



## Workshop on Tax Base Protection for Developing Countries New York, 4 June 2014

## TENTATIVE PROGRAMME

9:00 - 9:20 am	Welcoming Remarks
7.00 - 7.20 am	Mr. Alexander Trepelkov, Director, Financing for Development Office, Department of
	Economic and Social Affairs, United Nations
	Mr. Pascal Saint-Amans, Director, Center for Tax Policy and Administration, Organisation
	for Economic Co-operation and Development (OECD)
9:20 - 9:40 am	UN Project on Building Capacity of Developing Countries to Protect Their Tax Base Ms.  Dominika Halka, Chief, Capacity Development Unit, Financing for Development Office, Department of Economic and Social Affairs, United Nations; Mr. Harry Tonino, Economic Affairs Officer, Capacity Development Unit, Financing for Development Office, Department of Economic and Social Affairs, United Nations
9:40 - 11:30 am	Major Issues for Developing Countries in Protecting the Tax Base
	Chair: Ms. Carmel Peters, Policy Manager, Inland Revenue, New Zealand; Member of the UN Committee of Experts on International Cooperation in Tax Matters and Coordinator of the Subcommittee on Base Erosion and Profit Shifting
	Presenters: Mr. Brian Arnold, Senior Adviser, Canadian Tax Foundation, Toronto, Canada; Mr. Hugh Ault, Professor Emeritus of Tax Law, Boston College Law School, USA; Mr. Peter Barnes, Senior Lecturing Fellow, Duke University School of Law, USA; Ms. Diane Ring, Professor of Tax Law, Boston College Law School, USA; Ms. Marlies de Ruiter, Head, Tax Treaty, Transfer Pricing & Financial Transactions Division, Center for Tax Policy and Administration, Organisation for Economic Co-operation and Development (OECD) Lead Discussants: Mr. Dejan Dabetic, Senior Counsellor, Head of Tax Treaties Division, Department of Fiscal System, Ministry of Finance, Serbia; Mr. Alvaro Romano, Deputy General Director, Directorate General for Taxation, Uruguay  Group discussion with interventions by country representatives and other participants
11:30 - 11:45 am	Coffee break
11:45 - 1:00 pm	Preventing Tax Treaty Abuse Chair: Stig Sollund, Director-General, Deputy Head of Tax Law Department, Ministry of Finance, Norway; Member of the UN Committee of Experts on International Cooperation in Tax Matters and Coordinator of the Subcommittee on Transfer Pricing Presenters: Mr. Hugh Ault, Professor Emeritus of Tax Law, Boston College Law School, Boston, USA; Mr. Jacques Sasseville, Head, Tax Treaty Unit, Center for Tax Policy and Administration, Organisation for Economic Co-operation and Development (OECD) Lead Discussant: Mr. Galo Antonio Maldonado López, Director of Negotiations of Investment Agreements and Agreements for the Avoidance of Double Taxation, Ministry of Foreign Trade, Ecuador Group discussion with interventions by country representatives and other participants
1:00 - 2:30 pm	Lunch
2.00 pm	<del></del>

2:30 - 3:30 pm	Taxation of Services (including Taxation of Fees for Technical Services)  Chair: Ms. Lise-Lott Kana, Head of the Department of International Taxation, Internal Revenue Service, Chile; Vice-Chairperson of the UN Committee of Experts on International Cooperation in Tax Matters and Coordinator of the Subcommittee on Tax Treatment of Services  Presenter: Mr. Brian Arnold, Senior Adviser, Canadian Tax Foundation, Toronto, Canada Lead Discussant: Ms. Laila Benchekroun, Head of International Tax Treaties Unit, General Directorate of Taxation, Morocco  Group discussion with interventions by country representatives and other participants
3:30 - 4:30 pm	Protecting the Tax Base in the Digital Economy Chair: Mr. Ulvi Yusifov, Head of International Treaties Division, Ministry of Taxes, Azerbaijan; Member of the UN Committee of Experts on International Cooperation in Tax Matters Presenters: Ms. Jinyan Li, Professor of Tax Law, Osgoode Hall Law School, York University, Canada; Mr. Jacques Sasseville, Head, Tax Treaty Unit, Center for Tax Policy and Administration, Organisation for Economic Co-operation and Development (OECD) Lead Discussant: Ms. Phensuk Sangasubana, Head, International Tax Division, Bureau of Tax Policy and Planning, The Revenue Department, Ministry of Finance, Thailand Group discussion with interventions by country representatives and other participants
4:30 - 4:45 pm	Coffee break
4:45 - 5:45 pm	Tax Incentives and Tax Base Protection Issues Chair: Mr. Eric Nii Yarboi Mensah, Chief Inspector of Taxes, Ghana Revenue Authority, Ghana; Member of the UN Committee of Experts on International Cooperation in Tax Matters and Coordinator of the Subcommittee on Extractive Industries Taxation Issues for Developing Countries Presenters: Mr. Eric M. Zolt, Professor of Law, UCLA School of Law, University of California, Los Angeles, USA; Ms. Marlies de Ruiter, Head, Tax Treaty, Transfer Pricing & Financial Transactions Division, Center for Tax Policy and Administration, Organisation for Economic Co-operation and Development (OECD) Lead Discussant: Mr. Baye Moussa Ndoye, Head, Office of International Relations, Directorate General of Taxation, Senegal Group discussion with interventions by country representatives and other participants
5:45 - 6:00 pm	Closing Remarks Mr. Alexander Trepelkov, Director, Financing for Development Office, Department of Economic and Social Affairs, United Nations Mr. Pascal Saint-Amans, Director, Center for Tax Policy and Administration, Organisation for Economic Co-operation and Development (OECD)