



## **Annual Report of the Secretary General 2018/2019**

**Dear fellow IFA Members,**

2018/2019 was memorable for its 72<sup>nd</sup> successful Annual Congress in Seoul with more than 1.600 participants including accompanying persons. It also saw the first European Region conference in Warsaw, a growing number of regional IFA activities across the globe, including but not limited to the Asia-Pacific Regional Conference in Melbourne and the Latin American Regional Conference in Panama. It also saw the foundation of again two new IFA Branches. In addition, a number of new programs are being launched. Activities since August 2018 are summarized hereafter. WIN is now a special sub-committee of IFA.

**In memoriam: Frans Spierdijk  
David R. Tillinghast  
Augusto Fantozzi**

On 15 August 2018, David R. Tillinghast, former Chairman of the PSC and distinguished international tax lawyer of New York City, passed away at the age of 88. David has served the IFA Permanent Scientific Committee for fourteen years, out of which five years as its Chairman. David was a very inspiring leader and contributor to the scientific programme of the Congresses, to which he devoted more working hours than anybody could ever ask for. He was the driving force in creating the research programme of IFA which has been of great importance for the discussions on the field of international taxation. As a token of IFA's gratitude, the General Assembly made David an Honorary Member of IFA. With special regard to his work on creating the research programme, it was decided to name it the "David R. Tillinghast Programme" in 2000. David has put in a tremendous amount of work and expertise to the benefit of IFA for which we are very grateful to him.

On March 1, 2019 former Secretary General and Honorary Member of IFA, Frans Spierdijk, passed away at the age of 87. Frans was an engaging and inspiring personality who joined IFA in 1963 and shared his great knowledge and experience as tax adviser within IFA, first as a member of the General Council and later in the Executive Board of IFA. As Secretary General from 1988 to 2002, he was at the heart of the IFA organization. During his 14 years tenure, the IFA membership grew, from 7,500 to more than 10,000 worldwide, and so did the number of Branches. Moreover, he enthusiastically supported the Regional and bilateral Conferences of IFA and visited many Branches. We are deeply indebted to him for his great and important contribution to the work and success of the IFA.

Honorary member, Prof. Avv. Augusto Fantozzi passed away on 13 July 2019 at the age of 79. Prof. Fantozzi was a very active and involved IFA Member, both in the Italian Branch and in central IFA. From 1981 until the end of 1994 he contributed to the scientific work in IFA, first as member of the PSC and since 1989 as Chair. At the end of 1994 he had to retire from the PSC upon his appointment as Minister of Finance of Italy. After his retirement from PSC he continued to be a regular participant of our Annual Congresses until some years ago. IFA is most grateful for his invaluable contribution to our association. In 2010, during the IFA Congress in Rome, he was appointed Honorary Member of IFA.



## International Fiscal Association

### Seoul Congress (72<sup>nd</sup> Congress, 2– 6 September 2018)



IFA thanks David Jin-Young Lee, Chair of the IFA 2018 Seoul Congress, and his Organising Committee for the organisation of an excellent and successful Congress for over 1.600 participants including accompanying persons. Unforgettable events include the Museum Evening at the National Museum of Korea, the dynamic Korean held at the three islands of Sebitseom located on the Han River, and the impressive Gala Dinner.

### **Scientific Programme**

IFA would like to thank everyone involved for their excellent contributions to the Scientific Programme of the Seoul Congress.

Paulo Rosenblatt (Brazil) and Manuel Tron (Mexico) were the General Reporters on Subject 1, “Seeking anti-avoidance measures of general nature and scope - GAAR and other rules”. Sai Ree Yun (Korea) acted as Chair. The Panel consisted of Georg Kofler (EU); Philippe Martin (France); Judith Freedman (United Kingdom); Danielle Rolfes (USA); Craig Elliffe (New Zealand) and Masao Yoshimura (Japan). Young Ran (Christine) Kim (Korea) acted as Secretary.

“Withholding tax in the era of BEPS, CIVs and digital economy” was the topic of Subject 2 with Chang Hee Lee and Ji-Hyun Yoon both from Korea as General Reporters, Paul Morton (United Kingdom) as Chair and Jiwon Park (Korea) as Secretary. The Members of the Panel were Gary Sprague (USA); Valère Moutarlier (EU); Jinyan Li (Canada) and Bill Sample (USA).

