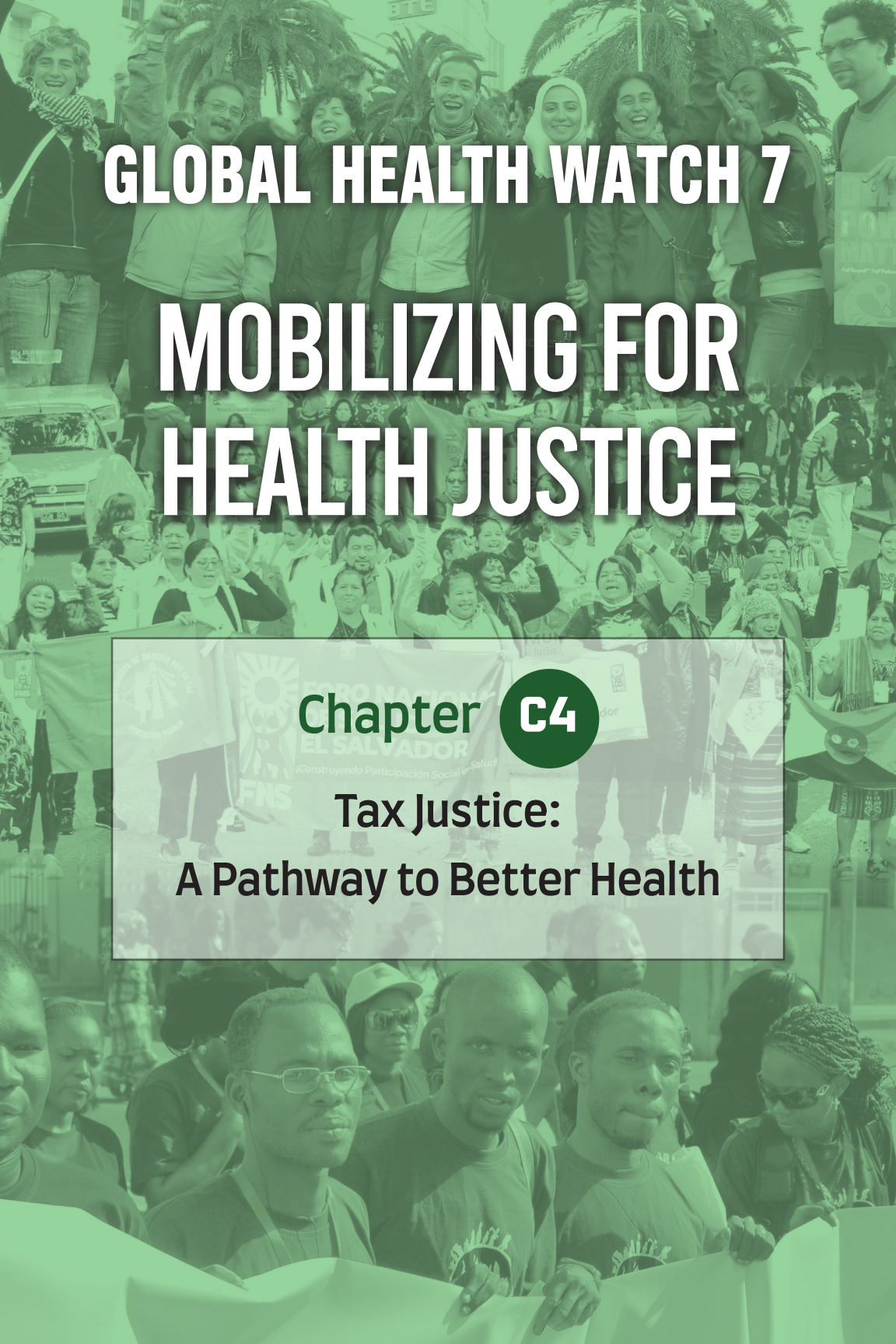




GLOBAL HEALTH WATCH 7

MOBILIZING FOR HEALTH JUSTICE

Chapter **C4**

Tax Justice: A Pathway to Better Health

Published by

Daraja Press

<https://darajapress.com>

Wakefield, Quebec, Canada

This paper will be a chapter in the forthcoming book *Mobilizing for Health Justice: Global Health Watch 7*. ISBN: 978-1-998309-48-1 (softcover)



