



South African Fiscal Association

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Dear Members

Seminars

We have conducted two seminars on extremely relevant topics this year dealing with selected issues relating to Loans (The quasi-equity argument in respect of transfer pricing, Selected questions on Thin capitalisation, Issues relating to loan forgiveness) as well as The Meaning Of Permanent Establishments. These seminars were well attended by our members.

The SAFA Exco has decided not to hold another seminar this year. **The seminars that were scheduled for November 2009 are therefore cancelled.**

Visit in 2010 by Prof Kees van Raad

However, we can inform members that we are in advanced discussions with Prof Kees Van Raad of Leiden University in the Netherlands to secure that he conducts lectures to SAFA members in SA next year, (Cape Town 19 - 20 April 2010 and Johannesburg on 22 - 23 April 2010). **Please make a note of the dates.**

The exact format of the lectures are not finalised yet but the plan is to present two seminars, in Cape Town and Johannesburg, each seminar extending for a full two days. The first day will probably focus on an introduction to international tax, dealing with basic issues such as the structure of double tax treaties. The second day would be more advanced, probably dealing with changes to the OECD Model relating to business profits and transfer pricing and other issues. Members are welcome to inform us if they would like specific topics to be included.

Prof van Raad is one of the most eminent International Tax personalities and conducts courses at the Leiden University law school, he is also a member of the Hauser Global Law Faculty at New York University Law School (US) and a Visiting Professor at Peking University Law School (China). He is the chairman of the European Association of Tax Law Professors, of counsel to Loyens & Loeff, and a part-time judge at a Tax Court in the Netherlands.

Subscriptions

For those members who have not yet settled their subscriptions for 2009, please do so as soon as possible!

Regards

Charl du Toit
President: SAFA