

dividend to the U.S. parent company. In order to prevent double taxation of the foreign earnings, under section 902 of the Tax Code, the U.S. provided a foreign tax credit for tax paid on those earnings. In this scenario, with respect to tax paid by the foreign subsidiary in Chile, the U.S. company would receive a dollar-for-dollar credit against its U.S. tax liability once the income was distributed, and subject to tax, in the U.S. in order to prevent double taxation of the dividend income.

TCJA made significant changes to these rules. For one, it ended the concept of “deferral.” As a result of TCJA, U.S. companies are now generally subject to current U.S. tax on their foreign earnings, even if they are not immediately distributed to the U.S. parent, under the global intangible low-taxed income, GILTI, which consequently eliminated the need to impose U.S. tax on dividends when ultimately distributed from the foreign subsidiary to the U.S. parent company.

As a result, in order to mitigate double taxation, TCJA modified and expanded section 960 to provide indirect tax credits for taxes paid on GILTI. TCJA also repealed section 902 foreign tax credits because, generally, dividends received by U.S. companies from a foreign subsidiary are no longer subject to U.S. tax. Instead, U.S. companies receiving foreign-source dividends are generally allowed a deduction under section 245A of the Tax Code for those dividends received. Because U.S. companies’ foreign earnings are now largely subject to tax under GILTI, the primary mechanism for relieving double taxation under current law is through an indirect tax credit under section 960. Indeed, recent IRS data confirms that an overwhelming majority of TCJA’s new category of U.S. companies’ foreign earnings subject to current U.S. tax requires a foreign tax credit to mitigate double tax relief.

As Ranking Member RISCH referenced, because Treasury did not agree to include in the reservation a reference to the primary method for alleviating double taxation on a U.S. company’s foreign earnings, it calls into question whether article 23 provides sufficient double tax relief post-TCJA. While I understand this lack of clarification should not result in increased taxation on earnings of a U.S. company’s Chilean subsidiary based on current law, U.S. taxpayers may not have adequate protection from double taxation with respect to future treaties.

In short, this outstanding issue is fundamental to one of the core motives for entering into income tax treaties, to mitigate double taxation to reduce barriers to cross-border investment. Thus, I intend to hold Treasury to its commitment to include language in future income tax treaties to more comprehensively address the post-TCJA foreign tax credit system. And if it fails to do so, I will not support approving ratification of any future U.S. income tax treaty.

Mr. RISCH. I completely agree with the ranking member of the Finance Committee. I will carefully review and consider future U.S. income tax treaties to both ensure we resolve this important issue and to make sure Treasury follows through on its commitment to further address relief from double taxation in our tax treaties. I thank Ranking Member CRAPO for his leadership on this issue, and we will continue to work together to hold Treasury to its commitment.

RWANDA AND THE DEMOCRATIC REPUBLIC OF THE CONGO

Mr. MENENDEZ. Mr. President, I rise to call upon the administration to take urgent action, as we did in 2012–2013, to pressure Rwanda to end its support for United Nations sanctioned M23 rebels and stop destabilizing eastern Democratic Republic of the Congo, DRC, and to stress the need for DRC to hold credible, on-time elections in December 2023.

According to the final report by the U.N. Group of Experts for the DRC, Rwandan support for the M23 extends from the highest levels in Kigali, including the Minister of Defense, an alarming allegation. Rwandan troops now are fighting alongside the M23 inside DRC, and the Rwandan Government is providing the M23 with weapons, uniforms, and equipment. M23 has killed hundreds of Congolese civilians over the past year, including the November 29 massacre of more than 170 men, women, and children in the village of Kishishe. With Rwandan support, M23 downed a U.N. helicopter, killing U.N. peacekeepers, recruited child soldiers, and displaced more than 1 million Congolese in eastern DRC. Incidents of sexual violence targeting internally displaced persons are also skyrocketing. On June 13, Human Rights Watch reported that, “Rwanda-backed M23 rebels in eastern Democratic Republic of Congo have committed unlawful killings, rape, and other apparent war crimes since late 2022.”

There is overwhelming evidence of Rwandan support for M23, and M23 has repeatedly failed to adhere to ceasefire agreements brokered by the East African Community. Despite this, the United States, the United Nations, and other members of the international community have been slow to respond. The last time Rwandan President Paul Kagame supported M23 rebels in eastern DRC, in 2012, the United States suspended Foreign Military Financing—FMF—for Rwanda, a decision that prompted several European donors to also suspend or redirect assistance away from Rwanda. The U.S. also imposed additional security assistance restrictions under the Child Soldiers Prevention Act, CSPA. President Obama, Secretary of State Clinton, Under Secretary of State for Political Affairs Sherman, and Assistant Secretary of State for African Affairs Carson all engaged directly with the leaders of DRC,

Rwanda, and Uganda to end the conflict and pressure Kagame to cease his support for M23.

