



Annual Report of the Secretary General 2019/2020

Dear fellow IFA Members,

2019 was memorable for its 73rd successful Annual Congress in London with more than 2.200 participants including accompanying persons. It also saw the foundation of a new IFA Branch in the Democratic Republic of Congo and a steady growth of members and activities across the globe. The year 2020 brought about lasting change. The Covid-19 crisis has altered the world forcing it to a shutdown in order to fight the virus. IFA events such as all regional conferences and many bilateral and Branch activities were either cancelled or adapted to a virtual equivalent. To anticipate future developments and to ensure the health and wellbeing of our participants, the Annual IFA Congress to take place in Cancun in October 2020, has been postponed to 2022. Instead IFA will offer a virtual programme to its members in November 2020, benefitting from the hard work already done by the Cancun Organising Committee and by IFA's Permanent Scientific Committee. The Berlin 2021 Congress will be held at its original dates in 2021 and we hope to see as many of you there to greet you in person. Its format will take into account the development of the worldwide sanitary situation.

In memoriam

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.

Dr. Marcus Desax, Honorary President of IFA, passed away on 8 October 2019 at the age of 71. Marcus represented the IFA Swiss Branch in IFA General Council, first as a deputy member (1988-1993) and then as a member (1994-2000). At the 2005 IFA Congress in Buenos Aires, he was appointed President of the IFA. That same year, the Young IFA Network YIN was launched, and Marcus made the YIN the first priority of his presidency. As a result, during his tenure, Young IFA members took on more roles in the Permanent Scientific Committee, the Executive Committee and the Congresses. In 2014, the first 'IFA President YIN Scientific Award', established by Marcus, was awarded. On retirement from his role as President in 2009, at the Vancouver IFA Congress, Marcus was appointed Honorary President as a token of IFA's gratitude. He remained in touch with IFA through participation in the Annual Congresses, usually with his wife Cornelia, and other national and regional IFA conferences. We are deeply indebted to Marcus for his important contributions to the work and success of the IFA.

The sad news reached us in January 2020 that Professor **Dr. Jürgen Lüdicke**, partner at PricewaterhouseCoopers (PwC) in Hamburg and active IFA member passed away at the age of 63. Jürgen Lüdicke was a member of numerous professional bodies, including IFA's Permanent Scientific Committee, the board of the German Branch of IFA. He was a very active and involved IFA Member, both in the German Branch and in Central IFA. He was one of the best international tax experts. From 2014 until today he contributed to the scientific work in IFA, as member of the PSC. Next to his active role in the PSC he was a regular participant and speaker at our Annual Congresses. IFA is most grateful for his invaluable contribution to our association.



London Congress (73rd Congress, 8– 12 September 2019)

IFA thanks Joy Svasti-Salee, President of the IFA 2019 London Congress, and her Organising Committee for the organisation of a successful Congress for over 2.200 participants including accompanying persons. Memorable events include the Museum Evening at the National Gallery, the Cultural evening held at the iconic St. Paul's Cathedral and the wonderful Gala Dinner at the international renown Hurlingham Club.

Scientific Programme

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

James Gadwood (USA) and Paul Morton (United Kingdom) were the General Reporters on Subject 1 "Interest deductibility: the implementation of BEPS Action 4". Yash Rupal (United Kingdom) acted as Chair. The Panel consisted of Bernd-Peter Bier (Germany); Pierre-Henri Durand (France); Karishma Phatarphekar (India) and Adam Zalasinski (EU). Sandra Martinho Fernandes (Luxembourg) acted as Secretary.

"Investment funds" was the topic of Subject 2 with Oktavia Weidmann (Switzerland) and Sung Hwang (USA) as General Reporters, Jean Schaffner (Luxembourg) acted as Chair and Olympe Alexandre (Luxembourg) as Secretary. The Members of the Panel were Delphine Charles-Péronne (France); Roland Hummel (Germany); Nigel Johnston (Canada) and Florian Ponce (Switzerland).

