Report for the Japan Society of the Promotion of Science: JSPS Invitation Fellowship Program for Research in Japan (short term)

2 November 2014-22 November 2014

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1 Thank you

First of all: many thanks to the Japan Society for the Promotion of Science (JSPS) for awarding me the short term fellowship. It was a very rewarding experience through which I have met many Japanese researchers, I have learned a lot about research in Japan and about the history and culture of Japan, made new contacts and renewed old acquaintances and was able to make plans for future research with Japanese colleagues. I am also very grateful to dr. Yuka Shiba for applying for the JSPS grant and organising my stay in Japan, especially the second part which was more focused on tax law and to prof. Goto for organising the first part which was more focused on economics. This really brought together my research interests and gave me the opportunity to talk about tax in an interdisciplinary way. Furthermore I am grateful to all academics who invited me to their universities and in their classrooms and everybody who took the time to exchange views with me. It really was an invaluable experience and I definitely hope to come back to Japan for another research visit!
2 Outline of academic activities

2.1 Lectures

2.2.1 Kyoto University, Graduate School of Economics

Lecture 'Fairness & taxation in a globalised world' (no. 1 in the annex) and intense discussion on the Japanese view on tax competition, organised by prof. Morotomi. Both the lecture and discussion were in English as Japanese translations were not necessary. When discussing tax competition, we had a very interesting conversation on the intention of the current Japanese government to reduce the corporate income tax rate. Currently the rate is 36%, the highest in the world after the US. At the same time the tax base would be broadened.

When discussing privacy and exchange of information and the use of the tax number for other government purposes than tax it was pointed out that there are many worries in Japan whether information would not be used for other purposes and whether the information would be safe. This discussion gave many insights on the Japanese view on tax competition and exchange of information. We also discussed the Korean case of tax evasion by Samsung in relation to reputational risk issues, where there was not a big uproar of the public. We concluded that this might be a different case as it was a Korean and not a foreign company, the company is very important for employment and the evasion was of a Korean inheritance tax and did not get the attention of international NGOs and media.

2.2.2 Kansai University, Faculty of Commerce

Lecture 'Fairness & taxation in a globalised world' (no. 1 in the annex) organised by prof. Tsuruta (professor of public finance) and dr. Tsuji (associate professor of tax law). Lecture and discussion in English with translations in Japanese by prof. Goto. This lecture was very interesting, as the attendants came both from public finance and tax law. There were professors of three different faculties: Commerce, Law and Economics. Also dr Shiba joined the presentation and the discussions.

Many master students in tax law attended, some of them were working on master thesis which linked to the theme of my lecture. They had very interesting questions. It also showed how fruitful it is when public finance and tax law academics work...
together in one faculty. There was a high attendance of this lecture: extra chairs and extra copies of the hand out had to be found. I was very honoured that the vice president, prof. Hayashi (Faculty of Economics), attended the lecture.

After the lecture we had a very nice dinner with prof. Tsuruta, prof. Urahigashi (professor of tax law, Faculty of Law), dr. Tsuji and two master students in tax law. During this dinner we continued our discussions and broadened these to sales tax and VAT. In the Netherlands we have a reduced rate of 6% next to the general rate of 21%. Japan currently only has one rate of 8%. This will be increased to 10%. It is discussed whether a reduced rate should be introduced. Both from a Japanese view and from a Dutch view we concluded that a reduced VAT/sales tax rate is not an effective instrument. The example of Denmark with only one rate of 25% shows that this is possible. In the Netherlands, many academics are in favor of abolishing the reduced rate as it is very costly, ineffective and leading to complexity (the abolishment should be accompanied by a reduction in wage tax to stimulate employment). In this respect we discussed the case law about art in the VAT and the different treatment of printed books (reduced rate) and e-books (regular rate). However, it is politically very difficult to abolish the reduced rate. We also discussed taxes and insurances, a research theme of dr. Tsuji. As dr. Tsuji does research in Europe as well, we will try to meet again when she is in Amsterdam for research at the IBFD. This lecture, therefore, led to very interesting research contacts and was also very valuable for that reason.

2.2.3 Doshisha University, Faculty of Economics

Prof. Yagi of Doshisha University was host to the lecture, 'Tax incentives for the creative industries' (no. 2 in the annex). The lecture was attended by master students of economics. We had an in depth discussion especially on tax incentives for the film industry and where the Dutch tax incentives failed. We also discussed the reduced VAT rate and came, again, to the conclusion that is not efficient for Japan to introduce such reduced rate in the sales tax given the complexity it leads to and the problems we have in Europe. We also discussed the low price elasticity of visits to performing arts as evidenced by Dutch empirical research. This indicated that it is more efficient to give a targeted direct subsidies to certain low income groups to incentivise their visits to performing arts than giving a broad untargeted tax incentive by applying a reduced VAT/Sales tax rate.

After the lecture prof. Goto and I had a walk in the Kyoto imperial park, after which we had a very nice and typical Japanese dinner with prof. Yagi during which we could discuss further.
2.2.4 Setsunan University, Faculty of Economics: lecture for academic staff

Prof Goto and dr. Tanaka had made it possible to deliver the lecture 'The attractiveness of the Netherlands for Japanese investors: a focus on tax' (no. 3 in the annex) to their colleagues at Setsunan University (in English without translations). It was very nice to speak to dr. Tanaka again. I first met him at a conference in Vienna and later during an earlier research trip to Japan when he was pursuing his Phd at Kyoto University. Researchers from the Faculty of Economics attended the lecture and even a professor from the Faculty of Engineering who was interested in the lecture. I was very honored that the Dean of the Faculty of Economics who is also Vice President of the university, prof. dr. Yagi attended the lecture. He explained that for the university, which just celebrated its 40th anniversary, internationalisation is very important and that my lecture was a contribution to that object. There were many questions and we had a lively discussion after the lecture. Prof. Kubo, who is specialised in EU economics, had very interesting questions on EU tax competition and the Common Consolidated Corporate Tax Base (CCCTB) project and more general questions on the EU, for example the reason for the negative answer in the Netherlands in the 2004 EU referendum and the difference between Belgium and the Netherlands. Prof. Goto asked questions about municipal and provincial taxes in relation to national taxes in the Netherlands. Dr. Nakata, who lived in Canada for 7 years, had interesting questions about the EU, also after the lecture. It was a very interesting experience and I enjoyed the lecture very much.

2.2.5 Setsunan University, Faculty of Economics: lecture for second year undergraduate students

Prof Goto and dr. Tanaka had joined their second year undergraduate seminar students of the Faculty of Economics of Setsunan University for whom I gave the lecture 'Japanese culture in the Netherlands' (no. 4 in the annex). Prof. Goto kindly provided translations in Japanese for the students. I had the impression that several students could understand English, but they were too shy to ask questions in English. It was a very nice experience. Setsunan University has very good facilities and very new lecture rooms. The students
raised many questions over the Netherlands. Afterward we had some drinks and snacks with the students. Prof. Goto offered me a very nice dinner in a typical Japanese restaurant in Gijon that evening during which we could further discuss the lecture and our plans for a joint book proposal.

