

## **CURRICULUM VITAE – JINYAN LI**

### **GENERAL INFORMATION**

#### **Current Position**

- Professor, Osgoode Hall Law School of York University  
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Tel: 416 737-5025; Fax: 416-736-5736  
Email: [jli@osgoode.yorku.ca](mailto:jli@osgoode.yorku.ca)
- Director, LLM International Business Law; Co-director, LLM Tax
- Member of Advisory Board, Belt and Road Initiative Tax Administration Cooperation Mechanism (BRITACOM) (2019-2021)

#### **Employment History**

- Interim Dean (July 1, 2009- June 30, 2010)
- Full Professor (2006 –)
- Adjunct Faculty, Faculty of Law, University of Sydney, Australia (2010 to present)
- Visiting Professor, Tsinghua Law School (2013-2015)
- Associate professor, Osgoode Hall Law School, York University (1999 to 2006)
- Associate professor, Faculty of Law, University of Western Ontario (1997-1999)
- Assistant professor, tenure track, Faculty of Law, University of Western Ontario ; 1991tenured in 1997)
- Visiting professor, Kenneth Wang Law School, Soochow University (September 2004-June 2005)
- Visiting Scholar, Harvard Law School (January - May 1998)
- Visiting Professor of International Taxation, Faculty of Law, University of Sydney, Australia, Greenwoods and Freehills (Sept.- Oct 1997)
- adjunct professor, Loyola Law School (L.A., USA) (Feb. - Mar. 1990)
- legal consultant, Baker & McKenzie (Barristers & Solicitors), Toronto, (1987 - 1991)

#### **Education**

- D.Jur. (Doctor of Jurisprudence) (1991, York University)
- LL.M (1987, Queen's)
- LL.B. (subsequently re-named "JD") (1991, Toronto)
- LL.M Candidate (1985) University of International Business and Economics, Beijing, China)
- BA (Economics) (1984), University of International Business and Economics, Beijing)

#### **Languages:**

- English
- Chinese

## Awards and Distinctions

- 2021 Tax Excellence Award, Ontario Bar Association
- 2017 York University Research Leader
- 2017 Lifetime Contribution Award, Canadian Tax Foundation
- Excellence in Teaching (OPD), Osgoode Hall Law School, 2014
- Recipient of the Queen Elizabeth II Diamond Jubilee Medal (2012)
- Chinese Canadian Legend Awards, October 30, 2010
- CPAC, Excellence Award, November 2009
- FCCP Education Foundation Award of Merit 2009
- Academic Excellence Award, 2007, Canadian Association of Law Teachers (CALT)
- Excellence in Teaching, Osgoode Hall Law School, 2004
- Douglas J. Sherbaniuk Distinguished Writing Award (1999)

## Community Positions

- Governor, Canadian Tax Foundation (2011-14)
- Council, IFA Canada (2023-)

## Professional Affiliation

- Law Society of Upper Canada (current)
- Canadian Tax Foundation (current)
- International Fiscal Association (current)
- Canadian Bar Association
- International Pensions and Benefits Lawyers Association
- CALT
- Law and Society (current)

## Fellowship and bursary

- Full People's Bursary (1980-1985)
- York University Graduate Bursary (1986-87)
- Fellowship from CIDA to study at Queen's University (1985-1986)
- Queen's University Graduate Student Scholarship (1985-86)

## Citation of work by Canadian Courts

- Books and articles have been cited frequently by the Tax Court of Canada, Federal Court of Appeal and Supreme Court of Canada
- Recent cases by the Supreme Court of Canada include: *Deans Knight Income Corp. v. Canada* (2023 SCC 16), *Alta Energy Luxembourg SARL v. Canada* (2021 SCC 49), *MacDonald v. Canada* (2020 SCC 6).

## RESEARCH GRANTS AND FELLOWSHIPS

### SSHRC (Social Sciences and Humanities Research Council)

- Insight Grant, Fiscal Antibodies: Lessons from the COVID-19 Pandemic for Developing More Responsive, Resilient, Coherent and Sustainable Fiscal and Tax Policy (April 2021), \$98741 (with Scott Wilkie)
- Insight Grant, (Li and Hwong) “From Norm Takers to Norm Shakers and Makers? A Comparative Study of Tax Transplants in China and India, \$130,764.00 (2012)
- Insight Grant, “International Mobility of Highly Skilled Workers in the Canadian Context: Tax Barriers and Reform Options” \$24,750 (2005)
- Insight Grant, “The Role of Tax Policy in Integrating the Private and Public Sphere of Pensions” \$42,500 (2004)
- Connection Grant, “Global Corporate Minimum Tax in Canada? Politics, Policy and Practice,” \$23,005 (co-applicant with Jean-Pierre Vidal, HEC Montreal) (July 2022)
- Connection Grant, “Women with Disabilities: Income Security and Tax Policy,” \$22,629 (principal investigator, with Hengameh Saberi) (July 2022)
- Connection grant, Reimaging Tax for the 21<sup>st</sup> Century: Inspired by the Scholarship of Tim Edgar (\$25,000) October 2018
- Connection Grant, (Li, et al), Workshop: Tax Policy for a Better Tomorrow: Intersectoral and Multidisciplinary Connections”, \$33,504 (2013)

### Canadian Tax Foundation and IFA Canada

- Canadian Tax Foundation ,“Global Corporate Minimum Tax in Canada? Politics, Policy and Practice,” \$30,500
- Canadian Tax Foundation, *Reimaging Tax for the 21<sup>st</sup> Century: Inspired by the Scholarship of Tim Edgar* (\$26,000) August 2018
- Canadian Tax Foundation, *Reimaging Tax for the 21<sup>st</sup> Century: Inspired by the Scholarship of Tim Edgar* (\$26,000) August 2018
- IFA Canada, *Reimaging Tax for the 21<sup>st</sup> Century: Inspired by the Scholarship of Tim Edgar* (\$8,000) August 2018
- Conference and publication of a book on 100 Anniversary of the Federal Income Tax Act, \$8,000 (2015-2016)
- Workshop: Tax Policy for a Better Tomorrow: Intersectoral and Multidisciplinary Connections” \$5,000, (2013)
- Empirical research on the GAAR in Canada, Australia, UK and US (with Tim Edgar and Thaddeus Hwong), \$63,000, (2012 and 2017)
- Conference on Tax Expenditures and Public Policy in Comparative Perspective (with Lisa Philipps and Neil Brooks) \$25,000 (2009)
- International Fiscal Association (Canadian Branch), \$40,000 (1997), E-commerce Taxation

