
INTERNATIONAL TAX PLANNING

Co-Editors: Lincoln Schreiner* and Michael Maikawa**

With this issue of the journal, we welcome Lincoln Schreiner, CA, and Michael Maikawa, CA, as co-editors of the International Tax Planning feature. Mr. Schreiner, the lead partner of PricewaterhouseCoopers LLP's international tax services department in Vancouver, advises large companies on the fiscal aspects of complex domestic and international business arrangements. Mr. Maikawa, a partner in the Toronto office of PricewaterhouseCoopers LLP, is also a member of the firm's international tax services department and is primarily involved in providing advice to multinational corporations concerning the international tax aspects of structuring and financing investments inside and outside Canada. Both Mr. Schreiner and Mr. Maikawa are frequent speakers and writers on international tax matters.

The Canadian Tax Foundation and its members extend their warmest thanks for exemplary service to Nick Pantaleo, CA, and C. Andrew McAskile, CA, of PricewaterhouseCoopers LLP, Toronto, who are retiring as co-editors of the International Tax Planning feature. Their dedication to the feature (Mr. Pantaleo since 1996 and Mr. McAskile since 1999) has resulted in a reliable source of topical and accurate information in an area of importance to taxpayers and their professional advisers.

CONTINUANCE OF A FOREIGN AFFILIATE

*Lincoln Schreiner**

From a Canadian tax perspective, corporate continuance of a foreign affiliate from one foreign country to another involves three main considerations: the application of the Canadian foreign affiliate regime (foreign accrual property income and surplus balances), the rights of the company under the tax treaty network of the country of continuance, and the income tax consequences to the continuing company under the domestic (departure) tax laws of the export foreign country and the domestic (arrival) tax laws of the import foreign country. This article addresses each of these considerations.

KEYWORDS: FOREIGN AFFILIATES ■ FOREIGN CORPORATIONS ■ MIGRATION

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