



**International Fiscal Association**

**IFA 2021 Virtual Event  
29 November – 1 December 2021**

## **OUTLINE**

**The Global Tax Agreement: the Two-Pillar Solution  
IFA Regions: the Inclusive Framework  
North America**

**North America | Tuesday, 30 November 2021 | 19.00 – 21.00**

**Introduction**

Peter Barnes (President IFA)

**Chair**

Barbara Angus (USA)

**Panel members**

Ana Paula Jiménez (Mexico)

Loren Ponds (USA)

Omar Zuñiga (Mexico)

Amanda Heale (Canada)

Wei Cui (Canada)

**Secretary**

Lauren Ross (USA)



## Outline of Scope and Focus

- I. Introduction
  - Focus on Canada, Mexico, and the United States
- II. Overview and comparison of each country's approach to the OECD/G20 Inclusive Framework project
  - Participation in Inclusive Framework
  - Perspectives on the project
  - Priorities for outcomes
- III. Deeper dive on Pillar One – New nexus and profit allocation rules
  - Government and business community positions on new Pillar One rules as well as digital services taxes (DSTs) and other unilateral measures
  - Revenue expectations from new Pillar One rules
  - Process, prospects, and expected timeline for implementation of new Pillar One rules (and related action on any DST or other unilateral measures)
  - Readiness for administration of new Pillar One rules, including conduct of dispute prevention and resolution mechanisms
  - Q&A on Pillar One
- IV. Deeper dive on Pillar Two – New global minimum tax rules
  - Government and business community positions on new Pillar Two rules
  - Interaction with existing law, including anti-abuse rules
  - Revenue expectations from new Pillar Two rules
  - Process, prospects, and expected timeline for implementation of new Pillar Two rules
  - Readiness for administration of new Pillar Two rules, including new reporting requirements
  - Q&A on Pillar Two
- V. Key takeaways
  - What to watch for in North America as these fundamental changes in the global tax architecture move from design to implementation to operation