### Other External Sources

- BLG Fellowship (\$10,000), “Interest Deduction and Multinational Corporations” (2008)

- Centre for Innovation Law and Policy (Ontario, Canada) \$10,000 (2003), “Treatment of Electronic Commerce under International Trade Law and Tax Law”
- Centre for Innovation Law and Policy (Ontario, Canada):
  - a. \$10,000 (2002), “On-Line Disputes Resolution and Its Promise for International Tax Law”
  - b. \$10,000 (2001), “The Disappearing of the Corporate Tax Base Into Cyberspace and Its Implications for Canadian Tax Policy”
  - c. \$10,000 (2000), “Slicing the Digital Pie with A Conventional Knife--Effectiveness of the Arm's Length Principle in the Age of Electronic Commerce”
  - d. \$10,000 (2000), Research and enhance an existing course on “Advanced Corporate Tax”
  - e. \$10,000 (2002), Research and deliver a new course on “Internet Commerce and Tax Policy”
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- Heward Stikemen Fiscal Institute, \$10,000 (1996) (with Daniel Sandler)
- University of Western Ontario (1997) -- sabbatical leave grant (no specific publication was required)
- Maxbell Foundation (1990-1991) (with Alec Easson), funding the research related to the books entitled *Taxation of Foreign Investment in the People's Republic of China* (1989) and *Taxation in the People's Republic of China* (1991)

### Osgoode and York University

- *Osgoode Research intensification fund*
  - a) “Global Corporate Minimum Tax in Canada? Politics, Policy and Practice,” \$6,000 (May 2022)
  - b) “Coding Indian Transfer Pricing cases and Chinese Transfer Pricing Articles”, (2020) (\$6,000)
  - c) Reimagining Tax for the 21<sup>st</sup> Century: Inspired by the Scholarship of Tim Edgar (\$6,000, RIF) August 2018
  - d) “International Tax Disputes Among Belt & Road Countries: Can There Be One Mechanism that Works for All (Big and Small)?” (\$6,000) (2018)
- *Osgoode Osgoode Large Collaborative Research Grants:*
  - a) Taxation of private corporations (2017), \$1500
  - b) Tax Symposium celebrating the 100<sup>th</sup> anniversary of the federal Income Tax Act, \$6,000 (2014)
- *Osgoode, Dean's office:*
  - a) Tax Blog at Osgoode Hall Law School (with Wilkie) (\$1,500) (2020)
  - b) 40-year history of Chinese international taxation (\$3,000) (August 2018)
- *Osgoode Fellowship* (one term teaching release) (2012) (2020)
- *York University:*
  - a) “Learning from the COVID-19 Pandemic: Developing Fiscal Antibodies” (2020) (\$14,792)
  - b) YCAR, Canada-China Initiative, “International Tax Disputes Among Belt & Road Countries: Can There Be One Mechanism that Works for All (Big and Small)?” (\$15,000 towards a collaborative workshop in Guangzhou, China, 2019)
  - c) Research, York University, \$1,000, Workshop: Tax Policy for a Better Tomorrow: Intersectoral and Multidisciplinary Connections” (2013)

- d) York University U50 Celebration Fund: \$7500, Tax Expenditures and Public Policy in Comparative Perspective (with Lisa Philipps and Neil Brooks)

### EXPERT POSITIONS & CONSULTING

1. BRITACOM (Belt and Road Initiative Tax Administration Cooperation Mechanism), Advisory Board member (2019-present)
2. Minister of Finance, Canada, Expert Panel on Tax Expenditures (2017-18)
3. United Nations, Dept. of Economic and Affairs (2013 and 2014-2016)
4. Asian Development Bank (2013-2014), Fiscal Policy and Transformation of Resource-based Economy
5. Asian Development Bank (through Euro Trends), “People’s Republic of China: Supporting Reforms in Taxation and Budget Management ” (2010 – December 2012)
6. German banking association (2011), “Borrowing by municipal governments in Canada”
7. Canada, Department of Finance, Tax Panel on International Tax Reform (2008), Transfer Pricing Subcommittee (2008)
8. Department of Justice, Canada (2008), Expert for the government in the *Knights of Columbus v. Regina* case (advising Justice lawyers about the meaning of “permanent establishment” and issues raised by the taxpayer’s expert witnesses).
9. Willkie Farr & Gallagher LLP, New York, re. Re: *United States v. Conrad Black, et al.*, 05-cr-727 (N.D. Ill.) (2007) (Expert witness on the taxation of non-compete payments)
10. Ontario Expert Commission on Pensions (2007) (tax policy and pension policy)
11. GTZ Project for the Chinese National People’s Congress, *Chinese Basic Tax Law* (June 2005)
12. Department of Justice, Canada, 2003 (bifurcism in international taxation) (presentation to officials of Department of Justice and write a written memorandum)
13. Minister of National Revenue, Electronic Commerce Technical Advisory Group, providing expert advice to the Minister of National Revenue on the interpretation of legislation involving Canadian income tax and tax treaties concerning e-commerce (1999-2002)
14. Asian Development Bank (via Intrados), “Pension Reform in China” (2000-2001)
15. Organization for Economic Cooperation and Development (OECD) 1995-1998 (Teaching courses in Mongolia and China; Report on China’s tax treaty policy and taxation of foreign investment in China)
16. International Monetary Fund (IMF) (1992 – 2000) (Assisting China in tax legislation and tax policy development; Report on developing rule of law in Chinese tax administration; Training Chinese tax officials)
17. Technical Committee on Business Tax Reform, Dept. of Finance, Canada (1997) (Report on comparison and assessment of the tax treatment of foreign source; income in Canada, Australia, France, Germany and the United States)
18. Auditor-General of Canada (1996) (Report on information and reporting requirements in Canada, Australia and the United States)
19. The World University Students Services (1994) (Coordinating training of Chinese officials)
20. Chinese State Administration of Taxation (1993) (Organize and teach a training program in Canada on Comparative studies of Chinese and Canadian tax systems)
21. Tory Tory DesLauriers & Binnington (Barristers and Solicitors), Toronto (1994 – 1996) (International and Chinese tax planning)
22. Goodman, Philips and Vineberg, Canada (1997-1998)
23. Baker & McKenzie, Toronto (1987-1991)

