

# GLOBAL IFA TRAVELLING LECTURESHIP PROGRAMME 2024



**TOPIC: INTERNATIONAL TAX DISPUTE RESOLUTION**  
**REGISTRATION: FREE OF CHARGE**



**Lecturer: Porus Kaka** (Honorary President IFA, Senior Advocate (India) & Barrister (England & Wales) and Trustee (IBFD))

**Opening of scientific agenda:** Prof Robert Danon (Chair Global IFA PSC)

**Panelists:**

**DR. Mekar Satria Utama, SE., MP, Acc.** (Director of International Taxation – the Director General of Taxes)

**Patrick Connolly** (TEI Asia President)

**Permana Adi Saputra** (IFA Indonesia Secretary General)

**JAKARTA,  
INDONESIA**

**13 MAY, MONDAY**

**16:00-18:00**

On Five  
Grand Hyatt Hotel 5th Floor  
Jl. MH Thamrin Kav. 28-30  
Jakarta 10350

**Language:** English

**IN COOPERATION WITH:**  
*INTERNATIONAL CHAMBER OF COMMERCE (ICC)*  
*TAX EXECUTIVES INSTITUTE (TEI)*

**To register, please send an e-mail to IFA Indonesia:  
[ifa.indonesia.chapter@gmail.com](mailto:ifa.indonesia.chapter@gmail.com)**



16:00-16:15. Arrival attendees and Coffee

16:15-16:25. Opening words: **Ichwan Sukardi** (IFA Indonesia President)

16:25-16:30. Opening of scientific agenda: Prof. Robert Danon (Chair Global IFA PSC). Introduction of topic, objectives, travelling lecturer and panel composition

16:30-16:55. Lecture on a main topic: **Porus Kaka**

- Objectives of BEPS Action 14 and global standards on dispute resolution, including Peer Review Mechanism
- Scope of the MAP (including as the case may be tax treaty arbitration): what is inside and outside the MAP
- Access/denial of MAP requests
- Judicial review in relation to the denial of access to MAP and information access
- Possible improvements to the OECD Commentary on Art. 25 to better align the practice to the objectives of BEPS Action 14

16.55-17.30. Panel discussion. Moderation: **Prof. Robert Danon**

**DR. Mekar Satria Utama, SE., MP, Acc., Patrick Connolly, Permana Adi Saputra**

- Indonesia tax treaty dispute resolution policy and practice and standards laid down by BEPS Action 14;
- Perspective and experience with tax treaty arbitration;
- Current experiences: (i) increase or decrease of MAP cases/country(ies) with the most important number of MAP cases, (ii) experiences with developing countries;
- Challenges raised by capacity building;
- Indonesia's perspective on the handling of P2 disputes.
- Perspective of businesses on the above inputs.

17.30-17.40. Q&A with the floor

17.40-17.45. Concluding remarks: **Prof. Robert Danon**

17.45-19.00. Cocktail Reception

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