



International Fiscal Association

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I n t r o d u c t i o n

IFA, a unique community

The International Fiscal Association is an organisation devoted to the study and advancement of international and comparative tax law and public finance. The association counts over 10,000 individual and corporate members in more than 90 jurisdictions.

That, in itself, makes IFA unique. Another noteworthy characteristic is that its members include individuals and organisations from all sectors: business, consulting professions, governments, the judiciary, universities, etc. As a result, IFA provides a neutral platform where representatives of all professions and interests can meet and discuss international tax issues at the highest level.

In essence, IFA is a network of specialists interested in exchanging ideas and experiences with each other on neutral territory. As the only network of its kind on an international scale, IFA stimulates such exchanges at the local, regional and international levels through its programmes and activities.

This brochure presents a brief sketch of IFA and its activities. Please visit the IFA website at www.ifa.nl for more information.

General

Founded in 1938 as an association under Dutch law, IFA's headquarters and General Secretariat are located in the Netherlands. The organisation's daily affairs are managed by executive officers, including the President, the Secretary General, the General Treasurer and the Chairman and Vice-Chairman of the Permanent Scientific Committee- Major decisions on operational issues are the responsibility of the Executive Committee (EC), while the Permanent Scientific Committee (PSC) bears responsibility for scientific issues. The EC consists of up to 14 people and meets three times a year; the PSC has approximately 20 members and meets twice annually.

Many of IFA's activities take place at the IFA branches, which totalled 47 in 2003. All branches are represented in the General Council, which is empowered to take certain fundamental decisions and which meets once a year during the annual Congress. Ultimate power rests with the General Assembly which also meets once a year during the Congress.

The Branches

Many IFA activities take place at branch level. The branches are organised as local associations, corporations or other entities, each with its individual Board of Directors and organisational structure. As a rule, membership in a branch is exclusive to IFA members.

IFA recognises one branch per taxing jurisdiction; however, some branches in large jurisdictions have created separate sub-branches. Branches run their own programmes, which are often synchronised with IFA's worldwide activities. The nature and frequency of these activities depend entirely on the branch management; some branches hold monthly meetings, others meet less frequently during the year. Branch meetings feature discussions on international issues, and domestic and foreign experts often make presentations. Most branches devote one meeting each year to discussing the draft reports submitted by the branch reporters to the general reporter on the main subjects of the next year's Congress. Additionally, there is a growing trend for two or more branches to organise joint activities, such as lectures, seminars and meetings.

Information about branch activities can be found on the IFA website (and, if available, on the local branch's website). This allows travelling IFA members to visit events organised by other branches. Where available, documents used or produced for such events are added to the Documents Database on the IFA website.

Jurisdiction s w h e r e I F A h a s m e m b e r s



Annual Congresses

Each year IFA organises a four-day Congress for all its members. These Congresses are devoted primarily to the study and discussion of important international tax issues. Apart from this scientific content - reflecting the highest professional level that is IFA's trademark - an engaging social programme gives members and their guests every opportunity to meet others and enjoy the host country's hospitality.

Each Congress addresses two main subjects, which are prepared over a three-year period and ultimately result in the publication of Cahiers. Two days of the Congress are generally devoted to these two subjects, while the other two days feature a variety of seminars (in recent years, as many as eight). Examples include the joint IFA-OECD seminar and a seminar on recent developments, the contents of which are chosen very shortly before the Congress.

Check the IFA website for a list of past and future Congress locations, as well as an overview of the main subjects dealt with at past Congresses. The Documents Database also features summaries and documents pertaining to recent Congresses.

Cahiers de Droit Fiscal International

The two volumes written by IFA members each year have gained worldwide acclaim for their high quality and usefulness. These books require tremendous preparation, attention and devotion, and it is therefore no surprise that they have become IFA's hallmark, occupying a prominent place in hundreds, possibly thousands, of private and public tax libraries.

Each Cahier contains the general report and the branch reports on the selected subject. A list of all the Cahiers published since 1939 can be found on the IFA website.

Seminars

Since 1976, publications on some of the seminars held at IFA Congresses have been issued in the 'IFA Congress Seminar Series' (see website). Although the list by no means reflects all IFA Congress Seminar activities, these books are useful and high-quality reference works for the topics concerned. For information on Seminars held during more recent Congresses, IFA members may also consult the Documents Database. This features all materials distributed to Congress participants as well as other relevant documents.

Yearbook

Each year, IFA publishes a Yearbook which reports on the activities and events of the past year. This annual publication includes a short report on the Congress proceedings and summaries of the discussions on the two main Congress subjects. Together with the IFA website, the Yearbook ensures that members stay in close touch with IFA.