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Publisher: Daraja Press, PO BOX 99900 BM 735 664 Wakefield, QC J0X 0C2, Canada

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EU Authorized GPSR Representative: Easy Access System Europe – Mustamäe tee 50, 10621 Tallinn, Estonia, gpsr.requests@easproject.com

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Tax justice, a pathway to better health

National governments, independently through their policy choices and collectively through global institutions, influence nearly all determinants of health: from providing access to public health care, adequate housing, social protection, and universal education, to ensuring decent work and employment, a fair income, food security, and a sustainably healthy environment.¹ To do so, governments must raise revenue through taxation and use it effectively and accountably.

Taxes have been described as society's superpower.² Yet deep historic and structural global injustices mean governments are often unable or unwilling to effectively generate and allocate taxes in ways that dismantle inequalities. Tax injustice infringes on the lives, rights, and well-being of all people and further marginalizes discriminated groups. This is the *status quo*.

There is an alternate path possible, the *status futurus*. Activist communities and engaged policymakers are already shaping a world where tax abuse is being stemmed, tax systems within and across countries are becoming fairer, and taxes are effectively contributing to healthier societies. Resistance to this movement is strong and from many sides; what role are health activists playing in challenging this resistance?

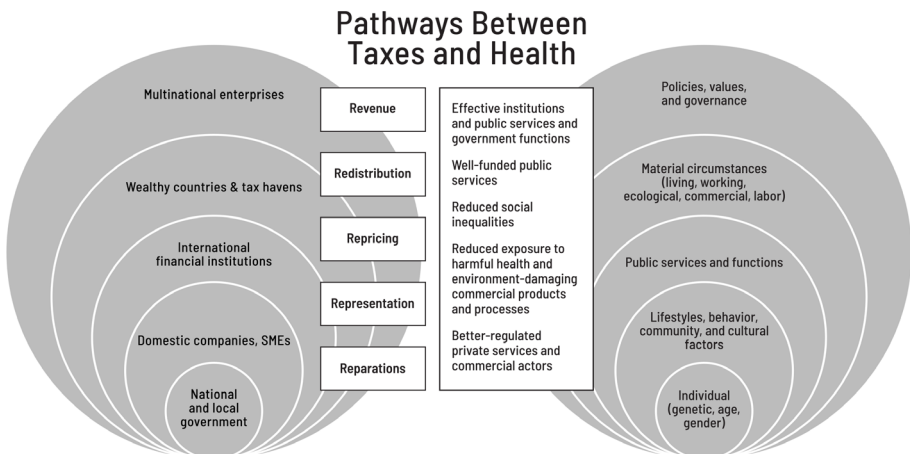
Why does tax matter for health?

The principles of tax justice—often called the 5Rs of tax justice—capture the transformative power of tax for society: revenue, redistribution, repricing, representation and reparations.³ When used as a force for good, taxes raise *revenue* for public services and carrying out other government functions, constituting 70–85 per cent of total government revenue, with the remainder made up of social contributions, grants and other non-tax revenue like licenses, fees and fines.⁴ Progressive tax systems help *redistribute* wealth to address inequalities by ensuring that larger, wealthier taxpayers, including multinational companies, pay more than the lowest-income households and small/informal enterprises, and by pooling tax revenue to finance universal benefits and services, such as public health care, that are delivered based on needs rather than ability to pay. Taxes are fundamental to fund universal public sector health services provided free at the point of access and public health actions, and to effectively redistribute resources from high- to low-income groups and low-to-high health risk groups through income and risk cross-subsidies, preventing disease and contributing to improved wellbeing.⁵ Taxes can also be designed to *reprice* or discourage and limit the social, environmental, and economic costs of health-harming products, such as