Seminar A, “Effectiveness of anti-tax avoidance mechanisms (including Limitations of Benefits)”, was chaired by Patricia Brown (USA). Casey Plunket (New Zealand); Jay Shim (Korea); Dennis Weber (Netherlands); Axel Verstraeten (Argentina) and Michael Miller (USA) were Members of the Panel. Mariana Eguiarte Morett (Mexico) acted as Secretary.

Seminar B dealt with “Alternatives to resolving tax disputes - evolving experience and possible developments”. Chair was Michael Quigley (USA/Korea) and Members of the Panel were Judge EuiYoung Lee (Korea); Mukesh Butani (India); Sjoerd Douma (Netherlands) and Peter Nias (United Kingdom). Eun Jin (Eunice) Choi (Korea) acted as Secretary.

“Limits of tax jurisdiction - non-traditional “business presence”” was the topic of Seminar C, chaired by Richard Vann (Australia). Panel Members were DP Sengupta (India); Sophie Chatel (OECD); Conrad Turley (Ireland/PRC) and Liz Chien (USA) whilst Soojin Lee (IBFD) acted as Secretary.

Seminar D, “Recent trends in the taxation of corporate distributions” was chaired by Guglielmo Maisto (Italy). The Panel Members were Vincent Agulhon (France); Dirk Suringa (USA); Sang-Bum Oh (Korea) and Pascal Hinny (Switzerland). Cesare Silvani (Italy) acted as Secretary.

Seminar E, “IFA/OECD” was chaired for the first time by Stef van Weeghel (Netherlands). The Panel was made up by Pascal Saint-Amans (OECD); Pam Olson (USA); Akhilesh Ranjan (India); Daniel Gutmann (France) and David Bradbury (OECD). Erisa Nuku (Albania/Netherlands) was the Secretary.



## International Fiscal Association

“Tax incentives to attract foreign direct investments without eroding the tax base” was the topic of Seminar F. The session was chaired by Peter Barnes (USA). Panel Members were Eng-Tay Geok Lee (Singapore); Na Li (China, PRC); Jesper Barenfeld (Sweden); Joon-Seok Oh (Korea) and Paolo Arginelli (Italy). Elizabeth Stevens (USA) acted as Secretary.

The “IFA/EU” Seminar was chaired for the fourth and last time by Pasquale Pistone (IBFD/Italy). João Nogueira (IBFD/Portugal) acted as Secretary. Juliane Kokott (EU); Philip West (USA); Christian Dorenkamp (Germany) and Sune Hein Bertelsen (Denmark) were Members of the Panel.

Seminar H dealt with “Recent developments in international taxation” with Chloe Burnett (Australia) as Chair for the first time. Panelists were Joshua Odintz (USA); Kees van Raad (Netherlands); Marlies de Ruitter (Netherlands) and Hyejung Claire Byun (Korea). Bob Stack (USA); Mariana Miranda Lima (Brazil) and Kuntal Dave (India) acted as expert witness. Secretary was Heidi Armin-Grimm (Australia).

The “Regional Government Officials' Seminar” was chaired by Wayne Adams (Canada). Panel Members were Hayato Furukawa (Japan); Andrew Mills (Australia); Jeongwook Choi (Korea) and Zhiyong Zhang (PRC). Maria Chang (Korea) was the Secretary.

Seminar J, “Recent International VAT/GST issues from the perspective of basic principles included in the OECD’s International VAT/GST Guidelines” was chaired by Andrea Parolini (Italy). Panel Members were Piet Battiau (OECD); Soo-A Shim (Korea); Karl-Heinz Haydl (Germany) and Fabiola Annacondia (IBFD/Italy). Selina Siller (Austria) acted as Secretary.

### **IFA Branches and Regions**

At its meeting during the Seoul Congress, the General Council of IFA accepted the application of two new IFA Branches in Honduras and Nigeria. IFA now has 72 Branches and several countries have expressed their interest in establishing IFA Branches. Membership of IFA now stands at 12.648 (per 8 July 2019) from 114 countries.

IFA now has four regions covering the globe: the Asia-Pacific, European and the Latin American Regions.



