



**IATJ 9th Assembly  
September 28/29, 2018  
Ottawa, Canada**

**AGENDA**

**Thursday 27 September 2018**

*[Tax Court of Canada, 200 Kent Street, 3<sup>rd</sup> Floor, Ottawa, ON K1A 0M1]*

12:00 p.m. to 14:00 p.m. Meeting of the Executive  
14:00 p.m. to 17:00 p.m. Meeting of the Board Directors

**Friday, 28 September 2018**

*[Lord Elgin Hotel, Pearson Room, 100 Elgin Street, Ottawa, ON K1P 5K8]*

8:00 a.m. to 9:00 a.m. **Registration**

9:00 a.m. to 9:05 a.m. **Welcome by Eugene Rossiter** (Canada)  
President IATJ

9:05 a.m. to 9:10 a.m. **Presentation Agenda by Wim Wijnen**  
(Netherlands)  
Chairman PPC

9:10 a.m. to 10:30 a.m. **Substantive Session on GAAR under BEPS and  
MLI**  
**Chair:** Philippe Martin (France)  
**Panel:** Peter Cools (Netherlands)  
Vesa-Pekka Nuotio (Finland)  
John Owen (Canada)  
Jacques Sasseville (UN-Guest)  
Malcolm Gammie (United Kingdom)

10:30 a.m. to 11:00 a.m. Health Break– coffee/tea

- 11:00 a.m. to 12:00 p.m.      **Substantive Session on GAAR under BEPS and MLI**  
Continued
- 12:00 p.m. to 14:00 p.m.      Lunch  
*[Lord Elgin Hotel]*
- 14:00 p.m. to 15:30 p.m.      **Substantive Session on Precedent: Stare Decisis v. change of case law**  
**Chair:** Peter Wattel (Netherlands)  
**Panel:** Emmanuelle Cortot-Boucher (France)  
Paige Marvel (United States)  
Kristina Ståhl (Sweden)
- 15:30 p.m. to 15:45 p.m.      Health Break– coffee/tea
- 15:45 p.m. to 17:15 p.m.      **Substantive Session on Tax Procedures in Canada**  
**Chair:** Clement Endresen (Norway)  
**Panel:** Wyman Webb (Canada)  
Federal Court of Appeal  
David Graham (Canada)  
Tax Court of Canada
- 18:30 p.m.      **Cocktail Reception**  
*[Lord Elgin Hotel, Lady Elgin Room]*

**Saturday, 29 September 2018**

*[Lord Elgin Hotel, Pearson Room, 100 Elgin Street, Ottawa, ON K1P 5K8]*

- 09:00 a.m. to 10:30 a.m.      **Substantive Session on Recent Case Law on Permanent Establishments**  
**Chair:** Bernard Peeters (Belgium)  
**Panel:** Pierre Collin (France)  
Susanne Tiedchen (Germany)
- 10:30 a.m. to 10:45 a.m.      Health Break– coffee/tea
- 10:45 a.m. to 12:00 a.m.      **Substantive Session on Recent Case Law on Tax Fraud in VAT/GST**  
**Chair:** Friederike Grube (Germany)  
**Panel:** Annie Rochat Pauchard (Switzerland)  
Jennifer Davies (Australia)
- 12:00 p.m. to 14:00 p.m.      Lunch  
*[Lord Elgin Hotel]*

14:00 p.m. to 15:25 p.m. **Substantive Session on Transparency of Court Proceedings**

**Chair:** Manuel Hallivis Pelayo (Mexico)

**Panel:** Michael Beusch (Switzerland)

EuiYoung Lee (Korea Rep.)

Marcus Livio Gomes (Brazil)

Tony Pagone (Australia)

Peter Panuthos (United States)

Caroline Vanderkerken (Belgium)

15:25 p.m. to 15:40 p.m. Health Break– coffee/tea

15:40 p.m. to 17:00 p.m. **Substantive Session on Transparency of Court Proceedings**

Continued

17:00 p.m. to 17:15 p.m. **Exotic topic: “The most important court in Canada”**

Eugene Rossiter (Canada)

17:15 p.m. to 18:00 p.m. **IATJ Business Meeting**

20:00..... **Closing Dinner**

*[Rideau Club, 99 Bank Street, Ottawa, ON K1P 6B9]*

**Guest speaker:** Heather Evans (Executive Director of the Canadian Tax Foundation)

**Conference Coordinator**

Mary Doran

*[Tax Court of Canada*

*200 Kent Street, Ottawa, ON K1A 0M1(Canada)]*

**Spousal program**

Museum tour

**Sunday, 30 September 2018**

**Business:**

09:00-12:00:

Meeting of the Executive and Board Directors

*[Tax Court of Canada, 200 Kent St., 3rd Floor, Ottawa, ON K1A 0M1]*

**Excursion:**

Rideau Canal boat cruise

**Permanent Program Committee**

Friederike Grube (Germany)

Manuel Hallivis Pelayo (Mexico)

Philippe Martin (France)

John Owen (Canada)

Peter Panuthos (United States)

Wim Wijnen (Netherlands)