

UK tax deal with Switzerland is already being renegotia...

Published: January 12, 2026, 10:16 pm

I have commented often on the UK - Swiss tax deal that Dave Hartnett negotiated and which was initialled by both parties in October. My objections to the deal are numerous, some [being summarised here](#) and [others here](#).

Now [Bloomberg has noted](#):

Switzerland is discussing "technical adjustments" to tax agreements with the U.K. and Germany, SonntagsZeitung reported, citing Andre Simonazzi, a spokesman for the Swiss Federal Council.

The changes aim to counter criticisms of the accords from the European Union, the Zurich-based newspaper reported. The talks are on revisions to distinguish between the EU-Swiss tax on interest and a separate withholding tax, Simonazzi was cited as saying.

Similar stories have appeared in the Swiss press.

I think three observations follow. The first is that those who said the opinion of the EU on this issue did not matter are clearly wrong: it does, very much.

Second, this renegotiation seems to confirm that others will not go down this route and the hopes of Luxembourg that they might use the deal as a mechanism to shatter the upgrade to the European Union Savings Tax Directive - a hope, I suspect shared by George Osborne in support of UK tax havens - look like they may be shattered.

Last, yet again we see the gross incompetence of Dave Hartnett at work - seemingly doing deals irrespective of their legality to keep his political masters happy, whatever the cost. I just wish I had the confidence he was being replaced by someone better.