

Global Conference on The Future of Resource Taxation

June 26–28 2023

Mulungushi International Conference Centre,
Lusaka, Zambia

AGENDA

| DAY 1: Monday 26, June 2023 | |
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| Opening Ceremony 09:15–10:00 | Welcome to the Global Conference on the Future of Resource Taxation |
| SPEAKERS <ul style="list-style-type: none"> • Mary Baine, Deputy Executive Secretary, ATAF • Dingani Banda, Commissioner General, Zambia Revenue Authority • Mohato Moima, Principal Mining Engineer, Department of Mines and Geology, Lesotho (IGF Executive Committee member) • Dr. Situmbeko Musokotwane, Minister of Finance, Zambia | |
| Session 1 10:00–11:00 | Taking Stock of Domestic Revenue Mobilisation: How has mining revenue collection improved? |
| <p>This session will discuss the state of play of mining taxation, including success stories, ongoing challenges, new opportunities, and risks for governments of resource-rich countries.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Dingani Banda, Commissioner General, Zambia Revenue Authority • Julien Gourdon, Senior Economist, Africa Department, Agence Française de Développement • Sam Lois, Commissioner of Taxation, Internal Revenue Commission, Papua New Guinea • Alexandra Readhead, Lead, Tax and Extractives, IGF <p>MODERATOR</p> <ul style="list-style-type: none"> • Dingani Banda, Commissioner General, Zambia Revenue Authority | |

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| Session 2 11:30–13:00 | Financial Benefit Sharing in the Energy Transition: Business as usual or time for a change? |
| <p>This session will discuss key opportunities and risks for resource-rich countries arising from the low carbon transition, particularly the demand for critical minerals, and implications for the current model of financial benefit sharing in the mining sector. It will discuss the demand projections for critical minerals, regional and country-level strategies, including fiscal policy levers, as well as an industry perspective on the mining boom.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Ekpen Omonbude, Senior Policy Advisor, IGF • Iain Steel, Director, Econias • Miryam Yepes Salazar, Director of the Directorate for Economic Intelligence and Tax Optimisation, Finance Ministry, Peru <p>MODERATOR</p> <ul style="list-style-type: none"> • Ana Elizabeth Bastida, Associate Professor, Center for Energy, Petroleum, and Mineral Law and Policy, University of Dundee | |
| Session 3 14:15–15:45 | An Evolving International Tax Landscape: What does it mean for the mining sector? |
| <p>This session will focus on the impact that a changing landscape of international tax, and global tax cooperation, will have on resource-rich developing countries. It will discuss new taxing rights, the global minimum tax, and the proposal for a UN Convention on Tax. It will also discuss emerging regional approaches to international and domestic tax issues.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Christian Hallum, Tax Justice Lead, Oxfam International • Anthony Munanda, Senior Specialist, International Tax and Transfer Pricing, ATAF • Alpha Ngom, Senior Technical Adviser to Director General of Taxation, Senegal • Andrew Viola, Senior Advisor, Tax Treaty, Transfer Pricing and Financial Transactions, OECD <p>MODERATOR</p> <ul style="list-style-type: none"> • Chenai Mukumba, Acting Executive Director, Tax Justice Network Africa | |
| Session 4 16:00–17:00 | Accelerating a Low Carbon Transition through Taxation |
| <p>The mining industry has a role to play in limiting global carbon emissions. As the EU is looking to introduce a carbon border adjustment mechanism (CBAM), governments from mining rich countries are assessing the likely impact of CBAM or other carbon pricing options on their revenue base. This session discusses innovative fiscal policies in support of a balanced, and just decarbonization agenda.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • William Davis, Senior Economist, NRGi • Andrés Pardo, Director for Large Taxpayers, DIAN, Colombia <p>MODERATOR</p> <ul style="list-style-type: none"> • Stephanus Van Zyl, Professor in Tax Law, University of Pretoria | |

| DAY 2: Tuesday, June 27 2023 | |
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| Session 5 09:00–10:00 | The Future of Resource Taxation: 10 Policy Ideas to Mobilize Mining Revenues |
| <p>IGF and the ATAF will officially launch the The Future of Resource Taxation: 10 Policy Ideas to Mobilize Mining Revenues. This joint ATAF-IGF initiative, presents a menu of innovative fiscal measures contributed by governments, civil society, academia, and industry, that aim to strengthen mining revenue collection, sustainably, while helping combat climate change.</p> <p>PRESENTER</p> <ul style="list-style-type: none"> • Viola Tarus, Policy Advisor, Tax and Extractives, IGF <p>DISCUSSANTS</p> <ul style="list-style-type: none"> • James Cust, Senior Economist, Office of the Chief Economist, Africa at World Bank • Grace Muzondo, Director for Tax Policy, Ministry of Finance and Economy, Zimbabwe • Antonia Strachey, East Africa Regional Tax Advisor, Foreign Commonwealth and Development Office, United Kingdom <p>MODERATOR</p> <ul style="list-style-type: none"> • Ezero Madzivanyika, Research Manager, ATAF | |
| Session 6 10:00–11:00 | Fireside Chat Increasing the Economic Benefits from Mining: Brazil's Experience and Zambia's Ambitions |
| <p>The exploitation of mineral resources does not automatically translate into industrial development. Raw materials are often extracted and exported without having been processed domestically or integrated into local supply chains. Brazil has changed this, and Zambia is looking to do the same. Brazil successfully leveraged its large iron ore sector to produce steel, aluminium, all the way to manufacturing cars. In 2022, Zambia and the Democratic Republic of Congo signed a historical agreement to facilitate the development of value chain in electric battery and clean energy sector. This session discusses the key drivers of value addition, including the enabling role that fiscal policy can play.</p> <p>DISCUSSANTS</p> <ul style="list-style-type: none"> • Lilian Bwalya, Permanent Secretary, Ministry of Commerce, Trade, and Industry, Zambia • Mauro Sousa, Director General, National Mining Agency, Brazil <p>MODERATOR</p> <ul style="list-style-type: none"> • Oliver Maponga, Economic Affairs Officer, United Nations Economic Commission for Africa | |
| Session 7 11:30–13:00 | Legislating for Uncertainty: Price volatility, opaque value chains and transfer mispricing |
| <p>Pricing of minerals is not always straightforward. It may be complicated by price volatility, opaque markets, different quality or grades of mineral products, the stages of beneficiation, and contractual terms. The stakes are especially high for countries that are host to critical minerals experiencing major price increases. This session discusses these challenges, and opportunities, and possible fiscal policy and administrative solutions to ensure progressive, predictable government revenues.</p> | |

