

Programme 2010



BRITISH BRANCH
OF THE
INTERNATIONAL FISCAL
ASSOCIATION

www.ifa-uk.org



INTERNATIONAL FISCAL ASSOCIATION

The International Fiscal Association (“IFA”) is the leading non-governmental international organisation dealing with tax matters. It comprises taxpayers, their advisers, government officials and academics. It is a unique forum for discussing international tax issues.

The IFA is headquartered in the Netherlands and now has nearly 12,000 members worldwide, from more than 100 countries, and currently has branches in 59 countries. The objects of IFA are the study and advancement of international and comparative law in regard to public finance, specifically international and comparative fiscal law, and the financial and economic aspects of taxation.

These objects are achieved by research, the holding of Congresses throughout the world where branches are located, and through publications. In 2010, the Annual Congress will be held in Rome. Subsequent Congresses will be held in Paris (2011), Boston (2012), Copenhagen (2013), India (2014), Switzerland (2015), Brazil (2016) and Spain (2017).

The Association’s main publication is the “Cahiers de Droit Fiscal International”. This contains a detailed general report and a series of branch reports on the two main subjects which are due to be discussed at the Congress in that year, and copies of the Cahiers are distributed free to all IFA members.

The British branch is well represented in the central organisation of IFA having Jonathan Schwarz on the Executive Committee, Philip Baker QC on the Permanent Scientific Committee, and Eric Tomsett and David Hinds on the General Council.

For further details, visit www.ifa.nl

British Branch website: www.ifa-uk.org



**International Fiscal Association
British Branch**

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WELCOME TO THE 2010 BRITISH BRANCH PROGRAMME

The British Branch of IFA has an exciting technical programme for 2010, providing the ideal platform for members to learn, exchange views, and make new friends in the international tax community. It is a unique meeting place for everyone interested in international taxation, including tax managers and directors from industry, accountants, lawyers, and members of HM Treasury and HM Revenue & Customs. Our joint meetings, with HMRC and HMT, and with the Chartered Institute of Taxation, provide invaluable opportunities to exchange views with others in the tax community. This year we also have a “trilateral” meeting amongst the UK, German and Dutch branches of IFA.

If you have any suggestions for improving our programme, please do let me know. I look forward to welcoming you all over the coming year and hope that you find our meetings interesting, informative and enjoyable.

Tom Scott
Chairman, British Branch

We will contact you in advance of each meeting to confirm the venue and other arrangements.

Please note that registration is required for all meetings. A charge will be made for the joint meetings, including the trilateral meeting.



**International Fiscal Association
British Branch**

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**International Fiscal Association
British Branch**

COMMITTEE: continued

Joy Svasti-Salee	Ernst & Young
Eric Tomsett	
Tim Voak	Tesco plc
Mike Williams	HM Treasury

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BRITISH BRANCH PROGRAMME 2010

- January 28 - Future of Agency Permanent Establishments
- February 25 - EU Litigation: Trends and Developments
- March 18 - Controlled Companies: an Update and Future Proposals
- April 20 - Beneficial Ownership for Tax Purposes: a Practical Discussion
- May 27 - Transfer Pricing in an Uncertain Economic Environment
- June 17 - AGM and Keynote Speech
- June 25 - Joint Meeting with HM Treasury and HM Revenue and Customs
- September 6 - Young International Corporate Tax Practitioners Conference (jointly with the Chartered Institute of Taxation)
- September 23 - Cross-Border Business Restructuring
- October 21 - Key Practical Issues to Eliminate Double Taxation of Business Income
- November 2 and 3 - Trilateral Meeting of the UK, German and Dutch Branches of IFA
- November 19 - Joint Cross-Atlantic Symposium with the Chartered Institute of Taxation
- December 9 - Recent Tax Cases



**International Fiscal Association
British Branch**

Thursday 28 January

6.00 - 7.30pm

Queen Mary, University of London
The Morris Lecture Theatre
The Robin Brook Centre
St. Bartholomew's Hospital
West Smithfield
London, EC1A 7BA

The Future of Agency Permanent Establishments

Jacques Sasseville: Head, Tax Treaty Unit, Centre for Tax Policy and
Administration, OECD