## PUBLICATIONS

### Books

1. *International Taxation in Canada* (4<sup>th</sup> ed) (Li, Cockfield with Wilkie) (2018) (LexisNexis)
2. *Income Tax at 100 Years: Essays and Reflections on the Income War Tax Act* (Li, Wilkie and Chapman, eds.) (Canadian Tax Foundation, 2017)
3. *Principles of Canadian Income Tax Law* (9th ed. & 10<sup>th</sup> ed.) (Li, Magee and Wilkie) (Carswell, 2017, 2022)
4. *International Taxation in China: A Contextualized Analysis* (BIFD, 2016)
5. *International Taxation in Canada: Principles and Practices* (3rd ed) (Li, Cockfield and Wilkie) (Lexis, 2014) (several chapters were rewritten)
6. *Principles of Canadian Income Tax Law* (8th ed.) (Hogg, Magee and Li) (Carswell, 2013)
7. *Tax Expenditure Analysis: State of the Art*, ed. Neil Brooks, Jinyan Li and Lisa Philipps (Canadian Tax Foundation, 2011)
8. *International Taxation in Canada: Principles and Practices* (2<sup>nd</sup> ed) (Li, Cockfield and Wilkie) (Lexis, 2011)
9. *Principles of Canadian Income Tax Law* (7th ed.) (Hogg, Magee and Li) (Carswell, 2010)
10. *International Taxation in Canada: Principles and Practices* (Li, Cockfield and Wilkie) (Lexis, 2006)
11. *Principles of Canadian Income Tax Law* (6th ed.) (Hogg, Magee and Li) (Carswell, 2007)
12. *Principles of Canadian Income Tax Law* (5th ed.) (Hogg, Magee and Li) (Carswell, 2005)
13. *Principles of Canadian Income Tax Law* (4th ed.) (Hogg, Magee and Li) (Carswell, 2002)
14. *International Taxation in the Age of Electronic Commerce: A Comparative Study* (Canadian Tax Foundation, May 2003) (655 pages)
15. *Electronic Commerce and Multijurisdictional Taxation*, Doernberg, Hinnekens, Hellerstein, and Li (Kluwer, 2001)
16. *Materials on Canadian Income Tax* 12th ed. (Edgar, Li, and Sandler, eds., 2000)
17. *Materials on Canadian Income Tax* 11th ed. (Arnold, Edgar, Li and Sandler, eds., 1996)
18. *Materials on Canadian Income Tax* 10th ed. (Arnold, Edgar and Li, 1993)
19. *China's Tax Reform Options*, Fulton, Li and Xu, eds. (New York: World Scientific, 1998)
20. *Taxes and Investment in the People's Republic of China* (Loose-leaf) (Amsterdam: International Bureau of Fiscal Documentation, 1994)
21. *Tax Reform in China*, Xu and Li, eds. (Beijing: China Economics Press, 1997) (in Chinese)
22. *Taxation in the People's Republic of China* (New York: Praeger, 1991) 194 pages.
23. *Taxation of Foreign Investment in the People's Republic of China* (Easson and Li (Deventer: Kluwer, 1989).

### Book Chapters

1. "Tax Reform: A Missing Piece in Canada's National Housing Policy" in *Dangerous Opportunities: The Future of Financial Institutions, Housing Policy, and Governance* (Ben-Ishai ed.) (University of Toronto Press, 2021) 101-30
2. "The Misuse and Abuse Exception: The Role of Economic Substance" in *The Canadian General Anti-Avoidance Rule* (Brian Arnold, ed.) (Canadian Tax Foundation, July 2021) 295-326
3. Chapter 13, "Article 13 of the OECD Model" in IBFD Platform Online publications (revised frequently)
4. "Taxation of Intangibles" (with Angelo Nikolakakis) in *Corporate Tax Management* (Canadian Tax Foundation forthcoming 2019)
5. "China" in B.J. Arnold, Hugh Ault and Graeme Cooper, eds. *Comparative Income Taxation* (4<sup>th</sup> ed.) (Wolters Kluwer, 2019)



6. "International Tax Simplification in South Africa through Managing Substantive Complexity and Improving Drafting Efficiency in C. Evans, P. Mellor and S. Slack, *Tax Simplification: An African Perspective* (Pretorial University Press, 2019) (with Teresa Pidduck) 293-314.
7. "Celebrating the Centennial of the Income War Tax Act, 1917: The Future seen by the light of 100 candles" (with Wilkie), in *Income Tax at 100 Years: Essays and Reflections on the Income War Tax Act* (Li, Wilkie and Chapman, eds.) (Canadian Tax Foundation, 2017)
8. "The Source of Income and Canadian International Taxation" (with Wilkie), in *Income Tax at 100 Years: Essays and Reflections on the Income War Tax Act* (Li, Wilike and Chapman, eds.) (Canadian Tax Foundation, 2017)
9. "China" in Transfer Pricing Disputes, IBFD Platform Online publications (revised frequently) (co-author with SU, Tian)
10. "Triple non-taxation and BEPS: Implications" in *A Global Analysis of Tax Treaty Disputes* (Eduardo Baistrocchi, ed.) (Cambridge University Press, 2017) 1497-1511
11. "Protecting the Tax Base in the Digital Economy" in a volume edited by Trepelkov, Tonino and Halka and published by the United Nations (2015) and (2017) *Handbook on Selected Issues in Protecting the Tax Base of Developing Countries*. 479-522 (<http://www.un.org/esa/ffd/publications/handbook-tb.html>.)
12. "Taxation of Non-residents on Business Profits" in *Papers on Selected Topics in Administration of Tax Treaties for Developing Countries* (Trepelkov, Tonino and Halka eds.) (UN, 2013) 193-220
13. "Resolving Transfer Pricing Disputes – China Chapter" in Eduardo Baistrocchi, ed. *Resolving Transfer Pricing Disputes: A Global Analysis*, (Cambridge University Press, 2013) 634-665
14. "Soft Law, Hard Realities and Pragmatic Suggestions: Critiquing the OECD Transfer Pricing Guidelines" in Wolfgang, S. and K.A. Konrad, eds. *Fundamentals of International Transfer Pricing in Law and Economics* (Springer 2012) 71-90
15. "Tax Treatment of Retirement Savings Plans: Past, Present and Future", in "Tax Expenditure Analysis: State of the Art", eds. Lisa Philipps, Neil Brooks and Jinyan Li (Canadian Tax Foundation 2011)
16. "Introduction" (with Neil Brooks and Lisa Philipps) in *Tax Expenditure Analysis: State of the Art*, Lisa Philipps, Neil Brooks and Jinyan Li, eds. (Canadian Tax Foundation 2011)
17. "Beneficial Owner in Tax Treaties: Judicial Interpretation and Case for Clarity" in Philip Baker, and Catherine Bobbett, eds., *Essays in Honour of John F. Avery Jones: Tax Polymath* (Amsterdam: IBFD Publications, 2010), 187-210
18. "Inter-nation Revisited", in A. Cockfield, ed., *Globalization and the Impact of Tax on International Investments* (University of Toronto Press, 2010) 117-137
19. Berkshire Encyclopaedia of China (5-volume) (Li and H. Huang) "Tax and Tax Law" (2009)
20. "Development and Tax Policy: Case Study of China", 235-76, in A. Usha, ed. *Tax Laws: Global Perspectives* (2007)
21. "The Public and Private Pillars of Canada's Retirement Income System: Separation, Linkage, and Blurring" in L. Stone ed., *New Frontiers of Research about Retirement and Other Later-Life Transition* (2006)
22. "Abusive Tax Avoidance versus Legitimate Tax Minimization: Economic Substance Draws the Line" in Duff and Erlichman, eds., *Tax Avoidance* (Irwin, 2006) 47-84.]
23. "Income from Business and Property" in Edgar, Li and Sandler, eds., *Materials on Canadian Income Tax* (12<sup>th</sup> ed.) (Carswell, 2000), 339-446
24. "Taxpayers' Rights in Canada" in Bentley, ed., *Taxpayers' Rights: An International Perspective* (Gold Coast, Australia: Revenue Law Journal, 1998), 89-137
25. "China's Tax Treaty Policy," in *Tax Reform Options* (Fulton, Li and Xu, eds.), 75-92
26. "Advance Tax Rulings in China," in *The International Guide to Advance Tax Rulings* (loose-leaf) (Amsterdam: International Bureau for Fiscal Documentation, 1997)
27. "Tax Administration," in Allen ed., *China Tax Manual* (Hong Kong: Asia Law and Practice, 1995) [14-23, 30-31, 64-65]

