



**SOUTH  
CENTRE**

**AGENDA**

**Second Annual Forum on Developing Country Tax Policies and Cooperation for  
Agenda 2030  
YOGYAKARTA, INDONESIA, 25 – 27 APRIL 2018**

**25 April 2018**

9:30 – 10:00	<p><i>Registration</i></p> <p><i>Morning Coffee</i></p>
10:00 – 11:00	<p><b>Opening Ceremony</b></p> <p>Opening Remarks by H.E. Mr. AM Fachir, Vice Minister of Ministry of Foreign Affairs, Indonesia (Delivered by Mr. Kamapradipta Isnomo)</p> <p>Welcoming Remarks by H.E. Vice Governor of Yogyakarta</p> <p>Introductory Remarks by Mr. Martin Khor, Executive Director, South Centre (Delivered by Prof. Manuel F. Montes)</p> <p>Keynote Speech by Mr. Robert Pakpahan, Director General of Taxes, Ministry of Finance, Indonesia</p>
11:00 – 11:30	<p><b>Introduction of Participants</b></p> <p>Prof. Manuel F. Montes, Senior Advisor on Finance and Development, South Centre</p> <p><b>Moderator:</b> Mr. Kamapradipta Isnomo, Director of Socio-Cultural and International Organization of Developing Countries, Ministry of Foreign Affairs Indonesia</p>
11:30 – 12:00	<p><b>International Tax Cooperation: Setting out a new agenda for the South</b></p> <p><i>This session will present the South Centre Tax Initiative, and explore its objectives and planned future activities on South-South Cooperation in international tax matters.</i></p> <p><b>Lead-off speaker:</b> Prof. Manuel F. Montes, Senior Advisor on Finance and Development, South Centre</p> <p><b>Moderator:</b> Prof. Poltak Maruli John Liberty Hutagaol, Director of International Taxation, Directorate General of Taxes, Ministry of Finance Indonesia</p>
12:00 – 13:30	<p><b>Transition paths towards single entity taxation: Building an international tax system for sustainable development</b></p> <p><i>The conceptual and practical challenges to the dominant standing of the separate entity principle of taxation have been escalating. What are the transition policies (short of global formulary apportionment) that developing countries can propose and embark on in the tax treatment of MNE operations? Are there existing</i></p>

	<p><i>successful approaches that developing countries can begin to apply in treating related enterprises and controlled foreign corporations to be able to tax where economic activity takes place?</i></p> <p><b>Lead-off speaker(s):</b> Mr. M. Govinda Rao, Commissioner, Independent Commission to Reform International Corporate Taxation (ICRICT)</p> <p><b>Discussants:</b></p> <p>Prof. Dr. Marcos Aurélio Pereira Valadao, International Tax Affairs Division, Secretariat of the Federal Revenue of Brazil</p> <p><b>Moderator:</b> Mr. Danny Sirait, Section Chief for Prevention and Settlement of International Taxation Dispute, Ministry of Finance, Indonesia</p>
13:30 – 15:00	<i>Lunch</i>
15:00 – 16:30	<p><b>Single Entity Tax Approaches</b></p> <p><i>Do developing countries use various apportionment and profit-split approaches in their tax policies which recognize the relatedness of subsidiaries and, in effect, adjust the strong separate entity approach? What are examples in developing countries of these kinds of approaches? What have been the experiences of tax officials in the efficacy of these innovations?</i></p> <p><b>Lead-off speaker:</b> Ms. Kim S. Jacinto Henares, Commissioner, Independent Commission to Reform International Corporate Taxation (ICRICT)</p> <p><b>Discussants:</b></p> <p>Ms. Verónica Grondona, Advisor to GUE/NGL on the European Parliament’s Committee of Inquiry into the Panama Papers</p> <p>Mr. Achmad Amin, Deputy Director of Prevention and Settlement of International Taxation Dispute, Ministry of Finance, Indonesia</p> <p><b>Moderator:</b> Mr. Ignatius Mvula, Assistant Director, Zambia Revenue Authority</p>
16:30 – 16:45	<i>Coffee Break</i>
16:45 – 17:30	<b>Breakout Groups on Unitary Approaches to Taxation</b>
17:30 – 18:00	<b>Reports from Breakout Groups</b>
18:00	<i>End of first day</i>