2.2.6 Meikai University, Faculty of real estate science: lecture for academic staff

Before, dr. Shiba was an associate professor at Meikai University, Faculty of Real Estate Science. Her former colleague, prof. dr. Maekawa had kindly organised a lecture for me: 'Housing taxation in the Netherlands' (no. 5 in the annex). It was a very interesting experience as many researchers joined with different backgrounds: economics, social science, architecture, mathematics. We had very interesting discussions during and after the lecture. Prof. Maekawa had even prepared some discussion slides. The lecture was in English, with dr Shiba providing for some Japanese translations and explanations. Before the lecture I had an interesting conversation with prof. dr. Ogawa, a professor of civil law who had been in Germany (München) for one year. He, dr. Shiba an two other researchers had just been rewarded a research grant for their research on open data. Many researchers had spent some time abroad, mainly in Cambridge. I also had a very interesting conversation with prof. em. dr. Hayashi about educational systems. Prof. Hayashi knew that various faculties of the Erasmus University Rotterdam (including the School of Law) had changed to Problem Based Learning. We talked about my positive experience with the system. He was positive about the system, but doubted whether it would be possible to introduce it in Japan. After the lecture we had a very nice shinsuke dinner with several researchers during which we discussed further in a very informal atmosphere. It is really interesting that researchers from different fields work together in this faculty. I can imagine that this leads to interesting research results.

2.2.7 Tokoha University, Conference Cultural heritage and landscapes as local resources

Dr. Shiba had organised the conference ‘Cultural heritage and landscapes as local resources’. The programme in which I participated was as follows:

14:00-14:10 Opening Remarks (Mr. Saito, Secretary General Fujinokuni University Consortium)
14:10 - 14:45 lecture 1. "How tax legislation can support private patronage of the arts and cultural heritage" (Erasmus University Rotterdam, Professor, Faculty of Law) (no. 6 in the annex)
14:45 - 15:15 lecture 2. "Cultural value of World Cultural Heritage Miho and Mount Fuji, from Izusan in Atami and Boso Peninsula" Mr. Tasuku Suzuki (Chiba prefecture, land development division)
15:15 - 15:45 lecture 3. "Shizuoka of regional resources and accessibility: the use of open data" Mr. Yasuharu Oishi (Shizuoka open data Promotion Council Secretary General, Open Data Shizuoka, CEO of AALT inc.)
15:45 - 16:00 Coffee Break

The audience was very diverse both in age and in background: university professors and students, company people (for example from Shimano, a company which has a subsidiary in the Netherlands (Nunspeet)) and people from the local government. It was a very interesting conference, especially as Mr. Imagawa of the Shizuoka City Government did not only provide for translations in Japanese of my lecture, but also translated the other lectures for me, so that I could really participate in this part of this interesting conference.

A very innovative concept used in this conference was that the results were not summarized in a written paper, but in drawings made by students of the arts faculty: a visual recording. I would really like to introduce this innovation in Dutch conferences. In my view it captures the results much better for a wider audience than a written report. In one view the most important parts of the conference are clear. Furthermore it is a good memory support for the notes participants made themselves.

The evening of the conference, we had a very nice and informal party during which it was possible
to discuss further and to get to know more people. It was a very well organised conference.

2.2.8 Meiji Gakuin University, Faculty of Economics, Department of Business Administration: lecture for master students

Prof. dr. Nishiyama of Meiji Gakuin University, Faculty of Economics, Department of Business Administration had very kindly organised a lecture for master students, ‘Fairness & taxation in a globalised world’ (no. 1 in the annex), in English. Only every now and then dr. Shiba gave some explanation in Japanese, but the students spoke English with me and did not need a full translation. Prof. Nishiyama had given the students the assignment to prepare questions for after the lecture. This was a very good idea as it really helped the discussion, especially as the students had prepared very good questions. One of the students aimed to become employed by the Japanese tax authority. This was very interesting, especially as I then learned that dr. Shiba also started her career at the tax authority. In Japan, this means a four year additional educational trajectory paid for by the government. After the lecture we had lunch with the students and as we were all female we discussed about female career making in the Netherlands and Japan. It was very nice that dr. Shiba, who often does joint research projects with prof. Nishiyama introduced us. I really hope to meet and work with prof. Nishiyama in the future as well.

2.2.9 Tokoha University, Faculty of Law: lecture for second year undergraduate students

Dr. Shiba allowed me to give a guest lecture to her second year undergraduate students. Also the students of prof. dr. Kajimura, a professor of family law, and prof Kajimura himself joined the lecture. The title of the lecture was Japanese culture in the Netherlands (no. 4 in the annex). The lecture was in English, but dr. Shiba provided for translations in Japanese. I gave the lecture in a very beautiful new classroom, with very good audiovisual facilities. I could show some short films without any troubles. It was very nice that dr. Shiba had given the students the assignment to prepare information on several topics, such as who was Yaesu-san and who was Von Siebold. Some of the students presented their findings (in Japanese). I gave little prizes (a key ring from my faculty) to the students who presented information or who asked a question or added a comment. This was very nice, as it resulted in more two way communication with the students.
2.2.10 Tokoha University, Faculty of Law: lecture for first year undergraduate students

Dr. Shiba and prof. dr. Kajimura had also joined their first year undergraduate students for a guest lecture. The title of my lecture was Japanese culture in the Netherlands (no. 4 in the annex). The lecture was in English, but dr. Shiba provided for translations in Japanese. Again, dr. Shiba had given the students assignments and some of the students presented their findings. Again I rewarded these students with the key ring of my faculty as a prize. The students were shyer than the second year students, but still had very nice remarks. Prof. Kajimura, being a professor of family law, asked an interesting question about divorce law and assignment of the children in the Netherlands.

2.2.11 Tokoha University, Faculty of Law: lecture for first year undergraduate students

Dr. Shiba and prof. dr. Tanaka had provided me with the opportunity to give a lecture to their first year undergraduate students. The title of the lecture was: Tax and social security in the Netherlands (no. 7. in the annex). The lecture was in English, but dr. Shiba provided for translations in Japanese. Again, dr. Shiba had given assignments to the students. This was very nice as the students raised interesting questions on the theme. In this lecture we made a comparison between Japan and the Netherlands: the tax and social security burden is much higher in the Netherlands than in Japan.

2.2 Formal meetings

2.2.1 Meeting with prof. dr. Morinobu and Ms. Fujiiwara of the Tokyo Foundation

Prof. dr. Morinobu of the Law School of Chio University had invited us to the Tokyo Foundation to discuss the Dutch income tax system. Prof. Morinobu is a senior fellow of the Tokyo Foundation, an independent Japanese think tank. He has been engaged in several policy research projects of the Tokyo Foundation on income tax reforms. Currently, he is involved in the tax reform policy research project. For that reason he was interested in the Dutch tax reform of 2001. We discussed the taxation of married couples in the Netherlands and the historic struggles in the Netherlands on that topic. Prof. Morinobu gave me the September 2014 issue of the Tokyo Foundation journal Japan
Perspectives in which his very interesting paper on this topic was published 'Rethinking Personal Tax Exemptions to Mobilize Women's Power'. It was very interesting for me to read how similar the Japanese discussions on how to tax married couples are to the discussions we have (had) in the Netherlands, even though our tax systems are different. It was also interesting to learn from prof. Morinobu that many tax academics in law schools are of the opinion that a tax credit would be unconstitutional as - opposite to a base exemption of income - it would breach the principle of allowing citizens to have a minimal part of their income untaxed. Both prof. Morinobi and I did not agree with this view. In the Netherlands constitutional issues were never raised when we switched from income deductions only to a mixed system of income deductions and tax credits. Partly because laws cannot be tested against the constitutions by Dutch judges (the Netherlands is one of the few western countries without a constitutional court) and second because a tax credit also allows for a basic tax free income, it just takes another form.