tobacco, alcohol, and obesogenic (ultra-processed) foods. When taxation underpins the social contract between public *representatives* and populations, it helps build effective states and democratic accountability. Though *reparations* through the tax system are unlikely to ever meet the cost of historic colonial (and continuing capitalist) plunder and extraction, they can ensure that perpetrators pay for injustices and their legacies.⁶ However, the current international financial system and influential global and national actors often undermine these principles.

The pathways between taxes and health are depicted in Figure 1. Here, the left-hand circle illustrates the key national, regional, and global influencers on international and national policy and tax, while the right-hand circle represents the determinants of health. The central boxes illustrate the principles of tax justice and how they can have a positive impact.

Figure 1: Pathways between taxes and health



B O'Hare and authors 2024

Multinational (MNC) and domestic companies significantly impact health both directly and indirectly. Company taxes directly contribute to positive health outcomes through *revenue*, which funds public services, contributing to *redistribution*.⁷ Indirectly, increased employment opportunities can benefit workers' health, especially if workers are represented by unions and work in safe and secure conditions with supportive management and training. Workers' income, in turn, contributes a significant share of national tax revenue which strengthens *representation*.

On the other hand, MNCs undermine the right to health when they reduce their contribution to public *revenue* by avoiding taxes, using tax havens often based in wealthy countries. Estimates suggest that 35 per cent of profits are deposited in tax havens.⁸ All countries lose when MNCs avoid or evade taxation. For example, American pharmaceutical companies, by exploiting both domestic tax codes and

tax havens, can report global profits but still record losses in the USA. In 2023, the sum of the reported US taxes paid by the top seven American pharmaceutical companies was zero.⁹ Some of this tax dodging may be ‘legal,’ but ‘the private enablers of tax avoidance actively exploit all these grey areas, and plenty more.’¹⁰ Notably, tax audits of corporate accounts carried out by tax authorities typically lead to MNCs having to pay more.¹⁰

The power of large global monopolies enables lobbying of international financial organisations to make recommendations in their interest, including reduced trade barriers, lowered tax rates, and curtailed regulation. These recommendations reduce *revenue*, and the ability of governments to *reprice* and to *represent* the best interests of their citizens, and in recent decades this has led to a race to the bottom in tax rates as countries ‘compete’ for investment.¹¹ (Box C4.1^{12 13 14 15})

In response to reduced corporate revenue, governments often resort to less progressive taxes, like value-added tax (VAT), which is added to the purchase price of most commodities or services. VAT can disproportionately burden low-income informal sector enterprises, households and women, particularly if applied to basic products.¹⁶ Additionally, governments may intensify tax collection from small low-income informal businesses, which is highly regressive, targeting people who are often already living with minimal material means.¹⁷ This can negatively affect a large proportion of black and brown women and girls, as in Brazil.¹⁸ Efforts from some African countries to bring informal sectors into the tax bracket have been linked to efforts to reduce aid dependency, as in Rwanda, or to increase political representation of organized informal sectors, as in Ghana.¹⁴ However, these efforts may be made without first adequately capturing tax from larger domestic enterprises and MNCs.