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9:00 – 10:15	<p><b>Taxing Extractive Industries: Designing taxation policies for developing countries' extractive sectors</b></p> <p><i>The Subcommittee on Extractive Industries of UN Committee of Experts on International Cooperation in Tax Matters completed the drafting of a new manual on the taxation of extractive industries for developing countries, which is now ready for publication. What are the principal elements/principles of the new manual? What are the issues, such as the audit of oil and mining activities and “trade mispricing” that still have to address? How can developing country tax administrators contribute to this effort?</i></p> <p><b>Lead-off speakers:</b> Mr. Ignatius Mvula, Assistant Director, Zambia Revenue Authority</p> <p><b>Discussants:</b></p> <p>Dr. AKS Bayunanto, Head of Tax Potential Extraction Section, Ministry of Finance, Indonesia</p> <p>Mr. Ah Maftuchan, Executive Director, Perkumpulan Prakarsa</p> <p><b>Moderator:</b> Ms. Sheyla Acosta Pérez, National Coordinator of International Taxation, Internal Revenue Service of Ecuador</p>
10:15 – 10:30	<p><i>Coffee Break</i></p>
10:30 – 11:15	<p><b>Breakout Groups on Taxing Extractive Industries</b></p>
11:15 – 11:45	<p><b>Reports from Breakout Groups</b></p>
11:45 – 12:30	<p><b>Tax Policy Challenges Arising from the Digital Economy</b></p> <p><i>In digital transactions, tax policy and cooperation must confront the lack of nexus between the physical presence and profit-making and the complexities in determining indicators of value-added for attributing profits from digital data creation and use. While discussions on the issue of taxation in the digital economy are not new, some of the solutions proposed do not properly answer the difficulties facing developing countries. What are the implications of the increased pressures towards more source-based taxation methods created by digital economy transactions? How are developing countries dealing with these challenges? What are the possible ways forward on tax cooperation in the digital economy?</i></p> <p><b>Lead-off speakers:</b> Mr. Michael Lennard, Chief of International Tax Cooperation and Trade in the Financing for Development Office (FfDO) of the United Nations (via Video)</p> <p><b>Discussants:</b></p> <p>Dr. Vinay Kumar Singh, Additional Commissioner of Income Tax, Ministry of Finance, Government of India (via Video)</p> <p>Mr. Rofyanto Kurniawan, Director of Centre for Revenue Policy, Fiscal Policy Agency, Ministry of Finance, Indonesia</p> <p><b>Moderator:</b> Prof. Manuel F. Montes, Senior Advisor on Finance and Development, South Centre</p>
12:30 -14:00	<p><i>Lunch</i></p>