After this very interesting and animated discussion, Ms Fujiwara, Public Communications Officer of the Tokyo Foundation informed me about the foundation. The foundation has a small staff of 40 people which are all bilingual (mostly English is the second language). Ms Fujiwara works for the foundation since September 2014. She worked for the Prime Minister's Office before. The Tokyo Foundation was funded in 1997. It is the biggest and one of the most influential independent policy think tanks in Japan. The Tokyo Foundation is a public interest incorporated foundation established in accordance with the collective will of the Nippon Foundation and Japan's boat race industry with grants provided from boat-racing profits. It has three missions and teams: (1) policy research (10 full time researchers and 40 senior external research fellows such as prof. Morinobu), periodically policy proposals are published on the website and in the journal; (2) people (leadership programmes and funding programmes) and (3) society. As tax issues are very important for Japan, an aging society, policy research on tax issues is deemed to be very important by the foundation. I really hope to be able to continue these interesting discussions with prof. Morinobu and his colleagues on tax reforms in the Netherlands and Japan as there seems to be much common ground.

2.2.2 Attend lecture of prof. dr. Wiman of Upsala University Sweden on BEPS at Meiji University Tokyo
Dr. Matsubara of Meiji University had organised a lecture of prof. dr. Wiman of Upsala University and had asked dr Shiba and me to attend his lecture 'Proposal for a Swedish tax reform'. It was very nice to meet prof. Wiman in Japan this time instead of in Europe. It was also nice to meet prof. Nishiyama again and to meet some other law professors. Prof. Wimans' lecture was very interesting as we could also discuss the similarities between Sweden and the Netherlands. A very important point which I could clear with the attending Japanese tax professors was that where in 2007 the Japanese CFC rules applied at a foreign tax rate of 25%, this is now lowered to 20%. It is calculated on the Japanese tax base. This is very important information for the Netherlands as the Netherlands does not want its tax rate to be too low for the Japanese CFC rules. The Swedish tax reform might not meet these CFC rules.

2.3 Informal meetings

2.3.1 Dinner with civil servants of Shizuoka City Government

On my first evening in Shizuoka, dr. Shiba had organised a dinner with Mr. Imagawa, Mr. Inaba and Mr. Yamada of the Shizuoka City Government. It was a very nice evening. We discussed differences in local taxes in Japan and the Netherlands. In the Netherlands, local governments only have a very limited tax authority and they may not levy taxes based on income. In Japan, municipalities may levy many more taxes which are mainly based on income. Furthermore, the dinner was also a cultural experience as we enjoyed a very typical style of Japanese dinner: wataminchi.

2.3.2 Lunch with four former master students of Kokugauin Law School

Dr. Shiba had arranged a lunch with four of her former master students of Kokugauin Law School. Two of these students already had much experience in practice (one was a retired employer of a pharmaceutical company, the other the president of a real estate company) the other students were young students who were still looking for a job after their graduation in March. Currently, it is very difficult for graduates of law schools to find a job in Japanese legal practice. As a result of this and of the decrease of the amount of young people in
Japan, law schools attract less students than before. Some law schools, for example the law school of Shizuoka University, a national university, had to close. Also Kokugain Law School did not have so many master students this year: only 10.

2.3.3 Coffee with Nick Wall, partner Allen & Overy Gaikokuho Kyodo Jigyo Horitsu Jimusho

After nearly three weeks of visiting Japanese law schools hearing about their difficulties and the difficulties of their graduates to find a job in the field of law, it was really interesting to exchange views with a practitioner. I am very grateful that Nick Wall, partner of Allen & Overy Gaikokuho Kyodo Jigyo Horitsu Jimusho took time to have a coffee with me in the café in the Ropongi Hills Mori Tower where Allen & Overy has its office on the 38th floor. Mr. Wall has been in Japan for almost 20 years and finished his undergraduate law course here. He confirmed that it is not only difficult to pass the exam for lawyers (currently less than 30% passes), but that even for those who pass the exam, there are not enough jobs. This is of course very frustrating for students who had to spend much money on a 2 year (for those with a bachelor degree in law) or 3 year (for those with another bachelor degree) master course. The big Japanese law firms only hire a handful of new trainees every year, this is almost nothing compared with the UK magic circle firms in London or even the big Dutch law firms in Amsterdam. Furthermore, the 'high street' lawyers activities, which provide work for many lawyers in the UK and the Netherlands, such as the drafting of documents to set up a business, are not done by lawyers in Japan but by a separate group of people with their own qualification. Also divorces are usually carried out without a lawyer in Japan: if both parties agree it is a mere signing of documents for which no lawyer is needed and if there is a dispute, this is usually settled by court mediation for which no lawyer is needed either. Lawyers, therefore, do high quality work for which not as many people are needed as graduate from law schools. Also Allen & Overy does not hire graduates from law schools, but only experienced Japanese lawyers (6 lawyers are Japanese, the other 17 have different qualifications) as the group is too small to allow for training of graduates. In any case, Allen & Overy focuses on international mergers and acquisitions and infrastructure projects and is not involved in practicing pure domestic Japanese law. Mr. Wall explained that as the Japanese market will decrease in the future, some say that the population will be reduced to 2/3s of the current number, and Japanese companies, which focus more on revenue than on profit and have rather passive shareholders, have ready cash to invest, Japanese companies are looking for possibilities to invest their cash abroad instead of in the decreasing home market. Because of this decreasing Japanese market he did not expect much from the idea that foreign investments in Japan could be increased by reducing the corporate income tax rate. Currently, about 30% of Japanese outbound investments are done in Europe. Acquisitions in Europe are regarded to be easier than in Asia, because Europe is much
more used to buying and selling of companies, for example because of private equity investors than Asia where most companies are family owned and because in (northern) Europe, acquisitions follow the legal rules and there is more certainty than in other Asian countries where unwritten rules may apply and circumventions of written law and bribes may be necessary. Mr Wall mentioned that the Japanese CFC rules, which entail that the effective foreign tax rate must at least be 20% of the tax base calculated according to Japanese rules, are very important in investment decisions of Japanese companies. In relation to investments in Luxembourg this can, for example, be an issue. For the Netherlands, the Japanese CFC rules are very important in setting the tax rate.

