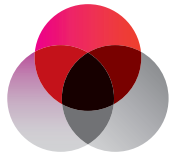




UNIVERSITY OF AMSTERDAM  
Amsterdam Centre for Tax Law



**ACTL**  
Designing the  
Tax System for  
a Cashless,  
Platform-Based and  
Technology Driven  
Society

Summer Course  
**3-4-5 July 2024**

**Blockchain,  
Digital assets and Web3:  
taxation & reporting**

Amsterdam Law School



## Blockchain, Digital assets and Web3: taxation & reporting

Blockchain technologies, digital assets (including cryptocurrencies) and Web3 are rapidly changing the international tax landscape giving rise to new challenges for policymakers and tax administrations. While countries have started to issue guidance in this field, the tax treatment of such phenomena continues to pose several theoretical and practical issues.

This three-days summer course focuses on these technological developments to provide a comprehensive overview of the tax aspects of blockchain, digital assets, and Web3. Government officials, tax professionals, Ph.D. students and motivated scholars are introduced to the latest developments in this novel area to acquire an understanding of the basics of the underlying technology and knowledge on the existing and potential future approaches to taxation and reporting.

### Among the themes covered are

- Basics of blockchain technologies
- Smart contracts and tokenization
- Blockchain-based tax systems
- Regulatory aspects of digital assets (MiCA)
- Taxation of digital assets (including cryptocurrencies and NFTs)
- Tax aspects of crypto staking and mining
- Tax reporting of digital assets (CARF/DAC8)
- Taxation of Decentralized Autonomous Organizations (DAOs)
- Taxation of the metaverse

This summer course is organized by the ACTL under the umbrella of the research project 'Designing the tax system for a Cashless, Platform-based and Technology-driven society' (CPT project).

### Lecturers

**Dr Giorgio Beretta** (UvA)  
**Dr Claudio Cipolini** (UvA / RCLex)  
**Dr Edoardo D. Martino** (UvA)  
**Dr Dennis Post** (EY / UvA)  
**Izzat-Begum B. Rajan** (Imani Partners)  
**Olivier Rikken** (Emerging Horizons)  
**Raffaele Russo** (Chiomenti)  
**Dion Seymour** (Andersen UK)  
**Anna Vvedenskaya** (UvA)

# Day 1 Blockchain for Tax

3 July 2024

## 9:00 - 9:15 Opening by the Chair of the CPT Project

## 9:15 - 10:45 Basics of Blockchain technology

Lecturer **Olivier Rikken** (Emerging Horizons)

Content Basics of different types of blockchain networks; main features of blockchain with respect to immutability, transparency, and real-time information; main tools that are commonly associated with a blockchain network (e.g. oracles).

- Learning goals
- outline the different types of blockchain networks
  - illustrate the main features of blockchain technologies
  - discuss the potential of oracles within blockchain technologies

10:45 - 11:00 Break

## 11:00 - 12:45 Smart Contracts and Tokenization

Lecturers **Dr Dennis Post** (EY / UvA)  
**Olivier Rikken** (Emerging Horizons)

Content Technology aspects of smart contracts; legal status of smart contracts; the tokenization process; different types of digital assets; basic characteristics of digital assets (including cryptocurrencies); main features and applications.

- Learning goals
- describe the basic features of smart contracts and discuss their potential to automate processes
  - explain the concept of “code as law” and the legal status of a smart contract
  - explain the concept of tokenization and digital assets from a technical perspective
  - illustrate the main features of digital assets and discuss possible applications

12:45 - 14:00 Lunch and networking

## 14:00 - 15:30 The Combination of Blockchain Technology and Tax: When to Use Blockchain for Tax

Lecturers **Dr Dennis Post** (UvA / EY)  
**Dr Claudio Cipollini** (UvA / RCLex)

Content Preconditions for blockchain implementation in the tax field; different perspectives in participating in a blockchain-based tax system; examples of blockchain-based projects for tax in the public and private sectors.

