

September 17-18, 2020

Nexus and Jurisdiction in International and EU Tax law The 15th GREIT Annual Conference

Host organization: Faculty of Law and Criminology, UCLouvain (CRIDES),

Prof. Edoardo Traversa

Venue: Online conference

Invitation

It is our pleasure to announce that the Group for Research on European and International Taxation (GREIT) will hold its next Conference online on the 17 and 18 September 2020. The topic of this event will be Nexus and Jurisdiction in International and EU Tax law and it will be hosted online by the *Research Center on Law, Economy and Society* (CRIDES) of UCLouvain.

The purpose of this conference is to investigate the foundations of the jurisdiction to tax and the forms of the nexus requirements in International and EU tax law. Special attention will be devoted to the need to adapt those concepts to the economic and social developments induced by globalization and digitalization. The conference will also offer the opportunity to engage in a dialogue with specialists of other fields of law, in particular international law as well as officials from international/EU organizations.

The conference is organized around two sessions. The Thursday afternoon session will focus on international (tax) law, with a discussion of the legitimacy and effectiveness of the traditional nexus criteria of residence, source, permanent establishment, citizenship in the light of recent OECD initiatives and their impact of double taxation conventions.

The Friday morning session will address specific issues arising in European Union Law, such the interaction between Member States' jurisdiction to tax and EU harmonization, including pending proposals on digital taxation, the implementation of BEPS recommendations in the EU Internal market, and the importance of nexus for reform of the EU own resources system.



The number of participants is limited and therefore we kindly ask you to register at the latest on September 10, 2020, by filling this <u>Registration form</u>. More information on GREIT is available at http://www.greit-tax.eu/

The cost for participation is 100€. Participants with an academic background are granted a waiver. For practical information, please do not hesitate to contact Corinne Burgos (corinne.burgos@uclouvain.be) with copy to Elena Masseglia (elena.masseglia@uclouvain.be) or Professor Edoardo Traversa (edoardo.traversa@uclouvain.be)

Welcome to Louvain-la-Neuve!

Edoardo Traversa, for GREIT and

Cécile Brokelind, Ana Paula Dourado, Dennis Weber, Pasquale Pistone











Thursday 17 th September 2020	DAY ONE	Speakers/Notes
14.00-14.30	Introduction	Juliane Kokott, Advocate General, Court of Justice of the
14.30-18.00	Afternoon Session – Nexus and Jurisdiction in International (tax) law	European Union
14.30-15.30	Nexus and jurisdiction: the nature of the tax nexus requirement	Philip Baker, <i>QC, University of</i> <i>Oxford</i>
	Comments from a public international law perspective Open Discussion	Pierre d'Argent <i>UCLouvain</i>
15.30-15.45	Break	
15.45-17.15	Tax nexus and non-resident companies	Stjepan Gadžo, University of Rijeka
	Nexus, Digitalization and Democracy	Ana Paula Dourado, University of Lisbon
	Nexus, residence and citizenship	Ruth Mason, University of Virginia
		Open Discussion
17.15-17.30	Break	
17.30-18.30	Open Roundtable "Nexus and developing countries: the impact of OECD Pillar I and II"	Introduction: Irma Mosquera, Leiden University Esperanza Buitrago Diaz, Maastricht University Michael Lennard, United Nations



Friday 18 th September 2020	DAY TWO	Speakers/Notes
9.00-12.30	Morning Session - Tax nexus and European Union law	
9.00-10.30	Nexus and Jurisdiction: a private international law perspective	Pietro Franzina, Catholic University Milan
	Multiplication of nexus requirements in EU tax law after BEPS and ATAD: consequences for the Internal market	Pasquale Pistone, University of Salerno/IBFD/WU Wien
	EU direct Harmonization of tax nexus: lessons from past experiences Open discussion	Cécile Brokelind, Lund University
10.30-10.45	Break	
10.45-11.30	Tax nexus and reform of the EU own resources system Comments from a VAT and Customs perspective Open Discussion	Edoardo Traversa, UCLouvain Marya Senyk, Lund University Elena Masseglia, UCLouvain
11.30-12.30	Conclusive Roundtable "Tax nexus and digitalization" Open Discussion	Richard Lyal, Formerly EU Commission Ioanna Mitroyanni, EU Commission Jérôme Monsenego, Stockholm University
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Conclusion

Melchior Wathelet, former First Advocate General, Court of Justice of the European Union