Mr Wall explained that an international law firm like Allen & Overy is perfectly positioned to give legal assistance in international investments. Not only because of the international network, but also because of the fact that Japanese law firms do not have many high level international lawyers. One of the reasons for this is that foreigners cannot be partner of a Japanese law firm. This is also the reason why Allen & Overy has a different legal form than Japanese law firms, which is specific for foreign law firms: Gaikokuho Kyodo Jigyo Horitsu Jimusho. Another reason is a cultural issue, where it is a common view that foreigners are expected to be only temporarily in Japan. I also observed this at the universities I visited: there do not seem to be many European or American professors at the law faculties and law schools I visited. I did meet Korean professors. Another reason Mr. Wall gave was that it is difficult to work in Japan if you do not speak and write Japanese as everything, from forms to conversations is in Japanese. I observed this at the universities as well: the foreign students and the Korean professors I met all spoke Japanese. This is different at the Erasmus School of Law where we have several foreign professors who do not speak Dutch or do not feel comfortable speaking Dutch and where some faculty meetings are held in English as a courtesy to those professors. Mr. Wall underlined the importance that because of the necessity of outbound investments given the decreasing home market, internationalization is very important, also for universities, as is English as a second language.

Mr Wall ended our meeting by remarking that he would be available for a guest lecture on the legal business of an international law firm in Tokyo. I promised him to inform my Japanese contacts about this kind offer. For me it was a very interesting meeting with a view from outside the academia.

2.4 Cultural experiences

2.4.1 Visit to Mitsui family second house renovation site

Prof Goto had arranged a very special visit to the Mitsui family second house renovation site. Ms. Misato Oku, Director General for Culture and Arts Section of Culture and Citizens Affairs Bureau of Kyoto, Mr. Yukitaka Hasegawa, a specialist of cultural heritage and Mr. Yuichi Ishikawa who was also involved in the renovation, kindly
gave us a full story and tour of the renovation. The house is very special. In 1899 the Mitsui family bought the land and built the family shrine. In 1925 the main building, a house which was originally built in 1880 in the Sanjo area was transferred to the site. The tea ceremony house is even older as it dates from 1868. During the renovation, wooden panels were found in which the building year and the name of the carpenter (at that time there were no architects in Japan, so carpenters were very important) were mentioned. After World War II the US made rich families pay high taxes to the nation. The Mitsui family paid this tax with this house which became a court. After the court had moved to another building, the main judge lived in the house. Until 6 years ago, the house was thus privately inhabited. The renovation of the house is done with much care and respect. The scaffolding which is used for the renovation of the roof is a piece of art in itself. The renovation is expected to be finished in two years. In my view this is also a very special project as various governments work together very well: the house is owned by the national government, cared for by the Kyoto city government (we were guided through the house by civil servants of the Kyoto city government) and renovated by the Kyoto prefecture government.

2.4.2 Dutch traces in Nagasaki and Dejima and the 19th century

2.4.2.1 Dejima

A cultural highlight was the visit with prof. Goto to Nagasaki. In several of my lectures I refer to the old relationship between Japan and the Netherlands which is still lasting both economically and culturally. For me it was wonderful to see the foundation and beginning of this relationship in Dejima and the fantastic museums in Dejima telling the tale of this relationship. It was very insightful to experience in Dejima how small the Island where the Dutch trading post was situated was. Also, one can imagine that the Japanese people must have regarded the Dutch as being very uncivilized. Even now prof. Goto was appalled by the fact that, as could be seen on the old prints which were displayed, the Dutch walked on the tatami mats in the Dejima houses with their shoes on. There were many exhibited articles which were in Dutch and also the Dejima museum provided an information leaflet in Dutch. It was amazing to find this little corner of Dutch history so far away on the other side of the world. The knowledge was deepened further in the Nagasaki Museum of History and Culture. It was a pity that much of the information in this museum was in Japanese only, but here again, I was able to read the original texts of the Dutch books which
were presented in the exhibition. In the Nagasaki Traditional Performing Arts Museum at the end of Glover Garden (see below), we saw a film of Nagasaki’s Kunchi Matsuri in which also floats in the form of Dutch boats played a role. One of the floats representing a Dutch boat was displayed in the museum. This made it clear that Nagasaki does not forget its historical links with the Netherlands. This was also made illustrated by several sweets which were for sale in Nagasaki, for example the Nagasaki Holland Sable and the Castella Rusk (a cake of Portuguese origin, but a package with a Dutch boat). We had dinner in Nagasaki Dejima Warf, where we could sit outside, watch the sea and an old sailing ship, imagining the view the Dutch of Dejima had in their time.

2.4.2.2 Ph. F. van Siebold

Another theme included in my lectures and which I wanted to explore in the Nagasaki visit was the Japanese life of Ph. F. von Siebold (1796-1866). Von Siebold was a German born doctor employed by the Dutch Verenigde Oost Indische Compagnie sent to Japan not only to practice medicine, but also to study Japan. He taught western medicine to Japanese scholars. He married a Japanese wife and their daughter became the first Japanese woman to practice western medicine. He was expelled from Japan for possessing Japanese maps and was only allowed back 30 years later after Japan was opened to the world.

During my preparation for the JSPS fellowship I had already renewed by knowledge of his life and I had visited the Sieboldhuis in Leiden. This museum has an interesting permanent exhibition of the objects Von Siebold collected in Japan. The museum was so kind as to give me information brochures on that museum for the Japanese students I was going to deliver lectures to in which I referred to Von Siebold. It was very interesting to visit the Nagasaki Siebold Memorial Museum, which had a wealth of information on his life in Japan, his family and the influence he had. The museum had many documents written in Dutch again, which made the visit very rewarding. Even during the Japanese introduction video, parts were in Dutch with subtitles in Japanese. However, it seemed that this introduction video was rather old. It did not seem to refer to the current permanent exhibition in the Leiden Sieboldhuis whereas this might be of interest for Japanese tourists who are planning to visit the Netherlands and want to know more about Von Siebold. There might be interesting opportunities for the Leiden and the Nagasaki museum to work together and to exchange objects, introductory films (the Leiden museum has a very nice and modern film which gives a short summary of Von Siebold’s life) and information.
2.4.2.3 Westerners after opening in the second half of the 19th century

It was very interesting to learn that after Japan was opened to western countries after 1858, Nagasaki remained very important as a point of contact between Japan and the rest of the world. We visited the *Hollanders* (Dutch) slope and *Glover Garden* where the Europeans (at first all western people were called Dutch, hence, Dutch slopes) lived after the opening of Japan. It was remarkable how many wooden western houses were preserved. *Glover garden* gave a very interesting insight in how the Europeans lived and conducted business in Japan between 1856 and 1942. We were very lucky as we visited *Glover garden* at the end of the day when there were lights everywhere in the garden, giving it a fairy tale appearance. Furthermore we had lunch in one of the oldest western style restaurants in Nagasaki (established 1930), the Nagasaki Museum of History and Culture restaurant Ginrei, where we had a typical Nagasaki western style dish together with a former student of prof. Goto who is now working for the tourism department of the Nagasaki Prefecture Government. With him we also discussed about tourism in Nagasaki and what attracts foreigners to Japan.

