

Ad Hoc Expert Group Meeting "2011 Update of the UN Model Double Taxation Convention" (New York, 9-10 June 2011)

PROVISIONAL AGENDA

Thursday, 9 June 2011

9:30 a.m. - 10:00 a.m.

Opening of the meeting:

- Welcome remarks by **Alex Trepelkov**, Director, Financing for Development Office (FFDO/DESA)
- Introduction by Armando Lara Yaffar, Chairperson, Committee of Experts on International Cooperation in Tax Matters (UN Tax Committee)

10:00 a.m. - 11:00 a.m.

General discussion:

• General considerations, priorities of the meeting and framework of discussions

by Robin Oliver, Member, UN Tax Committee and Michael Lennard, Chief, International Tax

Cooperation Unit, FFDO/DESA

• General refections on the UN Model update by Brian Arnold, Senior Adviser, Canadian Tax Foundation and David Rosenbloom, Professor, New York University, and additional comments by Roy Rohatgi, International Tax Adviser

11:00 a.m. - 1:00 p.m.

Focused discussion:

- Article 1 (Persons covered); Article 2 (Taxes covered); Article 3 (General definitions); Article 4 (Resident) and Article 13 (Capital gains) by Armando Lara Yaffar, Chairperson, UN Tax Committee
- Article 6 (Income from immovable property); Article 8 (Shipping, inland waterways transport and air transport) and Article 9 (Associated enterprises) by Secretariat

1:00 p.m. - 2:30 p.m.

Lunch break

2:30

UN Tax Committee

, Member,

Friday, 10 June 2011

9:30 a.m. – 1:00 p.m.

Focused discussion:

• Article 14 (Independent personal services); Article 15 (Dependent personal services); Article 16 (Directors' security payments); Article 19 (Government service); Article 20

(Students); Article 21 (Other income) and Article 22 (Capital) by Claudine Devillet, Member, UN Tax Committee

1:00 p.m. – 2:30 p.m.

Lunch break

2:30 p.m. - 5:00 p.m.

Focused discussion:

 Article 23 (Methods for elimination of double taxation); Article 24 (Non-discrimination) and Article 26 (Exchange of information) by Anita Kapur, Member, UN Tax Committee

Article 87 Ml _ blbie

- Article 25 (Mutual agreement procedure) by Claudine Devillet, Member, UN Tax Committee
- Article 27 (Assistay

Secretariat

5:00 p.m. - 5:30 p.m.

Closing of the meeting:

Conclusions and way forward by Armando Lara Yaffar, Chairperson, UN Tax Committee,

Robin Oliver, Member, UN Tax Committee and Secretariat