

Chile

A. Progress in the implementation of the minimum standard

Chile has 33 tax agreements in force, as reported in its response to the Peer Review questionnaire. Five of those agreements, the agreements with Argentina, China, Italy, Japan and Uruguay, comply with the minimum standard.

Chile signed the MLI in 2017 and deposited its instrument of ratification on 26 November 2020. The MLI will enter into force for Chile on 1 March 2021.

Chile is implementing the minimum standard through the inclusion of the preamble statement and the PPT combined with the LOB. For its compliant agreements with Italy and Japan, the minimum standard is implemented through the inclusion of the preamble statement and the PPT.³¹ Chile notes that all of its agreements that do not contain a PPT provision include a main purpose test in the dividends, interest and royalties articles.

The agreements that will be modified by the MLI will come into compliance with the minimum standard once the provisions of the MLI take effect.

B. Implementation issues

No jurisdiction has raised any concerns about their agreements with Chile.

Summary of the jurisdiction response - Chile

	Treaty partners	Compliance with the standard	If compliant, the alternative implemented	Signature of a complying instrument	The alternative implemented through the complying instrument (if not the MLI)	Comments
1	Argentina	Yes	PPT and LOB	N/A	N/A	
2	Australia	No	N/A	Yes	N/A	
3	Austria	No	N/A	Yes	N/A	
4	Belgium	No	N/A	Yes	N/A	
5	Brazil	No	N/A	Yes	N/A	
6	Canada	No	N/A	Yes	N/A	
7	China (People's Republic of)	Yes	PPT and LOB	N/A	N/A	
8	Colombia	No	N/A	Yes	N/A	
9	Croatia	No	N/A	Yes	N/A	
10	Czech Republic	No	N/A	Yes	N/A	

³¹ For 28 of its agreements listed under the MLI, Chile is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI). Chile also opted for the simplified LOB under Article 7(6) of the MLI and expressed a statement that while Chile accepts the application of the PPT under the MLI, it intends where possible to adopt an LOB provision through bilateral negotiation. Chile made a reservation pursuant to Article 6(4) of the MLI not to apply Article 6(1) of the MLI with respect to agreements, which already contain the relevant preamble language. Chile also made a reservation pursuant to Article 7(15)(b) of the MLI not to apply Article 7(1) of the MLI with respect to agreements which already contain a PPT. Four of Chile's agreements are within the scope of these reservations.

11	Denmark	No	N/A	Yes	N/A	
12	Ecuador*	No	N/A	Yes	N/A	
13	France	No	N/A	Yes	N/A	
14	Ireland	No	N/A	Yes	N/A	
15	Italy	Yes	PPT alone	N/A	N/A	
16	Japan	Yes	PPT alone	N/A	N/A	
17	Korea	No	N/A	Yes	N/A	
18	Malaysia	No	N/A	Yes	N/A	
19	Mexico	No	N/A	Yes	N/A	
20	New Zealand	No	N/A	Yes	N/A	
21	Norway	No	N/A	Yes	N/A	
22	Paraguay	No	N/A	Yes	N/A	
23	Peru	No	N/A	Yes	N/A	
24	Poland	No	N/A	Yes	N/A	
25	Portugal	No	N/A	Yes	N/A	
26	Russia	No	N/A	Yes	N/A	
27	South Africa	No	N/A	Yes	N/A	
28	Spain	No	N/A	Yes	N/A	
29	Sweden	No	N/A	Yes	N/A	
30	Switzerland	No	N/A	Yes	N/A	
31	Thailand	No	N/A	Yes	N/A	
32	United Kingdom	No	N/A	Yes	N/A	
33	Uruguay	Yes	PPT and LOB	N/A	N/A	



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