

GLOBAL IFA TRAVELLING LECTURESHIP PROGRAMME 2024



TOPIC: INTERNATIONAL TAX DISPUTE RESOLUTION
REGISTRATION: FREE OF CHARGE FOR IFA MEMBERS

Lecturer: Bruno Gibert (France)

Panelists:

Sarah Blakelock (IFA UK)

Catherine Harlow (ICC)

John Connors (ICC)

LONDON, UK

28 FEBRUARY,

WEDNESDAY

17:30-20:00

 **Slaughter & May**
One Bunhill Row, London EC1Y 8YY

Language: English

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

To register, please send an e-mail to IFA UK:
admin@ifa-uk.org



17:30-18.00 - Arrival attendees and Coffee

18:00 -18:10. Opening words: Prof. Guglielmo Maisto (Global IFA President) and Philip Baker (President IFA UK)

18:10-18:15. Opening of scientific agenda: Robert Danon (Chair Global IFA PSC): introduction of topic, objectives, travelling lecturer and panel composition

18:15-18:45. Lecture on a main topic: Bruno Gibert

- 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
- Relation to EU directive

18.45-19.10. Panel discussion

Sarah Blakelock from (IFA UK):

- UK 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;
- UK perspective on the handling of P2 disputes.

Catherine Harlow (ICC), John Connors (ICC)

- Perspective of businesses on the above inputs.

19.10 -19.20. Q&A with the floor

19.20-19.30. Concluding remarks: Prof. Guglielmo Maisto and Prof. Robert Danon

19.30 – 20.00. Cocktail Reception

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