize rights. Governments should cooperate to create the enabling environment to meet their human rights obligations.

Since 2023, the UN High Commissioner for Human Rights has advocated for a “human rights economy”¹² to align economic policymaking with international human rights standards, including for the fulfillment of economic, social, and cultural rights (ESCR). A human rights economy, grounded in international human rights norms and standards, obviously engages policy questions related to tax with a focus on the realization of all people’s rights. The Committee on Economic, Social and Cultural Rights has issued a Statement in 2025¹³ emphasizing the role of equitable tax

¹¹ Resolution 58/7, The negative impact of the non-repatriation of funds of illicit origin to the countries of origin on the enjoyment of human rights, and the importance of improving international cooperation, adopted by the Human Rights Council on April 2, 2025, A/HRC/RES/58/7.

¹² Statement delivered by Volker Türk, UN High Commissioner for Human Rights at the 75th anniversary of the Universal Declaration of Human Rights, April 20, 2023, accessed July 28, 2025, <https://www.ohchr.org/en/statements-and-speeches/2023/04/statement-un-human-rights-chief-human-rights-economy>, and The Human Rights Economy Discussion Paper, <https://www.ohchr.org/sites/default/files/documents/issues/sdgs/hre-discussion-paper-en.pdf>.

¹³ E/C.12/2025/1: Committee adopts Statement on Tax Policy and the International Covenant on Economic, Social and Cultural Rights, February 28, 2025, accessed July 28, 2025,

policies in fulfilling ESCR, urging States to adopt progressive taxation and combat tax evasion to fund rights-based development. There is a call for financing strategies that prioritize the dignity, equality, and empowerment of all people, particularly those most marginalized.

3. Special Focus on Africa

3.1. Own Efforts to Strengthen Domestic Resource Mobilization Capacity

When turning commitments into impact, Africa is carefully assessing the path to sustainable financing through DRM. Africa alone faces an annual sustainable financing gap of \$194 billion, equivalent to 7% of the continent's GDP (Africa's Development Dynamics 2023). African governments rely on DRM for over 70% of their budgets and there is room for improvement. For example, VAT, according to the African Tax Outlook (ATO),¹⁴ contributes about 35% of African revenue and is inefficiently collected in more than half of the continent, with VAT efficiencies below 50%.

The African Tax Administration Forum (ATAF), since its foundation in 2009, has supported over 60 tax reforms across Africa. It has learnt lessons on strengthening DRM capacity from legislative and administrative reforms, and has facilitated the mobilization of \$2.3 billion in additional tax revenue through country specific support to its 44 member countries. ATAF has explored practical solutions: taxing the informal sector, modernizing tax administrations to serve a youthful digital economy, combating IFFs to curtail leakage of vital resources, and advancing tax equity. It acknowledges that FfD4 could not come at a more pivotal time, because its commitments to domestic public resources, including tax equity, informal economy taxation, health taxes, climate financing, and capacity building, must translate into transformative action. There is hope in the efforts to combat IFFs, through focused implementation of multistakeholder solutions, that will lead to the mobilization of domestic resources for development.

<https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=8R9thMaEFoSDwmWVuBCLvBLEjKJdxFdIcHNFjD%2FTM2XRPPaJykvzqHL0js1UApw2QzTnLr8iqHmZoA1Luds9qQ%3D%3D>.

¹⁴ "African Tax Outlook – 2023 Edition," ATAF, accessed July 28, 2025, https://events.ataftax.org/index.php?page=documents&func=view&document_id=243.

3.2. The Call to Support the Fight against Illicit Financial Flows

Africa needs to mobilize an estimated \$1.3 trillion annually to achieve the SDGs by 2030, as outlined in the UN Agenda 2030 and the African Union's Agenda 2063 (The Africa We Want). Nowadays, traditional financing tools like Foreign Direct Investment and ODA alone are no longer sufficient to meet Africa's development goals, so additional strategies for expanding Africa's fiscal space are being searched. Although the 10-year anniversary of the Mbeki Report is approaching, IFFs still drain significant resources from Africa each year. In the current landscape, there is a clear need to strengthen the IFFs measurement systems by harmonizing monitoring frameworks,¹⁵ improving cross-border data coordination for decision-making, and tackling the systemic enablers of tax abuse and capital flight.