2.4.2.3 Other cultural experiences in Nagasaki: Christian culture, Chinese culture and tea ceremony

While the focus of our visit to Nagasaki was on Dutch history, Nagasaki also gave us other cultural experiences. Next to the Dutch, only the Chinese were allowed to trade with Japan until 1858. The Chinese also had their own settlement, but seemed to be less confined than the Dutch. This might have to do with religious reasons. We visited the current China town of Nagasaki and had lunch there.

Another interesting aspect of Nagasaki history is the old Christian community. After the Portuguese and Spanish arrived in Japan, they started missionary activities and several inhabitants of Nagasaki became Christians. Then the Shogun banned Christianity and shut Japan. In 1597, 26 Christians were crucified in Nagasaki. However, after freedom of religion was installed in Japan in the 19th century, it turned out that there were still several Japanese Christians. Still, there are many Christian churches in Nagasaki, Nagasaki aims to make these world heritage (we saw advertisements for that both in the bus from the airport and in *Glover Garden*). We saw a beautiful lit *Oura Catholic Church*, the oldest (1865) Japanese church. The links with Portugal can also be found in sweets which are sold in Nagasaki, for example the famous *Castella*, a very nice cake which we tasted several times.
Finally we were lucky that during our visit to the Nagasaki Museum of History and Culture several tea ceremonies were conducted. It was very interesting to witness this very old tradition.

2.4.2.4 Concluding observation of Nagasaki visit

For a very sad part of Nagasaki history we did not have time to explore, but it should be mentioned: the atomic bomb which hit Nagasaki in 1945. As we focussed on the history of Nagasaki before the Second World War, we did not have time to include that in our 2-day programme. This omission is definitely a reason to come back to this very interesting city.

I have learned a lot during this visit to Nagasaki. The lectures which referred to the history (no. 3 and 8 in the annex) I gave in the two weeks after this Nagasaki visit benefitted much from this visit, which meant that I could give a much better description than if it would have been based on book knowledge only. It was a wonderful experience.

2.4.3 Visits to Kyoto temples

During my stay in Kyoto I had the opportunity to visit several temples, shrines and surrounding areas: Yasaka-jinja Shrine, Kodaiji Temple, Maruyama Park, Nanzenji Temple, Eikan-do (Zenrinji Temple), Ginkakuji (Jishoji) Temple, the Philosophers walk, Myoshinji Temple, Ninnaji Temple, Ryoanji Temple and Kinkakuji (Rokuonji) Temple. It showed once again how rich the cultural heritage of Japan and more specifically, Kyoto is. Finding funding to maintain all these buildings and parks is very important.

2.4.4 Visit to Kokugakuin University Museum

I was very kindly received in Kokugakuin University Museum by dr. Kato, curator and lecturer. She guided me through the archeological section of the museum. The collection includes beautiful and important artifacts. Also excavations of second year students were on display. In the Shinto section of the museum I was guided by two second year undergraduate students (one majored in law, the other in international relations), who did a very good job. They are volunteers who perform guided tours once every month. This was their first day in the museum. Through the exhibition I learned a lot about Japanese culture and religion.

2.4.5 Stay in Nihondaira Hotel with view on Mount Fuji

Dr Shiba had given me much written information on the important kami status Mount Fuji has in Japan. As rice is very important for Japanese people, many facts in Japanese society and culture can be explained from this importance of rice. As mountains provide the water necessary for growing rice, mountains and especially Mount Fuji have been very important since the old days. That is why Mount Fuji is a very important kami. In the
three trips I made to Japan before, the weather was never good enough to see Mount Fuji. This time I was really lucky. Not only did I see Mount Fuji from the Shinkansen, I also had time to admire the mountain from the beautiful Nihondaira hotel in which Dr. Shiba had arranged me to stay one night. It was a very special experience.

2.4.6 Visit to Mount Kuno Toshogu Shrine with Mr. Suzuki, witnessing shichi-go-san

Dr. Shiba had kindly arranged that Mr. Suzuki of the land development division of Chiba prefecture, but also a scholar of Japanese history and culture, took me for an excursion to Kuno-zan Toshogu Shrine. This is a very important shrine amongst the Toshogu shrines in Japan (most importantly the Shrine in Nikko, which I visited in 2003), that enshrine the first Shogun, Ieyasu Tokugawa. We went there by the Nihondaira Ropeway, which was already a special experience. As we went early in the morning it was still very quiet, which gave a special atmosphere. Mr. Suzuki, explained many things to me. At a certain moment a monk also helped to explain certain aspects of one of the buildings. Furthermore, we had the special experience of drinking macha outside. Also we witnessed a very special ceremony held on 15 November for 3, 5 and 7 year old Japanese children: shichi-go-san. A brother of 5 and his sister of 3 celebrated this in the Mount Kuno Toshogu Shrine together with their parents and grandparents (their mother who was wearing a beautiful kimono happily explained everything to me, including her own age as a joke). Later many more children followed. We also visited the excellent museum with many belongings of Shogun Ieyasu Tokugawa and his successors, including a clock which was made in Spain in the 16th century. From the viewing point we could see many greenhouses. Mr. Suzuki explained to me that these grow strawberries which are sold from December/January onwards and which are really delicious (unfortunately I was too early to try).

2.4.7 Sumpu Castle Park excursion with Mrs. Tanaka and Mr. Suzuki
Mrs. Tanaka, the wife of prof. dr. Tanaka, a colleague of dr. Shiba at Tokoha University, gave me and Mr. Suzuki a guided tour in the Sumpu Castle Park in Shizuoka, the former grounds of the castle were Shogun leyasu Tokugawa retired. She also explained about the tangerine tree which was planted by Shogun Ieyasu Tokugawa and of which the first harvest is presented to the Emperor every year. Mrs. Tanaka is a scholar and teacher of English and speaks the language fluently. Furthermore, she had been in Germany (Frankfurt) with her husband for quite some time and has therefore traveled quite a lot in Europe. Afterwards we had a typical eel dinner in one of Shizuoka’s restaurants.

2.4.8 Bicycle tour in Shizuoka and Shimizu

As a part of the conference Cultural heritage and landscapes as local resources, Mr. Yutaka Murai had organized a very special bicycle tour in which many participants of the conference participated. Early on Sunday morning we all gathered in a park. Dr. Shiba’s son had lent me his bicycle. Mrs. Tanaka kindly provided for translations during the whole day. First we cycled in the centre of Shizuoka and stopped at different places of historical importance where we were given explanations. We had the typical Shizuoka oden in the oldest restaurant selling this snack in Shizuoka (since 1945) which was still in the hands of the same family.

Then we and our bicycles went by a special train on the Shizutetsu line to Shimizu where we were welcomed by a delegation including Mr. Tanabe, the major of Shizuoka City. Mr. Tanabe spoke about the importance of bicycles and bicycle lanes in Shizuoka. After that I was presented to him by dr. Shiba and I could have a short talk with the mayor and present him a pen of the Erasmus School of Law.

