

Annotated Agenda for a Conference on “Developing a Tax Environment for Growth and Competitiveness”

A Conference sponsored by the Association Internationale de Droit Economique, the Institute for Austrian and International Tax Law, WU (Vienna University of Economics and Business) with the support of European Commission.

Vienna, 18/19 January 2013

Background

The financial and economic crisis – the most severe since the Second World War – has raised new questions on the role of taxation in today's economic policy environment. It has underlined the importance of taxation for achieving budgetary stability, the return to economic growth and an equitable sharing of the tax burden.

The erosion of the tax base in the context of growing economic interdependence characterized by the globalization of markets and companies has become of growing concern to governments. This issue is gaining political focus as can be seen from the Los Cabos G20 Communiqué which stated "we reiterate the need to prevent base erosion and profit shifting". Progress has been achieved notably with respect to the abuse of tax havens and harmful tax practices, but much remains to be done. Developing countries face particular challenges in enforcing their tax rules, mainly because of their lack of capacity in tax administrations.

The purpose of the Symposium is to engage a dialogue among decision makers, taxpayers and other stakeholders on the possibilities of achieving more transparency and convergence of national policies in the field of taxation, and developing generally agreed principles. The task is to deepen analysis of the different forms of taxation and their implication for crisis management and longer term growth strategies. As compared to the issue of tax havens where a large consensus has already been achieved, there is as of now, little common understanding on the action needed for greater international convergence of tax policies to promote inclusive and sustainable growth and to counter base erosion and profit shifting. The Symposium will contribute to increase the awareness of these challenges and develop a future platform for action.

Key elements of the agenda

Friday, 18 January 2013

Opening

09:00 – 09:15

Eric Balate, President of A.I.D.E.,

Michael Lang, Head of Institute for Austrian and International Tax Law, WU

Session 1: The Changing International Environment for Tax Policies

09:15 – 10:30

Chair: Michael Lang, Professor, Head of the Institute for Austrian and International Tax Law

Algirdas Semeta, Commissioner for Taxation, European Union

David Gauke, Exchequer Secretary to the Treasury, facing all countries

Vieri Ceriani, State secretary for taxation, Italy

José Antonio Meade Kuribreña, Secretario de Hacienda y Crédito Público, Gobierno Federal de Mexico (TBC)

During this panel session the different speakers will address the impact of globalization on national policies. The changing structure of the world economy with the increasing weight of emerging economies will be part of this debate. Taxation is at the heart of actual crisis management and longer term strategies for competitiveness and growth. Reconciling the role of taxation for revenue rising and its leverage for achieving broader objectives of sustainable development and fairness facing all countries is a major challenge.

10:30 – 11:00 Coffee Break

Session 2: Tax policies: Meeting the Challenges

11:00 – 12:30

Chair: Jeffrey Owens, Professor, Institute for Austrian and International Tax Law

Christian Valenduc, Head of the Tax Policy Unit, Studies Department, Federal Ministry of Finance, Belgium

Krister Andersson, Chairman of the Tax Policy Group at BUSINESSEUROPE

Michel Aujean, former director taxation, European Union

Will Morris, General Electric

Victoria Perry, IMF Fiscal Affairs Department

Tax is becoming increasingly important as a determinant of the attractiveness of a country for investment and the location of services. What taxes are important in these decisions? Are taxes just relevant for decisions on how to structure and finance investments? Are taxes a key as to where to locate intangibles? What role does the tax administration play? How do we get more transparency and cost/benefit analysis in the operation of incentives and in the role of MNE:

Session 3: The role of taxation and good governance in reducing inequalities and improving fairness in developed and developing countries

14:00 – 15:30

Chair: Gershem T. Pasi, Senior Member of the ATAF Council

John Martin, Director, DELSA, OECD

John Evans, Secretary General, Trade Union Advisory Committee to OECD

Grégoire Bakandeja wa Mpungu, Vice-chair, Institut Euro-Africain de Droit Economique, former Minister of Economy, Industry and Commerce, RDC

Hayley Reynolds, National Treasury, South Africa

Work at the OECD has shown that inequalities in the distribution of income and wealth have reached levels not seen since the 1920s. The post tax distribution of income and wealth is increasingly concentrated in the top 10% of income earners. Over the last 20 years government taxing and spending policies appear to have lost effectiveness in reducing these inequalities. Reducing inequalities is a particular challenge for developing countries since the elites tend to oppose any attempt to impose progressive and effective taxation. This session will explore what are the options open to countries to address these trends and to build up greater social cohesion.

15:30 – 16:00 Coffee Break

Session 4: Tax transparency and harmful tax practices

16:00 – 17:30

Chair: Monica Bhatia, Head of the OECD Global Forum Secretariat

Chris Lenon, Rio Tinto

Rafael Santiago Lima, Federal Revenue Service of Brazil

John Christensen, Tax Justice Network

Philip Kermode, Director Direct Tax, European Commission

Juergen Rittmaier, Special Advisor EITI, former Assistant Director of the IMF

The concept of transparency and exchange of information will continue to dominate the political debate, both as regards the taxation of individuals and corporations. Since the 2009 G20 summit considerable progress has been made in improving tax cooperation to counter non compliance through the use of offshore centres. The debate on EITI and country by country reporting continues. Governments are showing an interest in how to improve transparency in the operation of incentives for investment. At the same time business is calling for greater transparency in the formulation and implementation of tax policy.

