

# Guernsey

## A. Progress in the implementation of the minimum standard

Guernsey has 13 tax agreements in force, as reported in its response to the Peer Review questionnaire. Its agreement with the United Kingdom complies with the minimum standard.

Guernsey signed the MLI in 2017 and deposited its instrument of ratification on 12 February 2019, listing nine tax agreements. The MLI entered into force for Guernsey on 1 October 2018.

Guernsey is implementing the minimum standard through the inclusion of the preamble statement and the PPT.<sup>65</sup>

The agreements modified by the MLI come into compliance with the minimum standard once the provisions of the MLI take effect. Other agreements listed under the MLI are expected to become compliant with the minimum standard by the end of 2019.

Guernsey indicated in its response to the Peer Review questionnaire that bilateral negotiations would be used with respect to its agreement with Qatar and the other Crown Dependencies (the Isle of Man and Jersey).

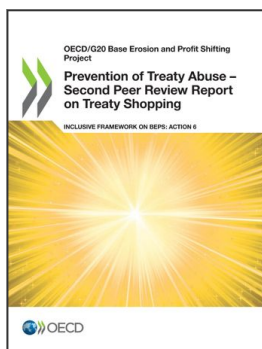
## B. Implementation issues

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	
2	Hong Kong (China)	No	N/A	Yes	N/A	
3	Isle of Man	No	N/A	No	N/A	Under bilateral renegotiation
4	Jersey	No	N/A	No	N/A	Under bilateral renegotiation
5	Liechtenstein	No	N/A	Yes	N/A	
6	Luxembourg	No	N/A	Yes	N/A	Entry into force for Luxembourg will be 1 August 2019
7	Malta	No	N/A	Yes	N/A	Entry into force for Malta was 1 April 2019; for Guernsey

						1 June 2019
8	Mauritius	No	N/A	Yes	N/A	
9	Monaco	No	N/A	Yes	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
11	Seychelles	No	N/A	Yes	N/A	
12	Singapore	No	N/A	Yes	N/A	Entry into force for Singapore was 1 April 2019; for Guernsey 1 June 2019
13	United Kingdom	Yes	PPT alone	No	N/A	New agreement in force from 7 January 2019, replacing earlier agreement. The express statement in the preamble and the Principal Purpose Test (PPT) alone (text equivalent to paragraph 9 of Article 29 of the 2017 OECD Model Tax Convention)



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