



International Fiscal Association

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

ISSUES PAPER

**The Global Tax Agreement: the Two-Pillar Solution
The global tax policy perspective**

Chair

Robert Danon (Chair PSC)

Secretary

Alessandro Turina (Italy)

Panel I | Monday, 29 November 2021 | 15.00 – 16.30

Introduction

Pascal Saint-Amans (OECD)

Panel members

Mary Baine (ATAF)

Itai Grinberg (USA)

Rasmi Ranjan Das (India)

Fabrizia Lapecorella (Italy)

Rahul Sahgal (Switzerland)

Wolfgang Schön (Germany)



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“The Global Tax Policy Perspective” addresses fundamental policy issues surrounding the conclusion and future implementation of the Global Tax Agreement both with regard to Pillar One as well as in connection with Pillar Two. The Panel will see the participation of Pascal Saint-Amans (OECD), Mary Baine (ATAF), Rasmi Ranjan Das (India, Ministry of Finance), Fabrizia Lapecorella (Italy, Ministry of Finance), Wolfgang Schön (Germany, Max Planck Institut), Rahul Saghal, (Switzerland, State Secretariat for International Finance) and Itai Grinberg (US, Treasury Department). With regard to Pillar One, the Panel will first address the genesis and evolution of the consensus on the scope of Pillar One, to then delineate the new balance from “Source” and “Residence” arising from the Agreement. This will give the chance to also address design issues such as the thresholds defining the scope of application as well as implementation measures in particular in the area of dispute resolution. The impact of the adoption of Pillar One on the existing framework which saw the proliferation of unilateral measures as well as on the perspectives surrounding the arm’s length standard will also be addressed. With reference to Pillar Two, the overall architecture of the prospected rules will be analysed in light of their policy goals, focus will then be placed on the agreed minimum rate and its implications for countries with different tax policy priorities. The future of incentives and their interaction with international agreements will also be addressed as well as the rationale and effects of the prospected tangible assets carve out. Pillar Two measures will then be analysed from a regional perspective, bearing in mind in particular, the context provided by the last two US tax reforms and by prospective measures to be adopted at the EU level. Focus will finally be placed on the institutional challenges surrounding tax certainty and possible dispute prevention and resolution mechanisms.