This situation often leads to increased borrowing and escalating debt service payments. Governments find their sovereign right to determine fiscal and monetary policy narrowed by lending institutions such as the International Monetary Fund (IMF), where the US holds most influence and which continues to impose austerity measures as a condition of emergency loans to help countries recover from the COVID-19 pandemic. Debt in African countries is particularly burdensome (see chapter A1). Most is held by international lenders in foreign currency, making it hard to restructure or refinance, and 40 per cent of borrowing is from private lenders, charging higher interest rates but imposing fewer conditions than multilateral lending institutions like the IMF.¹⁹

Although taxation is critical for funding strong and equitable national health services, financing for health is being choked in the neoliberal global economy with a bias toward so-called ‘innovative’ financing models such as privatized services, public-private partnerships, and segmented voluntary insurance.²⁰ These approaches undermine taxation as a way for the state to redistribute and pay for universal public sector health systems. In 2018/19, five countries in East and Southern Africa were found to be funding their public sectors above the estimated per

Box C4.1: Tax incentives reducing resources for health and environment in Africa

Many low-income countries use tax exemptions, tax holidays, tax deferrals, and low royalty rates to attract foreign investors without addressing health and environmental standards. These arrangements are often negotiated directly between government officials and multinational companies without parliamentary consultation. These public subsidies significantly reduce revenues for public sector provisioning and investment. They respond to global pressures and investor lobbies without evidence of economic benefit for countries. They also allow polluting companies, for example in the shipping and extractive industries, to pay less tax, depriving governments of revenue and running counter to the polluter pays principle. Tax holidays have been used in land leasing for agricultural investors in Mozambique, Tanzania, Mali and Ethiopia. For example, a five-year exemption from corporate income tax in the Ethiopian Regional State of Benishangul-Gumuz resulted in an annual tax loss of \$12.1 million. The extractive industries have often been a beneficiary of these tax exemptions, despite their contribution to significant health and environmental costs. In Tanzania, Zambia, Malawi and the Democratic Republic of Congo, extractives contribute to government revenues largely from royalties on the production value and payroll taxes, although Zambia imposes taxes on windfalls and variable profits. All these countries give exemptions on VAT on imports or export sales; no customs duties on imports or exports; often lower corporate income tax rates; lower withholding tax rates and reductions on taxes on profits and on royalties.

capita expenditure requirements needed for a comprehensive health system, but the remaining twelve countries in the region had a financing gap averaging between US\$28–84 per capita, or US\$36 billion annually.⁵ This funding shortfall undermines the achievement of Sustainable Development Goal 3 on universal health coverage. If three tax reforms were applied in the region—improved tax capacity, stopping tax losses from profit shifting to tax havens, and applying a minimum effective tax rate of 25 per cent across countries globally—the estimated improved tax collection could meet most of the funding gap for universal health coverage.⁵

Tax injustice, the status quo

The status quo of tax rules and resistance to their progressive reform echoes a longer exploitative colonial past. The extraction of wealth from African countries' rich mineral and biodiversity resources fueled industrial wealth and improved nutrition and conditions for health in colonizing countries. The continent exemplifies the wider extraction of resources and significant wealth outflows from Southern economies, at the expense of domestic wealth generation and population wellbeing.

A series of economic crises in the 1970s were marked by declining profit rates, high unemployment and increasing prices, exacerbated by the oil embargo. These intersected with the election of conservative governments in the USA and UK.

Together with transnational private (corporate) actors, these two countries led the charge in embracing a free-market neoliberal agenda. The resulting global diffusion of neoliberal economic policies, initially as structural adjustment programs, has seen many countries dramatically reduce their taxation rates in the name of remaining competitive in a globalizing economy, as covered elsewhere in past issues and this current edition of the GHW.

Over the 40+ years of liberalized global financial markets and neoliberal economic dominance, there has been a downward trend in corporate income tax rates and revenue.²¹ This can be attributed to the increased power of global and transnational private actors and tax wars between countries.¹⁴ Each country responds to low tax rates by lowering their own, with MNC profit-shifting to tax havens or low-tax countries diminishing the effective tax rate for MNCs²² and increasing the share of less progressive consumption taxes.²³

At the same time, tax cuts for the rich have increased. While justified by right-wing and market fundamentalist think tanks, like the Cato Institute in the USA, there is no evidence of this 'trickle-down' working.²⁴ When taxes were slashed for the rich in 18 Organisation for Economic Co-operation and Development (OECD) member countries, income inequality grew, while their economies and job creation did not.²⁵