Jonathan Schwarz: Barrister, Temple Tax Chambers



**International Fiscal Association
British Branch**

Thursday 25 February

6.00 - 7.30pm

**Whitefriars Lecture Theatre
Freshfields Bruckhaus Deringer LLP
65 Fleet Street
London, EC4Y 1HS**

EU Litigation - Trends and Developments

Adam Zalasinski: Legal Officer in Tax Matters, European Commission

Daniel Jowell: Barrister, Brick Court Chambers



**International Fiscal Association
British Branch**

Thursday 18 March

6.00 - 7.30pm

**Grant Thornton
30 Finsbury Square
London, EC2P 2YU**

Controlled Companies - an Update and Future Proposals

Ian Brimicombe:	Director Group Taxes, AstraZeneca plc
Jon Sherman:	HM Treasury
Nick Houghton:	HMRC
Murray Clayson:	Tax Partner, Freshfields Bruckhaus Deringer



**International Fiscal Association
British Branch**

Tuesday 20 April

6.00 - 7.30pm

Queen Mary, University of London
Derek Willoughby Lecture Theatre
John Vane Science Centre
Charterhouse Square
London, EC1M 6BQ

Beneficial Ownership for Tax Purposes - A Practical Discussion

Speaker Panel to be confirmed



**International Fiscal Association
British Branch**

Thursday 27 May

6.00 - 7.30pm

Auditorium
Freshfields Bruckhaus Deringer LLP
Northcliffe House
28 Tudor Street
London, EC4Y 0BQ

Transfer Pricing in an Uncertain Economic Environment

Gavin Macrae:	HMRC
Mark Atkinson:	Leader of the Deloitte Switzerland Transfer Pricing Practice and formerly Head of UK Transfer Pricing Practice at Deloitte
Industry Speaker:	to be confirmed



**International Fiscal Association
British Branch**

Thursday 17 June

The Annual General Meeting of the British Branch of IFA
will precede the technical meeting at 5.30pm

Technical Meeting from 6.00 - 7.30pm

Berwin Leighton Paisner
Adelaide House
London Bridge
London, EC4R 9HA

AGM and Keynote Speech

Keynote Speaker: Mary Bennett, Head of Tax Treaty, Transfer Pricing and
Financial Transactions Division, OECD, Paris



**International Fiscal Association
British Branch**

Friday 25 June

9.00am - 1.00pm

Auditorium
Deloitte
2 New Street Square
London, EC4A 3BZ

Joint Meeting with HM Treasury and HM Revenue and Customs

Topics and Speakers to be confirmed



**International Fiscal Association
British Branch**

Monday 6 September

10.30am - 5.00pm, followed by cocktail reception

Auditorium
Deloitte
2 New Street Square
London, EC4A 3BZ

The Third Young International Corporate Tax Practitioners Conference - a Joint Conference between the Young IFA Network and the European Branch of the Chartered Institute of Taxation

Topics and Speakers to be confirmed



**International Fiscal Association
British Branch**

Thursday 23 September

6.00 - 7.30pm

**Slaughter and May
One Bunhill Row
London, EC1Y 8YY**

**Cross-Border Business Restructuring
(Subject 1 for 2011 in Paris)**

Richard Newby:	Tax Partner, KPMG
Gareth Green:	TP Solutions
Maura Parsons:	HMRC



**International Fiscal Association
British Branch**

Thursday 21 October

6.00 - 7.30pm

**Allen & Overy
One Bishops Square
London, E1 6AD**

**Key Practical Issues to Eliminate Double Taxation of Business Income
(Subject 2 for 2011 in Paris)**

Gary Richards: Tax Partner, Berwin Leighton Paisner

Margaret Kayser: HMRC



**International Fiscal Association
British Branch**

Tuesday and Wednesday 2 and 3 November

2.30pm - 6.00pm	2 November
9.00am - 5.00pm	3 November

Auditorium
Freshfields Bruckhaus Deringer LLP
Northcliffe House
28 Tudor Street
London, EC4Y 0BQ

Trilateral Meeting Amongst the UK, German and Dutch Branches of IFA

Topics and Speakers to be confirmed



**International Fiscal Association
British Branch**

Friday 19 November

9.00am - 5.30pm

Auditorium
Deloitte
2 New Street Square
London, EC4A 3BZ

14th Cross-Atlantic and European Tax
Symposium Jointly with the Chartered Institute of Taxation European Branch

Topics and Speakers to be confirmed



**International Fiscal Association
British Branch**

Thursday 9 December

6.00 - 7.30pm

**Berwin Leighton Paisner
Adelaide House
London Bridge
London, EC4R 9HA**

Recent Tax Cases

David Goldberg QC:

Barrister, Gray's Inn Tax Chambers

Paul Davison:

Tax Partner, Freshfields Bruckhaus Deringer

