



Whither International Taxation:
A New International Tax Architecture Based on the OECD Blueprints?
Featuring keynote remarks by
Pascal Saint-Amans
Director, OECD Centre for Tax Policy and Administration

Friday, April 30, 2021
10:00 am – 12:30 pm ET

The architecture for international tax relations among developed economies was established almost 100 years ago by the League of Nations. Over the last few years, however, historic concepts regarding jurisdiction to tax, attribution of profits to permanent establishments, and arm's-length pricing have come under pressure. Notable developments include: the UK diverted profits tax, digital services taxes and levies enacted or proposed in over 40 countries, and the US Base Erosion and Anti-abuse Tax (BEAT).

In October of last year, the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting released two Blueprints proposing new guidelines for the taxation of multinational enterprises (MNEs). The Pillar One Blueprint reallocates the right to tax certain high-margin income of MNEs on the basis of sales or users. Pillar Two sets forth a model minimum tax on the income of foreign subsidiaries along with rules for denying deductions (or imposing withholding tax) on payments not subject to a minimum rate of tax in the payee jurisdiction. The Biden Administration has endorsed the OECD/G20 project and agreement on open issues is targeted for the middle of this year.

This conference brings together experts from academia, government, and private practice to share their views on challenges to the international tax architecture and the OECD Blueprints. In keynote remarks, Pascal Saint-Amans, Director of the OECD Centre for Tax Policy and Administration, will share his perspectives.

- 10:00 am **Introductory Remarks**
John Samuels (ITPF)
- 10:05 am **Overview of the OECD Blueprints**
Presenter: **Mary Bennett** (Baker McKenzie)
- 10:20 am **Are New Rules Needed for Taxing International Income?**
Moderator: **James Hines** (University of Michigan)
Presenters: **Wei Cui** (University of British Columbia)
Mihir Desai (Harvard Business School)
Ruud de Mooij (International Monetary Fund)
Wolfgang Schön (Max Planck Institute, Munich)
- 11:10 am **Should a New International Tax Architecture Be Based on the OECD Blueprints?**
Moderator: **Will Morris** (PwC)
Presenters: **Michael Devereux** (Oxford University)
Michael Graetz (Columbia Law School)
Chip Harter (PwC)
- 12:00 am **Keynote Address**
Introduction: **John Samuels** (ITPF)
Presenter: **Pascal Saint-Amans** (OECD)
- 12:30 pm **Adjourn**

WebEx information to attend the conference:

- (1) Go to: <https://pwc-americanmc-us.webex.com/pwc-americanmc-us/k2/j.php?MTID=t13b99009611cb45c6ef5b68ed3d6f18e>
- (2) Enter your name and email address
- (3) Enter the session password: **itpf2021**
- (4) Click "Join Now"
- (5) Follow the instructions that appear on your screen.

Please contact Allison Street (Allison.Street@pwc.com) with any questions.