- Learning goals
- identify the tax scenarios where blockchain can be useful for tax
  - understand the different perspectives of tax administrations and taxpayers with reference to the use of blockchain technology
  - give examples of blockchain-based projects in the tax field

15:30 - 15:45 Break

## 15:45 - 17:30 The Combination of Blockchain Technology and Tax: Governance and Tax Law Aspects

Lecturers **Dr Dennis Post** (UvA / EY)  
**Dr Claudio Cipollini** (UvA / RCLex)

Content Governance structures (blockchain rights, network users); on-chain governance and off-chain governance; governance objectives (legal compliance, technical goals); tax law aspects (exchange of information, dispute resolution, taxpayers’ rights, penalties).

- Learning goals
- illustrate the governance and tax law aspects of blockchain for tax
  - discuss the implementation challenges of a blockchain-based tax system from a governance perspective
  - evaluate legal systems in view of the possible introduction of a blockchain-based tax system

## Day 2 **Digital assets taxation & reporting**

4 July 2024

### 9:00 - 10:30 **Regulatory aspects of digital assets**

Lecturer **Dr Edoardo D. Martino** (UvA)

Content Legal challenges and opportunities around digital assets; EU regulatory environment for digital assets (MiCA).

Learning goals

- illustrate the different ways to regulate decentralized blockchain networks
- illustrate the EU regulatory environment for digital assets (MiCA)
- discuss today's and future legal challenges around implementation of blockchain-based systems

10:30 - 10:45 Break

### 10:45 - 12:00 **Digital asset taxation (direct)**

Lecturers **Izzat-Begum B. Rajan** (Imani Partners)  
**Dr. Dennis Post** (UvA / EY)

Content Taxation of digital assets (payment tokens, utility tokens and security tokens); direct tax and withholding tax aspects of NFTs.

Learning goals

- illustrate the different approaches to the taxation of digital assets including the identification of the taxable events
- discuss the relevance of NFTs for taxation and illustrate the direct tax and withholding tax implications

### 12:00 - 13:00 **Digital asset taxation (indirect)**

**Izzat-Begum B. Rajan** (Imani Partners)  
**Dr. Giorgio Beretta** (UvA)

Indirect taxation of digital assets (payment tokens, utility tokens, and security tokens)

- illustrate the VAT treatment of digital assets  
- discuss other indirect tax aspect of cryptocurrencies and NFTs

13:00 - 14:00 Lunch and networking

### 14:00 - 15:30 **Tax aspects of crypto staking and mining**

Lecturer **Dr. Claudio Cipollini** (UvA / RCLex)

Content Taxable events related to staking and mining; legal characterization of staking and mining; tax treatment in selected countries.

Learning goals

- understand the technical concepts of staking and mining
- identify the related taxable events
- define the legal characterization of staking and mining
- compare different country profiles for taxation

15:30 - 15:45 Break

### 15:45 - 17:30 **Tax reporting of digital assets**

Lecturers **Dion Seymour** (Andersen UK)  
**Dr Dennis Post** (EY / UvA)

Content The role of creator vs marketplace vs purchaser; introduction and understanding of the OECD CARF (Crypto-Asset Reporting Framework); introduction and understanding of the key aspects of the EU DAC8 Directive.

Learning goals

- illustrate the current tax reporting rules around digital assets across the globe
- discuss case studies and real-life examples

# Day 3 Web3 taxation

5 July 2024

## 9:00 - 10:00 Introduction to Web3

Lecturer **Dr Dennis Post** (EY / UvA)

Content The concept of Web3 and its evolution; key principles of Web3 technologies; the role of blockchain in Web3; impact of Web3 on industries and society

Learning goals

- illustrate the basic characteristics of Web3
- explain the differences with Web 1 and Web 2
- understand the impact of Web3 on taxation

## 10:00 - 11:45 Taxation of Decentralized Autonomous Organizations (DAOs)

Lecturers **Dr. Dennis Post** (UvA / EY)  
**Anna Vvedenskaya** (UvA)  
**Dr. Claudio Cipollini** (UvA / RCLex)

10:45 - 11:00 Break

Content Basic features of what a DAO is as a new business form; relevance of a legal wrapper for DAOs; potential international and domestic tax implications of a DAO; taxation of DAOs and country profiles

Learning goals

- identify basic implications of taxing a DAO
- compare different country profiles for DAO taxation
- discuss current challenges related to a DAO in the tax field

