

Report from the Conference “Currency, Taxes and Other Institutes of Financial Law in the Year of the 100th Anniversary of the Founding of Czechoslovakia”

An international conference bearing the above title was held in Prague on 20 and 21 September at the premises of Carolinum (the seat of the Charles University) and the Faculty of Law of Charles University. The organizer of this event was the Department of Financial Law and Financial Science of the Faculty of Law and its members, namely doc. JUDr. Michael Kohajda, Ph.D. and JUDr. Tomáš Sejkora, Ph.D. This conference was a success despite the unfavourable circumstances in the form of a broken water pipeline in the building of the Faculty of Law.

The conference, attended by more than 100 experts from the Czech Republic, Russia, Poland, Slovakia, Italy and Spain, dealt with issues of financial law, including the tax law, monetary law and other related areas. The participants discussed the development of legal regulation in Czechoslovakia, Central Europe and the current problems of the EU legislation. There were also discussed new topics such as the regulation of virtual currencies or the issue of taxation of multinational corporations.

The conference was held within the framework of the international cooperation of the Prague Faculty of Law with the Centrum Informacji i Organizacji Badań Finansów Publicznych i Prawa Podatkowego Krajów Europy Środkowej i Wschodniej and the Institute for Research and Development on State and Governance of the National University of Public Service (Budapest) and under the auspices of the Governor of the Czech National Bank Ing. Jiří Rusnok and the Minister of Finance of the Czech Republic JUDr. Alena Schillerová.

Within the conference, we had to occasion to interview one of the main plenary speakers. Eminent scholar and professor of tax law César García Novoa who concentrates especially on scientific issues related to European and Latin American contexts kindly answered our questions:

Dear professor Novoa, can you introduce yourself to our readers? What is the field of your scientific interest?

I am a Tax Law Professor at the University of Santiago de Compostela, in Spain, and also a tax advisor. For the last thirty years I have been combining my academic obligations with legal practice. I am the author of more than 20 books, a regular speaker at international congresses held in Europe and Latin America and the main researcher of more than 10 scientific projects financed by the central and regional administrations in Spain.

You have taken an active part in the conference “Currency, Taxes and Other Institutes of Financial Law in the Year of the 100th Anniversary of the Founding of Czechoslovakia”. What was your conference speech about?

The main topic of my conference speech was the concept of permanent establishment in international tax law. The current definition of permanent establishment requires having a physical presence or a dependent agent in the market jurisdiction in order to allow the State to tax the income received in that territory. Nowadays, this concept is obsolete as the digital multinationals do not need to have a physical presence at source to obtain a revenue. Suggestions included in the BEPS Action Plan Final Reports and, recently, the European Commission proposals on the introduction of a digital services tax and a digital permanent establishment based on a significant economic presence introduced several modifications to the traditional concept of permanent establishment in order to restore taxation at source.

How did you enjoy your stay in Prague and at our Faculty of Law?

I have enjoyed Prague very much, it is a beautiful and historical city. Unfortunately, I did not have enough time for a better exploration of all the historical centre and I realized just some walks there.

Since I did not have a lot of time to enjoy the city this time, I would love to return to Prague so that I can visit some specific places, such as Franz Kafka Museum, and to do the Castle tour.

Apart from that, I would like to thank everyone from the Prague Financial Law Department for the great welcome. The congress was a great success and every single person involved in the organization of the event did an amazing job.

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