### **Regional and bilateral IFA Conferences**

Since the 2018 Seoul Congress many IFA Branches organised successful conferences at local or regional level. The complete list is published on the website up to the extent that the activities were communicated to Central IFA. Hereunder some examples of regional meetings and bilateral conferences, as well as meetings of organisations with which IFA has a standing cooperation, most of them attended by representatives of Central IFA:

- The IFA USA Annual Conference, February 2019
- The Nordic conference Finland, March 2019
- The 13th Asia Africa IFA Regional Conference 9 – 10 May 2019, Mauritius
- The 11th Latin American Regional Conference, Panama City, Panama, 29 – 31 May 2019
- The 5th Asia-Pacific conference in Melbourne, Australia, 17 – 19 June 2019



## International Fiscal Association

More detailed reports on these successful Regional Conferences can be found on the IFA website.

**IFA** European  
Region  
Conference  
Warsaw, Poland  
22-24 May 2019



### **First European Region conference in Warsaw**

Established in 2018 the European Region organised its first regional IFA conference. From 22 -24 May 2019 the conference was held in Warsaw, Poland. With more than 250 delegates, it has already found its place on the international tax calendar.

### **Executive Committee (EC) of IFA**

The EC met in Seoul (2 September 2018) and in Warsaw (24 May 2019).

#### **Composition EC**

At the 2018 meeting in Seoul the following EC Members retired from office:

- Antonella Magliocco (Italy)
- Bertil Wiman (Sweden)
- Yuko Miyazaki (Japan)

IFA is grateful for all the work they did during their term.

The following persons were appointed in the EC at the Seoul Congress:

- Massimo Antonini (Italy)
- Yushi Hegawa (Japan)
- Ulrika Gustafson Myslinski (Sweden)

Maarten van der Weijden (Netherlands) was re-appointed for another term.

#### **Annual Financial Report**

At its 2019 Spring meeting the EC approved the financial report 2018, provided by IFA's General Treasurer, Jos Beerepoot. 2018 shows a surplus of € 300.981 which is added to the free reserves. Savings were made on the publication of the Cahiers by restructuring both the process of printed and digital publication through a new supplier, and by streamlining various expenses. Also the Brazilian Branch made a considerable contribution after its successful Congress in Rio de Janeiro in 2017. This contribution is much appreciated by IFA. The financial report will be submitted to the General Council, for final approval by the General Assembly at their combined meeting during the 2019 London Congress.

The Congress in Seoul has again been successful with more than 1.600 participants and the Korean Branch has stated they will make a contribution to Central IFA. This contribution is not reflected in the financial annual report over 2018 but will be in the next annual report. The support and contribution of the Korean Branch is much appreciated and the EB and EC thank the Korean Branch for their support.

#### **Future IFA Congresses**

Many Branches have organised successful IFA congresses in the past and IFA is fortunate to have more Branches showing an interest in hosting a future Annual Congress. After ample consideration, the EC has decided to amend the application process in order to allocate three congresses at one time. This allows for the right balance and regional spread now that IFA has become truly global. Branches, including those branches that already applied as per the previous format, will be advised.



## International Fiscal Association

### **Branch Development Fund (BDF)**

The BDF Committee had its first meeting during the Seoul Congress followed by conference calls. The call for applications was sent to all Branches in January 2019. The deadline for Branches to send in applications was 1 May 2019 with the grant to be given in June to have ample time for the event to be carried out by the end of 2019. Eight Branches sent in an application of which two were rewarded with support from the BDF: the IFA Branches in Ukraine and Bosnia and Herzegovina. Their activities are scheduled to take place in October/November 2019.

Following the successful Travelling Lectureship Programme (TLP) of 2017 in Central & Eastern Europe, another TLP is being organised to take place in the Caribbean/Central America region in February 2020. EC member Edgar Anaya (Mexico) is coordinating the project together with IFA's Colombian Branch.

During its Spring 2019 meeting, the EC endorsed proposal from the EB to hold an annual TLP. An annual budget of EUR 25'000 will be proposed.

### **Permanent Scientific Committee (PSC)**

Under the guidance of Chair Robert Danon (Switzerland) and Vice Chair Scott Wilkie (Canada), the PSC continued its valuable work and met in Seoul (2 September 2018) and in London (7-8 February 2019).