Mitchell B. Carroll Prize

To encourage young researchers in the field of international fiscal law, IFA has instituted a prize as a tribute to its first Honorary President. This prize is awarded for work addressing international fiscal questions, comparative fiscal law or national fiscal law with an emphasis on the relationship with the fiscal law of foreign jurisdictions. The entries are judged by a jury of internationally renowned specialists. This competition is open to lawyers, accountants and economists up to age 35. Visit the IFA website for details on entry rules, as well as a list of the winners since 1990. The prize (€ 5,000 in 2004) is awarded during the annual Congress, to which the winner is invited.

David R. Tillinghast Research Programme

In 1996, IFA launched a research programme, which in 2000 received the name of the departing Chairman of the Permanent Scientific Committee. The research is conducted by highly respected specialists, under the supervision of the PSC. It is funded out of IFA's Scientific Fund. The Programme currently consists of three segments, each dealing with relevant and fundamental topics. The first segment addresses the impact of technological innovation in information and communications on the taxation of income and activities. It resulted in the publication of two highly acclaimed books entitled *Electronic Commerce and International Taxation* (1999) and *Electronic Commerce and Multijurisdictional Taxation* (2001).

Work on the second segment, dealing with arbitration as an alternative method of solving international tax conflicts, resulted in the publication of the book *Income Tax Treaty Arbitration* in early 2004. A third segment covering deferred compensation, with particular emphasis on stock options, is now in progress. Further segments are expected to be launched to maintain the momentum of this Programme which spearheads IFA's scientific research activities.

A c t i v i t i e s

Contacts with Other Organisations

As a token of the high esteem in which IFA is held throughout the world of international tax and public finance, IFA is a welcome guest at many private and public forums where such issues are discussed.

IFA has consultative status with the United Nations Economic and Social Council; in that capacity, it is represented at meetings of the Ad Hoc Group of Experts on International Cooperation in Tax Matters. It maintains close contact with the fiscal activities of the EU, UNICE, the CIAT, the ICC, the OECD, the IOTA, CREDAF, the ANDEAN community, MERCOSUR, ASEAN, the EATLP and various other organisations,

A very special relationship exists with IFA's sister organisation, the International Bureau of Fiscal Documentation (IBFD) which was established initially as part of IFA. The two organisations support and participate in each other's scientific programmes.

The relationship with the OECD deserves special mention. The OECD representation in IFA's Permanent Scientific Committee ensures a close liaison between IFA's activities and those of the OECD. Furthermore, IFA and the OECD organise a joint seminar during the IFA annual Congress where OECD panel members report on their past and future activities, and participate in discussions with IFA members on important current issues.

Research Associate Programme

Each year, IFA engages a young research associate who assists the Permanent Scientific Committee in analysing, evaluating and selecting future Congress subjects and seminar topics. During the research associate's stay in the Netherlands, scientific and logistical support is provided by the International Bureau of Fiscal Documentation in Amsterdam. A basic stipend and a contribution towards housing costs are paid by IFA. During his or her tenure, the associate attends PSC meetings and the Congress.

Poster Programme

Since 1993, IFA has operated the Poster Programme to stimulate university and graduate students to study and discuss international tax issues, and to publish the results of their efforts. A maximum of ten candidates each year are selected to attend the annual Congress free of the registration fee, and to exhibit a poster illustrating the content of their work and the issues discussed.

Membership

General

Any individual or organisation interested in international tax and public finance issues may apply for membership. Generally, membership applications are handled through the IFA branch in the jurisdiction where the applicant resides; people residing in jurisdictions without branches may apply for 'direct membership' in IFA. The IFA articles of association require that all membership applications be approved by the General Council.

Benefits

The benefits IFA offers to its members are many. First and foremost, members will have access to IFA's vast network of specialists including the world's top international tax experts. Other important benefits include:

- Attendance at the annual IFA Congress and all events organised by the branches and Central IFA.
- Copies of the two Cahiers de Droit Fiscal International published each year, both in book form and on CD-ROM. An online version may also become available.
- Access to the Members' section of the IFA website, featuring the IFA membership list and the Documents Database.
- Significant discounts on publications produced or sponsored by IFA, such as the IFA Congress Seminar Series and David R. Tillinghast Research Programme publications. Other organisations including the IBFD may give IFA members access to their publications at favourable rates.

Costs

IFA charges a modest membership fee. The 2004 rate is €60 for individual members who are also members of a branch. € 65 for direct individual members, and € 140 for corporate members. Most branches add a small surcharge to this fee to cover branch expenses. To lower the membership threshold for younger applicants, a 50% reduction may be offered for branch members up to 30 years of age.

Interested in joining?

Please visit the iFA website www.ifa.nl for details.