Seminar A, "Tax and sharia instruments", was chaired by Osman Mollagee (South Africa). Peter Barnes (USA); Monia Naoum (Netherlands) and David Saleh (United Kingdom) were Members of the Panel. Carolina Descio (United Kingdom) acted as Secretary.

Seminar B dealt with "Form and substance". Chair was Tony Pagone (Australia) and Members of the Panel were Richard Collier (OECD); Robert Desax (Switzerland); Michael Lang (Austria), Philippe Martin (France) and Lionel Nobre (Brazil). Melissa Elechiguerra (Spain) acted as Secretary.

"Indirect taxation and financial services" was the topic of Seminar C, chaired by Jennie Rimmer (United Kingdom). Panel Members were Joanne Clarke (UAE); Karl-Heinz Haydl (Germany); Daniel Lyons (United Kingdom); Bevan Miles (New Zealand) and Saibh Young (United Kingdom) whilst Shan Sun (United Kingdom) acted as Secretary.



Seminar D, “Hybrid instruments and entities” was chaired by Diana Wollman (USA). The Panel Members were Renata Emery (Brazil); Christoph Marchgraber (Austria); John Peterson (OECD) and Dario Sencar (Italy). Ioana-Felicia Rosca (Austria) acted as Secretary.

Seminar E, “Taxation of space” was chaired by James Anderson (United Kingdom). The Panel was made up by Timothy Nelson (USA); Jonathan Schwarz (United Kingdom); Rohan Shah (India); Christine Simoes (Brazil) and Yun Zhao (Hong Kong). Alex Rigby (United Kingdom) was the Secretary.

The “IFA/OECD” Seminar was chaired for the second time by Stef van Weeghel (Netherlands). Panel Members were Richard Collier (OECD); Lafayette (Chip) Harter (USA); Huey Min Chia-Tern (Singapore); Amy Roberti (USA); Pascal Saint-Amans (OECD); Wolfgang Schön (Germany) and Natalia Quiñones Cruz (Colombia). Erisa Nuku (Netherlands) acted as Secretary.

“Tax transparency/enhanced cooperation/CbCR experience” was the topic of Seminar G chaired by Timothy McDonald (USA). Alessandro Turina (IBFD) acted as Secretary. Reinhard Biebel (EU); Marlies de Ruyter (Netherlands); Alan McLean (United Kingdom); Achim Pross (OECD); Natalia Quiñones Cruz (Colombia) and Takahiro Yasui (Japan) were Members of the Panel.

Seminar H “Unilateral treaty override” was chaired by Mukesh Butani (India). Panel Members were Sophie Chatel (OECD); Robert Danon (Switzerland); Adolfo Martín Jiménez (Spain) and David Rosenbloom (USA). Parul Jain (India) was the Secretary.

The “Recent developments in international taxation” Seminar was perfectly chaired for the second time by Chloe Burnett (Australia). Panelists were Jos Beerepoot (Netherlands); Ruth Mason (USA) and Dominic Robertson (United Kingdom). John Avery Jones (United Kingdom); Michael Keen (USA); and Stig Sollund (Norway) acted as guest speakers. Secretary was David Lewis (Australia).

The “IFA/EU” Seminar was chaired for the first time by Luc de Broe (Belgium). Panel Members Daniel Gutmann (France); Christian Kaeser (Germany); Edwin Visser (Netherlands) and Bert Zuidendorp (EU). Jasper Korving (Netherlands) acted as Secretary.

“Brexit” was the topic of Seminar K chaired by Melissa Geiger (United Kingdom). Sandy Bhogal (United Kingdom); Neil Sherlock (United Kingdom); Amanda Tickel (United Kingdom) and Andrea Tolley (United Kingdom) were Members of the Panel.

Appointment Honorary Members at the London Congress

During the Congress in London the General Assembly appointed Jos Beerepoot as Honorary Member for his contribution to IFA as General Treasurer for twelve years.