28. “Transfer Pricing in China,” in *Transfer Pricing* (loose-leaf) (Amsterdam: International Bureau of Fiscal Documentation, 1996)
29. “China’s Tax Treaties,” (Arnold and Li) in Xu and Li, eds., *Tax Reform in China*, (Beijing: China Economics Press, 1997) 42-69
30. “Income from Business and Property,” (Eansor and Li) in Arnold, Edgar, Li and Sandler, eds., *Materials on Canadian Income Tax*, 11th ed. (Toronto: Carswell, 1996), chapter 5
31. “Taxation of Business Entities,” (Li and Pomp) in Streng, ed., *Doing Business in China* (Irvington, New York: Transnational Juris Publications, 1996), chapter 17
32. “Income from Business and Property,” (Cumming and Li) in Arnold, Edgar and Li, eds., *Materials on Canadian Income Tax*, 10th ed. (Toronto: Carswell, 1993), chapter 5
33. *Supplement to Materials on Canadian Income Tax*, Arnold, Edgar and Li, eds., (Toronto: Carswell, 1995), 32 pages

### Chapters in IBFD Online Publications

1. Transfer Pricing Disputes, China (updated twice a year) (Li & Su)
2. Article 13 of Tax Treaties in Global Tax Treaty Commentaries (frequently updated) (Li & Avella)

### Published Articles

1. “Introducing a Global Minimum Tax (Pillar Two) in Canada: Some Knowns and Unknowns” (2023) 71:1 *Canadian Tax Journal* 103-136
2. “Canadian QDMTT Challenges”, (2023) 71:1 *Canadian Tax Journal* 137-58 (Jinyan Li, Angelo Nikolakakis and Jean-Pierre Vidal)
3. “Fiscal Contract and the Canada Disability Benefit: Lessons from Income Tax Law”, (2023) Osgoode Hall L.J. (forthcoming)
4. “UTPR – No Taxation Without Value Creation!” *Tax Notes Int’l*, April 3, 2023, 49-59 (Angelo Nikolakakis and Jinyan Li)
5. “UTPR: Unprecedented (Unprincipled) Tax Policy Response in Need of an MLI”, *Tax Notes Int’l*, Jan. 2023, 743-751 (Angelo Nikolakakis and Jinyan Li)
6. “The Pillar 2 Undertaxed Payments Rule Departs from International Consensus and Tax Treaties,” (2022) 105:3 *Tax Notes Int’l* 1401-1409  
Translated into Chinese: 支柱二中的 UTPR 是否偏离了国际共识及税收协定? *Journal of* (2022) No. 8 *International Taxation in China* 12-23
7. “The Global Tax Agreement: Some Truths and Legal Realities” (in Chinese) (2022) 105:3 *Journal of International Taxation in China* 12-23
8. “Finding the Purpose of Tax Treaty Provisions under the GAAR: Lessons from Alta Energy,” (2022) 105:2 *Tax Notes Int’l* 147-61
9. China’s Rising (and the United States’ Declining) Influence on Global Tax Governance? Some Observations, (2021) no.11/12 *Bulletin for International Taxation* 725-39.
10. Repurposing Pillar One into an Incremental Global Tax for Sustainability: A Collective Response to a Global Crisis, (2021) no.5 *Bulletin for International Taxation* 230-49 (Sophie Chatel and Jinyan Li)



