



South African Fiscal Association

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Newsletter 3/2007

Dear members

IFA Congress Amsterdam 2006 - DVD recording of subject II on Attribution of Profits to Permanent Establishments

As previously notified, the first DVD session is going ahead on the dates set out hereunder. Effect your bookings with the contact persons mentioned in Johannesburg and Cape Town. Please note that this DVD viewing is strictly limited to members and staff of corporate members.

To recap, the annual IFA congress is limited to members and last year the following topics were addressed:

- Subject I : The tax consequences of restructuring of indebtedness (debt work-outs)
- Subject I : 2006 Break-out session A : The tax consequences of restructuring of indebtedness (debt work-outs) between related parties
- Subject II : The attribution of profits to permanent establishments (PEs)
- Subject II : 2006 Break-out session A : The attribution of profits to PEs : selected issues for financial institutions
- Subject II : 2006 Break-out session B : The attribution of profits to PEs : EC law and non-discrimination issues
- 2006 Seminar A : Indirect tax aspects of cross-border services
- 2006 Seminar B : IFA/OECD - Do enterprises mean business ?
- 2006 Seminar C : International cooperation in countering tax avoidance
- 2006 Seminar D : The effect of regional and global trade agreements on domestic tax law and bilateral tax conventions

- 2006 Seminar E : Recent developments in international tax
- 2006 Seminar F : IFA/EU : the need and scope for coordination of tax policies in the EU
- 2006 Seminar G : Tax accounting versus commercial accounting
- 2006 Seminar YIN : Debt-to-equity conversion

Two of the sessions were recorded and IFA have provided our members with a DVD recording thereof. This session will run for a duration of two and a half hours and hardcopy handouts will be provided to those attending. The panel at the IFA congress comprised some of the top tax practitioners for those of you who did not attend, it would be a worthwhile session as it remains a leading topic in International Tax practice. The OECD's stance leading to and following the IFA congress, is developing at a rapid pace resulting in the OECD changing its position on certain issues, due to consultation with many role players. Further detail regarding congress documents may be found on the IFA website [link on the SAFA homepage] which members may access by entering your passwords which was provided to you by IFA. If you have lost or forgotten them you must contact IFA directly to assist you.

Dates, venues and booking details:

Date: 17 May 2007
Place: Cape Town
PricewaterhouseCoopers
No 1 Waterhouse Place
Century City
Time: 16h15 to 18h30
Topic: Attribution of profits to permanent establishments
Speakers: DVD Session
Bookings: jolandie.james@za.pwc.com Tel no: 021- 529 2368

Date: 28 May 2007
Place: Johannesburg
KPMG Auditorium, 85 Empire Road, Parktown
Time: 16h30 to 18h30
Topic: Attribution of profits to permanent establishments
Speakers: DVD Session
Bookings: Lolitha.Samlal@kpmg.co.za Tel no: 011 - 647 6836

Based on the response for this session we will organize a second session on another topic [seminar G] also recorded at the IFA congress . We shall send out notification in this regard at a later date.

Regards
Charl du Toit
President: SAFA