For the Global South, a narrow and distorted tax base caters more to the demands of high-income taxpayers. Economies in the Global South have high levels of natural resource extraction, with the tax system failing to capture fair portions of revenue from these resources due to exemptions and a lack of democratic accountability in the tax system. This limits the revenue, redistributive, representation and repricing role of tax systems noted in Figure 1, particularly for low-income countries that most need these roles. The visible signs are the poor progress in access to safe water, rising unmanaged waste, overcrowded housing, poor diets, lack of access to energy, and other deficits in key health determinants for high shares of the population.

International tax abuse—its enablers and impacts

The current international tax architecture is built on foundations of plunder²⁶: from colonial extraction by force in the 1500s onwards, to the transfer of wealth and income at the end of empire in the 20th century from the country of origin to tax havens typically controlled by colonial powers. The City of London, the center of the British Empire, became the center of the offshore system, with its spider's web of overseas territories and crown dependencies, such as Jersey and the British Virgin Islands.²⁷ The United Kingdom and territories remain chiefly responsible for enabling tax abuse.

In 2023, the world lost \$480 billion in tax revenue due to cross-border corporate abuse and wealth tax evasion, and this may be just the tip of the iceberg.²⁸ Over three-quarters of these global tax losses suffered by countries worldwide are

caused by the club of wealthy nations and their dependencies that form the OECD. Higher-income countries consistently lose the most in absolute terms. However, lower-income countries consistently face the deepest losses as a share of current tax revenues or budgets for health and its determinants, where per capita spending is skewed. Further, many health and social interventions are implemented by women outside formal systems and may go uncounted in economic data.²⁹

Tax abuse enabled by the international tax system undermines all human rights. If governments had revenue equivalent to the losses documented in the State of Tax Justice 2023, *every day*, 15 million people would have their right to basic water, 32 million their right to basic sanitation, 3.2 million additional children would attend school, 101 additional children would survive, and 11 additional mothers would not die during childbirth.³⁰ Increased government revenue leads to steady improvements in governance, which means additional revenue has a greater impact on human rights, creating a virtuous circle between government revenue and governance.³¹

The OECD, representing 38 of the world's wealthiest countries, many of which are former colonizing nations, has decided international tax rules favoring MNCs for the last 60 years, maintaining the status quo of colossal tax abuse. Efforts over the past decade have done little to curtail these rules. The OECD's work, while technically rigorous, nurtures neutrality at best, while operating from a set of principles and approaches that resists change in the global order of power. Tax transparency measures adopted have been watered down or compromised, such as the automatic exchange of information between tax authorities to overcome bank secrecy and undeclared offshore wealth. The OECD's Common Reporting Standard (CRS) for exchanging information is ineffective. It excludes all major financial centers, and the information that is shared cannot be used to investigate money laundering or other suspected criminal activity. In 2023, only 5 of 54 African nations exchanged information automatically on a reciprocal basis.

In the OECD's most recent iteration of international tax rules, the so-called 'two-pillar solution' aims to address the challenges of taxing MNCs in a digital age.³² Pillar One focuses on distributing taxing rights between countries. However, it will only affect a fraction of MNC profits, applying only to those with a turnover above \$20 billion. Even this proposed change is likely to amount to nothing, as the USA, which has effective veto powers, is unlikely to ratify the agreement. Pillar Two sets a global minimum tax for corporations, but it's only 15 per cent. This is well below the average in most countries. As the primary body representing African tax authorities, the African Tax Administration Forum (ATAF), noted:

...for such a rule to be effective, the minimum effective rate needed to be at least 20%... as most African countries have a statutory corporate income tax rate of between 25% and 35%. Multinationals will only be disincentivized from such profit shifting in Africa if all its profits are taxed at least at 20% no matter in which jurisdiction the profits are reported.³³

