**OEIGWG on TNCs and OBEs - 6th session**

**(ITEM 4) Part V - ARTICLES 12,13 and 14 (29/10/2020)**

**Brazil, national capacity**

**Thank you, Chair-rapporteur,**

**Under this agenda item, concerning the articles 12, 13 and 13 of the second revised draft, the Brazilian delegation would like to make the following two remarks:**

**2. Our initial evaluation is that Article 12 seems to establish excessive burden upon States, in a way that is not proportionate to the object of this instrument.**

**3. We take this opportunity to request further clarifications on the specific reasons for explicitly mentioning trade and investment agreements on the list of instruments that should be implemented and interpreted in a manner not to undermine the implementation of the LBI, in paragraph 14.5.**

**Thank you. (98 words)**