#### **Composition PSC**

The following PSC members retired at the Seoul Congress:

- Craig Elliffe (New Zealand)
- Wei Cui (PRC)

IFA is grateful for their valuable time and input.

The following persons were appointed in the PSC at the Seoul Congress:

- Casey Plunket (New Zealand)
- Xiang Wei (PRC)
- Anders Nørgaard Laursen (Denmark)

The following persons were re-appointed for another term of two years:

- Jorge Gebhardt (Argentina)
- Marcos Catao Vinhas (Brazil)
- Jurgen Ludicke (Germany)
- Valerio Barbantini (Italy)
- Jennifer Roeleveld (South Africa)

#### **Scientific Programme of IFA**

At its meetings, the PSC extensively discussed the Subjects and Seminars for the Congresses 2019-2022. Valuable contributions were made by the General Reporters, the Chairs of the Sessions and the members of the Programme Working Group.

### **Publications and communication**

#### **IFA Cahiers Online**



## International Fiscal Association

In line with the approval by the GC/GA of the step-by-step digitisation of the IFA Cahiers, the IFA Cahiers are now fully available online. The digital publication consists of the General Reports as well as all Branch Reports including the biographies and abstracts.

The “Online Cahiers” are published on the IFA website and are only accessible by IFA Members. The Cahiers with all its Reports (General Report, EU Report and the Branch Reports) are now available from 1980 onwards. It is possible to search for a specific Cahier via a large set of predefined keywords, or go directly to a specific year and select Cahier A or Cahier B. The digital publications are made available through the websites of IFA, of its sister organisation IBFD and of the publisher.

As of this year the printed publication of the Cahiers consists of the General Reports of both Subject 1 and Subject 2, together with EU Reports and short summaries of all Branch reports. By continuing the printing of the General Reports, IFA will sustain the legacy of the Cahiers.

During its Spring 2019 meeting, the EC decided to make available to those branches, which so wish, a full paper copy of the Cahiers. Printing and distribution to members will be at the cost of branches which order such full paper copies.

### **2019 Cahiers**

Volume 104a of the Cahiers 2019 discusses Interest deductibility: the implementation of BEPS Action 4, and includes a general report by James Gadwood (USA) and Paul Morton (UK), an EU report by Adam Zalasinski, and 44 Branch reports.

Volume 104b, Investment Funds, counts 42 Branch reports next to the general report written by Oktavia Weidmann (Switzerland) and Sung Hwang (USA).

### **Website, Newsletter and Congress App**

The IFA website has been completely updated and renewed in the summer and fall of 2018. With a fresh and modern design, it provides up-to-date information on all IFA Branches, IFA Regions and Central IFA. New features will be added continually such as webcasts of the Congress sessions, a best practices guide for Branches and a website template for Branches to use. The secured part of the website is accessible to members only and informs the members on the meetings and gives access to the Congress documents.

In 2018 the IFA App was further extended and now not only includes up to date information on IFA and messages to its community but also the Congress App, developed specifically every year for the Annual IFA Congress. It provides all information on the scientific and social programme as well as on Congress participants and speakers. The App has become a traditional feature during the Annual IFA Congresses, which is highly appreciated by the attendants.

Regularly members are kept informed by the IFA newsletters on publications, activities and the annual congress.

### **LinkedIn groups of IFA**

IFA now has a number of thriving groups: Not only YIN and WIN, but also many of the regions have established their own LinkedIn group. To stay up to date of activities and events, members can stay connected by becoming part of the IFA community:

<https://www.linkedin.com/company/international-fiscal-association>



**International Fiscal Association**



### **Young IFA Network (YIN)**

IFA's young community is thriving as more and more Branches have become interested in YIN. 59 IFA Branches have YIN Representatives that promote and coordinate the YIN activities in their Branches. In 2018 Claudia Suter (Switzerland) was appointed chair of the YIN Committee, succeeding Sanjay Iyer (Hong Kong). The YIN Community is present on LinkedIn and on Facebook. It has grown into a robust network developing activities in a growing number of Branches. The YIN Committee gets full support of Central IFA in its actions to make IFA even stronger in the future.

### **IFA President YIN Scientific Award**

In 2019 the Jury, chaired by Miranda Stewart (Australia), received 9 applications. The Jury concluded to award the prize to Hannelore Niesten (Belgium) for her work entitled "Revisiting the Fiscal and Social Security Status of Highly Mobile Workers in the Road and Railway Transportation: Quo Vadis?".