IFA Activities, Committees and Finances

IFA Branches and Regions

At its meeting during the London Congress, the General Council of IFA accepted the application of a new IFA Branch in the Democratic Republic of Congo. The General Council also unanimously approved the proposal to discontinue the IFA Branch in Croatia and in Barbados due to years of inactivity. Croatian members and members from Barbados who wish to stay member of IFA were requested to become a direct member and hopefully a branch can be re-established in both jurisdictions in the near future. IFA has 72 Branches and several countries have expressed their interest in establishing IFA Branches. Membership of IFA now stands at 13.429 (per 24 September 2020) from 118 countries.

IFA now has three established IFA regions: the Asia-Pacific, European and the Latin American Regions. The North American region is about to be launched. An African region covering the African continent also meets significant interest among African members. We will actively pursue these projects.

Regional, bilateral and other IFA Conferences

Due to the Covid-19 crisis, most regional and bilateral IFA conferences had to be cancelled from early 2020 onwards. Some were developed into successful virtual events, accessible to all IFA members.

Branch Development Fund (BDF)

In 2019 the IFA Branch Development Fund supported the two following successful IFA conferences:

- International TAX Conference in Sarajevo, 30-31 October 2019, organised by the IFA Branch Bosnia-Herzegovina.
- Tax transparency and digitalization era: Ukrainian view on global tax challenges, 15 November 2019, organised by the IFA Ukrainian Branch.

Both events were successful and a call for applications will be sent in 2021.

Travelling Lectureship Programme (TLP)

The TLP to take place in the Caribbean/Central America in June/July 2020 has been cancelled as a result of the Covid-19 crisis. A new TLP will be discussed at one of the future EC meetings.

David R. Tillinghast Research Programme (DRT)

In 2019 Cape Town and Singapore were granted funding from the DRT Programme:

- A DRT conference on Digital Economy Taxation organised by the Singapore Management University School of Law ("SMU"). The programme is crafted to bring out the unique Asian perspective including understanding the tax implications arising from digital economy models in Asia, including China, India and Indonesia.
- A DRT conference by the University of Cape Town and its Tax Unit for Fiscal Research, operating as an interdisciplinary research unit between the Faculties of Commerce and Law in the University of Cape Town. This 2-day academic Conference will have the theme: Evaluating global tax solutions for application in Africa.

Both conferences were to be held in April 2020 but have been postponed due to the Covid-19 crisis. They will be held in the Spring of 2021 and 2022.



Executive Committee (EC) of IFA

The EC met in London (8 September 2019) and communicated by e-mail in May 2020 due to the Covid-19 crisis on agenda items for approval and informational purposes. Virtual EC meetings are planned for September and November 2020.

Composition EC

At the 2019 meeting in London the following EC Members retired from office:

- Victor Matchekhin (Russia)
- Gustavo Brigagao (Brazil)
- Jos Beerepoot (Netherlands) as Treasurer of IFA

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

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

- Hein Zillikens (Netherlands) as Treasurer of IFA

Niv Tadmor (Australia), Christian Comolet-Tirman (France), Christian Kaeser (Germany) and David Lee (Korea, Rep. of) were re-appointed for another term.

Annual Financial Report

At its 2020 virtual Spring meeting the EC approved the financial report 2019, provided by IFA's General Treasurer, Hein Zillikens. The year 2019 shows a surplus of € 133.707 which is added to the free reserves. The result is largely due to cost savings on various budget items, and a raise in membership numbers. Also, the Korean Branch donated € 50.201 in 2019 after the positive result of the 2018 Seoul Congress. 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 virtual IFA event in November 2020.

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 London (8 September 2019) and in Madrid (20-21 February 2020). 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.

Composition PSC

The following PSC members retired at the London Congress:

- Krister Andersson (Sweden)
- Dariusz Wasylkowski (Poland)

IFA is grateful for their valuable time and input.

