



57th Annual Canadian Tax Conference



Join us at Canada's premier tax professional conference May 4 to 7 in Ottawa featuring workshops, income and commodity tax streams with participation from prominent industry practitioners and government officials.

We have many leading-edge speakers, breakout sessions and panels lined up (**see draft program details below**).

This is a conference not to be missed. **Register and book hotel now**. Early bird discount available until March 28 so register now to save.



Conference Fees

Early Bird Until March 28

- TEI Members \$700+ HST
- Non-Members \$800 + HST (online convenience fees additional)

March 29 – April 26

- TEI Members \$800+ HST
- Non-Members \$900 + HST (online convenience fees additional)

Terms and Conditions

Conference registration fee is full conference including Sunday welcome reception and Tuesday gala reception. Single day passes are not available. Registration fees are final and cannot be refunded.

Substitutions welcome with advance written notice.

Social Events Included with Registration

- Sunday evening reception and dinner hosted by McCarthy Tétrault
- Tuesday evening's Gala Reception
- Hospitality Suite

Attire

- Business casual, except for the Tuesday evening Gala Reception (Business)

Conference Team

- Mark Caluori – TEI Region 1 (Canada) Vice President
- Sandy Shanks – Chair, TEI Canadian Income Tax Committee
- Martin Behagg – Chair, TEI Canadian Commodity Tax Committee
- Polly Mah – Incoming TEI Region 1 (Canada) Vice President



Hotel Room Reservations

To receive the group rate, call the Fairmont Chateau Laurier at 1.800.441.1414 and identify yourself as a member of TEI. Or click [here](#) to reserve online. Fairmont Level room rate \$359 + tax per night. Block expires April 4, **but rooms are limited and fill up quickly**, so please reserve as soon as possible.

Rate available 3 days pre and post (subject to availability).


Questions

Registration, hotel room block: Jane-Ann Crombeen, ja@impacteventsLtd.ca

Program, sponsorship: Mark Caluori, mcaluori@panamericansilver.com

Conference Program (Subject to Change)

Sunday, May 4, 2025

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| All Day | Arrivals | |
| 18:00 – 21:00 | Registration Reception and Dinner - Hosted by McCarthy Tetrault  | Drawing Room |
| 21:00 onwards | The hospitality suite at the venue will open at 21:00. | Hospitality Suite – Floor 1 |



Monday, May 5, 2025

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| 7:15 – 8:30 | Breakfast | Canadian Room |
| 8:45 – 9:00 | Welcome Remarks Josie Scalia (TEI President) | Drawing Room |
| 9:00 – 9:50 | Plenary Session #1 – Tips on Planning and Tax Controversy – Practical Approaches and Pitfalls to Avoid Speakers – Jacob Yau, Sabina Han, and Marie-France Dompierre (Davies Ward Phillips & Vineberg LLP) Moderator – Rashpal Brar (Restaurant Brands International) Session Description: <i>"An ounce of prevention is worth a pound of cure". Proper documentation can go a long way in avoiding unnecessary headaches that could arise during a tax audit. Similarly, being adequately prepared for oral interviews can make the rest of an audit proceed more smoothly. However, more often than not people get busy, things get missed, and documentation evidencing legal relationships and transactions is not always available or adequate. Interviews may take place without sufficient preparation, which could lead auditors to draw conclusions or take positions that are markedly different than reality. Using practical examples, this session aims to give actionable tips on how to set your company up for success for future audits, as well as strategies on how to navigate situations where documentation may be lacking, incomplete, or inadequate.</i> | Drawing Room |
| 9:50 – 10:20 | Coffee Break | Drawing Room Foyer |
| 10:20 – 11:10 | Income Tax Breakout Session #1 – Tax Implications of Working with Indigenous Groups Speaker – Lori Bokenfohr (Fasken Martineau DuMoulin LLP) Moderator – Steve Saunders (ATCO Ltd.) | Drawing Room |
| 10:20 – 11:10 | Commodity Tax Breakout Session #1 – Corporate Reorganizations Speaker – Angelo Gentile (Aird & Berlis LLP) Moderator – Kevin Thom (ConocoPhillips) | Renaissance Room |
| 11:15 – 12:05 | Income Tax Breakout Session #2 – Spin-Off Transactions Speakers – Dan Jankovic (Blake, Cassels & Graydon LLP) Moderator – Tyler Lewis (TC Energy Corporation) | Drawing Room |



