

# IFA CANADA TAX CONFERENCE

IN-PERSON  
& WEBCAST **2022**



IFACANADA.ORG

**MAY 16-17**  
METRO TORONTO  
CONVENTION CENTRE

POCKET PROGRAM  
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## PROGRAM AT A GLANCE

MONDAY, MAY 16, 2022 | DAY 1

8:00 AM – 9:00 AM	<b>BREAKFAST</b> Registration desk opens
9:00 AM – 10:15 AM	YIN Welcome and Presentation <b>FOREIGN AFFILIATE DUMPING RULES</b>
10:15 AM – 10:30 AM	<b>BREAK &amp; CONFERENCE REGISTRATION</b>
10:30 AM – 10:40 AM	Welcome and Opening Remarks
10:40 AM – 11:55 AM	<b>RECENT TRANSACTIONS</b>
11:55 AM – 1:25 PM	<b>LUNCHEON</b> Keynote: Why Canada Needs Big Bang Corporate Tax Reform
1:25 PM – 2:40 PM	<b>CROSS-BORDER TOPICS OF INTEREST</b>
2:40 PM – 3:40 PM	<b>TAX DIRECTORS' ROUNDTABLE</b>
3:40 PM – 3:55 PM	<b>BREAK</b>
3:55 PM – 5:10 PM	<b>CURRENT CASES</b>
5:10 PM	<b>ADJOURNMENT</b>
5:30 PM	<b>COCKTAIL RECEPTION</b>
6:30 PM	<b>CONFERENCE DINNER</b>
9:00 PM	<b>YIN AFTERPARTY</b>

TUESDAY, MAY 17, 2022 | DAY 2

8:30 AM – 9:45 AM	<b>BREAKFAST</b> Registration desk opens
9:45 AM – 10:00 AM	IFA Canada Annual General Meeting
10:00 AM – 11:30 AM	<b>INTEREST DEDUCTIBILITY AND HYBRID MISMATCH RULES</b>
11:30 AM – 11:45 AM	<b>BREAK</b>
11:45 AM – 1:15 PM	<b>RECENT CANADIAN AND INTERNATIONAL DEVELOPMENTS</b>
1:15 PM – 2:15 PM	<b>LUNCH</b>
2:15 PM – 3:30 PM	<b>CRA ROUNDTABLE</b>
3:30 PM – 4:30 PM	<b>FINANCE ROUNDTABLE</b>
4:30 PM	<b>ADJOURNMENT</b>

**Monday, May 16, 2022**

**8:00 AM – 9:00 AM**

**BREAKFAST**

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**9:00 AM – 10:15 AM**

**YIN WELCOME AND PRESENTATION**

**Foreign affiliate dumping rules**

This session will address:

1. Overview of the rules
2. Technical interpretations and rulings
3. Common practical issues

**Moderator:**

**Shaira Nanji**, Osler, Hoskin & Harcourt LLP, Calgary

**Speakers:**

**Stephanie Dewey**, McCarthy Tétrault LLP, Toronto

**Sam Li**, EY LLP, Toronto

*Questions from the audience will be addressed at the end of the presentation.*

**10:15 AM – 10:30 AM**

**BREAK & CONFERENCE REGISTRATION**

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**10:30 AM – 10:40 AM**

**WELCOME AND OPENING REMARKS**

**10:40 AM – 11:55 AM**

**Recent Transactions**

The panelists will present an overview of recent Canadian cross-border M&A transactions.

**Moderator: Alex Pankratz**, Baker McKenzie, Toronto

**Speakers:**

**Mathieu Champagne**, Deloitte LLP, Montreal

**Derek Chiasson**, Norton Rose Fulbright Canada LLP, Montreal

**Ken Saddington**, Goodmans LLP, Toronto

**Gwen Watson**, Torys LLP, Toronto

**YIN Rapporteur: Kathryn Walker**, McCarthy Tétrault LLP, Toronto

*Questions from the audience will be addressed at the end of the presentation.*

**11:55 AM – 1:25 PM**

**LUNCHEON**

**Keynote Speaker**

**Jack Mintz**, President's Fellow, School of Public Policy, University of Calgary

**Why Canada Needs Big Bang Corporate Tax Reform**

The corporate income tax has been found to be the most economically damaging tax a country can have. It is complicated to administer and for taxpayers to comply with — even more so with the adoption of global minimum corporate income tax. Should it be abolished or reformed? Jack Mintz will discuss the necessity for big-bang corporate tax reform after surveying the ills with the current system.

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**DAVIES**

**1:25 PM – 2:40 PM**

**Cross-Border Topics of Interest**

This panel will discuss relevant issues in the Canadian cross-border M&A context including the impact of the FAD rules in M&A agreements, the taxation of break fees in the cross-border context and other relevant trends and considerations relating to investments in, and exit from, Canada including 111(4)(e) planning.

**Moderator: Laura Gheorghiu**, Gowling WLG (Canada) LLP, Montréal

**Speakers:**

**Carrie Aiken**, Blake, Cassels and Graydon LLP, Calgary

**Christopher Anderson**, Davies Ward Phillips & Vineberg LLP, Toronto

**Nik Diksic**, EY Law LLP, Montréal

**Francesco Gucciardo**, Aird Berlis LLP, Toronto

**YIN Rapporteur: Samantha D'Andrea**, EY Law LLP,  
Montreal

*Questions from the audience will be addressed at the end of the presentation.*

### 2:40 PM – 3:40 PM

#### **Tax Directors Roundtable**

In-house tax professionals will discuss the issues that are foremost for their enterprises such as current challenges in building a tax group, matters related to proposed legislation and how they are responding to the changing international environment.

