



# CFE Forum 2016

## “Rebuilding international taxation: How to square the circle?”

**Date: Thursday 21 April 2016**

**Time: 9.00 - 16.30 hrs**

**Venue: Representation of the State of North Rhine-Westphalia, rue Montoyer 47, B-1000 Brussels**

The finalisation of the BEPS project has provided governments with materials, tools and blueprints for reapplying the basic principles of international taxation like economic substance, permanent establishment and value creation. Yet it is far from clear how this large-scale project should be implemented: how to shape the new provisions so that they are fit for purpose? How can the implementation effort be coordinated internationally and achieve its political objectives? And how can one assure that the reconstruction does not lose sight of the taxpayers who are going to be subject to this new regime.

It will be crucial for both companies and tax authorities to clearly understand the concepts, and how they interact, in order to ensure that reasonable transactions are not deemed to be abusive:

- What level of economic substance will be required and how will this be reflected in practical terms, so as to determine where the key economic activities are actually being performed?
- What is the difference, if any, between value creation and economic substance?
- How can the spirit of the law be understood and interpreted in a consistent way in a cross-border context?
- What is the relevance of contract law, legal terms and interpretation in the field of transfer pricing (e.g., comparability analysis): will the above aspects have to change?
- What are the implications for VAT?

To be able to adapt successfully, taxpayers must be clear about the new rules. Where traditional concepts are revised and tax rulings are under pressure, new ways of creating legal certainty and ensuring confidentiality must be explored.

More information on programme, registration and logistics are available on our [website](#).

For further details, please do not hesitate to contact the CFE Office in Brussels:

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9.00 hrs Admission

9.30 hrs Welcome by **Henk Koller**, President of the CFE  
Introduction by **Piergiorgio Valente**, Chairman of the CFE Fiscal Committee

9.45 hrs Session 1 - The EU and OECD Roadmap in Action - latest initiatives

Moderation: **Stella Raventós**, Partner, ECIJA legal, Spain

**Valère Moutarlier**, Director, Directorate General for Taxation and Customs, European Commission  
**Grace Perez-Navarro**, Deputy Director, Centre for Tax Policy and Administration, OECD  
**Ingo van Lishaut**, Deputy Director Taxation, Ministry of Finance of North Rhine-Westphalia, Germany

10.45 hrs Panel discussions

11.15 hrs Coffee break

11.45 hrs Session 2 - Economic substance - What will change?

Moderation: **Ian Young**, Chairman of the CFE Direct Tax Sub-Committee / Technical Manager International Tax, ICAEW Tax Faculty, United Kingdom

**Vanessa De Saint-Blanquat**, Movement of the Entreprises of France (MEDEF), France  
**Joachim Englisch**, Professor, Institute of Tax Law, Westfälische Wilhelms-Universität Münster, Germany  
**Martin Hess**, Senior Policy Manager Taxation, Swiss Holding, Switzerland

12.45 hrs Panel discussions

13.15 hrs Lunch

14.15 hrs CFE Award ceremony: **Albert J.Rädler Medal**

14.30 hrs Session 3 - Certainty, confidentiality, transparency - What may taxpayers expect from administration?

Moderation: **Rupert Shiers** Partner, Hogan Lovells, United Kingdom

**Petra Pospíšilová**, Chairwoman of the CFE Indirect Tax Sub-Committee / Tax Director, ČSOB Bank, Czech Republic  
**Isabelle Richelle**, Professor, Tax Institute of the University of Liège, Belgium  
**Jeroen Lammers**, Manager Policy Team Fiscal Affairs, Corporate Governance and Corporate Law, Association of Dutch Businesses, VNO-NCW, The Netherlands

15.30 hrs Panel discussions

16.00 hrs Summary and concluding words by **Piergiorgio Valente**