

Webinar Series

The Role of Investment Arbitration in Tax Disputes

Tax Policy Center

Center of Comparative, European and International Law

Over the last years, investment arbitration as a means to solve tax-related disputes has gained increased attention. The recent awards rendered by tribunals under the auspices of the Permanent Court of Arbitration in *Vodafone v. India* and *Cairn Energy v. India* have underscored this trend.

In light of the growing importance of the topic, the University of Lausanne is pleased to continue its inaugural webinar series on “The Role of Investment Arbitration in Tax Disputes” with its second session on 11 November 2021, 14.00 – 16.00 CET.

Bringing together leading professionals and academics from both the investment law and tax law world, this webinar series aims at providing a neutral forum to discuss the most relevant and recent strategic, policy, procedural and substantive issues involving international investment arbitration and tax disputes as well as ongoing reforms in this area.

The second webinar of the series will address jurisdiction over tax-related disputes in investment arbitration, arbitral jurisprudence in relation to tax carve-out clauses and future policy trends. In particular, the taxation article of Canada’s 2021 Model Foreign Investment Promotion and Protection Agreement (FIPA) will be introduced. A panel of experienced tax and investment lawyers will comment on and discuss the issues raised in the three presentations.

Second Webinar

“Jurisdiction over Tax-related Disputes in Investment Arbitration”

11 November 2021, 14.00 – 16.00 CET

Welcome Address

Prof. Robert Danon / Sebastian Wuschka (University of Lausanne)

Presentations

Chair: Prof. Robert Danon (University of Lausanne)

Tax Carve-Outs in Investment Treaties in Light of Recent Jurisprudence

Marinn Carlson (Sidley Austin, Washington D.C.)

Future Models for the Treatment of Tax Issues in Investment Treaties

Prof. Wolfgang Alschner (University of Ottawa)

The Example of Canada’s 2021 Model FIPA

Mark Luz (Trade Law Bureau, Government of Canada)

Panel Discussion

The Future Evolution of Jurisdiction over Tax-related Disputes under IIAs

Chair: Prof. Stef van Weeghel (University of Amsterdam)

Panelists:

Mukesh Butani (BMR Legal)

Dr Arno Gildemeister (SciencesPo, Paris)

Myriam Seers (Savoie Laporte, Toronto)

Matthew Weiniger (Linklaters, London)

Concluding Remarks and Presentation of the Next Webinar

Sebastian Wuschka (University of Lausanne)

www.unil.ch/taxpolicy

Unil

UNIL | Université de Lausanne

Webinar Series : The Role of Investment Arbitration in Tax Disputes
Second Webinar : Jurisdiction over Tax-related Disputes in
Investment Arbitration

Zoom online event – 11 November 2021, 14.00-16.00 CET

REGISTRATION FORM

Mrs. ☐ Mr. ☐ Dr. ☐ Other ☐

Family name First name

Function

Company

Country

E-mail

I herewith agree to register

Free of charge. Upon reception of your registration form, you will receive our confirmation. The zoom link will be sent to you a few days before the event.

Registration form to be returned by e-mail to taxpolicy@unil.ch

Signed by Date