**Moderator: Lynn Moen**, Enbridge Inc., Calgary

#### **Speakers:**

**Alexander Chan**, Investment Management Corporation of Ontario, Toronto

**Larry Greer**, Telesat Canada, Ottawa

**Andrea Shreeram**, Bank of Nova Scotia, Toronto

**YIN Rapporteur: Vanessa Zuchetto**, Felesky Flynn LLP,  
Calgary

*Questions from the audience will be addressed at the end of the presentation.*

### 3:40 PM – 3:55 PM

#### **BREAK**

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### 3:55 PM – 5:10 PM

#### **Current Cases**

The panelists will discuss the implications of recently decided tax cases including the Supreme Court of Canada decisions in *Alta Energy* and *Loblaws*.

**Moderator: Margaret Nixon**, Stikeman Elliott LLP,  
Toronto

#### **Speakers:**

**Al Meghji**, Osler, Hoskin & Harcourt LLP, Toronto

**John Sorensen**, Gowling WLG (Canada) LLP, Toronto

**Matt Williams**, Thorsteinssons LLP, Toronto

**YIN Rapporteur: Darren Joblonkay**, Davies Ward Phillips & Vineberg LLP, Toronto

*Questions from the audience will be addressed at the end of the presentation.*

### 5:10 PM

#### **ADJOURNMENT**

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### 5:30 PM

#### **COCKTAIL RECEPTION**

#### **Intercontinental Toronto Centre**

225 Front Street West, Toronto

Lower Level | Ontario-Niagara Foyer

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### 6:30 PM

#### **CONFERENCE DINNER**

#### **Intercontinental Toronto Centre**

225 Front Street West, Toronto

Lower Level | Ontario Room

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**GOWLING WLG**

9:00 PM

**YIN AFTERPARTY**

**The Pint Public House**

*Up The Stairs!* 277 Front St W, Toronto

(Located inside the Metro Toronto Convention Centre)

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**OSLER**

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& Harcourt LLP

**Tuesday, May 17, 2022**

8:30 AM – 9:45 AM

**BREAKFAST**

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9:45 AM – 10:00 AM

**IFA CANADA ANNUAL GENERAL MEETING**

[IFA Members can view the AGM materials here.](#)

10:00 AM – 11:30 AM

**Interest Deductibility and Hybrid Mismatch Rules**

This session will provide an in-depth review of the mechanics and implications of Canada's proposed interest deductibility limits (EIFEL rules). The speakers will also address Canada's previously announced hybrid mismatch rules, to the extent that legislation is released beforehand.

**Moderator: Marie-Emmanuelle Vaillancourt**, Davies Ward Phillips & Vineberg LLP, Montréal

**Speakers: Byron Beswick**, KPMG LLP, Calgary

**Ken Buttenham**, PwC LLP, Toronto

**John Lorito**, Stikeman Elliott LLP, Toronto

**Sabrina Wong**, KPMG LLP, Toronto

**YIN Rapporteur: Bryan Madorsky**, KPMG LLP, Toronto

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**Aaron Grinhaus, LLB, JD, LLM**  
Lawyer, Grinhaus Law Firm

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**11:30 AM – 11:45 AM**

**BREAK**

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**11:45 AM – 1:15 PM**

**Recent Canadian and International  
Developments**

This session will cover recent Canadian and international tax developments (including in the US and the EU). This session will discuss the reactions of Canada and other countries to global tax reform (e.g., Pillar 1 and the Canadian DST, and Pillar 2 global minimum tax).

**Moderator: Christopher Montes**, Felesky Flynn LLP,  
Calgary

**Speakers:**

**Mark Kaplan**, EY LLP, Toronto

**Patrick Marley**, Osler, Hoskin & Harcourt LLP, Toronto

**Stefanie Morand**, McCarthy Tétrault LLP, Toronto

**Andrew Spiro**, Blake, Cassels & Graydon LLP, Toronto

**YIN Rapporteur: Taylor Cao**, Osler, Hoskin &  
Harcourt LLP, Toronto

*Questions from the audience will be addressed at the  
end of the presentation.*

**1:15 PM – 2:15 PM**

**LUNCH**

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**2:15 PM – 3:30 PM**

**CRA Roundtable**

A representative from the Canada Revenue Agency will answer questions regarding the CRA’s stance on various issues.

**Moderators:**

**Kim Brown**, McCarthy Tétrault LLP, Vancouver  
**Michael Kande**, Davies Ward Phillips & Vineberg LLP, Montreal

**Speaker:**

**Yves Moreno**, Canada Revenue Agency, Ottawa

**3:30 PM – 4:30 PM**

**Finance Roundtable**

Representatives from the Department of Finance will answer questions regarding their stance on various issues.

**Moderators:**

**Phil Halvorson**, EY LLP, Toronto  
**Kim Maguire**, Bennett Jones LLP, Vancouver

**Speakers:**

**Trevor McGowan**, Department of Finance, Ottawa  
**Peter Repetto**, Department of Finance, Ottawa

**4:30 PM**

**ADJOURNMENT | END OF CONFERENCE**



**International Fiscal Association**  
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CANADIAN BRANCH

**2022 IFA CANADA TAX CONFERENCE**

**PROGRAM CO-CHAIRS:**

- ▶ **John O'Connor**, Stikeman Elliott LLP, Toronto
- ▶ **Elie Roth**, Davies Ward Phillips & Vineberg LLP, Toronto

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