Evening Event:

20:00 Dinner at a typical Viennese "Heurigen" (wine tavern)

Saturday, 19 January 2013

Session 5: Taxing Multinational Enterprises - Getting the right balance

09:00 – 11:00

Chair: Manfred Schekulin, Chair of the OECD Investment Committee

Michelle Levac, Chair of Working Party 6 of the OECD

Jacques le Cacheux, Directeur à l'OFCE

Seth Terkper, Deputy Finance Minister, Ghana

Stephan Kuhn, Ernst & Young

Stig Sollund, Chair of UN Transfer Pricing Group

Edoardo Traversa, Professor, Catholic University of Louvain

Christian Kaeser, Global Head of Tax and Corporate Vice President for Siemens

Multinational enterprises continue to play a dominant role in the global economy accounting for almost 50% of cross-border activities. Currently the taxation of

the related parties of an MNE is based on the arms' length principle (ALP). This session will examine the difficulties that developed and developing countries are facing in the application of this principle and will look at how its application can be improved and simplified in the light of recent EU, OECD and UN work.

11:00 – 11:30 Coffee Break

Session 6: Providing a framework for policy makers

11:30 – 12:30

Chair: Richard Stern, Director International Finance Corporation

Theo Keijzer, Chair ICC Tax Committee

Matthias Witt, Head of Public Policy Section, German Agency for International Cooperation(GIZ)

Mathilde Dupré, French Coordinator Tax Justice Network

Jeffrey Owens, Professor, Institute for Austrian and International Tax Law

This final session will examine what frameworks can policy makers use to address the issues discussed in earlier sessions.

Speakers will discuss what are the trade offs between the different objectives set for tax policy, what's the political economy of tax reforms and, how to deal with transitional issues

Concluding remarks by the rapporteurs

12:30 – 13:00

Dr. Rainer Geiger, Member of the Board, Association Internationale de Droit Economique

Mr. Philip Kermode, Director European Commission

Prof. Dr. Jeffrey Owens, Professor, Institute for Austrian and International Tax Law, WU

Venue

The conference will take place:

WU (Vienna University of Economics and Business)
Augasse 2-6
1090 Vienna, Austria
Ceremony Hall, 1st floor

Application form

There are no participation fees. Participants will cover their own expenses. Places are limited, admission granted to applicants on a first come first served basis.

Please download the participation form at www.wu.ac.at/taxlaw or register online at <https://www.wu.ac.at/wuw/institutes/taxlaw/events/taxandgrowth2012>

Accommodation

Conference delegates are responsible for their accommodation costs. WU has held a limited number of rooms in the following hotels at following rates (bed/breakfast single room per night):

Hotel Arkadenhof <http://www.arkadenhof.com/> - Euro 83,- WIFI: on surcharge
reservation: arkadenhof@gmail.com

Hotel Alexander <http://www.alexander.co.at/> - Euro 63,- WIFI: for free
reservation: hotel@alexander.co.at

Hotel Bellevue <http://www.austria-hotels.at/de/hotel-bellevue/index.html> -
Standard room: Euro 86,-
De Luxe room: Euro 108,-
Junior Suite Euro 128,- For all: WIFI on surcharge
reservation: c.zimmermann@austria-hotels.at

Please make your reservation by email mentioning "**tax.and.growth**" in order to get the special conference rate. When booked through the website or through booking agencies, the special rate will not be available.

Conference Language

The working language at the conference is English. Presentations can also be made in French, with an outline and summary provided in English.

Information on the Organizers

Association Internationale de Droit Economique: An international network for research on matters of economic law and international cooperation, which provides a forum for interdisciplinary discussion through conferences and workshops and also publishes a three-monthly journal, the Revue Internationale de Droit Economique (RIDE).

Institute for Austrian and International Tax Law, WU

The Institute for Austrian and International Tax Law of WU (Vienna University of Economics and Business) is among the largest academic institutions in the world conducting research on and teaching tax law. Both research and teaching focus mainly on corporate, international and European tax law.

The WU Global Tax Policy Center (which is part of the Institute) aspires to become one of the leading think tanks on the interface between tax policy, tax administration and tax law in today's global economy. The Center provides a forum for discussions on tax policy formulation and implementation, drawing upon the experiences of developed and developing countries and economies in transition.

Conference Rapporteurs

Jeffrey Owens, Professor, Institute for Austrian and International Tax Law, former Director of the Centre for Tax Policy and Administration, OECD (jeffrey.owens@wu.ac.at)

Rainer Geiger, Member of the Board, Association Internationale de Droit Economique, former Deputy Director, Financial and Enterprise Affairs, OECD (rainer.geiger@law-governance.de)