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| 11:15 – 12:05 | <p>Commodity Tax Breakout Session #2 – PST – Does the Single Supply Analysis Apply?</p> <p>Speaker – Rosemary Anderson (Thorsteinssons LLP) Moderator – Alison Eakin (Amazon Canada)</p> | Renaissance Room |
| 12:15 – 13:30 | <p>Lunch Reception</p> | Drawing Room |
| 13:40 – 14:30 | <p>Plenary Session #2 – Tax Insurance – A Practical Review</p> <p>Speakers – Carrie D’Elia, Colena Der, Matias Milet, and David Wilson (Osler, Hoskin & Harcourt LLP)</p> <p>Session Description: The presentation will focus on:</p> <ul style="list-style-type: none"> a) availability of tax insurance in Canada for transactions and audit and appeal risk; b) overview of the insurance process; c) tips and traps in negotiating insurance coverage; and, d) the tax treatment of insurance premiums and insurance proceeds. | Drawing Room |
| 14:30 – 15:00 | <p>Break</p> | |
| 15:00 – 15:50 | <p>Income Tax Breakout Session #3 – Mandatory Disclosure Rules and GAAR Reporting</p> <p>Speakers – Stephanie Dewey, Michael Dolson, and Dominic Bedard-Lapointe (McCarthy Tetrault LLP) Moderator – Monique Sami (Brookfield Asset Management)</p> | Drawing Room |
| 15:00 – 15:50 | <p>Commodity Tax Breakout Session #3 – Input Tax Credit Documentation: What the CRA Wants, What Clients Really Need, and What We Are Seeing in Practice</p> <p>Speakers – Randy Schwartz, Simon Douville, and Hubert Cadotte (McCarthy Tetrault LLP) Moderator – George Dritsas (ArcelorMittal Canada)</p> | Renaissance Room |
| 15:55 – 16:45 | <p>Income Tax Breakout Session #4 – Considerations in Tax Department Governance in the Context of Unprecedented Legislative Volatility, Technological Advancement and Talent Challenges</p> <p>Speaker – Mike Munoz (Deloitte LLP) Moderator – Sue Wooles (BMO Financial Group)</p> | Drawing Room |



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| 15:55 – 16:45 | <p>Commodity Tax Breakout Session #4 – Navigating Financial Service and Financial Institution Rules for Non-Financial Businesses: What Do I Need to Think About?</p> <p>Speaker – Tamara Rozansky (Deloitte LLP) Moderator – Shashi Fernando (BMO Financial Group)</p> <p>Session Description: This session will focus on various elements of the financial institution and financial services GST/HST rules which may affect businesses that are not “typical” financial institutions.</p> <p>Proposed agenda:</p> <ul style="list-style-type: none"> • Pension plans and ITCs for employers • Section 185 – are you missing out on ITCs? • Tripping de minimis rules? Determining if an entity is a de minimis FI, and the implications. • Questions | Renaissance Room |
| 17:00 onwards | <p>There is no set dinner for Monday. Firms are welcome to invite delegates for dinner and other events at their own discretion.</p> <p>The hospitality suite at the venue will open at 17:00.</p> | Hospitality Suite – Floor 1 |

Tuesday, May 6, 2025

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| 7:30 – 8:40 | Breakfast | Canadian Room |
| 8:50 – 9:40 | <p>Plenary Session #3 – Case Law Update</p> <p>Speaker – David Robertson (EY Law LLP) Moderator – Paul Magrath (Bitfarms Ltd.)</p> | Drawing Room |
| 9:40 – 10:10 | Coffee Break | Drawing Room Foyer |
| 10:10 – 11:00 | <p>Plenary Session #4 – Beyond Tax Dure Diligence</p> <p>Speakers – Daniel Lang and Olivia Ruvo (Borden Ladner Gervais LLP) Moderator – Constance Gemmell (Imperial Oil Limited)</p> | Drawing Room |
| 11:05 – 11:55 | <p>Plenary Session #5 – US Tax Implications of Inbound Transactions</p> <p>Speaker – David Farhat (Skadden, Arps, Slate, Meagher & Flom LLP)</p> | Drawing Room |
| 12:00 – 12:45 | Lunch Reception | Canadian Room |
| 12:45 – 13:25 | Break | |