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

- Jesper Barenfeld (Sweden)
- Nico Derksen (Singapore)
- Adam Zalasinski (Poland)

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

- Georg Kofler (Austria)
- José C. Silva Sanchez-Gavito (Mexico)
- Peter Barnes (USA)



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. 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 2020 the Jury, chaired by Miranda Stewart (Australia), received 8 applications. The Jury concluded to award the prize to Giorgio Beretta (Italy) for his work entitled "Citizenship and Tax". Honourable mentions were given to Elizabeth Gil Garcia (Spain) for her work entitled "The Single Tax Principle: Fiction or Reality in a Non-Comprehensive International Tax Regime?" and to Lucas de Lima Carvalho (Brazil) for his work entitled "Spiritus Ex Machina: Addressing the Unique BEPS Issues of Autonomous Artificial Intelligence by Using 'Personality' and 'Residence'".

During the 2019 London Congress successful and well attended YIN activities have been organised, such as the YIN Seminar, the YIN Meet & Greet and the YIN Party. Future IFA Congresses will again host a number of activities for our young tax professionals.

IFA Prizes

Next to the YIN activities IFA has a number of opportunities for young tax professionals such as a yearly poster programme and the two prestigious Prizes, Mitchel B. Carroll and Maurice Lauré.

Mitchell B. Carroll Prize

The Jury for the MBC Prize received 9 entries from Austria, Belgium (2x), Congo, Cuba, India, Netherlands, New Zealand and Tunisia. 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 2020 Prize to Raphael Holzinger (Austria) for his work "Ergebnisabgrenzung bei verbundenen Unternehmen und Betriebsstätten Post-BEPS: Rechtsformneutralität im OECD Musterabkommen".

Honourable mentions were granted to Jasper Bossuyt (Belgium) for his work "The legal status of extrinsic instruments for the interpretation of tax treaties" and to Hamdi Kessentini (Tunisia) for his work "La concurrence fiscale dommageable et les aides d'Etat sous forme fiscale (Harmful tax competition and State aid in the form of tax measures)".

Maurice Lauré Prize

The Jury for the ML Prize received 1 entry from Austria. They unanimously concluded to award the 2020 Prize to Karoline Spies (Austria) for her work entitled "Permanent Establishments and Value Added Tax".



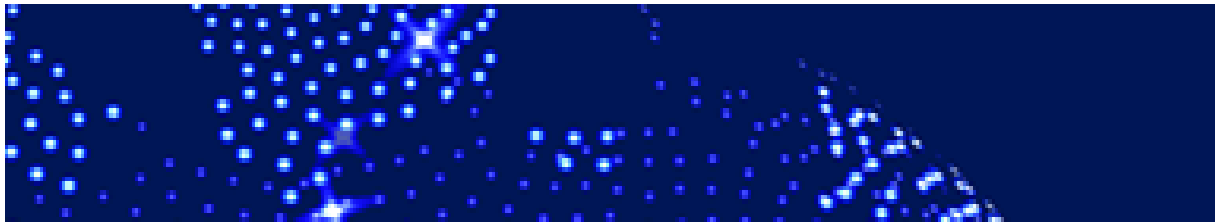
International Fiscal Association



Women IFA Network (WIN)

In recent years, the female membership of IFA has grown to more than 2.000 female members across the globe; it is an evident and welcome sign of the increasing awareness of the significance of professional women in international taxation. WIN has been established as a Special Committee to represent and connect the many professional women working in international tax. WIN is present on LinkedIn, Facebook and Twitter.

As mentioned, 2019 saw the official appointment of the WIN Special Committee with representatives for activities and all regions appointed for a term of two years. The WIN Committee is chaired by Jeanne Goulet (USA). Also, most IFA Branches have appointed a WIN representative on which more information can be found on the IFA website.



