

112TH CONGRESS
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S. RES. 108

Expressing the sense of the Senate on the importance of strengthening investment relations between the United States and Brazil.

IN THE SENATE OF THE UNITED STATES

MARCH 17, 2011

Mr. LUGAR submitted the following resolution; which was referred to the Committee on Foreign Relations

RESOLUTION

Expressing the sense of the Senate on the importance of strengthening investment relations between the United States and Brazil.

Whereas President Barack Obama is set to visit Brazil on March 19 and 20, 2011, during a 5-day trip which will include stops in Chile (March 21), and El Salvador (March 22);

Whereas the United States and Brazil enjoy longstanding economic relations sustained by trade and investment;

Whereas investment in and by Brazil promotes economic growth, generates greater wealth and employment, strengthens the manufacturing and services sectors, and enhances research, technology, and productivity in the United States and Brazil;

Whereas the United States is the largest direct investor abroad, with total world-wide investments of \$3,508,000,000,000 in 2009;

Whereas the United States has historically been the largest direct investor in Brazil, investing a total of \$56,692,000,000 in 2009;

Whereas the sound economic policy of the Government of Brazil was given an investment-grade rating by the 3 major investment rating agencies in 2009;

Whereas the United States is the largest recipient of direct investment in the world, with total foreign direct investments of \$2,320,000,000,000 in 2009;

Whereas the United States received direct investment from Brazil, including a total of \$1,400,000,000 in 2007 and a reduction of that amount by \$647,000,000 in 2009;

Whereas Brazil is the only country with a gross national product of more than \$1,000,000,000,000 with which the United States does not have a bilateral tax treaty;

Whereas Brazil is the 4th largest investor in United States Treasury securities, which are important to the health of the United States economy;

Whereas Brazil ranked 7th among other countries in the number of corporations listed on the New York Stock Exchange in 2009, with 35 corporations listed;

Whereas a bilateral tax treaty between the United States and Brazil would enhance the partnerships between investors in the United States and Brazil and benefit small- and medium-sized enterprises in both the United States and Brazil;

Whereas a bilateral tax treaty between Brazil and the United States would promote a greater flow of investment between Brazil and the United States by creating the certainty that comes with a commitment to reduce taxation and eliminate double taxation;

Whereas the Brazil-United States Business Council and the United States-Brazil CEO Forum have worked to advance a bilateral tax treaty between the United States and Brazil;

Whereas the Senate intends to closely monitor the progress on treaty negotiations and hold a periodic dialogue with officers of the Department of the Treasury; and

Whereas the United States and Brazil will greatly benefit from deeper political and economic relations: Now, therefore, be it

1 *Resolved*, That it is the sense of the Senate that—

2 (1) the United States Government and the Government of Brazil should continue to develop their
3 relationship; and

5 (2) during the President's March 19 and 20, 2011, visit to Brazil, he should propose to his Brazilian counterpart that the United States and Brazil begin negotiations for a bilateral tax treaty that—

9 (A) is consistent with the existing tax treaty practices of the United States Government;
10 and

(B) reflects modern, internationally recognized tax policy principles.

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