

Guernsey and Luxembourg Sign Competent Authority Mutual Agreement on Implementation of Mutual Agreement Procedure under Tax Treaty

19 January 2023

Report from IBFD Tax Treaties Unit

According to a recent update published by the tax authorities of Guernsey, Guernsey and Luxembourg signed a [competent authority mutual agreement](#) to establish the mode of application of the arbitration process provided for in paragraph 5 of article 24 of the [Guernsey – Luxembourg Income and Capital Tax Treaty \(2013\)](#) on 10 October 2022. According to the update, the agreement is effective from 10 October 2022 and applies to any request for arbitration made pursuant to paragraph 5 of article 24 of the treaty after that provision has become effective.

The competent authorities further agreed that they may modify or supplement the mutual agreement by an exchange of letters between them.

Guernsey; Luxembourg - Guernsey and Luxembourg Sign Competent Authority Mutual Agreement on Implementation of Mutual Agreement Procedure under Tax Treaty (19 Jan. 2023), News IBFD.

Exported / Printed on 9 Mar. 2024 by hkermadi@deloitte.lu.