## 11:45 - 13:00 Taxation of the Metaverse

Lecturers **Raffaele Russo** (Chiomenti)  
**Dr Claudio Cipollini** (UvA / RCLex)

Content Understanding the metaverse; key technology concepts; overview of the main taxable events; direct tax implications (what to tax and where to tax)

Learning goals

- understand the concept of metaverse and explain its main technology aspects;
- illustrate the main taxable events;
- discuss the challenges around where to tax the metaverse

13:00 - 14:15 Lunch and networking

## 14:15 - 17:00 Case Study

Lecturers **Raffaele Russo** (Chiomenti)  
**Dr Dennis Post** (UvA / EY)  
**Dr Claudio Cipollini** (UvA / RCLex)

Content Presentation and group discussion of a real-life case study involving the combined use of blockchain technology, digital assets and DAOs.

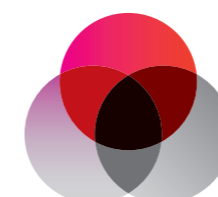
Learning goals

- apply the knowledge acquired during the course to real-life tax cases

17:00 - 18:00 Drinks in a nearby Cafe

## More information

<b>Dates</b>	<b>3-4-5 July 2024</b>
<b>Location</b>	<b>University of Amsterdam, Roeterseilandcampus</b> Building E - REC E0.14. Roetersstraat 11, 1018 WB Amsterdam
<b>Course responsible</b>	<b>Prof. Dr. D. Weber</b>
<b>Academic coordinators</b>	<b>Dr. D. Post</b> <b>Dr. C. Cipollini</b>
<b>Mode of instruction</b>	On-campus (Amsterdam Law School)
<b>Degree</b>	ACTL-Certificate indicating completion of the programme
<b>Language of instruction</b>	English
<b>Admission deadline</b>	31 May 2024
<b>Capacity</b>	max. 30 participants
<b>Tuition fee</b>	<p>The tuition fee for registering to the 2024 edition of the summer course <i>Blockchain, Digital assets, and Web3: taxation &amp; reporting</i> is € 1.750. Early-Bird: Participants who register for the programme by 31 March 2024 are entitled to a reduced tuition fee of € 1.250.</p> <p>Full time staff of universities or comparable academic institutions and Alumni of the Advanced Master's (LL.M.) in International Tax Law of the University of Amsterdam are entitled to a reduced tuition fee of € 500 (seats available are limited).</p> <p>The tuition fee is non-refundable. The fee includes:</p> <ul style="list-style-type: none"><li>• all course readings and materials</li><li>• lunch on class days</li><li>• drinks at the end of day 3</li><li>• access to university buildings and facilities</li><li>• an official certificate issued by the ACTL indicating completion of the program</li></ul>
<b>Who is this course for?</b>	Government officials, tax professionals, Ph.D. students, motivated scholars.
<b>PE points</b>	This course qualifies for 20 PE hours for the NOB Permanente educatie.
<b>How to apply</b>	<b>You can register via <a href="https://actl.uva.nl">actl.uva.nl</a> &gt; Education</b> Fill in the registration form on the ACTL website under Education/ Summer Course Blockchain, Web3, and Digital Assets: Taxation & Reporting, How to Apply.



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## The ACTL CPT-project

Whenever major economic or social changes occur, tax systems must follow suit. Working from the assumption that society is in the process of transitioning to a new economic model, accelerated by the corona crisis, the CPT project examines how tax systems can be designed and structured for a society based primarily on cashless payment methods, online platforms, and digital technologies, such as artificial intelligence and blockchain.

The goal of the CPT project is to arrive at concrete recommendations to help governments, businesses and NGOs address problems under current tax systems and/or introduce structural tax reforms. The project also aims at providing guidelines and/or minimum standards for the redesign of modern tax systems.

The CPT project is financed with university funding and funds provided by external stakeholders (i.e., businesses and governments) interested in supporting academic research to design fair, efficient and fraud-proof tax systems. Stakeholders participating and financing this project include the private commercial organizations **EY, Gatti Pavesi Bianchi Ludovici, Loyens & Loeff, Microsoft, Netflix, NEXI Group and &Partners**. Other organizations financing this initiative are the **Dutch Association of Tax Advisers (NOB)** and the **Dutch Branch of the International Fiscal Association (IFA)**.