11. The Legal Challenges in Creating a Global Tax Regime with OECD Pillar One Blueprint, (2021) no.2 *Bulletin for International Taxation* 84-93, translated into Chinese: “OECD 支柱一蓝图创建全球性税制的法律挑战” (2021) no.8 *China International Tax Journal* 27-38)
12. The Trend of Convergence and Divergence in the GAAR in Canada, Australia and New Zealand (一般反避税规则的趋同与差异 : 基于加拿大、澳大利亚和新西兰 司法实践的分析), (2021) No.2 *China International Tax Journal* 13-21) (with Hu Shanghua)
13. “Tax Weapons in the COVID-19 War: A Preliminary Study of Brazil, Canada, Denmark, UK and US”, (2020) 1:1 *Belt and Road Initiative Tax Journal* 105-13 (with Nathan Bao, Shanghua Hu and Matias Zerbino)
14. “Digitization and International Tax Dispute Resolution: A Window of Opportunity for BRITACOM” <https://ssrn.com/abstract=3664039>. (with Nathan Bao, Shanghua Hu, Wei Hu and Matias Zerbino)
15. “GAAR in Action: An Empirical Study of Transaction Types and Judicial Attributes in Australia, Canada, and New Zealand” (2020) vol.68:2 *Canadian Tax Journal* 539-78 (with Thaddeus Hwong)
16. “Automation and Workers: Reimagining the Income Tax for the Digital Age” (2020) 68:1 *Canadian Tax Journal* 99-124 (with Arjin Choi and Cameron Smith)
17. “Value Creation: A Constant Principle in A Changing World of International Taxation” (2019) 67:4 *Canadian Tax Journal* 1107-1134 (with Nathan Bao and Christina Li)
18. “Re-Imagining Tax For the 21<sup>st</sup> Century: Inspired by the Scholarship of Tim Edgar” (2019) 67:3 *Canadian Tax Journal* 613-4 (with Graeme Cooper and Scott Wilkie)
19. “BEPS and the Emerging Global Approach to Taxing Multinational Enterprises” (with Huaning Li and Jin Bao) (2019) [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3443593](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3443593)
20. “The Rule of Law in International Tax Relations” in *Building a Growth-friendly Tax Environment (in collaboration with International Taxation in China)* (April 2019) 49-56
21. “Tax, Race and Child Poverty: Improving the Canada Child Benefit Program” (2018) 28:2 *Journal of Law and Social Policy* 67-96 (with Jacklyn Neborak)
22. “Location Specific Advantages: A Disruptive Factor in Post-BEPS Transfer Pricing” (2017) 71:5 *Bulletin for International Taxation* 259-71 (with Stephen Ji)
23. “Introduction – Tax Policy for a Better Tomorrow” (2015) 52:2 *Osgoode Hall Law Journal* 377-378 (with Tim Edgar and Thaddeus Hwong)
24. “China and BEPS: From Norm-Taker to Norm-Shaker,” (2015) 69:6/7 *Bulletin for International Taxation* 355-70.
25. ‘Tax Transplants and the Critical Role of Processes: a Case Study of China’ (2013) 3 *Journal of Chinese Tax and Policy* 19.
26. “GAAR in Action: An Empirical Exploration of Tax Court of Canada Cases (1997-2009), (2013) 61:2 *Canadian Tax J.* 321-66 (with Thaddeus Hwong et al)
27. “The Great Fiscal Wall of China: Tax Treaties and Their Role in Defining and Defending China's Tax Base,” (2012) 66 *Bull. Intl. Taxation*. 9.
28. “Taxing International Communications Income” *Tax Notes Int’l* 913 (with Bacci and Payan).
29. “Justice Bowman and Substance Over Form,” (2010) 58:1 *Canadian Tax J.* 127-40 (with Brian J. Arnold).
30. “Tax Transplants and Local Culture: A Comparative Study of the Chinese and Canadian GAAR” (2009) 11:2 *Theoretical Inquiries in Law* 75-105
31. “A Principled Approach to Reforming the Canadian Outbound Tax System” (2008) *Tax Notes Int’l*, Nov.3 417-27

32. "The Transformation of Chinese Enterprise Income Tax: Internationalization and Chinese Innovations," (2008) *Bulletin for Int'l Fiscal Documentation* 275-88 (with Thaddeus Huang)
33. "Fundamental Enterprise Income Tax Reform in China: Motivations and Major Changes", *Bulletin for International Fiscal Documentation*, Vol.61-No.12, 2007, 519-528.
34. "Reviving the Modern Rule in the Interpretation of Tax Statutes: Baby Steps Taken in *Canada Trustco, Mathew, Placer Dome, and Imperial Oil*" (2007) *Supreme Court Law Review* 519-556 (with David Piccolo)
35. "The Rise and Fall of Chinese Tax Incentives and Implications for International Tax Debates" (2007) 8 *Florida Tax Rev.* 670-712
36. "Development and Tax Policy: Case Study of China", CLPE Research Paper 3/2007, Vol. 03 No. 04 (2007)
37. "Canadian Taxation of International Mobile Workers: A Case for Reform" (2007) vol.40 *UBC Law Review* 375-400
38. "Abusive Tax Avoidance versus Legitimate Tax Minimization: Economic Substance Draws the Line" (2006) vol.54, no.1 *Canadian Tax J.* 23-56  
[This article was reprinted in Duff and Erlichman, eds., *Tax Avoidance* (Irwin, 2006) 47-84.]
39. China's Individual Income tax: A 26-Year-Old Infant" (2006) vol.43, no.4 *Tax Notes Int'l.* 297-302
40. "International Mobility of Highly Skilled Workers in the Canadian Context: Tax Barriers and Reform Options" SSHRC and Industry Canada, INE Working Paper 2006 D-21,  
[http://strategis.ic.gc.ca/epic/site/eas-aes.nsf/en/h\\_ra01877e.html](http://strategis.ic.gc.ca/epic/site/eas-aes.nsf/en/h_ra01877e.html)
41. "Efficiency, Export, and Evasion: Triple-E Concerns in China's VAT reform" (2005) 37 *Tax Notes Int'l* (Feb.8, 2005) 775-8 (Li and Wang)
42. "Enterprise Annuities and Tax Policy in China: Engaged, but Not Yet Married", (2005) vol.59, no.12, *Bulletin for Int'l Fiscal Doc.*
43. "Enterprise Annuities in China: Regulatory Framework, Practical Challenges, and International Opportunities" (2005) no.52 *International Pension Lawyer* 39-53
44. "Chinese Tax Policy on the Taxation of Gains realized by Non-residents From the Disposition of Shares in Chinese Companies" *Shewai Shuiwu (China International Tax Journal)* 2005, no.5 (Li and Liu) (in Chinese) 195-208
45. "Relationship between International Trade Law and National Tax Policy: A Case Study of China," (2005) vol.59, no.2, *Bulletin for Int'l Fiscal Doc.*, 77-87.
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50. "China: 2002 in Review", *Tax Notes International* (30 December 2003) 1270-1
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52. "Electronic Commerce and International Taxation" (2002) vol.3, no.1 *Canadian J. of Policy Research* 101-7 (with Jonathan See)