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| <p>13:25 – 14:15</p> | <p>Income Tax Breakout Session #5 – The Future of Tax Technology: Strategies for Long-Term Success</p> <p>Speakers – Neil Chandler and Michael Charette (RSM Canada LLP) Moderator – Nathalie Rodier (Air Canada)</p> <p>Session Description: In today's rapidly evolving regulatory and technological landscape, tax teams must make strategic technology investments to enhance efficiency, accuracy, and compliance. However, determining the right investments, integrating tax technology needs into broader enterprise strategy, and securing stakeholder buy-in remain significant challenges.</p> <p>Join us for an engaging session where we'll explore how tax departments can effectively navigate these complexities. We'll discuss best practices for aligning technology investments with operational strategy, adapting to rapid advancements in AI and automation, and making a compelling case for investment to key decision-makers. This session will provide actionable insights to help tax leaders future-proof their departments and drive long-term success.</p> | <p>Drawing Room</p> |
| <p>13:25 – 14:15</p> | <p>Commodity Tax Breakout Session #5 – GST/HST and Asset Securitization as a Financing Vehicle</p> <p>Speakers – Bobby Solhi and Braek Urquhart (Cassels Brock & Blackwell LLP)</p> <p>Session Description: Many organizations are involved in some aspect of asset securitization whether through securitizing their accounts receivables or capital assets, investing in such securitizations, or operating in the securitization sector.</p> <p>In this session, Bobby B. Solhi and Braek Urquhart discuss the key GST/HST considerations in the securitization lifecycle using a practical case study. This session will provide essential insights into matters such as the characterization of supplies throughout the securitization structure, input tax credit entitlements, and unintuitive GST/HST traps such as the de minimis financial institution threshold.</p> | <p>Renaissance Room</p> |
| <p>14:15 – 14:45</p> | <p>Coffee Break</p> | <p>Drawing Room Foyer</p> |
| <p>14:45 – 15:35</p> | <p>Income Tax Breakout Session #6 – Excessive Interest and Financing Expense Limitation (EIFEL)</p> <p>Speakers – Phil Halvorson (Doane Grant Thornton LLP) and Michael O'Connor (KPMG LLP) Moderator – Bonnie Long (Morguard Corporation)</p> | <p>Drawing Room</p> |



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| 14:45 – 15:35 | <p>Commodity Tax Breakout Session #6 – Efficiencies Through Automation – Optimize the Indirect Tax Function from Calculation and Reporting to Audit Readiness</p> <p>Speaker – Justin Reinard (DuCharme, McMillen & Associates, Inc.) Moderator – Don Mills (Canopy Growth)</p> <p>Session Description: Provide an overview to attendees on automation opportunities through the transaction tax lifecycle. This session will provide an understanding of where tax professionals can leverage technology and use cases on solving different complex challenges via automation. After providing a general overview, DMA will focus into enhancement opportunities within the month-end data wrangling, reconciliation, and pre-compliance procedures.</p> | Renaissance Room |
| 15:40 – 16:30 | <p>Income Tax Breakout Session #7 – Top Ten Ideas for Tax Reform</p> <p>Speaker – Sarah Chiu (Felesky Flynn LLP) Moderator – Cheryl Bailey (Sun Life)</p> | Drawing Room |
| 15:40 – 16:30 | <p>Commodity Tax Breakout Session #7 – Plus Applicable Taxes? Thinking About GST/HST on Reimbursements, Revenue Shares, and other Contractual Payments</p> <p>Speaker – Andrew Azmudeh (PwC Law LLP)</p> <p>Session Description: Tax authorities are increasing their audit activities across Canada. This session will discuss recent common indirect tax audit issues and will provide some tips and discuss common traps in respect of these common issues. The session will also discuss a number of Canadian court cases on similar topics as well.</p> | Renaissance Room |
| 18:30 – 21:00 | Gala Reception | Drawing Room |
| 21:00 onwards | The hospitality suite at the venue will open at 21:00. | Hospitality Suite – Floor 1 |

Wednesday, May 8, 2024

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| 7:30 – 8:40 | Breakfast | Canadian Room |
| 8:50 – 9:40 | Plenary Session # 6 – Case Study – Optimizing Your Tax Settlement | Drawing Room |



Canada Region 1

57th Annual Canadian Tax Conference – May 4 to 7, 2024

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| | Speakers – Pierre Barsalou and Philippe Hamelin (Barsalou Lawson Rheault) Moderator – Nancy Sauvé (AtkinsRéalis) | |
| 9:45 – 10:35 | Plenary Session # 7 – Canada Revenue Agency Update Speakers – Representatives from the Canada Revenue Agency Moderator – Scott Crowell (Irving Oil) | |
| 10:35 – 11:10 | Coffee Break and Hotel Check-Out | Drawing Room Foyer |
| 11:10 – 12:00 | Plenary Session #7 – Department of Finance Update Speakers – Representatives from the Department of Finance | Drawing Room |
| 12:00 – 12:10 | Closing Remarks Polly Mah (Incoming TEI Canadian Regional Vice President) | Drawing Room |
| 12:10 onwards | Boxed Lunches and Departure | Drawing Room Foyer |