South Africa's G20 presidency offers an opportunity to reset the African-European financial cooperation on sustainable development. The Africa-Europe Foundation has hosted a high-level dialog to deepen sustainable cross-continental financial cooperation and to showcase African solutions to combat IFFs and Europe's contributions including through the Team Europe Initiative on Combatting IFFs and Transnational Organized Crime. It has also highlighted the chance for joint action between European and African Member States to drive momentum toward the UNFC. There have been discussions on how Europe can formulate a more visible agenda on IFF and fair global taxation, and what role Europe should play in supporting African leadership on IFFs and DRM financially, technically, and politically.

3.3. Ongoing Collective Action in the Continent to Shape the UN Framework Convention on International Tax Cooperation and Its Protocols

Continuing its work under the mandate received from the Specialized Technical Committee on Finance, Monetary Affairs, Economic Planning and Integration in the Tunis Ministerial Declaration, the African Union and its partners – ATAF, the United Nations Economic Commission for Africa and

¹⁵ Considering the UNCTAD-UNODC Conceptual Framework for the statistical measurement of IFFs and its definition. UNCTAD is the Custodian of SDG 16.4.1 on IFFs. Africa-Europe Foundation, the African Union Development Agency, and the UN Economic Commission for Africa provide coordination and technical support.

the Tax Justice Network Africa – updated the stakeholders on the ongoing reform of the global tax governance framework at the United Nations. Their main purpose was to obtain feedback, identifying pitfalls and solutions, to strengthen the continent’s collective position in the negotiation.

They reflected on the challenges and strategies to be implemented by the African nations to amplify Africa’s influence on global tax governance and collectively advocate for their priorities for equitable tax cooperation. According to the organizers, “the reform of international tax cooperation is a critical issue for African countries, as it addresses the challenges of tax evasion, tax avoidance through profit shifting by MNCs [multinational corporations], illicit financial flows, and the unfair distribution of taxing rights.” They made a call to AU Member States and African stakeholders to provide inputs to this UNFC and related protocols, addressing resource constraints, political will and effective coordination.

4. Oversight as a Cornerstone in Any Reconfiguration of the (Inter)National Financial Architecture

Public audit and accountability are often keys to unlocking new resources. The International Organization of Supreme Audit Institutions (INTOSAI) Development Initiative, the Government of Ireland with Irishaid and Global Affairs Canada timely underlined how Supreme Audit Institutions (SAIs) contribute to closing financing gaps (e.g., by facilitating better use of existing domestic public resources). In fact, SAIs report on public resources of a country and enable Parliaments and citizens to hold governments accountable.

When governments need to accelerate DRM and identify new ways of investing, they must do so in a transparent way. SAIs work increases value for money and helps them better their spending – in turn leading to more available resources for citizens. SAIs usually make recommendations on how governments could use their domestic resources better or improve the delivery of public services. They advise on the strengthening of the financial management of the country, through effective procurement, tax collection and debt management, in order to make progress on the SDGs. However, SAIs can provide assurance not only on use of public domestic funds, but also on international assistance ones.

It is worth noting that, due to the negative trends in ODA volume, ensuring that available finances benefit as many as possible is becoming more important for countries relying on external financial support. SAIs can inform national governments and their international partners on where efforts need to be focused to reduce risks to good governance, and whether development assistance is being spent effectively, and leading to the intended results. In addition, they can assess the effectiveness of funds channeled to external providers for development programs, and parts of financial reform packages.

Since 2010 the INTOSAI-Donor Cooperation has been supporting SAIs in developing countries. This partnership between the 195 national members of INTOSAI and 23 donor organizations advocates for strengthening public sector audit as part of public financial management (PFM) and good governance. SAIs play a crucial role in the accountability chain on a country and global level. This is intrinsically linked to the relevant issue of public trust (e.g., when it affects tax management).

To correctly implement the commitments of FfD4, SAIs should be in a good institutional position to provide oversight on development support, DRM, public expenditure and anti-corruption efforts with prevention and investigation through audits and sanctioning. They should be allowed to provide external and independent information that can help inform the progress of sustainable financing.

5. The Sevilla Platform for Action

With the aim of turning political promises into action, there has been an attempt to begin implementing the Sevilla Commitment during the FfD4. This pragmatic approach has been articulated through The Sevilla Platform for Action.¹⁶ Among the 130 initiatives launched over four days, some included actions to strengthen tax systems and DRM.

