

今後 3 年間の年次総会の Subject

Rio de Janeiro 2017

Proposed Main Subjects and Seminar Topics		suggested by	status
1	International BEPS and Practical consequences in Domestic and multilateral laws	Brazilian Branch	General Reporters: Steve Shay (USA) and Allison Christians (Canada)
2	The future of Transfer pricing	Brazilian Branch	General Reporter: Sergio Silva André Rocha (Brazil)

Seoul 2018

Proposed Main Subjects and Seminar Topics		suggested by	status
1.	Seeking anti-avoidance measures of general nature and scope -GAAR and other rules: Do we need them, and what should they be like?	Korean Branch	Draft Directives to be discussed at PSC Winter meeting 2017
3	Withholding tax+: indirect taxation of business profits (The subject covers jurisdiction to tax, constructive permanent establishment, implications of “turnover taxes”	Korean Branch	Draft Directives to be discussed at PSC Winter meeting 2017 RA completing outline; more interaction with PSC via JSW

London 2019

Proposed Main Subjects		suggested by	status
1	Interest Deductibility: the implementation of BEPS Action 4	UK Branch	Approval by PSC during the PSC meeting September 2016. Next step is to choose General Reporters.
2	Investment funds	UK Branch	Approval by PSC during the PSC meeting September 2016. Next step is to choose General Reporters.