Future IFA Congresses

Following the EC decision to amend the application process with allocating three congresses at one time, a call for application for hosting a future IFA Congress for the years 2026-2028 was sent to all IFA Branches in August 2019. The deadline for sending in applications was 29 February 2020. The following eleven Branches sent in an application:

Asia Pacific: India, Singapore and the United Arab Emirates

Europe: France, Italy, Poland and Spain

Latin America: Argentina and Colombia

North America: Canada and the USA

Due to the Covid-19 crisis the already allocated annual Congresses for 2020-2025 were rescheduled. This resulted in the postponement of the 2020 Cancun Congress to 2022, the Berlin 2021 Congress remaining in place and the other Congresses postponed by one year. The next three future Congresses to be allocated will therefore cover the years 2027-2029. Allocation will be decided upon during the virtual meetings of the EC in the autumn of 2020.

IFA Virtual Event November 2020

From 16 – 25 November 2020 IFA organises a virtual programme with seven webinars and a number of other activities. The Main Subjects of this years' Cahiers and IFA's regular sessions will be held virtually on the IFA website and on the IFA App. Also IFA's Young IFA Network (YIN) and Women IFA Network (WIN) will organise a virtual session, and you can visit the virtual poster programme.

The event will be opened by the IFA President, Murray Clayson and the President of the Cancun Congress, Edgar Anaya, on 16 November 2020, followed by a brief introduction on the scientific programme by the Chair of the PSC, Robert Danon.

The sessions will be accessible through the IFA website and the IFA App. They will be live with interactive features allowing attendees to participate. To ensure these sessions are convenient for all participants across the globe, all sessions will be recorded and made available to participants if they wish to access these at a later stage.



Publications and communication

IFA Cahiers Online

The IFA Cahiers are fully available online. 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 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 printed publication of the Cahiers consists of the general reports of both Subject 1 and Subject 2, together with EU reports and OECD reports where applicable, and short summaries of all Branch reports. By continuing the printing of the general reports, IFA will sustain the legacy of the Cahiers.

2020 Cahiers

Volume 105a of the Cahiers 2020 discusses Reconstructing the treaty network, and includes a general report by David G. Duff (Canada) and Daniel Gutmann (France), an OECD report by Sophie Chatel and Jessica Di Maria, an EU report prepared within and by the members of the ECJ Task Force of the CFE Tax Advisers Europe, and 41 Branch reports.

Volume 105b, Exchange of information: issues, use and collaboration, counts 40 Branch reports next to the general report written by Tatiana Falcão (Brazil) and Armando Lara Yaffar (Mexico) and an EU report by Reinhard Biebel and Jasna Voje.

Website, Newsletter and IFA Society App

The IFA website has been further developed and now includes a multisite platform for Branches and Regions. Branches can choose to use the multisite for their own website, benefitting from uniform branding and exchanging information and activities with other Branches. We strongly encourage each Branch to use or to transfer onto the multisite system. With the virtual event in November 2020, new features will be added continually such as webcasts of the Congress sessions, the possibility to organise round table sessions and other meetings. Next to the website, the IFA App has become a traditional feature during the Annual IFA Congresses, which is highly appreciated by the attendants. The App has now also been developed to include the possibility to participate in the virtual events and become part of the IFA community all year round. Regularly members are kept informed by the IFA newsletters on publications, activities and the annual congress.

IFA and social media

Next to its own LinkedIn Community of more than 8.000 followers, IFA has a number of thriving groups: YIN, WIN and many of the regions have established their own LinkedIn groups. 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> <https://twitter.com/GlobalIFA>



International Fiscal Association



Closing remarks

Conclusion

Many if not all initiatives mentioned above arise from a full review of the IFA 2025 strategy that the EB started in 2018. 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.

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 Chief Operating Officer, Cecile Riphagen, and her team at our Secretariat in Rotterdam, Ms Anja van Zwietering, Ms Marga Vink, Ms Anita Burggraaf and Ms Lizzy van Loon 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, among others, the BEPS project of the OECD keeps having a very significant impact. These continuing developments will provide IFA with ample opportunity to fulfil its objectives and grow stronger in all regions across the globe.

October 2020

A handwritten signature in blue ink, appearing to read 'JBEL'.

Jean-Blaise Eckert
Secretary General IFA