### **YIN activities**

During the 2018 Seoul Congress successful and well attended YIN activities have been organised, such as the YIN Seminar, the YIN Meet & Greet and the YIN Party. The London Congress will again host a number of activities for our young tax professionals.

### **Women IFA Network (WIN)**

In recent years, the female membership of IFA has grown to more than 2.000 female members across the globe; there is a growing awareness of the significance of professional women in international taxation.

2018 saw the further consolidation and growth of the Women IFA Network (WIN) guided by the WIN Steering Committee. WIN has been established to represent and connect the many professional women working in international tax. The objective is to level the playing field for women and to increase the involvement of women in all IFA levels, including improving the representation of women in the PSC and the scientific programme of IFA.

During the 2019 London Congress, it will be proposed that WIN becomes a special sub-committee of IFA. A WIN luncheon will be organised at the 2019 London Congress.

### **IFA Prizes**

#### **Mitchell B. Carroll Prize**

The Jury for the MBC Prize received 17 entries from Australia, Austria, Belgium, Brazil (2x), Croatia, France (3x), Germany, Hong Kong, Poland, Portugal, South Africa, Spain, Venezuela and Vietnam. We are very grateful for the time and efforts spent by the Jury members in meeting this daunting task. The Jury concluded to award the 2019 Prize to Nicolas Vergnet (France) for his work "La création et la



## International Fiscal Association

répartition de la valeur en droit fiscal International (Value creation and allocation in international tax law)”.  
Honourable mentions were granted to Kasper Dziurdz (Poland) for his work “Non-Discrimination in Tax Treaty Law and World Trade Law - Impact of Formal, Substantive and Subjective Approaches” and to Filip Debelva (Belgium) for his work “International Double Taxation and the Right to Property - A Comparative, International and European Law Analysis”.

Honourable mentions were granted to Kasper Dziurdz (Poland) for his work “Non-Discrimination in Tax Treaty Law and World Trade Law - Impact of Formal, Substantive and Subjective Approaches” and to Filip Debelva (Belgium) for his work “International Double Taxation and the Right to Property - A Comparative, International and European Law Analysis”.

### **Maurice Lauré Prize**

The Jury for the ML Prize received 3 entries, namely from Austria, Poland and Ukraine. They unanimously concluded to award the 2019 Prize to Thomas Bieber (Austria) for his work entitled “Der Einfuhrumsatz - Die umsatzsteuerliche Behandlung der Einfuhr von Gegenständen aus Drittländern in die EU unter besonderer Berücksichtigung der österreichischen Einfuhrregelungen des UStG 1994”.

### **IFA 2025 strategy**

Many if not all initiatives mentioned above arise from a full review of the IFA 2025 strategy that the EB started one year ago. There will be more to come, in terms of new activities but also continuing efforts to make sure that IFA, a global organization, continues to work in a global manner, including, in its typical neutral way, all constituencies worldwide.

### **Closing remarks**

We are most grateful for the dedication and enthusiasm of so many members who spend part of their precious time to contribute to IFA – they are making and keeping IFA the unique, neutral and independent platform for study, research and dialogue on international taxation.

We also want to thank our General Manager, Cecile Riphagen, and all employees of our Secretariat in Rotterdam, Ms Anja van Zwietering, Ms Marga Vink and Ms Anita Burggraaf for their absolute dedication to the multiple activities of IFA, that they very competently manage on a daily basis.

IFA’s objectives are the study and advancement of international and comparative law in regard to public finance by organising Annual Congresses, Regional Conferences and publishing scientific research while taking current fiscal developments and changes in local legislation into account. Reaching these objectives assumes that IFA, in all its global, regional, national and local activities, must remain a neutral, technical, independent and non-lobby organisation.

Traditional fiscal borders are fading in a global economy that is becoming more digitised by the day. An increasing number of jurisdictions in the world is getting involved in international taxation and the BEPS project of the OECD will also leave its impact. These continuing developments will provide IFA with ample opportunity to fulfil its objectives and grow stronger in all regions across the globe.

**8 July 2019**

**Jean-Blaise Eckert**  
**Secretary General IFA**