14:00 – 14:45	<b>Breakout Groups on Digital Economy</b>
14:45 – 15:15	<b>Reports from Breakout Groups</b>
15:15 – 16:30	<p><b>Anti-avoidance Rules in International Taxation: Developing countries efforts against abusive tax practices</b></p> <p><i>Many developed and developing countries have policies and practices to contain the negative impact of aggressive international tax planning. Transfer pricing standards, ceilings on deductibility of thin-capitalization and debt payments are some of the approaches in place to constrain abusive tax practices and profit shifting. What are the experiences of developing countries on this issue? Have developing countries applied innovative mechanisms in fight against abusive tax practices? How can information exchange and tax cooperation strengthen these policies?</i></p> <p><b>Lead-off speakers:</b> Mr. Zhang Ming, Head of the International Cooperation Division, State Administration of Taxation, China</p> <p><b>Discussants:</b></p> <p>Mr. M. Govinda Rao, Commissioner, Independent Commission to Reform International Corporate Taxation (ICRICT)</p> <p>Ms. Dwi Astuti, Deputy Director of Tax Treaties and Cooperation, Director General of Taxes, Ministry of Finance, Indonesia</p> <p><b>Moderator:</b> Prof. Dr. Marcos Aurélio Pereira Valadão, International Tax Affairs Division, Secretariat of the Federal Revenue of Brazil</p>
16:30 – 17:00	<i>Coffee Break</i>
17:00 – 18:15	<p><b>Exchange of Information: Sharing Developing Country Experiences</b></p> <p><i>The sharing and exchange of tax related information between different countries has been touted as a panacea for curbing tax evasion and illicit financial flows. However, there is little evidence to show the effectiveness of mechanisms like the Exchange of Information on Request (EOIR) or the Automatic Exchange of Information (AEOI) for developing country tax administrators. What have been the experiences of the primary users from developing countries? Would it be useful to identify the most relevant concerns and their solutions? What are developing country authorities' views about the effort to create an international registry of beneficial ownership?</i></p> <p><b>Lead-off speakers:</b> Dr. Rishi Kumar, Deputy Commissioner of Income Tax, Government of India</p> <p><b>Discussant:</b></p> <p>Mr. Abdul Gafur, Section Chief for Exchange of Information, Directorate of International Taxation, Directorate General of Tax, Ministry of Finance, Indonesia</p> <p>Mr. Nguyen Minh Ngoc, Deputy Director of International Tax Department, General Department of Taxation of Viet Nam</p> <p><b>Moderator:</b> Ms. Verónica Grondona, Advisor to GUE/NGL on the European Parliament's Committee of Inquiry into the Panama Papers</p>
18:15	<i>End of second day</i>

09:00 – 10:15	<p><b>Developing Countries and the Current Outcomes of the Global Tax Agenda</b></p> <p><i>The First Global Conference of the Platform for Collaboration on Tax, the Report of the UN Committee of Experts on International Cooperation in Tax Matters, the 2017 Update to the OECD Model Tax Convention and the continuing discussion on BEPS Action 15 on the development of a Multilateral Instrument on Tax Treaty Measures to Tackle BEPS are some of the issues discussed in 2017 and early 2018. What are the developing countries initial experiences in their engagement in these fora? What are their expectations on these tax cooperation platforms? How can a network of developing country tax officials and development-oriented experts build more robust engagement these processes and their evolution?</i></p> <p><b>Lead-off speakers:</b> Mr. Gabriel Ricardo Perdomo Zelaya, Director Nacional de Gestión Estratégica del SAR, Honduras.</p> <p><b>Discussants:</b></p> <p>Ms. Sheyla Acosta Pérez, National Coordinator of International Taxation, Internal Revenue Service of Ecuador.</p> <p>Mr. Pande Putu Oka Kusumawardani, Deputy Director of International Taxation Division, Fiscal Policy Agency, Ministry of Finance, Indonesia</p> <p><b>Moderator:</b> Mr. Mohammad Zahir Syah Soedajat, Deputy Director of Finance and Industry, Directorate of Legal Affairs and Economic Agreement, Ministry of Foreign Affairs, Indonesia</p>
10:15 – 12:00	<p><b>Way Forward and Closing Session</b></p> <p><b>Lead-off speakers:</b></p> <p>Prof. Poltak Maruli John Liberty Hutagaol, Director of International Taxation, Directorate General of Taxes, Ministry of Finance Indonesia.</p> <p>Prof. Manuel F. Montes, Senior Advisor on Finance and Development, South Centre</p> <p><b>Summary of Conference</b></p> <p><b>Closing Speech</b></p>
12:00 – 14:00	<i>Lunch</i>
14:00	<i>End of third day</i>