53. "E-Commerce Tax Policy in Australia, Canada and the United States" (2000) Vol. 6, no.2 *University of New South Wales Law Journal Forum* 40-48
54. "E-Commerce Taxation in China," *Tax Notes Int'l* (4 December 2000) 2619-32
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56. "The WTO and China's Tax System", *Tax Notes Int'l* (May 29, 2000), 2451-12.
57. "Social Security Reform in China – A Tax Lawyer's Perspective" (1999) vol.53 *Bulletin for Int'l Fiscal Doc.*, 60-79
58. "Rethinking Canada's Source Rules in the Age of Electronic Commerce" (1999) vol. 47, No. 5 and No. 6 *Canadian Tax Journal*, 1077-1125, and 1411-1478
59. "Electronic Commerce and Canada's Tax Administration," *Tax Notes Int'l*, (December 28, 1998), 2117-2136
60. "Counteracting Corruption in Tax Administration in Transitional Economies: A Case Study of China," (1997) vol.51, No. 11 *Bulletin for Int'l Fiscal Doc.*, 474-92
61. "Relationship between Domestic Anti-avoidance Provisions and Tax Treaties,"(1997) vol.45, No.5 *Canadian Tax Journal* 891-958 (Li and Sandler)
62. "Technology Transfer to China - A Tax Analysis," (1996) vol.50, No.7 *Bulletin for Int'l Fiscal Doc.*, 286-305
63. "The Appropriate Tax Treatment of the Reimbursement of Moving Expenses," (1996) vol. 44, No.1 *Canadian Tax Journal* 1-37 (Arnold and Li)
64. "Taxpayers Rights in Canada," (1996) *The Revenue Law Journal* 172-201
65. "Transfer Pricing Law and Policy in China," *Tax Notes Int'l* (Oct. 2, 1995), 931-944
66. "Withholding Tax for Domestic Dividends and Interest" (1995) vol. 43, No.3 *Canadian Tax Journal* 553-591
67. "Tax Implications of Doing Business in China" (1995) vol.43 *Canadian Tax Journal* 75-119
68. "China's Tax Treaties and Their Impact on Foreign Investment," (1995) 10 *Tax Notes Int'l*, 1891-1911
69. "People's Republic of China: Domestic Enterprise Income Tax," (1995) vol. 49 *Bulletin for Int'l Fiscal Doc.*, 81-94
70. "Value-added Tax in the People's Republic of China," (1994) vol. 5 *Int'l VAT Monitor*, 130-146
71. "The Impact of the New Sales Taxes on Foreign Investment in China," (1994) 8 *Tax Notes Int'l*, 1075-87
72. "New Individual Income Tax - Unified Taxation of Citizens and Foreigners," (1994) vol. 48 *Bulletin for Int'l Fiscal Doc.*, 64-74
73. "The Impact on Foreigners of China's Implementing Regulations for the New Individual Income Tax Law," (1994) 8 *Tax Notes Int'l*, 939-945
74. "People's Republic of China: The New Law on Tax Administration," (1993) 47 *Bulletin for Int'l Fiscal Doc.*, 263-77
75. "Tax Position of Foreigners in China under the New Individual Income Tax Law," (December 19, 1993) 7 *Tax Notes Int'l*, 1495-1505
76. "The Implementing Regulations for the New Consolidated Income Tax on Foreign Investment," (1992) 46 *Bulletin for Int'l Fiscal Doc.*, 170-80
77. "Turnover Tax on Foreign Investment in China: The Consolidated Industrial and Commercial Tax," (1992) 2 *Int'l VAT Monitor*, 2-16
78. "Focus on the People's Republic of China," (1991) *The Int'l VAT Monitor*, 8-16
79. "The New Canada-Mexico Tax Treaty," (1991) vol. 45 *Bulletin for Int'l Fiscal Doc.*, 523-29

80. "People's Republic of China: The New Income Tax on Foreign Investment," (1990) 45 *Bulletin for Int'l Fiscal Doc.* 482-93
81. "China's Tax System: An Evaluation," (1989) 3 *Denver Journal of International Law and Policy* 527-80
82. "Incentives for Foreign Investment in China," (1989) 4 *Review of International Business Law* 99-113
83. "The Concept of Permanent Establishment in China's Tax Treaties" (1989) 7 *International Business and Tax Lawyer* 120-32
84. "People's Republic of China: Taxation of Private Business and Private Investors," (1988) 42 *Bulletin for Int'l Fiscal Doc.*, 415-26
85. "People's Republic of China: Foreign Tax Update," (1990) 44 *Bulletin for Int'l Fiscal Doc.* 26- (Easson and Li)
86. "People's Republic of China: Value Added Tax," (1988) 42 *Bulletin for Int'l Fiscal Doc.*, 167-71
87. "Discussion of Individual Income Tax Law," (1987) *Jingji Fazhi* No. 9 (Easson and Li) 221-7 (in *Chinese*)
88. "Taxation of Foreign Business and Investment in the People's Republic of China" (1987) vol. 23 *Northwestern Journal of International Business Law and Business* 666-95 (Easson and Li)
89. "Tan Zhongguo Dui Waiguo Touzi de Zhengshui" (Taxation of Foreign Enterprises in China) (1987) *Guoji Maoyi Wenti*, No. 1 (Easson and Li) 13-18 (in *Chinese*)
90. "The New Regulatory Tax on Individual Income," (1987) vol. 41 *Bulletin for Int'l Fiscal Doc.*, 167-71
91. "The Evolution of the Tax System in the People's Republic of China" (1986) 23 *Stanford Journal of International Law* 399-447 (Easson and Li)

### Case Comments and Reviews

- "Pension Power: Unions, Pension Funds, and Social Investment in Canada" (2006) vol.21 no.3 *Banking and Finance Law Rev.* 553
- "Interest is not always a capital expense": *Gifford v. The Queen*, 2004 SCC 15 (*Canadian Tax Journal*, "Current Cases" column, 2004, no.3)
- "Case Analysis: The Meaning of 'Active Business' for Canadian FAPI Purposes: *Canada Trustco Mortgage Company v. M.N.R.*," (1992) 5 *Tax Notes International* 1071-75
- *Practical China Tax Planning*, for *Tax Notes International* (December 1996)

## OTHER SCHOLARLY OUTPUTS

### Organization of conferences

- Deeper into the Knight: Exploring the Effect of Deans Knight Income Corp. v. Canada on the GAAR", June 28, 2023
- Pillar Two for Canada symposium, July 27, 2022 (initiator and part of planning panel)
- Pillar Two for Canada Academic Roundtable, October 14, 2022
- Women with Disabilities: Income Security and Tax Policy, Nov.11, 2022
- Re-imaging Tax Policy for the 21<sup>st</sup> Century Inspired by the Scholarship of Tim Edgar (Feb.2019)
- Conference on Income Tax Act's 100 Anniversary (2016) (with the "Tax@York Group")
- Workshop: Tax Policy for a Better Tomorrow: Intersectoral and Multidisciplinary Connections" (2013) (celebration of Neil Brooks contributions)
- Conference on Tax Expenditures and Public Policy in Comparative Perspective (with Lisa Philipps and Neil Brooks) \$25,000 (2009)

