



PRESS RELEASE

FOR IMMEDIATE RELEASE

Amsterdam, 5 May 2017

3rd IBFD Frans Vanistendael Award goes to Romero Tavares



Romero Tavares (Brazil/Austria) is the winner of the 3rd IBFD Frans Vanistendael Award for International Tax Law for his article titled “Multinational Firm Theory and International Tax Law: Seeking Coherence”, published in IBFD’s World Tax Journal (Vol. 8), No. 2 (2016).

In his winning article, Mr Tavares applies the theory of the firm to international taxation. In doing so, he presents an original analysis of the allocation of taxing powers on the profits of multinationals that unites sound economic theory with national and international tax law.

The IBFD Frans Vanistendael Award for International Tax Law was established to promote worldwide excellence in research on international tax law. Prof. Dr Frans Vanistendael personally conferred the award to Mr Tavares during the official ceremony that took place today during the [Global Tax Treaty Commentaries Conference](#) at IBFD’s headquarters in Amsterdam.



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The jury of the 3rd Frans Vanistendael Award was composed of John Avery Jones, Reuven Avi-Yonah, Tsilly Dagan, Ana Paula Dourado, Marjaana Helminen, Rick Krever, J. Manfred Mössner, Pasquale Pistone (chair) and Luis Eduardo Schoueri.

IBFD welcomes applications for the 4th IBFD Frans Vanistendael Award by 31 December 2017. All articles and books on international (including European) tax law published in 2017 are eligible. The conferral of the 4th IBFD Frans Vanistendael Award will take place at IBFD's headquarters in Amsterdam from 3 to 4 May 2018.

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About the IBFD Frans Vanistendael Award

The IBFD Frans Vanistendael Award for International Tax Law was established to promote worldwide excellence in research on international tax law. The award was introduced in 2015 and named after IBFD's previous, esteemed Academic Chairman, Prof. Dr Frans Vanistendael.

The previous winners of the Frans Vanistendael Award are [Dr John Avery Jones and Prof. Dr Jürgen Lüdicke \(2015\)](#), and [Prof. Dr Wolfgang Schön \(2016\)](#).

About the winning article

In line with his theoretical reconstruction, Mr Tavares suggests in his winning article that economic transactions between associated enterprises in an integrated group are more efficient and profitable than economic transactions between separate and independent enterprises. This is because the asymmetry of knowledge and information that exists between independent enterprises is absent within a group of associated enterprises.

In a historical reconstruction from the time of the League of Nations to the present, Mr Tavares also points out that multinationals have organized themselves as economic replicas of the parent company, and concludes that the concept of permanent establishment and the arm's length principle are based on transactions between separate and independent enterprises. Furthermore, he addresses the attribution of residual taxing rights to the state of residence based on Knight's theory of the ultimate entrepreneur, opening up new avenues for questioning whether this still validly backs up a fair international distribution of taxing rights on the income of multinational enterprises.

Mr Tavares is currently completing his doctoral studies in the framework of the interdisciplinary Doctoral Programme on International Business Taxation (DIBT) of the WU Vienna University of Economics and Business.

About IBFD

[IBFD](#) is a leading international provider of cross-border tax expertise, with a long-standing history of supporting and contributing to tax research and [academic activities](#). As an independent foundation, IBFD utilizes its global network of tax experts and its Knowledge Centre to serve Fortune 500 companies, governments, international consultancy firms and tax advisors. Headquartered in Amsterdam, IBFD has regional offices in Beijing, Washington and Kuala Lumpur. IBFD's [Library and Information Centre](#) is widely regarded as the world's leading research facility in the field of international and comparative taxation.

Renowned as the leading expertise portal in the field of cross-border taxation and legislation, IBFD's powerful [Tax Research Platform](#) allows tax practitioners around the world to access a wealth of reliable and valuable content, enabling faster and more effective work.

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