In an act of global solidarity and resistance among non-OECD members, the Africa Group at the United Nations (UN) proposed a resolution in 2022, adopted unanimously by the UN General Assembly, giving the UN Secretary-General the mandate to report on options and modalities for negotiating a UN Framework Convention on Tax.³⁴ A year later, a further resolution was passed to start negotiations on such a Convention. No OECD member voted in favor yet, despite resistance, a majority of UN member states passed the resolution, and negotiations are ongoing. This UN-led initiative presents ‘an opportunity for an institutional and conceptual reset, to re-establish a global perspective that has been disrupted by the assumption of an increasingly dominant role in international tax by the OECD.’³⁵

Tax justice, the ‘status futuris’

Countries can and must use their tax superpower. As Tax Justice Network Africa emphasizes, ‘Any reversal [of tax injustice] is most likely to start from the bottom up, with taxpayers becoming the key drivers of change’, with population interest groups, parliaments, professionals, southern states, diplomats, and regional economic communities demanding transparency in tax decisions and the use of tax money.¹⁴

Since all tax ultimately belongs to the people, populations and taxpayers have the right to know and be literate on how taxes are collected, where they are being levied, and how this affects them. This means that revenue data, including sources and allocation, should be regularly published. All agreements and treaties that affect revenue should be disclosed and discussed in parliament. Tax justice requires tax policies that promote vertical equity that disproportionately benefits poorer groups. Countries should reject tax exemptions that reduce direct taxes on products that harm health or that exempt tax contributions to health services.

It is both possible and essential to meet the health financing gap for public sector health systems worldwide through sufficient funding from progressive taxation. Public interest constituencies within and across countries need to clearly state that public sector funding demands addressing the right to health care, universal health coverage, primary health care, and other health-related sustainable development goals, and to show that this calls for progressive taxation as a major source of revenue.⁵ This implies redoubling national efforts to address tax gaps by building domestic capacity within revenue authorities, expanding the tax base through the expansion of wealth and other progressive taxes, and increasing transparency in and blocking of illicit outflows. It also calls for work at the regional level to reduce tax competition, and to reduce incentives and exemptions for corporations that lessen a country’s capacity to mobilize tax revenue.⁵ Regional bodies like ATAF in Africa and the Regional Platform for Tax Cooperation in Latin America and the Caribbean (PTLAC) can strengthen regional cooperation on tax matters, including in acting as a bloc in international spaces.³⁶

These actions within countries and regions call for wider international action, specifically focusing on negotiations of the UN Framework Convention on Tax. In contrast to the OECD's dominion over setting tax rules, the UN is inclusive and representative. Member states are legally bound to implement the provisions of conventions and agreements, and are held accountable for this by various UN bodies.³⁷ As of August 2024, the terms of reference for the Convention have been adopted and negotiations will continue through to 2026. The work toward a UN Framework Convention on Tax responds to the promotion of human rights frameworks and conventions. UN committees have consistently urged that tax haven nations reform domestic rules to ensure that their tax policy (enabling profit-shifting) does not undermine the rights of citizens in other countries, and that nations have maximum available resources for developing and delivering human rights.³⁸

Demands around international tax reform, and a shift to the UN as the framework for rule setting have become more urgent with the scale of global health challenges, including pandemics and the climate emergency. Leaving these challenges to overseas development aid and other forms of unpredictable, voluntary, or concessional financing is problematic for the equity and sustainability in investment that these challenges call for. Climate financing in the form of overseas development aid has failed to meet pledges or needs, with climate-related loans adding debt burdens to what are already inequitable climate burdens, carbon credit schemes using carbon markets while leaving the drivers of climate change unmanaged, and power left in the hands of high-income countries that are the primary drivers of climate change.³⁹ Tax reform based on principles of tax justice can overcome these limitations while disincentivizing ecologically destructive extractive industries.

