

FORUM ON TAX ADMINISTRATION

TAX CERTAINTY DAY

18 November 2020

Virtual meeting

Agenda

Wednesday 18 November 2020 (13h00 – 17h00)

13h00 – 13h10

Opening remarks

- **Grace Perez-Navarro**, Deputy-Director, Centre for Tax Policy and Administration, OECD

Item 1. Welcome and introduction to the meeting

Ted Gallivan and Will Morris will welcome attendees, outline the aims of the meeting and cover housekeeping items.

Speakers:

- **Ted Gallivan**, Assistant Commissioner, Canada Revenue Agency
- **Will Morris**, Chair, Business at OECD Tax Committee

13h10– 13h30

Item 2. Introduction and release of 2019 MAP statistics

The Secretariat will present the 2019 MAP statistics and key messages.

Speaker:

- **Achim Pross**, Head of International Cooperation and Administration Division, OECD
- **Félicie Bonnet**, Adviser, OECD

13h30 – 14h00

Item 3. MAP Awards

Announcement and presentation of the MAP Awards.

Speaker:

- **Bob Hamilton**, Commissioner, Canada Revenue Agency & FTA Chair

14h00-14h10 Break

14h10 – 14h45

Item 4. Current MAP landscape

This session will focus on the current MAP landscape, how this has evolved in the last 12 months, and possible future developments.

Speakers:

- **Sandra Knaepen**, Co-Head of Tax Certainty Unit, OECD
- **John Hughes**, Chair, FTA MAP Forum

- **Sharon Katz-Pearlman**, Head of KPMG's Global Tax Dispute Resolution & Controversy Team
- **Bruno Gibert**, Partner, CMS Francis Lefebvre Avocats

Questions & Answers:

The Secretariat will invite questions and comments from participants.

14h45– 15h35

Item 5. ICAP

The Secretariat will give a short overview of the ICAP programme and its current status, followed by interventions from tax administrations and MNE groups participating in ICAP 2.0.

Speakers:

- **Mark Johnson**, Co-Head of Tax Certainty Unit, OECD
- **Jennifer Best**, Director, Treaty and Transfer Pricing Operations Practice Area, Internal Revenue Service, United States
- **Rasmus Christian Johansen**, Chief Advisor, Transfer Pricing, Danish Tax Agency
- **John Stowell**, Senior Vice President of Tax, Walt Disney Company, United States
- **Erik Skarstad**, Tax Principal, Transfer Pricing, Walt Disney Company, United States
- **Christer Tønder Bell**, Vice-President of Tax, Lego, Denmark

Questions & Answers:

The Secretariat will invite questions and comments from participants.

15h35 – 16h25

Item 6. Tax Certainty Tools

The Secretariat will give a brief update on ongoing projects and tools, with a particular focus on:

- **Multilateral MAPs**
- **Improving APAs**
- **Benchmarking**

This update will be complemented by tax administration and business perspectives on the need for greater tax certainty and the tools in progress.

Speakers:

- **Sandra Knaepen**, Co-Head of Tax Certainty Unit, OECD
 - **Sriram Govind**, Adviser, OECD
 - **Jessica de Vries**, Adviser, OECD
 - **John Hughes**, Chair, FTA MAP Forum
 - **Alex Duric**, Transfer Pricing – Financial Services, HMRC, United Kingdom
 - **Alan McLean**, Executive Vice President Taxation, Shell
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16h25 – 16h50

Item 7. Accelerating Tax Certainty through Technology

The Secretariat will introduce how information is communicated securely in a face-to-face environment by law enforcement officials.

Tax administration representatives will share their experience of the benefits and challenges of hosting multilateral dialogues and using online platforms for the sharing of MNE information.

Speakers:

- **Mark Johnson**, Co-Head of Tax Certainty Unit, OECD
- **Philip Kerfs**, Head of International Co-operation Unit, OECD
- **Isabelle Brault**, Director, Competent Authority Services Division, Canada Revenue Agency
- **Ryan Bassett**, Risk Management Framework Lead, Large Business, HMRC, United Kingdom

Questions & Answers:

The Secretariat will invite questions and comments from participants.

16h50 – 17h00

Item 8. Closing Remarks

Speakers :

- **Ted Gallivan**, Assistant Commissioner, Canada Revenue Agency
- **Will Morris**, Chair, Business at OECD Tax Committee
- **Pascal Saint-Amans**, Director, Centre for Tax Policy and Administration, OECD

End
