### PARTICIPATION IN THE SEMINAR IS FREE OF CHARGE

ATTENDANCE IS LIMITED TO 100 PARTICIPANTS AND REGISTRATION IS COMPULSORY

Registration requests should be sent to the following e-mail address

### seminar@maisto.it

Participation will be confirmed by e-mail

How to reach the venue



Departures from the OECD MC and **Commentaries** in EU Law and Tax Treaties

## Seminar

To obtain more information on the hotel accommodation you may visit the website www.eutaxgroup.org

Monday 25 November 2013 9.15 - 17.00 **Hotel Four Seasons** 

Via Gesù, 6/8 - Milan

UNDER THE AEGIS OF

**ITALIAN COUNCIL OF MINISTERS** 





## Programme

8.45-9.15 - Registration

### **MORNING SESSION**

9.15-12.45

#### Chairman

Michael Lang WU Wien

### 9.15-9.30 - INTRODUCTION

Gualielmo Maisto

Catholic University of Piacenza

9.30-11.00

# "RESERVATIONS", "OBSERVATIONS" AND "POSITIONS" TO THE OECD MC

# The role and evolution of "reservations", "observations" and "positions" to the OECD MC

Jacques Sasseville

# The legal status of "reservations" and "observations" to the OECD MC

Alberto Vega Garcia Universidad Pompeu Fabra – Barcelona

# "Reservations" and "observations" to the OECD MC: are they necessary?

Liselott Kana

UN and Chilean Ministry of Finance

11.00-11.30 - **COFFEE BREAK** 

11.30-12.45

### OECD MC AND EU LAW

### EU Law and OECD MC Concepts: differences and similarities

Michael Lang

WU Wien

# Relevance of OECD MC and Commentaries in ECJ Case Law Income taxes

Peter Wattel

Amsterdam University and Hoge Raad

#### VAT

Andrea Parolini

Catholic University of Piacenza

12.45-14.00 - **LUNCH** 

### **AFTERNOON SESSION**

14.00-17.00

#### Chairman

Jacques Sasseville OFCD

14.00-15.00

### SELECTED ISSUES INVOLVING THE OECD MC

### Alternative provisions in the OECD MC Commentary

Jacques Sasseville OFCD

### **National MCs developed by Member Countries**

Claudine Devillet

Federal Fiscal Administrations - Belgium

15.00-15.30 - **COFFEE BREAK** 

15.30-16.45

### **REVISITING AND REVIEWING**

"RESERVATIONS", "OBSERVATIONS" AND "POSITIONS" TO THE OECD MC - SELECTED PROVISIONS

### **OECD Member countries**

Michael Dirkis University of Sydney

Paolo Arginelli

Catholic University of Piacenza

#### Third countries

Pramod Kumar

Income Tax Appellate Tribunal - India

16.45-17.00

#### **CONCLUSIONS**

Augusto Fantozzi

Rector at Università Giustino Fortunato di Benevento