Our response to the current M23 crisis has been, by comparison, woefully inadequate. Although Secretary of State Blinken travelled to the region in August 2022 to discuss the instability in eastern DRC, the United States did not publicly call on President Kagame to end Rwanda’s support for M23 until October 2022, months after the first U.N. Group of Experts report documented Rwanda’s actions. We have not imposed any new sanctions on M23 leaders or Rwandan officials implicated in gross violations of human rights in eastern DRC, nor have we completely cut security assistance and military-to-military engagement to Rwanda. In fact, as recently as May of this year, Rwanda participated in the African Land Forces Summit sponsored by the U.S. Army Chief of Staff. In February 2023, the United States invited members of the Rwandan Defense Force to participate in a multinational exercise in Kenya called Justified Accord, where the U.S. reportedly provided Rwanda cyber capability training. The decision to provide cyber-related training to Rwanda is particularly difficult to comprehend in light of 2021 reports by Freedom House and Amnesty International. According to the Amnesty report, “Rwanda used NSO Group’s spyware to potentially target more than 3,500 activists, journalists and politicians.” The Freedom House report states that “Rwandans abroad experience digital threats, spyware attacks, family intimidation and harassment, mobility controls, physical intimidation, assault, detention, rendition, and assassination.” The United States cannot continue to support Rwandan efforts to serve as peacekeepers in some parts of Africa while the very same Rwandan military is fomenting violence and instability next door in DRC.

In addition to disrupting the lives of more than 1 million people in eastern DRC, Rwanda’s support for M23 is also undermining efforts to prepare for elections. The last elections were so poorly managed that the United States sanctioned the leadership of the National Independent Electoral Commission—CENI—a precedent that should serve as a warning to future electoral commissions across Africa. While CENI is under new leadership, procurement and management of the voter registry seem as opaque now as they were before. This is a problem. It is important for CENI to be transparent about its spending and its management of the voter registry. Contrary to its actions in 2018, the DRC should welcome international election observers and do everything it can to help, not hinder, domestic election observers.

Even if all of those shortcomings are addressed, violence in the east may disenfranchise voters by preventing them from registering to vote or casting a ballot on election day. Credible and

timely elections are crucial to the future stability of the DRC and in the interest of the United States, the region, and the international community. The U.S. and its partners must increase pressure on Rwanda to end its destabilization campaign and must encourage the CENI and the Congolese Government to do all they can to hold timely, credible elections in December 2023.

Although the situation is dire, it is not hopeless. There are steps that the United States can take. First, the State Department must complete a review of its Rwanda policy, which it committed to undertake in response to a letter I sent last July. As I also requested in July, the Department should continue suspending security assistance until Rwanda ceases support for the M23. This suspension should apply to security cooperation and exchanges with Rwanda at all levels. The U.S. should impose sanctions on Rwandan Government officials implicated—either directly or indirectly—in human rights violations or corruption, to include the theft of minerals or other resources from eastern DRC.

And there are steps the Congolese must take. I encourage President Tshisekedi and DRC officials to do more to combat corruption in their country, particularly within the judiciary and the armed forces, and to lift the “state of siege” in eastern DRC. It is clear that conditions for civil society have improved under President Tshisekedi, but much more should be done to ensure that Congolese are able to criticize their government freely, particularly in eastern DRC. I am troubled by multiple reports that journalists have been arrested, including by national intelligence agency operatives, for reporting on what is happening in the east. There have also been disturbing reports that the DRC Government or individual DRC military officers are enlisting the support of rebel groups or militias to help combat M23. If these reports are true, it is incumbent upon President Tshisekedi to put an end to such efforts. Finally, I urge CENI and President Tshisekedi to ensure that international organizations are able to obtain accreditation and visas in a timely manner, so that they are able to support domestic election observation efforts without impediment.

The situation in eastern Congo is not going to fix itself. It requires a collective effort—from us, from our partners, from the U.N., and from the Congolese. I urge us all to act.