African leadership at the 2023 Africa Climate Summit noted an 'unjust configuration of multilateral institutional frameworks that perpetually place African nations on the back foot through costly financing.'⁴⁰ African countries in the September 2023 Nairobi Declaration from this Summit called for climate financing to be derived from a carbon tax on fossil fuel trade, maritime transport, and aviation, alongside a global financial transaction tax, to shift financing towards more predictable, equitable forms. In Latin America, Colombia is leading the way on environmental taxation, having already adopted three kinds of taxes: a national tax on carbon, a national tax on the consumption of plastic bags, and an additional tax on vehicles.⁴¹ Based on this experience, Colombia is coordinating the environmental tax working group of PTLAC.

Some key global tax reforms and technical solutions require international measures and national implementation to curtail international tax abuse. These have been described as the ABCs of tax transparency,⁴² as set out by the Tax Justice Network, and part of the larger Global Alliance for Tax Justice. Initially described as utopian, these measures formed the basis for global OECD-designed and watered-down tax transparency measures. They are now considered to

be essential transparency rules that support domestic enforcement so that tax authorities can audit corporations and trace untaxed offshore wealth. From 2020, the Tax Justice Network developed its core platform beyond the ABCs of tax transparency to include the DEFGs of tax justice.⁴³ (See Box C4.2)

Global influencers promoting tax transparency and tax justice, including redistribution, are also emerging from unlikely places. A small and growing number of MNCs have Fair Tax Mark accreditation under the Global Multinational Business Standard,⁴⁴ which signals that they abide by the principles of fair tax. This includes paying the right amount of tax (but no more) in the right place at the right time, according to both the letter and the spirit of the law, and readily providing sufficient public information to enable its stakeholders to form a rounded and informed view of its beneficial ownership, tax conduct, and financial presence (across the world if they are a multinational).⁴⁵ Additionally, wealthy individuals associated with the organizations Patriotic Millionaires and Millionaires for Humanity have asked to be taxed more on their assets and inheritance. In a letter millionaires and billionaires sent to leaders attending the World Economic Forum in Davos, Switzerland, in 2022, they wrote,

As millionaires, we know that the current tax system is not fair... This injustice baked into the foundation of the international tax system has created a colossal lack of trust between the people of the world and the elites who are the architects of this system. Bridging that divide will take more than billionaire vanity projects or piecemeal philanthropic gestures—it's going to take a complete overhaul of a system that, up until now, has been deliberately designed to make the rich richer.

To put it simply, restoring trust requires taxing the rich. The world—every country in it—must demand that the rich pay their fair share. Tax us, the rich, and tax us now.⁴⁶

The way ahead

Health activists are rightly concerned that public health systems be adequately and equitably financed to achieve individual and communal health. But change will not come by tinkering at the edges. Health movements should not expend energy on dead-end struggles that focus only on 'sin' or earmarked taxes. These collect little revenue while distracting attention and resources from extensive and necessary structural reforms and the closing of loopholes for corporate tax abuse and wealth tax evasion.

Box C4.2: The ABCDEFGs of Tax Justice

A—Automatic exchange of tax information on financial accounts is critical to overcome the scourge of bank secrecy and the associated undeclared offshore accounts. By 2022, more than 110 jurisdictions had signed up for automatic exchange including all the major financial centres except the USA. But many still refuse to provide information to lower-income country signatories.

B—Beneficial ownership of companies, trusts, foundations and partnerships is increasingly made transparent through public registers, identifying who and how is benefiting through these private entities. While uncovering major corruption, these registers still lack robust verification.

C—Country-by-country reporting by multinational companies is necessary to reveal the misalignment between where their real economic activity takes place, and where profits are declared for tax purposes. The OECD now requires this data to be provided to home country tax authorities and a growing number of major companies are already publishing voluntarily to the Global Reporting Initiative standard. Investors with trillions of dollars of assets under management are actively demanding this from others.