Apart from the two initiatives mentioned above – one devoted to enforcing the effective taxation of high-net-worth individuals, and the other with the Addis Tax Initiative’s Seville Declaration on DRM – a couple of new coalitions have emerged. A Coalition for Global Solidarity Levies – led

¹⁶ “Sevilla Platform for Action,” UN DESA, accessed July 28, 2025, <https://financing.desa.un.org/ffd4/sevilla-platform-action>.

by France, Kenya and Barbados, supported by Benin, Somalia, Zambia and Spain – aims at the collection of new revenue by taxing premium-class flying and private jets to raise funds for climate action and sustainable development. Another Coalition for Tax Expenditure Reform has been propelled by the International Institute for Sustainable Development.

The OECD and the United Nations Development Programme (UNDP) have presented their shared initiative Tax Inspectors Without Borders (TIWB) 2.0 for a more targeted, peer-driven model of tailored technical assistance and institutional strengthening of both host and partner administrations, expanding into new areas of support (e.g., IFFs). Since TIWB was launched in 2015, it has enabled countries to mobilize an additional \$2.4 billion in revenue, of which \$1.91 billion has been raised across Africa alone. It has delivered \$125 in additional revenue for every \$1 invested.¹⁷

6. The Outcome Document of the Fourth International Conference on Financing for Development

A look into section II.A. of the Sevilla Commitment entitled “Domestic public resources” reveals that

mobilizing additional domestic public resources and ensuring their effective and efficient use for sustainable development impact will require **decisive national action to strengthen fiscal systems, promote their progressivity**, build long-term financial resilience, and align them with sustainable development, including through the use of data and statistics to inform decisions.¹⁸

In a globalized and increasingly digitalized world,

domestic efforts must be **complemented** by international cooperation, including through **inclusive and effective international tax cooperation, improved capacity to collect revenues and robust measures to prevent and combat tax evasion, illicit financial flows and corruption** (Para. 26).

¹⁷ OECD-UNDP, *Tax Inspectors Without Borders Annual Report 2025: Ten Years of Hands-on Assistance in Developing Countries* (Paris: OECD Publishing, 2025), <https://doi.org/10.1787/e9762366-en>.

¹⁸ In this section, emphasis will be added by **bolding** the wording in different paragraphs on the relevant topics previously analyzed.

To ensure that countries have the necessary **resources**, and that they are **collected and spent transparently and efficiently**, the countries commit to **strengthening tax systems and ensuring transparency and accountability** in PFM, taking a whole-of-government approach. They encourage enhanced supreme audit institutions and parliamentary oversight. In particular, **oversight and management of tax expenditures**, including through transparent tax expenditure **reporting**. The **broadening of the tax base** and continuing efforts to integrate the informal sector in a socially inclusive way into the formal economy – **easing tax registration**, reducing the cost of compliance, and providing appropriate incentives – especially to support micro-, small- and medium-sized enterprises, are also encouraged.

The countries will promote progressive tax systems and enhance efforts to address tax evasion and avoidance by **high-net-worth individuals**. They encourage effective taxation of **natural resources** that optimize domestic revenue. They will advance discussion on **gender** responsive taxation and build capacity to identify and address gender biases within tax systems. To promote the consideration of the environment, biodiversity, climate, disaster risk, food security, nutrition, and sustainability of agrifood systems, they may consider taxes on **environmental** contamination and pollution, and taxes on **tobacco and alcohol**.

There is an agreement to scale up demand-based institutional, technological, and human **capacity-building support** to developing countries for fiscal systems and DRM, through strengthening tax policy, tax and customs administrations. This could be achieved through digitalization to allow simplification. They call on “development partners to collectively at least double this support to developing countries by 2030. This increase should be targeted at developing countries aiming to increase tax-to-GDP ratios, especially those seeking to increase their ratios to at least 15 per cent” (Para. 27. n)).

To ensure that **international tax cooperation** is fully inclusive and effective, and beneficial to all, the countries adopting the *Compromiso* will provide developing countries with demand-based technical assistance and capacity building programs. They will engage constructively in the negotiations on the UNFC and its protocols.

They have added: “We will (...) take note with appreciation the work of the United Nations’ **Committee of Experts on International Cooperation**

in Tax Matters, including its subcommittees.” They also “recognize the ongoing implementation of Pillar Two of the **OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting**” and call for country-based specific technical support to interested Member States in implementing the Global Anti-Base Erosion Model Rules and the Subject to Tax Rule. They will make sure that all companies pay taxes to the Governments of countries where economic activity occurs and value is created, and will enhance tax transparency, while ensuring data protection and information security. **Country-by-country reporting** will be strengthened and the creation of a central public database for the reports evaluated. They commit to enhance **beneficial ownership transparency** and information exchange among national beneficial ownership registries, considering the feasibility of a global registry, and to help developing countries in implementing the transparency standards (Para. 28).