We then cycled in the port of Shimizu and were told interesting facts about its history. We had a pick-nick in the yard of a 130 year old warehouse (Kura in Japanese). The owner of the warehouse had made a little museum and explained us all about the business. Then we cycled back to the station and a special train brought us back to Shizuoka. It was a very nice experience, especially for a Dutch citizen who is used to cycling every day, both in Amsterdam and Rotterdam and taking her folding bicycle with her on the train.
2.4.9 Tour at Meiji Gakuin University and its organs

Professor Nishiyama of Meiji Gakuin University gave us a tour around the university campus. Meiji Gakuin University is a very special university. It was founded in 1863 by the American Christian missionary and medical doctor James Curtis Hepburn and his wife Clara. It is, therefore, not only an old university, it is also a Christian university. There are still several old buildings on the campus: the wooden Imbrie Hall, a wooden house (nationally designated Important Cultural Property) in colonial style which reminded of the houses at Glover Garden in Nagasaki, the Meiji Gakuin Chapel and the Memorial Hall and its chapel. The two chapels each have an organ. Professor Nishiyama takes organ lessons at the organ of the Meiji Gakuin Chapel. That organ is actually a Dutch organ. We were very lucky as the organ professor was just starting a lesson. I could speak with her for a short while. She has studied at the Amsterdam conservatory and could speak Dutch very well: we had our conversation in Dutch! Then we could enjoy her student playing the organ. When we entered the Memorial Hall chapel, another student was just starting to practice, so we could hear that organ as well. He was a student of French literature and played a piece of a French composer. It was very special: being in the middle of bustling Tokyo enjoying the peace and calmness of Christian chapels while enjoying beautiful organ music. It really was a special gift from prof. Nishiyama and Meiji Gakuin University to us.

2.4.10 The Ministry of Justice Museum Message Gallery, Tokyo

Dr. Shiba and I visited the Ministry of Justice Museum Message Gallery in Tokyo. This museum is located in a monumental red brick 1895 building (nationally designated Important Cultural Property), which still serves as the Ministry of Justice. The fact that citizens are allowed to enter the Ministry to visit the museum shows that Japan still is a very safe country. In most countries, including the Netherlands, such government buildings are, unfortunately, not open for the public for safety reasons. It was a very interesting museum which documented the codification of modern penal law in the Meiji Era and the assistance of French and German Scholars in this. Also documents related to several criminal court cases of the Meiji Era were on display, including documents on court cases following two tax riots (one was actually a misunderstanding about a 'blood tax'). The exhibition also explained the architectural history of the building, which survived the
Great Kanto Earthquake (1923) with practically no damage, but which was damaged severely in the 1945 US air raid on Tokyo.

2.4.11 Visit to Sengen Shrine, Shizuhata Mountain, War Memorial and Shizuhatayama Tumulus and Sengen Shrine Museum

Dr. Shiba took me on a very nice cycling trip to the Sengen Shrine. We visited the shrine and then went up the Shizuhata mountain from which we had a beautiful view over the city, the sea and Mount Fuji. I could also see a chapel from the mountain, dr. Shiba explained to me that this belonged to a Christian high school. During this visit to Japan I have learned that there is quite some Christian culture in Japan, even though I would not have expected that.

On the mountain is the impressive war memorial for the 6000 people from Shizuoka which were killed in the US air raid of June 1945. Being European, I did not really know about the victims of such air raids. Of course I knew about the atom bombs on Hiroshima and Nagasaki, but I was not aware of all the people which were killed and the many cities which were damaged by 'regular' air raids during World War II. By seeing this monument and pictures in various Japanese museums I have know come to realise this. Shizuoka was hurt very much by air raids, as in July 1945 also Shimizu was hit by an air raid. What is very special is that next to the monument for the Japanese victims, there is a monument for the 28 US army men which died in Shizuoka during the war. This monument is maintained by volunteers from Shizuoka.

Halfway our descend of the mountain, we visited the Shizuhatayama Tumulus. This tumulus was built in the latter half of the 6th century. It is a circular mound of about 32 metres wide and 7 metres high. Inside is a burial chamber and corridor and a house shaped sarcophagus in which the ruler of that time was buried. It was very interesting to see this very old and well preserved part of Japanese history.

Finally we visited Sengen Shrine Museum where very interesting old photos of Shizuoka were on display, including photos of the remains of the city after a big fire which hit a large part of Shizuoka in 1940. But also children playing in the 1950s and photos of the Olympic games were included as were some household items and toys. It was a very interesting window on pre- and post-war Shizuoka. After this visit we had a curry lunch in dr. Shiba's house.

2.4.12 Yeasu-san memorial Tokyo station
In my lecture on Japanese culture in the Netherlands I mentioned Jan Joosten. He sailed from Rotterdam on the first Dutch ship, De Liefde (formerly De Erasmus) which arrived in Japan in 1600. He is by his Japanese name, Yaesu-san, still remembered in Tokyo in the Yaesu street en Yaesu exit of Tokyo station. Dr Shiba and I looked for the Yaesu memorial in Tokyo station which we could find after a bit of a search (unfortunately it was not indicated on the map with shops and restaurants). It is a very nice memorial with a statute, a map of his travels from Rotterdam to Japan and some explanation in Japanese.

2.4.13  Edo-Tokyo Museum and Shiseido Gallery

The Edo-Tokyo Museum permanent exhibition gave a very good overview on the history of Edo and Tokyo and did so in a very innovative way. The history came alive and linked many historic knowledge I had acquired during this visit to Japan and helped my understanding. There was a special exhibition on Ginza photographs from the 1930s to the 1980s. Interestingly, at the same time the Shiseido Gallery hosted an exhibition of Ginza photos made in the summer of 2014 by Nobuyoshi Araki, which I also visited.

2.4.14 Visit to Sakura

On my last day in Japan Dr. Shiba took me to the old samurai town Sakura. Mr. Suzuki had advised us to go there and he was right. It is a very nice little city to visit. We rented bycicles at the local tourist office and cycled to the National Museum of Japanese history. This was a very big museum that tried to cover the whole history of Japan. Parts of the museum were very well signposted in English, others were a bit more difficult without knowledge of the Japanese language. After visiting the museum, we cycled through the beautiful Sakura Castle Park to the old Samurai houses. It was very interesting to see these beautiful preserved houses with their gardens. Then we cycled back to the station and Dr. Shiba and I said goodbye. As I was staying in Narita and still had some time left I walked back to the old main street of Sakura where I entered the museum. Unfortunately the new exhibition was only opening the next day. As there is still much more to been seen in Sakura and it is very conveniently located as the last visit for the airport, I definitely hope to come back in this charming little town.
3 Future research projects initiated by the JSPS fellowship

The contacts I have made, the lectures I gave and the discussions I have had during my JSPS fellowship will at least lead to the following new research projects:

- Paper on tax incentives for cultural heritage (based on presentation 7), dr. Shiba will write a paper on the same topic from a Japanese point of view (deadline 1 December 2014).
- Paper on fairness (based on presentation 1) for dr. Shiba, deadline 28 February 2015.
- Proposal for joint book with prof. Goto on tax incentives for the creative industries (link with presentation 2, the book proposal is included in annex 3) in a Springer series on creative industries which is published under the responsibility of prof. Yagi.
4 Impressions and thoughts on the state of science in Japan in the fellow’s field of research

I have had the privilege to speak to many people from many different fields such as tax law, public finance, economics, real estate and even engineering. I experienced how Japanese researchers from different fields work together, which in my view is very fruitful and definitely an object we should pursue as academics. Just as in the Netherlands, many researchers in tax law also have experience in private practice which is deemed to be an asset, a view I agree with.