D—Disclosure, including consistent, aggregate performance measures of the tax authority, and a full accounting of tax incentives and subsidies provided, as well as online publication of company financial accounts and related information. Aggregate statistics from country-by-country reporting can tell a similar story for corporate tax abuse.

E—Enforcement is also critical and has been especially vulnerable in several high-income countries including the UK and US. 'Austerity' has often provided political cover to cut resources of tax authorities and other relevant agencies (and often their independence too), and this remains a key threat to effective and accountable taxation. It is the falsest of all false economies to cut the resources of tax authorities in order to 'save' public funds.

F—Formulary apportionment is the basis towards which international tax rules must now finally move. Global taxable profit globally should be at the unit of the multinational, and not the separate corporate entities within the group, and taxes apportioned to countries according to the share of the multinational's economic activity taking place in each.

G—Global governance of tax in the 21st century requires a genuinely inclusive and representative forum at the UN to replace the rich country members' club, the OECD. This will be in the form of a UN Framework Convention on Tax, currently under negotiation, that could also ensure that the full benefits of the ABC of tax transparency are delivered to all countries and peoples.

Continues opposite

Box C4.2 continued

G₂—Global asset register, or a GAR, is a key piece of the puzzle. This proposal, now supported also by the Independent Commission for the Reform of International Corporate Taxation, would join up national-level registers of ultimate beneficial ownership, coupled with the broadening of coverage to include high-value assets of all types, from property and financial accounts to art works and aircraft, and including all types of legal vehicles. The GAR provides the basis both to facilitate wealth taxes of all types and to ensure their effectiveness.

G₃—Good taxes is a catchall including a range of taxes that can contribute most to the 5Rs of tax justice. Direct taxes (mainly income taxes on corporates and individuals) are the most salient and can do most to strengthen state-citizen relations of accountability and providing the strongest basis for redistribution. Specific taxes on wealth, land value, inheritance, and capital gains as well as taxes responsive to the climate crisis are also important 'good taxes'.

National governments are central to tax justice as they are responsible for design, collection, and expenditure. However, there is fierce resistance to positive pathways for positive health outcomes domestically and internationally, with MNCs, international financing institutions, and tax havens bending the rules in ways that do not serve the common good. We must not be discouraged. The past years have shown the incredible power of collective action at the global level towards a UN Framework Convention on Tax, which must deliver on the principles of tax justice. Examples included in this chapter also shine a light on domestic action, reversing decades of eroding tax and narrowing public service delivery.

Tax can be society's superpower if used for good:

- To improve revenue collection for public health, governments must focus on taxing the highest income earners and largest companies, targeting multinational enterprises, and designing tax codes that do not give them a free ride. This includes resisting awarding profit-based tax incentives and national governments collaborating to prevent a regional race to the bottom in tax rates. National and regional support must continue in the negotiations of substantive elements of the UN Framework Convention on Tax, including fundamental principles, crucial tax transparency measures, and reforms to how wealth and corporate income are taxed.
- To ensure that revenue raised addresses inequalities, it must be redistributed from high- to low-income households and from low to high health need, including through financing universal health coverage and primary health care that is free at the point of access. Efforts to privatize health systems or crowd out public healthcare improvements through privatization must be resisted.

- Although it's not game-changing for domestic revenue collection, repricing to increase the cost of socially harmful products, including carbon, can affect behavior and contribute to government revenue needed to meet the health needs that result from some of these products. These should target the multinational and large corporate producers, such as ultraprocessed foods, not consumers.
- Improved tax capacities, strengthened public tax 'literacy', and greater transparency and democratic accountability need to be built within countries and internationally to fulfil representation, including in the global tax architecture.
- Countries must seek reparations for the impacts of the climate crisis, which affects many determinants of health. Interim approaches can include ensuring tax and grant-based climate financing and debt relief, and increased contribution to taxes to protect longer term health and ecosystems in the extractive sectors.

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