



South African Fiscal Association

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18 February 2009

Newsletter 1/2009

Dear members

We trust that 2009 will be a good year. As usual, we invite your active participation in the SAFA activities that are planned for 2009.

1. As in the past the main SAFA activities planned for 2009 are seminars. The provisional **dates for seminars for 2009** are:
 - Cape Town: 5 May
11 August
10 November
 - Johannesburg: 7 May
13 August
12 November
2. We invite you to provide us with **suggestions for topics and speakers** for seminars. Any suggestions from members will be considered but we remind members that the primary focus of SAFA is on international tax. In the past we have dealt with important international tax concepts such as place of effective management, transfer pricing and beneficial ownership.
3. An important topic that SAFA has not dealt with yet is that of the meaning of **permanent establishment**. This is an important concept not only for tax treaty purposes but also for purposes of domestic tax, such as the taxation of exchange differences and capital gains in respect of foreign assets. The current thinking is therefore to dedicate one of the 2009 SAFA seminars to the meaning of permanent establishment.
4. We have sent out **invoices for 2009 subscriptions** and would appreciate early settlement thereof please.
5. The **IFA Congress** this year is to be held in **Vancouver** and we include an excerpt from the Canadian branch:

On behalf of the IFA Canadian Branch, we invite you to join us at the 63rd Congress of the International Fiscal Association in Vancouver, British Columbia, Canada from August 30 – September 4, 2009. This year's Scientific Programme has been designed to be of keen interest to tax practitioners, in-house tax advisors, academics and government officials. The main Subjects are:

Subject 1 - Is there a permanent establishment?

Subject 2 - Foreign exchange issues in international taxation

In addition to the Scientific Programme, a superb Social Programme has also been planned to provide Congress Participants an opportunity to experience the natural beauty and diverse culture of British Columbia.

The online system to reserve your hotel accommodation for the 2009 IFA Vancouver Congress is now available. Full Official Congress Hotel details and reservation instructions are at the following link:

http://www.ifa2009vancouver.ca/hotel_info.htm

Congress registration will be available in March 2009.

The Congress website is a very good source for information (www.ifa2009vancouver.ca) for the 2009 IFA Vancouver Congress Scientific Programme, Social Programme and hotel information.

Regards

Charl du Toit
President: SAFA