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| Session 7 (continued) 11:30–13:00 | Legislating for Uncertainty: Price volatility, opaque value chains and transfer mispricing |
| <p>SPEAKERS</p> <ul style="list-style-type: none"> • Athelia Grasco, Manager, Extractive Industries Unit, Liberian Revenue Authority • Benjamin Jones, Lead Economist, Anglo American • Yakouba Kourouma, Economic and Tax Advisor, Ministry of Mines and Geology, Guinea • Thomas Lassourd, Senior Policy Advisor, Tax and Extractives, IGF <p>MODERATOR</p> <ul style="list-style-type: none"> • Kalale Mambwe, Project Manager, Tax Inspectors Without Borders, OECD | |
| Session 8 14:15–15:45 | New Models of Financial Benefit Sharing for the Mining Sector |
| <p>The dominant fiscal regime used in the mining sector is based on production royalties and corporate income tax (CIT). However, many mining countries have found it difficult to collect CIT, prompting them to look for alternatives. This session discusses emerging fiscal policies in the mining sector, some of which have their roots in oil and gas. Broadly speaking, they reflect governments’ desire for simplicity, reliability, and fairness.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Maria Cielo Magno, Undersecretary, Department of Finance, Philippines • Bertha Soraya Vaca Ortiz, National Tax Audit Expert, Internal Revenue Services, Ecuador • David Spencer, Head of Tax, International, Anglo American • Viola Tarus, Policy Advisor, Tax and Extractives, IGF <p>MODERATOR</p> <ul style="list-style-type: none"> • Joseph Nonde, Commissioner of Direct Taxes, Zambia Revenue Authority | |
| Session 9 16:00–17:00 | Putting the ‘Just’ Back in the Energy Transition: What’s in it for communities? |
| <p>The rise in demand for critical minerals presents an opportunity for not only governments to benefit from the potential upside in revenues but for the benefits to flow directly to communities. This session discusses the effectiveness of some of the fiscal tools, and strategies, that can be used to generate revenues for mining-affected communities.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Kudzai Mataba, Policy Analyst, Tax and Investment, IGF • Mukupa Nsenduluka, Policy Officer, Tax Justice Network Africa • Ronald Wasiwa, ATAF <p>MODERATOR</p> <ul style="list-style-type: none"> • Wilson Prichard, CEO, International Centre of Tax and Development | |

| DAY 3: Wednesday, June 29 2023 | |
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| Session 10 09:00–10:30 | Protecting the Mining Revenue Base: From risk assessment to audit |
| <p>Tax base erosion and profit shifting (BEPS) in mining undercuts government revenues and threatens the energy transition. The International Monetary Fund (IMF) estimates that profit shifting in the mining sector in Africa results in USD \$470 to USD \$730mn loss tax revenue annually. This session will explore the key causes of revenue loss, as well as practical tools and policies to address them.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Telmuun Byambaragchaa, Director General of Tax Policy Department, Ministry of Finance, Mongolia • Ines Cumbane, Head of the Specialized Audit and Inspection Division for Extractive Industry, Mozambique Revenue Authority | |
| Session 11 10:45–12:15 | Fireside Chat How is Zambia Positioning Itself to Benefit Financially from the Mining Boom? |
| <p>Zambia is rich in minerals such as copper and cobalt which are critical for the energy transition. The mining sector contributes significant revenues to the Zambian economy. In this session the Permanent Secretary in a conversation with Twivwe Siwale shares plans on how Zambia is getting ready to benefit financially and economically from the mining boom.</p> <p>DISCUSSANT</p> <ul style="list-style-type: none"> • Danies Chisenda, Permanent Secretary, Ministry of Finance, Zambia <p>MODERATOR</p> <ul style="list-style-type: none"> • Twivwe Siwale, Head of Tax for Growth, International Growth Centre | |
| Session 12 12:15–13:00 | Closing Plenary |
| <p>In this closing session, the panel will discuss key take aways from the conference including opportunities for institutional and regional cooperation.</p> <p>SPEAKERS</p> <ul style="list-style-type: none"> • Mary Baine, Deputy Executive Secretary, ATAF • Dingani Banda, Commissioner General, Zambia Revenue Authority • Alexandra Readhead, Lead, Tax and Extractives, IGF | |