

Guernsey

A. Progress in the implementation of the minimum standard

Guernsey has thirteen tax agreements in force, as reported in its response to the Peer Review questionnaire. Five of those agreements, the agreements with Isle of Man, Luxembourg, Malta, Monaco, Singapore and the United Kingdom, comply with the minimum standard.

Guernsey signed the MLI in 2017 and deposited its instrument of ratification on 12 February 2019. The MLI entered into force for Guernsey on 1 June 2019.

Guernsey indicated in its response to the Peer Review questionnaire that bilateral negotiations would be used with respect to its agreements with Jersey and Qatar.

Guernsey is implementing the minimum standard through the inclusion of the preamble statement and the PPT.⁶⁰

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

B. Implementation issues

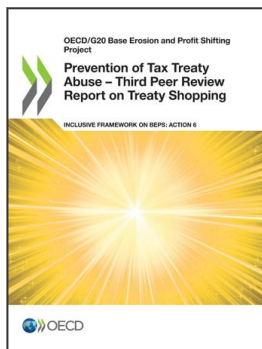
No jurisdiction has raised any concerns about their agreements with Guernsey.

Summary of the jurisdiction response - Guernsey

	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	Cyprus*	No	N/A	Yes	N/A	Entry into force for Cyprus* 1 May 2020; for Guernsey 1 June 2019
2	Hong Kong (China)	No	N/A	Yes	N/A	
3	Isle of Man	Yes	N/A	Yes	PPT alone	An amending Protocol was signed with the Isle of Man on 18 October (by the Isle of Man) + 12 November 2019 (by Guernsey). It is anticipated that the Protocol will be ratified by Guernsey on 15 July 2020. The text of the Protocol is available at https://www.gov.gg/CHttpHandler.ashx?id=122034&p=0
4	Jersey	No	N/A	No	N/A	Under bilateral renegotiation

⁶⁰ For its agreements listed under the MLI, Guernsey is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).

5	Liechtenstein	No	N/A	Yes	N/A	Entry into force for Liechtenstein 1 April 2020; for Guernsey 1 June 2019
6	Luxembourg	Yes	PPT alone	N/A	N/A	Entry into force for Luxembourg was 1 August 2019; for Guernsey 1 June 2019
7	Malta	Yes	PPT alone	N/A	N/A	Entry into force for Malta was 1 April 2019; for Guernsey 1 June 2019.
8	Mauritius	No	N/A	Yes	N/A	Entry into force for Mauritius 1 February 2020; for Guernsey 1 June 2019
9	Monaco	Yes	PPT alone	N/A	N/A	Entry into force for Monaco was 1 May 2019; for Guernsey 1 June 2019.
10	Qatar	No	N/A	No	N/A	Under bilateral renegotiation; arrangements for signature being made.
11	Seychelles	No	N/A	Yes	N/A	
12	Singapore	Yes	PPT alone	N/A	N/A	Entry into force for Singapore was 1 April 2019; for Guernsey 1 June 2019.
13	United Kingdom	Yes	PPT alone	N/A	N/A	New agreement in force from 7 January 2019, replacing earlier agreement. The express statement in the preamble and the PPT alone (text equivalent to paragraph 9 of Article 29 of the 2017 OECD Model Tax Convention).



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