

PRAVRI

Pravni fakultet Faculty of Law



Sveučilište u Rijeci
University of Rijeka



7th Rijeka Tax Law Day

29 April 2026

international conference

7th Rijeka Tax Law Day: Cross-border Administrative Tax Procedures under Tax Treaties, EU and Domestic Law

organized by the Department of Corporate and Financial Law,
University of Rijeka – Faculty of Law, IBFD and IFA Croatia



CONFERENCE PROGRAMME

9.30 - 10.00 **Registration**

10.00 - 10.10 **Welcome and introduction**

10.10 - 12.00 **Morning Session**

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

MAPs as sui generis administrative procedures and their relations with domestic procedural law

Keynote lecture by Prof. Dr. Pasquale Pistone (University of Salerno / IBFD / Vienna University of Economics and Business)

Evolutions in MAP

Keynote lecture by Sandra Knaepen (Global TP Controversy Desk Leader Belgium at EY / Fmr. Co-Head of the Tax Certainty Unit at OECD's Centre for Tax Policy and Administration)

Practical observations in relation to MAPs and APAs

Merima Džaferović (Senior Manager at Ernst & Young Croatia)

Obtaining withholding tax relief in practice: MAPs and other procedural instruments

Vladimir A. Batarelo, LL.M. (Partner at BDV Law d.o.o.)

MAPs, exchange of information and joint audits – Slovenian experience

Prof. Dr. Polona Kovač (University of Ljubljana)

Živa Mrazić Kramarič (Financial Administration of the Republic of Slovenia)

12.00 - 13.00 **Lunch break**

13.00 - 14.20 Afternoon Session

Chair: Assoc. Prof. Dr. Stjepan Gadžo (University of Rijeka)

Joint tax audits

Assoc. Prof. Dr. Nevia Čičin Šain, LL.M. (Vienna University of Economics and Business)

Scope of the EU Dispute Resolution Directive in light of the C-497/25 Maxima LT case

Assist. Prof. Dr. Katerina Perrou (National and Kapodistrian University of Athens)

Croatian experience with the EU Dispute Resolution Mechanism Directive

Dalibor Legac & Željko Martinović (Croatian Ministry of Finance, Tax Administration, Central Office)

The protection of taxpayers' rights in the exchange of information

Assoc. Prof. Dr. Menita Giusy de Flora (University of Salerno)

14.20 - 14.30 Conference conclusions

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

14.40 - 15.30 Radionica (na hrvatskom jeziku)

Aktualnosti u razmjeni informacija o inozemnim primicima i imovini

Dalibor Legac (Ministarstvo financija, Porezna uprava, Središnji ured, pomoćnik ravnatelja i voditelj Sektora za međunarodno oporezivanje i suradnju, europske poslove i razmjenu informacija)

Doc. dr. sc. Irena Klemenčić (Sveučilište u Zagrebu, Pravni fakultet)

Conference partners:



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span



29 April 2026
9:30 – 15:30



Faculty of Law in Rijeka
Hahlić 6
Rijeka, Croatia



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Programme and Organising Committee:

Prof. Dr. Nataša Žunić Kovačević (University of Rijeka); Prof. Dr. Pasquale Pistone (IBFD / WU Vienna / University of Salerno); Prof. Dr. Edita Čulinović Herc (University of Rijeka); Assoc. Prof. Dr. Stjepan Gadžo (University of Rijeka); Prof. dr. Polonca Kovač (University of Ljubljana); Assist. Prof. Dr. Katerina Perrou (University of Athens); Viktorija Pisačić (University of Rijeka)