





International Colloquium

3rd Rijeka Tax Law Day: Tax Litigation in the EU Internal Market

University of Rijeka, Faculty of Law

April 30th 2021

Venue: Online conference (Cisco Webex)

Organizers: Department of Corporate and Financial Law, Faculty of Law University of Rijeka and International Bureau of Fiscal Documentation (IBFD), Amsterdam

Programme

Morning session (10.00 - 13.00)

Chair: Prof. Dr. Nataša Žunić Kovačević (University of Rijeka)

10.00 – 10.10	Welcome words
10.10 – 10.30	Cross-border tax dispute settlement within the EU Internal Market: critical issues and future perspectives Keynote lecture by Prof. Dr. Pasquale Pistone (IBFD, Amsterdam / Vienna University of Economics and Business / University of Salerno)
10.30 – 10.45	Resolving Tax Disputes in the EU Internal Market: perspective of the European Commission Jasna Voje (DG Taxation and Customs Union at European Commission)
10.45 – 11.00	Traditional and alternative tax dispute instruments: tax authorities' perspective Željko Martinović & Dalibor Legac (Croatian Ministry of Finance, Tax Administration)

11.00 – 11.15	Break
11.15 – 11.30	Baseball arbitration under the BEPS MLI and the motivation of administrative acts in tax matters Assist. Prof. Dr. Ricardo Ricardo Garcia Antón (Tilburg University)
11.30 – 11.45	Mechanisms of dispute settlement in the area of value added tax (VAT) Dr. Nevia Čičin-Šain (Vienna University of Economics and Business)
11.45 – 12.15	Open discussion
12.15 – 12.45	BOOK PRESENTATION: Flexible Multi-Tier Dispute Resolution in International Tax Disputes (P. Pistone & J.P. de Goede eds., IBFD 2021)

Afternoon Session (14.00 – 16.00)

Chair: Prof. Dr. Edita Čulinović Herc (University of Rijeka)

14.00 – 14.20	The boundaries of ECJ's jurisdiction in 'state aid and tax rulings' line of cases Keynote lecture by Prof. Dr. Vesna Tomljenović (Judge at the EU General Court)
14.20 – 14.35	Harmonization of procedural tax law in the EU: a third-country perspective Assist. Prof. Dr. Svetislav Kostić (University of Belgrade)
14.35 – 14.50	Collaborative approach to tax disputes: a practitioner's view Adrian Hammer (Deloitte Croatia)
14.50 – 15.30	Panel discussion — 'Tax litigation vs. dispute prevention: current state of play and future prospects' Panellists: Prof. Dr. Dario Stevanato (University of Trieste); Mr. Damir Brajković (Croatian Chamber of Tax Advisors); Assist. Prof. Dr. Šime Jozipović (University of Split) Moderator: Assist. Prof. Dr. Stjepan Gadžo (University of Rijeka)
15.30 – 15.45	Conclusions and closing remarks Prof. Dr. Nataša Žunić Kovačević (University of Rijeka)

Program and Organizational Committee of the Conference: Prof. dr. sc. Nataša Žunić Kovačević (University of Rijeka, Faculty of Law); Prof. dr. sc. Edita Čulinović Herc (University of Rijeka, Faculty of Law); Prof. dr. Pasquale Pistone (IBFD/WU Vienna/University of Salerno); Prof. dr. Polonca Kovač (University of Ljubljana); Izv. prof. dr. sc. Sandra Fabijanić Gagro (University of Rijeka, Faculty of Law); Doc. dr. sc. Stjepan Gadžo (University of Rijeka, Faculty of Law).