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to deal with problems
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Taxation of Income
Derived from
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with these and other
questions related to
the application of
Article 17 that
prepared by a
subgroup of was
Working Party 1 on
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Related Questions.

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That public discussion draft included proposals for additions and changes to the Commentary on the OECD Model Tax Convention resulting from the work of that subgroup.

ISSUES RELATED
TO ARTICLE 17 OF
THE MODEL TAX

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various issues directly or indirectly related to the 1977 Model

Convention. This work resulted in a number of reports, some of which recommended amendments to the Model Convention and its

Commentaries.¹⁹ In 1991, recognizing that the revision of the

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become an ongoing
process, the
International
Committee on Fiscal
Taxation
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Income and on
Capital
There are four basic
categories of

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triangular cases that will be discussed in this thesis. They are (i) PE triangular cases, (ii) dual resident triangular cases, (iii) reverse PE triangular cases and (iv) reverse dual resident triangular cases.

Chapter 1 Introduction

1.1. Introduction

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The 2017 update primarily comprises changes to the OECD Model Tax

Convention U (the OECD Model) that were approved as part of the BEPS Package or were foreseen as part of the follow-up work on the treaty-related BEPS measures.

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2017 UPDATE TO THE MODEL TAX CONVENTION - OECD

The History of Tax
Treaties. The OECD
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and the related
Commentary has an
established history. In
fact, the work on a
first model
Convention was
commenced in 1921

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by the League of Nations and led to the drawing up in 1928 of the first model bilateral Convention and, finally, to the Model Conventions of Mexico (1943) and London ...

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