I see big changes as regards the English language. When I first came to Japan in 2003, it was very difficult to encounter people speaking English. This has changed. Especially in Kyoto, an important tourist and conference destination for foreigners (in my observation there were many more foreigners in Kyoto than 11 years ago when I also visited Kyoto) it was easier to get by in English. Furthermore, this is the first time that I could give some lectures without a Japanese translation being necessary. For the other lectures translations were still necessary, but I had the impression that people did understand the English. The same impression I had in the conversation with a former student of prof. Goto who is now working for the Nagasaki Prefecture Government (tourism department): he seemed to understand everything was saying in English, but preferred to talk in Japanese to me with translations of prof Goto. However, one to one discussions with academics were all in English, mostly without translation help. Students were still a bit shy to speak English. However, I have the impression that that will be different as well within 10-15 years.

During my visit I had the privilege to have dinner at home with two families. Their children were very interested in the English language and not shy to practice words. I was amazed by the vocabulary of these 6 to 9 year old children: when I drew some typical Dutch characteristics (bicycles, flower, sea etc) they knew the English words. Also they were very easy in saying and pronouncing English words. Three children had the advantage that their mother teaches English and speaks English fluently, but I had the impression that also the other children felt comfortable with English words. I therefore expect that this generation will probably not have any problems in speaking English. The Olympic games of 2020, when many foreigners will visit Japan and many volunteers who speak English will be needed, may further this trend. This opens good possibilities for international trade and tourism to Japan.

What is quite different in Japan compared to the Netherlands is the distinction between national, prefecture, city and private universities, each with their own level of entrance exams. The buildings and teaching facilities of the private universities I visited were very well maintained and of high quality. Students are very tidy, they clean up their own mess: something which Dutch students (and Dutch people in general) could learn from the
Japanese. However, Dutch students never fall asleep during lectures, something which does happen to Japanese students. Maybe because the Japanese only have a few hours of sleep during the night and therefore need some sleep during the day?

It was also interesting to observe that many Chinese, Taiwanese and Korean students study in Japan. They speak Japanese and sometimes English as well. I did not encounter European students during my lectures. For them the language would probably be a problem when courses are taught in Japanese only.

For me it was very interesting to learn that in Japanese social sciences book publications are deemed to be very important, more so than in the Netherlands. Prof Goto explained to me that an important reason is that especially older academics deem it important that the general public can be informed about the achievements of the social sciences. This is easier through the publications of books which are sold in book stores and as e-books than by publications in (American) journals which are only read by a small group of academics. She told me the story of the father of a student who came to talk to her and who had bought one of her books to prepare for the meeting. In my view this is an important lesson the Netherlands legal and social sciences can learn from Japan: do not forget to inform your own citizens who, by their taxes, make your research possible.
5 Other comments concerning the fellowship program

It is wonderful that the fellowship programme makes it possible for foreign researchers to come to Japan, deliver lectures, make new contacts and discuss about research. It is a very valuable programme and I am extremely grateful that I was allowed to benefit from it for the second time.
## Annexes

### Annex 1  
**Day-to-day programme**

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Location</th>
<th>Activity</th>
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<tbody>
<tr>
<td>3</td>
<td>4/11/2014</td>
<td>Kyoto</td>
<td>Preparation of lectures, visit temples, dinner at IYEMON salon with prof. Goto.</td>
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<tr>
<td>4</td>
<td>5/11/2014</td>
<td>Kyoto-Osaka prefecture</td>
<td>Morning: Visit and tour cultural heritage renovation site, lunch and preparation of lecture with prof. Goto, 13:00-14.30 Seminar at Kyoto university (Fairness: presentation 01) prof. and Ph.D of public finance 16:30-18.30 Seminar at Kansai University (Fairness: presentation 01) professors and master students of public finance, economics and tax law, 18.30-20.30 Dinner at Kansai University with 4 professors and two master students with interesting discussions on tax law in Japan and the Netherlands.</td>
</tr>
<tr>
<td>7</td>
<td>8/11/2014</td>
<td>Kyoto-Nagasaki</td>
<td>Dejima, China town, Hollanders Slopes, Glover Garden, Nagasaki Traditional Performing Arts Museum, Oura Catholic Church, Nagasaki Dejima Wharf.</td>
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<tr>
<td>9</td>
<td>10/11/2014</td>
<td>Kyoto</td>
<td>Preparation of lectures, visit to Kyoto temples, dinner in Yamashina.</td>
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<tr>
<td>10</td>
<td>11/11/2014</td>
<td>Osaka prefecture</td>
<td>Setsunam University, talk with dr. Tanaka, work.</td>
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<tr>
<td>Day</td>
<td>Date</td>
<td>Location</td>
<td>Activities</td>
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<tr>
<td>11</td>
<td>12/11/2014</td>
<td>Kyoto-Shizuoka</td>
<td>Packing bags, evaluation of seminars, lunch with prof. Goto and discussion of book proposal, transfer to Shizuoka, present myself to dean, vice president and academic staff at Tokoha Faculty of Law meeting, discuss with dr. Shiba, dinner with civil servants of Shizuoka City Government.</td>
</tr>
<tr>
<td>12</td>
<td>13/11/2014</td>
<td>Shizuoka-Tokyo</td>
<td>Prepare for lecture, transfer to Tokyo, lecture at Meikai University (Housing taxation in the Netherlands, presentation 5), dinner with researchers from Meikai University.</td>
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<tr>
<td>13</td>
<td>14/11/2014</td>
<td>Tokyo-Shizuoka-Nihondaira</td>
<td>Visit to Kokugakuin University Museum, lunch with former master students of Kokugakuin University School of Law, transfer to Shizuoka and Nihondaira hotel.</td>
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<tr>
<td>14</td>
<td>15/11/2014</td>
<td>Nihondaira-Shizuoka</td>
<td>Morning excursion to Mount Kuno Toshogu Shrine with Mr. Suzuki (land development division of Chiba prefecture), lecture 'How taxation can support private patronage of the arts and cultural heritage' (presentation 6) and participation in Tokoha University conference 'Cultural heritage and landscapes as local resources, excursion to Sumpu Castle Park with Mrs. Tanaka and Mr. Suzuki, eel dinner and conference party.</td>
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<tr>
<td>15</td>
<td>16/11/2014</td>
<td>Shizuoka-Shimizu</td>
<td>Bicycle tour (part of conference of previous day) with historical explanations in Shizuoka and Shimizu, meeting with the mayor of Shizuoka City.</td>
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<td>16</td>
<td>17/11/2014</td>
<td>Tokyo</td>
<td>Tour of historical buildings of Meiji Gakuin University and its organs, lecture for master students at the Faculty of Economics, Department of Business Administration organised by prof Nishiyama 'Fairness &amp; taxation in a globalised world' (presentation no. 1), meeting with prof. dr. Morinobu and Ms. Fujiwara of the Tokyo Foundation, discussion on income tax reform, visit to Ministry of</td>
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<td>Date</td>
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<td>17</td>
<td>Shizuoka-Tokyo-Shizuoka</td>
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<tr>
<td>18/11/2014</td>
<td>Visit to Sengen Shrine, Shizuhata Mountain, War Memorial and Shizuhateyama Tumulus and Sengen Shrine Museum, 13.00-14.30</td>
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<td></td>
<td>Tokoha University, Faculty of Law: lecture for second year undergraduate students on Japanese culture in the Netherlands (presentation 4); 14.40-16.10 Tokoha University, Faculty of Law: lecture for first year undergraduate students on Japanese culture in the Netherlands (presentation 4); transfer to Tokyo in the Shinkansen, 18.30-20.00: attend lecture of prof. dr. Wiman of Upsala University Sweden on BEPS at Meiji University, Tokyo.</td>
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<td>18</td>
<td>Shizuoka-Tokyo</td>
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<tr>
<td>19/11/2014</td>
<td>Packing of suitcase, 13.00-14.30 Tokoha University, Faculty of Law: lecture for first year undergraduate students on Tax and social security in the Netherlands (presentation 7); transfer to Tokyo in the Shinkansen, dinner and stay in Nerima.</td>
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<td>19</td>
<td>Tokyo</td>
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<tr>
<td>20/11/2014</td>
<td>Morning in Nerima, visit to Edo part of Tokyo-Edo Museum, meeting with Nick Wall of Allen &amp; Overy Gaikokuho Kyodo Jigyo Horitsu Jimusho, visit to Tokyo part of Tokyo-Edo Museum, visit to Shiseido Gallery.</td>
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<tr>
<td>20</td>
<td>Tokyo-Sakura-Narita</td>
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<tr>
<td>21</td>
<td>Narita-Amsterdam</td>
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<tr>
<td>22/11/2014</td>
<td>Flight back to Amsterdam</td>
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Annex 2  Presentation slides