### **Guest Lectures and Conference Presentations (In Recent Years Only)**

- 1) The Future of the Corporate Form in Income Tax: A Case Study of Canada (April 11-13, 2023, Coimbra, Portugal)
- 2) The Interlinking between Income Tax, Citizenship and Democracy: A Case Study of Canada and China, Oslo, May 8, 2023.
- 3) “A Canadian Qualified Domestic Minimum Top-up Tax (QDMTT): Promises and Pitfalls” (July 2022) (presented at a Pillar Two Symposium on July 27, 2022 and forthcoming in the Canadian Tax Journal)
- 4) “Lessons from Canada’s COVID-19 Fiscal Response for Building Fiscal Antibodies through Transforming the Income Tax System” (paper presented at the Law & Society Global Meeting on July 15, 2022) (with J.S. Wilkie)
- 5) Implementing A Global Large Corporations Tax (Pillar One) through Domestic Law: Possible Insights from a Case Study of Brazil, Canada, China and India (UofT, March 9; UBC, March 19)
- 6) “Arbitration of International Tax Disputes: A Rich Countries’ Game Ill-fit for Belt & Road Countries”, Boston College Law School, USA, Nov.18, 2019
- 7) “China’s Tax Developments and Belt & Road Initiative”, ATAX, University of New South Wales, May 6, 2019
- 8) “The Significance of BRITACOM in the Evolution of International Tax Regime”, Zhongshan University, China and Guangzhou State Taxation Administration, April 23 and 24, 2019
- 9) “The Rule of Law in Taxation”, BRITACOM Forum, April 18-21, 2019, Wuzhen, China
- 10) “BEPS and the Emerging Framework for Taxing Multinational Enterprises”, Re-imaging Tax Policy for the 21<sup>st</sup> Century Inspired by the Scholarship of Tim Edgar (Feb.2019)
- 11) “Automation and the Taxation of Workers: Making the Income Tax System Fair Again” (Arjin Choi and Cameron Smith) Re-imaging Tax Policy for the 21<sup>st</sup> Century Inspired by the Scholarship of Tim Edgar (Feb.2019)
- 12) Lecture Series at Central University of Finance and Economics, Beijing, China November 2018
- 13) “International Tax Environment and Simplification of South African Tax Legislation (with Teresa Pidduck), October 11, 2018, Johannesburg, South Africa
- 14) “Withholding Tax, CIVs and Digital Economy”, September 2, 2018, Seoul, Korea, IFA Congress
- 15) “The Canadian Experience with Preferential Tax Regime for Small Businesses: Bad Tax Policy, Good Politics?” Kunming, December 17, 2017
- 16) “Cutting-Edge Issues and Leading Cases on Transfer Pricing and Permanent Establishment”, Jiangsu State Administration of Taxation, Nanjing, Dec.14-15, 2017
- 17) “Publishing articles in English journals”, Seminar at Zhongnan University of Finance and Law, Dec.12, 2017
- 18) “China and BEPS”, Wuhan University, December 11, 2017
- 19) “Celebrating the Centennial of the Income War Tax Act”, Ottawa, Sept.19, 2017
- 20) “Taxation in the Digital Economy”, invited round table workshop between the Department of Finance and Canadian Tax Foundation (November 2014)
- 21) “China at the Frontier of International Tax Reform” Keynote speech at Central University of Finance and Economics, Beijing, China (May 19, 2014)
- 22) *Combating BEPS through LSAs: The Approach of China and India*, Tulane Tax Roundtable, Tulane Law School, US, March 21, 2014

- 23) “Redistributive Justice and Progressive Taxation in China” (May 2013) at Workshop “Tax Policy for a Better Tomorrow: Intersectoral and Multidisciplinary Connections”(Toronto, Canada)
- 24) “Keys to Successful Tax Transplants: Process, Process, Process” (written in English and Chinese), Nov.24-25, 2012, Inaugural Chinese Tax Conference, Guangzhou, China
- 25) “Taxation of International Communications Income”, Chair of an International panel at the annual congress of International Fiscal Association, September 30 to Oct.2, 2012, Boston, USA
- 26) “Individuals’ Ability-To-Pay, Corporations’ Ability-To-Avoid, and Canada’s Ability-To-Tax”, delivered at The Carter Commission 50 Years Later: A time for Reflection and Reform, Dalhousie University, September 28-29, 2012
- 27) “Legal Transplants” at UBC Law School, March 2012.
- 28) “China and Legal Transplants”, Tsinghua Law School, China, November 2011
- 29) “Transfer Pricing Litigation in Canada” (IFA, Australia, March 2012)
- 30) “Western Legal Transplants in the Middle Kingdom: An Inquiry about China’s Role as a Norm Taker, Norm Shaker and Norm Maker” (Faculty of Law, University of British Columbia, March 2012)
- 31) “Smelling the Smell Test in GAAR Cases”, invited lecture at Faculty of Law, Queen’s University, November 2011.
- 32) “Comment on OECD Recent Work on Transfer Pricing” presented by Mary Bennett, Head, Tax Treaty, Transfer Pricing and Financial Transactions Division, OECD”, Dec.10 and 11, 2010, Munich, Germany, Max Planck Research Centre, “Fundamentals of International Transfer Pricing in Law and Economics”
- 33) “Economic Substance”, presentation to Canada Revenue Agency, June 2010
- 34) “Beneficial Ownership” at a Conference in honour of John Avery Jones, April 2010
- 35) “Transfer pricing Disputes in China”, July 2010, London School of Economics
- 36) “The Public Role in Private Pensions: Making Tax Expenditures Count”, Tax Expenditures and Public Policy in Comparative Perspective: Toronto Conference, September 11-12, 2009
- 37) “Law as Culture: A Cross-cultural Inquiry of the General Anti-Avoidance Rule in China and Canada”, Prato, Italy, June 8-11, 2009
- 38) “Tax Transplant from the West to China”, lecture at NYU Law School, April 24, 2009
- 39) Peter Willoughby Memorial Lecture, “Cross-cultural Convergence of Corporate Income Tax: A Case Study of China and Canada”, Dec.10, 2008
- 40) Hong Kong University, Faculty of Law, “Curriculum Reform in Canada and Hong Kong”, Dec.9, 2008
- 41) “GST and Public Bodies”, seminar at IFA Congress, Brussels, September 3, 2008
- 42) “Tax Transplants: A Cross-cultural Inquiry”: Comparative Tax Research Workshop, Tel Aviv; summer 2008
- 43) “Inter-nation Equity Revisited”, Globalization and the Impact of Tax on International Investments: A Symposium in Honour of the Memory of the Late Alex Easson, Queen’s University, Feb. 29, 2008
- 44) “The Rise of Chinese Tax Incentives and Implications for International Tax”, International Tax Symposium, September 21, 2007, University of Florida, Levin College of Law
- 45) “Development and Tax Policy: Case Study of China”, presented at 1<sup>st</sup> INTR Conference, “TAXATION AND DEVELOPMENT”, 3-5 November 2006, Michigan Law School
- 46) Chinese Tax Policy and Development, James Hausman Tax Law & Policy Workshops, University of Toronto, March 2007)



