

US Senators Endorse US-Taiwan Legislative Package on Double-Tax Relief

30 November 2023

Report from IBFD Tax Treaties Unit

On 29 November 2023, bipartisan Senate Finance and Foreign Relations Committee members and the House Ways and Means Committee announced they have come to an agreement on a legislative package concerning the US-Taiwan Expedited Double-Tax Relief Act (USTEDRA) and the US-Taiwan Tax Agreement Authorization Act (Authorization Act). Senate Finance Committee Chairman Ron Wyden (D) and Ranking Member Mike Crapo (R), along with Senate Foreign Relations Committee Chair Ben Cardin (D) and Ranking Member James Risch (R) have endorsed the amendment in the nature of a substitute released by the House Ways and Means Committee and have called for swift passage of the legislative package.

The [amendment in the nature of a substitute](#) amends the USTEDRA by redesignating it as "Title I" and adds the new Authorization Act as "Title II". The Authorization Act would authorize the President to negotiate and conclude an agreement between the US and Taiwan within the scope of the [2016 United States Model Income Tax Convention](#). The Authorization Act also sets forth requirements on consultations with Congress on the commencement and ongoing updates of the negotiation process, as well as language for the approval and implementing legislation, among other points. For the full description of the Chairman's amendment, see [here](#).

The House Ways and Means Committee has scheduled a committee markup on 30 November 2023, with the hopes of getting it to the floor as soon as possible.

The USTEDRA was approved by the Finance Committee on 14 September 2023 (see [United States Senate Committee on Finance Approves Taiwan Expedited Double-Tax Relief Act \(15 September 2023\)](#)) and introduced in Congress on 19 October 2023 (see [US Congressional Leaders Formally Introduce US-Taiwan Double-Tax Relief Bill \(24 October 2023\)](#)). The Taiwan Tax Agreement Act of 2023 was approved by the Foreign Relations Committee on 13 July 2023 (see [United States Senate Committee on Foreign Relations Approves Bill Authorizing Negotiations of Tax Agreement with Taiwan \(20 July 2023\)](#)).

Further developments will be reported as they occur.