They will promote measures to **eliminate safe havens, aggressive tax practices, and loopholes**. Additionally, they will take effective steps to prevent IFFs from entering their jurisdictions and will strengthen the **capacity of customs administrations** for their detection. They will enhance accurate and timely trade data exchange to address **smuggling** of commercial goods and trade **mis-invoicing**, and support developing countries to upgrade technology in their ports (Para. 29).

In section II.B on “Domestic and international private business and finance,” the **need for policy frameworks and incentives for private investment**, at the national and global levels, that promote sustainable development is underlined. Countries will address regulatory obstacles and provide incentives for foreign direct investment in developing countries aligned with their sustainable development plans (Para. 31).

To ensure that development partners’ policies strengthen development cooperation, **tax exemptions on government-to-government aid** will be reduced on a voluntary basis (Para. 39. g)). They will support developing countries in using technologies including through, *inter alia*, **incentives or conditions** linked to research and development, procurement or other funding and regulatory policy measures (Para. 59. d)).

7. Final Remarks

Many of the events of the FfD4 have taken stock of the achievements in advancing efforts by some Member States, international institutions and civil society organizations. In this sense, the work done to achieve the mainstreaming of the Social and Solidarity Economy (SSE) in the Financing for Development may be an example. This has been shown by the Intercontinental Network for the Promotion of Social Solidarity Economy (RIPESS),¹⁹ the Global Fund for Cities Development and the United Nations inter-agency Task Force on the Social and Solidarity Economy (UNTFSSSE),²⁰ in collaboration with the Ministry of Labor and Social Economy of Spain, the Special Administrative Unit of Solidarity Organizations of the Ministry of Labor of Colombia and the Iberoamerican Network of Governments for the Social and Solidarity Economy.

The Resolution 77/281 on Promoting the social and solidarity economy for sustainable development, adopted in 2023, was followed in 2024 by the UNGA Resolution 79/213, that contains an SSE development financing mandate. It calls on member States to facilitate access for social and solidarity economy entities to financial services and funding, and capacity-building; and “encourages multilateral, international and regional financial institutions and development banks to support the social and solidarity economy, including through existing and new financial instruments and mechanisms adapted to all stages of development”.

In this vein, the final FfD4 outcome document, the *Compromiso de Sevilla* reads: “We will (...) facilitate the growth of micro, small and medium enterprises (MSMEs), cooperatives and social and solidarity economy”

¹⁹ “Implementing UN Recommendations on Social and Solidarity Economy Financing: Proposals for a Generic Intermediary Organizational Approach,” RIPESS Working Paper, accessed July 28, 2025, <https://www.ripest.org/wp-content/uploads/2025/07/RIPESS-proposal-intermediary-mechanism-FfD4postscript-EN-1.pdf>.

²⁰ “Financing for Development: Unlocking the Potential of the Social and Solidarity Economy,” UNTFSSSE, accessed July 28, 2025, https://unsse.org/wp-content/uploads/2025/05/En_UNTFSSSE-Policy-brief_Financing-for-development_Unlocking-the-potential-of-the-social-and-solidarity-economy.pdf. UNTFSSSE, “Strengthening Access to Finance and Support for SSE Entities: A Collection of Good Practices,” report prepared by the Technical Working Group on Financial Access and Support for SSE entities, accessed July 28, 2025, <https://unsse.org/wp-content/uploads/2025/05/RIPESS-Press-release-A-Call-to-Recognize-and-Mainstream-the-Social-and-Solidarity-Economy-in-the-FfD4-1.pdf>.

(Para. 21, section I. A renewed global financing for development framework). “We encourage support for social and solidarity economy entities including access to tailored financial and non-financial assistance from local, national, and international financial institutions” (Para. 32. h), section II. B. Domestic and international private business and finance). “We also encourage MDBs [Multilateral Development Banks] and other development institutions to work as a system through enhanced cooperation and coordination with national development banks, in support of national priorities and plans” (Para. 30. b), section II.A. Domestic public resources). Sadly, the SSE demand of “fiscal” incentives is not explicitly contemplated in the final text, despite its unequivocal inclusion in former substantive UNGA Resolutions on SSE.²¹

It remains to be seen whether the statement made at closing press release comes true: that the FfD4 “delivers renewed hope and action for sustainable development.” The following global interactive map published by the SDG Transformation Center²² offers an overview of the propensity of the UN Members States to ratify UN Treaties, and it is relatively limited.

