



**International Fiscal Association (Canadian Branch)
Association fiscale internationale (Section canadienne)
President's Greeting
Spring 2014**



Greetings! Over the past months, when not preoccupied by the intrusions of the Polar Vortex, with its attendant blizzards, ice storms, freeze-ups and deep frosts, we have had much to occupy us on the international tax front.

IFA-CTF International Tax Seminar

For the Canadian Branch, 2014 got off to a strong start with our joint IFA-CTF International Tax Seminar in Calgary and Toronto. With participants not only from Canada but also the U.S., U.K. and Australia, the day-long seminar, entitled "Treaty Shopping: Anticipating Developments in Canada and Internationally", drew a very large attendance in both cities. We were treated to a wide-ranging and extremely thoughtful discussion of the issues surrounding some of the most important tax issues facing the international professional and business community. The views expressed over the course of the seminar spanned the tax policy spectrum and included insights into the policies, practices and experience of other countries. And all of it imparted with wit, wisdom and goodwill. I think everyone, including the participants themselves, came away with new insights and knowledge.

International Tax Conference

Looking ahead, our next milestone will be our annual International Tax Conference in Toronto on May 22 and 23. This joint conference with the U.S. branch will also bring together a range of knowledgeable and experienced speakers from both countries to provide a comprehensive view of international tax developments affecting Canada-U.S. tax issues. We are fortunate to have the participation of officials from the Department of Finance, CRA, the U.S. Treasury and the IRS. Our luncheon speaker on the 22nd will be the Honourable Michael Wilson, Chairman of Barclays Capital Canada Inc., and former Canadian Ambassador to the United States and Minister of Finance. At the end of the formal proceedings on the 22nd, we will adjourn to the Four Seasons Hotel for a cocktail reception and dinner, giving everyone a chance to connect with old friends and spend more time with our guests from the U.S.

If you have not already done so, I encourage you to register and to make this event known to your friends and colleagues across the border who might also benefit from this program. Also, please encourage younger practitioners to attend – this conference will provide a terrific opportunity for future leaders in the tax community to build their knowledge base and their professional relationships.

YIN

The YIN Committee has continued to be busy and recently held another successful webinar on back-to-back arrangements in a cross-border context. Thank you to our speakers Nadia Rusak (Osler, Montreal) and Mathieu Champagne (Deloitte Vancouver) for excellent presentations, as well as to Michael Kandev and the YIN Committee for pulling it together. We are looking forward to more of the same from this very active group!

Annual Congress - Mumbai

As you know, this year's annual Congress will be in Mumbai from October 12 to 17. It is a big undertaking to go so far for so long, but based on past experience I can attest to the warm and enthusiastic welcome the India Branch will provide and the program will be first rate. The program and related material can be accessed at https://www.ifa.nl/activities/annual_congresses. I hope to see you there.

Annual Meeting

Our upcoming Council meeting and annual meeting of Branch members will be held as usual during the course of the May conference. One of the things we will be raising for further thought and discussion is the evolving role and constitution of our Council.

The Branch's Council meets twice a year to deal with major governance issues. It is our board of directors, and like any board, its mandate is to act in the interests of the entire membership. Last year we enshrined in our by-laws the principle that Council members "should be selected with due regard for the broad and national range of the branch's membership consisting principally of legal and accounting practitioners in private practice and industry across Canada and for the need to ensure ongoing renewal of its membership". We intend to focus on how we can invigorate that principle more fully. We will be seeking your input.

As the fourth largest IFA branch in the world, we have much to be proud of and we all owe a great debt of thanks to past officers, Council members and members at large. As we move forward into a world of increasing tax complexity and confusion, IFA has a central role to play in fostering study, understanding and dialogue for the benefit of the practitioner community, the taxpaying public, tax administrators and policymakers. Please give some thought to how you can contribute.

I look forward to seeing you in Toronto next month.

Stephen Bowman
President