175TH ANNIVERSARY OF UNUM

Ms. COLLINS. Mr. President, I rise today to commemorate the 175th anniversary of Unum, a great company with deep Maine roots, the country's largest provider of private disability insurance and a leader in advancing the health and financial security of America's workers.

When the company was incorporated in Maine in 1848 as Union Mutual, the very first policy issued covered founder and president Elisha B. Pratt for \$5,000. Today, Unum helps protect 45 million people and their families across the United States, the United Kingdom, and Poland. The company pays \$8 billion in benefits each year and helps many people in their journey back to work after a long illness or injury. More than 180,000 businesses, including many of America's largest companies, partner with Unum to provide for their employee's well-being.

Unum has a long history in Maine and is today one of our State's major employers with a proud tradition of providing access to insurance coverage for workers and their families. The company was a pioneer in the nascent insurance market in the United States and, over the years, has provided businesses and individuals with new ways to help protect their financial futures.

A century ago, Unum was the first to offer life insurance through group coverage, enabling employees to purchase policies at reduced premiums. Nearly 85 years ago, the company introduced the first disability insurance to provide workers with the ability to protect their paychecks in the event of illness or injury.

An article titled “The Popular Home Company” in the “Maine Board of Trade Journal” from 1905 offered two examples of business practices that illustrate the principles that guide the company: It writes policies in simple, understandable language devoid of technicalities, and it pioneered extending insurance coverage to beneficiaries who had fallen behind in premium payments due to the difficulties that often precede a death in the family. As a result, the article stated, it would be impossible to fully describe “the hardships it has alleviated in thousands of families throughout the land.”

With around 11,000 employees across the U.S. and in Europe, Unum provides a dynamic and welcoming workplace where people can experience rewarding careers and are encouraged to bring their best ideas to work. I am proud to note the company's recognition by many third parties as a best employer for excellence in health and wellbeing, disability employment, diversity, opportunity for women and new graduates, and technology. For the last 3 years, the company has received the prestigious designation as one of the World's Most Ethical Companies by the Ethisphere.

Unum has a tradition of giving back to the community. The company has been recognized for 5 consecutive years on the Civic 50 list of America's most community-minded companies by the Points of Light Foundation founded by President George H. W. Bush. Unum provided \$12 million of charitable giving last year, while its employees donated more than 45,000 hours of volunteer work, for causes as diverse as developing education leaders in Maine,

helping enable rehabilitative services for patients in Tennessee, and supporting humanitarian efforts in Poland.

Throughout its 175-year history, Unum has had a tremendous impact in the State of Maine and beyond. I congratulate the company and its employees on reaching this impressive milestone and wish them a long and successful future.

400TH ANNIVERSARY OF DOVER, NEW HAMPSHIRE

Mrs. SHAHEEN. Mr. President, I rise today to honor the city of Dover, NH, on the 400th anniversary of its first settlement.

In 1623, brothers Edward and William Hilton, two fishmongers from London, sailed up the Piscataqua River and set up their Cochecho Plantation near Pomeroy Cove. The name of the settlement changed in the early years, first to Bristol, then to Dover, then to Northam, then back to Dover. But the settlers remained, which leads many historians to contend that Dover is the oldest continuously settled city or town in New Hampshire. It is also among the oldest cities in all of the United States.

The city of Dover's nickname, The Garrison City, has its roots in these early years. Its settlers took advantage of the area's abundant forestlands to fell trees for use in heavily fortified houses called “garrisons.” Made with sturdy logs and slits in the walls for rifles and muskets, these structures provided protection and a sense of security in cases of emergency or attack. Most of Dover's garrisons were destroyed in the late 1600s, but modern day residents and visitors can see for themselves the intact Damm Garrison at the local Woodman Museum. It is a symbol of the common threads of resilience, grit, and solidarity that are woven into the long and proud history of Dover.

The city of Dover has hosted many thriving industries over the past four centuries, including agriculture and shipbuilding in the 1700s and brickmaking in the 1800s. Yet anyone who takes a short stroll down Central Avenue can see the remnants of an industry that catapulted Dover to national prominence in the late 1800s and early 1900s. Textile manufacturers used the currents of the Cochecho River to power a sprawling mill complex that at one time employed over 2,000 workers. The Cochecho Manufacturing Company, its name the product of a clerical misspelling on incorporation documents, was one of the leading national producers of printed cotton and generated millions of yards of textiles annually. In 1828, it was the site of the first all-women strike in the United States when hundreds of “mill girls” marched off the job and through city streets in protest of meager wages. The nearby Sawyer Woolen Mills on the Bellamy