²¹ Giulia Boletto and María Amparo Grau Ruiz, “A New Bottom-Up Perspective in International Tax Cooperation for Sustainable Development,” *Revue Européenne et Internationale de Droit Fiscal*, no. 4 (2023): 473. María Amparo Grau Ruiz and Giulia Boletto, “International Financial and Tax Cooperation to Support Sustainable Development: Solidarity Reinterpreted,” *Rivista di Diritto Tributario Internazionale*, no. 1 (2025): 67–101. María Amparo Grau Ruiz, “Impulso tributario a las entidades de la economía social en el ámbito interno e internacional,” in *Fomento de la Economía Social: Instrumentos Fiscales y de Políticas Públicas. Administración pública y economía social: aliados para una prosperidad inclusiva*, eds. R. Chaves Ávila et al. (Valencia: CIRIEC, 2024), 215–26, accessed July 28, 2025, <https://ciriec.es/novedades-bibliograficas/fomento-de-la-economia-social-instrumentos-fiscales-y-de-politicas-publicas-la-administracion-publica-y-la-economia-social-aliados-para-una-prosperidad-inclusiva/>.

²² The Sustainable Development Solutions Network has tried to measure countries’ support to UN-based multilateralism through indicators, focusing on the UN Treaties ratified, or countries’ votes at the UNGA aligned with the vote of the international community, including timeseries. See: SDG Transformation Center, accessed July 28, 2025, <https://dashboards-unmi.sdgindex.org/map/indicators/percentage-of-un-treaties-ratified/cross-sectional>. However, despite the proclivity to sign multilateral conventions, sometimes the high number of reservations (like the ones on mutual assistance for the collection of taxes) may become an obstacle in policy implementation. Meanwhile, initiatives like TIWB could be supplemented with specific cooperation among tax enforcement officials as well.

One could easily guess that in more sensitive matters, like those involving taxation, their proclivity to do so probably diminishes.

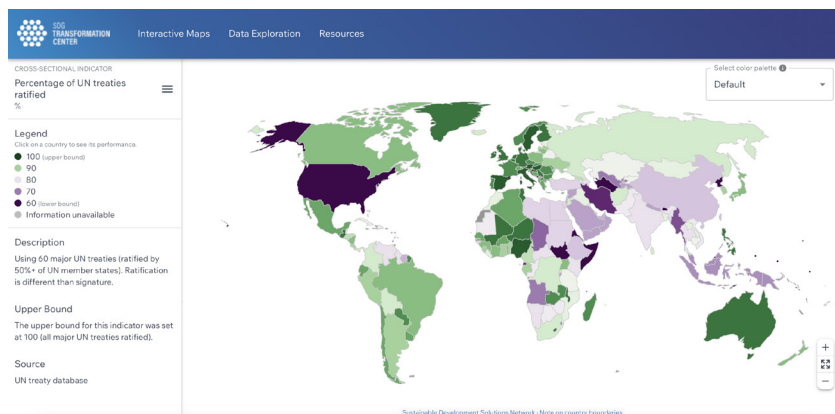


Fig. Percentage of UN treaties ratified. (SDG Transformation Center, accessed July 28, 2025, <https://dashboards-unmi.sdgindex.org/map/indicators/percentage-of-un-treaties-ratified/cross-sectional>.)

Member States have agreed to ensure that **deliberations of the special meeting of the Council on international cooperation in tax matters will be taken into account by the Forum** on an appropriate cycle to strengthen the follow-up process on Financing for Development, including the *Compromiso de Sevilla*; enhance monitoring and global policy coherence; and reinforce links to regional and national-level action, without creating significant new burdens (Para. 65, b)). However, in our opinion, the discourse remains basically unchanged in tax matters, although there is room for going further with innovative extra fiscal approaches with bottom-up strategies.

As suggested in the 2024 Financing for Sustainable Development Report, reform strategies need to bring together various government agencies involved in tax policy design and implementation, taxpayers and civil society engaging with the tax system and, if relevant, external development partners supporting tax reforms – bearing in mind that, when they affect distribution and incentives, social consensus is critical. International tax

cooperation should be oriented towards the respect of ability to pay, redistributive and redistributive principles to expand the fairness of the national tax systems constitutionally designed to the bilateral, regional or multilateral legal instruments now being devised.

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