- 47) "Tax treatment of personal injury damages", discussant, Tax Policy Symposium, Deloitte Centre for Tax Education and Research at the University of Waterloo, August 24-5, 2006
- 48) "RRSP Withdrawals and Policy Implications", discussant, Tax Policy Symposium, Deloitte Centre for Tax Education and Research at the University of Waterloo, August 22-3, 2007
- 49) "Issues and Recent Developments in the Chinese Enterprise Annuities System", IPEBLA Tele-conference, March 8, 2006
- 50) "The Economic Substance Doctrine and Abusive Tax Avoidance: A Critical and Comparative Perspective", November 18, 2005.
- 51) "Enterprise Annuities in China", May 25, 2005, IPEBLA Conference at Vienna
- 52) "Western Theories and Traditions of Social Security and Implications for China", June 6, 2005 at South China University of Politics, Law and Finance, Wuhan, China
- 53) "Bijuralism and International Tax Law", Department of Finance, Canada (February 7, 2003)
- 54) "Balancing Equity and Global Competitiveness in Chinese Tax Reforms" (May 13-14, 2005) at the Tsinghua-Michigan Sino-American Conference on Business Law Developments
- 55) "Globalization, Sovereignty and Tax Reforms" (May 12, 2005) at Chinese University of Politics and Law, Beijing, China
- 56) "Traditional Tax Concepts in A Digital World," Cybertax panel, Centre for Innovation Law and Policy, January 31, 2003
- 57) "Consumption Taxation of Electronic Commerce", 32<sup>nd</sup> Annual Workshop on Commercial and Consumer Law (Oct.18-19, 2002)
- 58) "Tax Policy and E-commerce", New Economy Symposium, June 2001, organized by Privy Council Research Office, Canada
- 59) "Valued Added Tax in the European Union", Insight Conference on E-commerce Taxation, February 2001.
- 60) "Taxation in A Global Economy," lunch speaker at the Conference (Institute for International Research) October 31, 2000.
- 61) Seminar at Beijing University, "International Tax Issues Raised by Electronic Commerce," November 1997
- 62) Seminar at Harvard Law School, "Counteracting Corruption in Taxation Administration - A Case Study of China", April 1997
- 63) Seminar for faculty members at the Faculty of Law, University of New South Wales, Australia, "Rule of Law and Chinese Tax Developments," October 1997
- 64) Seminar at International Fiscal Association (Melbourne and Sydney, Australia), "Tax Considerations for Doing Business in China," September and October 1997

### Commissioned Reports

- "Fiscal Policy and Transformation of Resource-Based Economy", Asian Development Bank, November 2014
- "The Administration of Canada's Transfer Pricing Rules: Issues and Recommendations: Report by the Transfer Pricing Subcommittee of the Advisory Panel on Canada's International Taxation, August 2008
- "International Mobility of Highly Skilled Workers in the Canadian Context: Tax Barriers and Reform Options" (2009). *Commissioned Reports, Studies and Public Policy Documents*. Paper

55.

<https://digitalcommons.osgoode.yorku.ca/reports/55>

- “Impact of Tax Policy on the Coverage and Funding of Corporate Pension Plans”, a working paper written for the Ontario Expert Commission on Pensions (2007)
- “Tax Expenditure Analysis of Employer-sponsored Pension Plans”, a working paper written for the Ontario Expert Commission on Pensions (2007)
- Commentaries and Recommendations on Drafting the Chinese Basic Tax Law (June 2005) (GTZ Project for the Chinese National People’s Congress) (co-author with Michael Baum and Nolan Sharkey)
- *Bijuralism in international taxation*, report to Dept. of Justice, March 2003
- *Legal Framework for China's Basic Pension System* -- Report for the Asian Development Bank, 2001.
- *Comparison and Assessment of the Tax Treatment of Foreign Source Income in Canada, Australia, France, Germany and the United States*—Working paper 96-1, prepared for the Technical Committee on Business Taxation, Department of Finance, Canada (co-written with Brian Arnold and Daniel Sandler), 1996
- *China’s Tax Treaty Policy with OECD Countries*—Report for the OECD Fiscal Affairs Committee, co-written with Brian Arnold, May 1996
- *Information and Reporting Requirements - Canada, Australia and the United States* – a report for the Auditor General of Canada, co-written with Brian Arnold and Daniel Sandler, April 1996
- *Materials on Basic Tax Law in China* -- report prepared for the State Administration of Taxation in connection with a seminar on introducing basic tax law in China, November 1995
- *People’s Republic of China: Taxation and the Rule of Law* --report for the Legal Department of the IMF, co-written with Minoru Nakazato, Richard Pomp, Victor Thuronyi and Frans Vanistendael, 1994

### Policy Submission

- Submission GAAR Reform, “Comments on “Modernizing and Strengthening the General Anti-Avoidance Rule Consultation Paper”, Aug.2022
- Submission on the Consultation Paper Tax Planning Using Private Corporations, October 2017
- “A Principled Approach to Canadian Taxation of Foreign Income” A Submission to the Advisory Panel on Canada’s System of International Taxation, August 2009

### Editorship

- Co-guest editors for a special volume of Osgoode Hall Law Journal dedicated to Neil Brooks
- Editorial board, *World Tax Journal* (2023-)
- Co-editor, “Current Tax Readings”, *Canadian Tax Journal* (July 2007 --)
- Member of Editorial Board, Osgoode Hall Law Journal (2001- present)
- Book review editor, *Banking and Finance Law Review* (2002- 2003)

### Journal Features

- *Bulletin for International Fiscal Documentation* (1989-present), regular correspondent
- *Tax News Service* (1994-present), regular correspondent
- *Tax Notes International* (1994-present), regular correspondent

- *International VAT Monitor* (1991-1994), regular correspondent