

Preface

As a result of the Actions under the BEPS Action Plan, the OECD plans to update its Model Convention in the near future. The OECD Committee on Fiscal Affairs and its Working Parties have been working on drafting the proposals for the necessary changes to the Model Convention that would help to mitigate the base erosion and profit shifting strategies of multinational enterprises. The proposed changes particularly concern the introduction of savings and limitation on benefits clauses, reconsideration of treaty entitlement for fiscally transparent entities and articulation of various proposals with regard to the current concept of permanent establishment and limitations on the abuse thereof.

In order to examine the expected changes to the Model Convention, the twenty-second Viennese Symposium on International Tax Law was held on 19 June 2015 at the WU (Vienna University of Economics and Business). Renowned professors from Austrian and foreign universities, tax researchers from the WU and tax experts from various countries participated in the conference. In the presence of Jacques Sasseville, Head of the Tax Treaty Unit of the Fiscal Affairs Division at the OECD, the speakers presented the proposed changes to the Model Convention resulting from the BEPS Project, and analysed their practical relevance and how they might affect international tax planning and policy. In addition, BEPS Action 15 on the multilateral instrument was analysed and possible advantages and difficulties of its implementation were presented. The authors completed their papers using input received during the conference, and these papers became the chapters of this book. They offer an in-depth analysis along with the most recent scientific research results on the topics.

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Michael Lang
Pasquale Pistone
Alexander Rust
Josef Schuch
Claus Staringer
Alfred Storck