Part of the CPT project is also financed by the **Netherlands legal research agenda 2019-2025 on Digital Legal Studies**. The project forms part of Amsterdam Law School 'Digital Transformation of Decision-Making' initiative. Funding is also provided by the **Erasmus+ program of the European Commission**.

Other (non-commercial) partners of the CPT project are the **University of Cape Town (UCT)** from South Africa, the **Chulalongkorn University** from Thailand and the **tax authority** of the Autonomous City of Buenos Aires (AGIP).

For more information about the CPT project and its partners, please visit its website <https://actl.uva.nl/cpt-project/cpt-project.html> and on LinkedIn: <https://www.linkedin.com/company/cpt-project?originalSubdomain=nl>

2024

## Information about the CPT Project's financing

### Private commercial organizations

**EY:** Supports the research related to the “tax challenges and opportunities raised by technology with particular attention to blockchain and artificial intelligence”.

**Gatti Pavesi Bianchi Ludovici:** Supports the research related to the “taxation of the digital economy, with particular attention to the tax treatment of online platforms”

**Loyens & Loeff:** Supports the research related to the “tax challenges and opportunities raised by technology with particular attention to trustworthy and responsible AI in the field of taxation”

**Netflix:** Supports the research related to the “taxation of the digital economy with special attention to developing countries (the African continent and South America)”

**NEXI Group:** Supports the research related to the “tax challenges and opportunities raised by cashless payments methods with particular attention to the role that fintech should play in current and prospective tax systems”

**The Dutch Association of Tax Advisers (NOB):** Supports the research related to the “influence of technology on taxpayers’ rights, with a special focus on Dutch procedural tax law”

### Government funding

**Netherlands legal research agenda 2019–25** on Digital Legal Studies

**Amsterdam Law School** ‘Digital Transformation of Decision-Making’ initiative.

### EU Funding

**Jean Monnet Action in the Field of Higher Education Modules:** supports the CPT-summer course on Platforms and Tax Information Reporting

### Other (non-financing) partners of the project

**University of Cape Town (UCT)** South Africa; which supports and collaborates with the general research program of the CPT Project but with a special attention to developing countries on the African continent

**Chulalongkorn University** Thailand; which supports and collaborates with the general research program of the CPT Project

**Tax authority of the Autonomous City of Buenos Aires (AGIP)** from Argentina, which supports and collaborates with the general research program of the CPT Project

For more information about the CPT project’s financing in 2021-2022, please visit <https://actl.uva.nl/cpt-project/partners/more-information-about-financing-cpt-project.html>

## The Amsterdam Law School

### The Amsterdam Law School was one of the five faculties that first formed the UvA in 1877

With over 5,000 students and more than 500 staff members, the Amsterdam Law School is one of the larger law faculties in the Netherlands. We educate lawyers who know how to apply the law effectively with the aim of making a real contribution to solving social problems.

The faculty was based at the Oudemanhuispoort for almost 140 years. As of the end of 2017, the Amsterdam Law School moved to building REC A on the Roeterseiland, located on and near the Roeterstraat in the centre of Amsterdam.

Amsterdam is the creative and cultural heart of the Netherlands, and a city with lots of opportunities and activities for students.

### The city of Amsterdam

#### Capital city with small-town feel

- Amsterdam is one of the world’s best places to live (ranked 12th in the 2018 Mercer’s Quality of Living Survey)
- The 2018 Global Power City Index ranks Amsterdam third in the EU and sixth globally for its comprehensive power to attract people, capital and enterprises
- Amsterdam is the safest city in Europe and 6th safest globally (Safe Cities Index 2017)

The city is also ranked first for English proficiency, third for innovation and sixth for happiness. Find out more in I Amsterdam’s overview of international surveys.

#### A cosy feel

With some 800,000 inhabitants, Amsterdam has all the advantages of a major metropolitan centre while retaining a cosy, small-scale feel.

Amsterdam boasts beautiful architecture and over 150 canals, lending the city its characteristic shape and atmosphere. It is full of museums, art galleries, theatres, concert halls and many lovely parks, which serve as the inhabitants’ gardens in summer. The city is home to world famous music, opera, theatre and dance companies, as well as many internationally recognised visual artists.