1  Fairness & taxation in a globalised world

- Do they pay their fair share?
- Principle of Fairness: legal and political philosophy
- Does fairness require consent to tax system?
- Free riding
- Fairness defined in relation to other tax payers
- European Commission
- Horizontal supervision not for tax evaders
- Dutchman for big companies
- Tax evaders
- General Anti Abuse Rules
- OECD BEPS project Action 5: harmful tax practices (report sept. 2014)
- Fairness goes further than abuse of law
- Tax is not a matter of law
- Combat free riders
- Combat free riding
- Combat free riding
- Combat free riding
- BEPS Action Plan
- Important tool: (automatic) exchange of information
- Other forms of exchange of information
- Multilateral Agreement on exchange of Financial Information
- Right to privacy and exchange of information
- International shift from the individual to the collective
- Difficult issue: tax competition

Example Ireland: artists exception
Annemarie did not pay tax until 2005 and significantly low taxes on their other income 2006-11.
Many foreign artists move to Ireland to legalise their income from non-UK sources.

Public Goods

BEPS Iran project

Public league of tax payers

Public league of tax payers
2. Tax incentives for the creative industries

Some examples of tax incentives for creative industries
- Tax incentives for film industry
- UK Creative Industry Tax Relief
- Tax incentives for actors

Tax incentives for film (introduced in NL, 1996)
- Tax incentives for film industry
- Dutch film incentive
- Same as Dutch film incentive and increase profitability of commercial Dutch films
- Example: minimum return Onex film cv
- Participation: -10000
- Return excluding tax incentive: 6500
- Return including tax incentive: 99950

Returns on several investments for individual investors in various films

Other critical remarks
- Commercial success not because of merits, but because films were
  marketed at cultural groups like doctors and fans of容易操作.

Result of the discussions
- Dutch film incentive is not the only factor influencing returns.
- Dutch film incentive is not the most effective influence on returns.

Other countries face similar problems
- Dutch film incentive is not the only factor influencing returns.
- Dutch film incentive is not the most effective influence on returns.
3 The attractiveness of the Netherlands for Japanese investors: a focus on tax
4 Japanese culture in the Netherlands
5 Housing taxation in the Netherlands
6 How tax legislation can support private patronage of the arts and cultural heritage
7 Tax and social security in the Netherlands

Book proposal: Tax incentives for the creative industries

Prof. dr. Kazuko Goto (Setsunan University) and prof. dr. Sigrid Hemels (Erasmus University Rotterdam)
For the Springer Creative Industries Series under the responsibility of prof. Yagi

Outline of the book

Contents, Table of abbreviations, List of contributors, Preface
Approximately 5 pages

I  Introduction  Goto/Hemels
Approximately 15 pages.

II  Theoretical part
Approximately 20 pages per chapter (compensation between chapters is possible): total of 60 pages
II.1 Definition of Creative Industry for the purpose of this book (both profit and non-profit)  Goto
II.2 Economic Theory on the Creative Industries (including: why government interference in the creative industries)  Goto, O'Hagan (?)
II.3 Theory of Tax Incentives (what is it, how does it relate to direct subsidies)  Hemels, O'Hagan (?)

III  Cases: focus on specific tax incentives
Approximately 20 pages per chapter including literature references (compensation between chapters is possible): total of 100 pages
III.1 Tax incentives for museums and cultural heritage (gift deduction, exemptions of inheritance and gift tax, acceptance in lieu of tax (pay tax with works of art), tax incentives for volunteers: examples of the USA, the Netherlands, France, England and Ireland).  Hemels
III.2 Tax incentives for films, television and video games (various tax incentives in Europe (for example, Hungary, Belgium, UK, Asia (?) and the United States and the UK Creative Industry Tax Reliefs)  Name of (UK) author? If we cannot find anyone: Hemels
III.3 Tax incentives for cultural investments of individuals and companies (example: The Netherlands (individuals), Spain (businesses), Germany (businesses), France (incentives for companies to support contemporary artists and musicians and to preserve cultural heritage)  Hemels
III.4 Incentives for artists (example: Ireland artists exemption, reduced VAT rate in Europe for works sold by the artist and the performing arts)  John O'Hagan, if he cannot participate: Hemels
III.5 Arts, crafts and other small enterprises (design, advertisement, clustering of creative industries)  Name of (Asian?) author? or Goto
IV    Policy recommendations and conclusion

Approximately 20 pages per chapter (compensation between chapters is possible): total of 40 pages

III.1   Effective and efficient tax incentives (What can we learn from the cases in part II, what works and what does not work?) Goto/Hemels/O'Hagan (?)

III.2   Conclusion Goto/Hemels/O'Hagan (?)

Index

Approximately 10 pages.

Total: approximately 220 pages

The literature references will be included at the end of each chapter.

The idea is, furthermore, that authors review the content of each other's contributions and make additions, comments and recommendations from the view of their research field and/or jurisdiction. If possible, authors could also write chapters together.