



National
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Studies in International Taxation

Edited by

**Alberto Giovannini,
R. Glenn Hubbard,
and Joel Slemrod**

Studies In International Taxation

Yariv Brauner



Studies In International Taxation:

Studies in International Taxation Alberto Giovannini, R. Glenn Hubbard, Joel Slemrod, 2007-12-01 As a united global economy evolves economists and policymakers are forced to consider whether the current system of taxing income is inconsistent with the trend toward liberalized world financial flows and increased international competition To help assess existing tax policies and incentives this volume presents new research on how taxes affect the investment and financing decisions of multinationals today The contributors examine the effects of taxation on decisions about international financial management business investment and international income shifting They consider the influence of tax rules on dividend policy decisions within multinationals the extent to which tax incentives affect the level and location of research and development across countries and the fact that foreign controlled companies operating in the United States pay lower taxes than do domestically controlled companies The contributors to this volume are Rosanne Altshuler Alan J Auerbach Neil Bruce Timothy Goodspeed Roger H Gordon Harry Grubert Bronwyn H Hall David Harris Kevin Hassett James R Hines Jr Roy D Hogg Joosung Jun Jeffrey K Mackie Mason Jack M Mintz Randall Morck John Mutti T Scott Newlon James M Poterba Joel Slemrod Deborah Swenson G Peter Wilson and Bernard Yeung [Research Handbook on International Taxation](#) Yariv Brauner, 2020-12-25 Capturing the core challenges faced by the international tax regime this timely Research Handbook assesses the impacts of these challenges on a range of stakeholders evaluating various paths to reform at a time when international tax policy is a topic high on politicians agendas **The Oxford Handbook of International Tax Law** Florian Haase, Georg Kofler, 2023-10-13 International Tax Law is at a turning point Increased tax transparency the tackling of Base Erosion and Profit Shifting BEPS the reconstruction of the network of bilateral tax treaties the renewed discussion about a fair and efficient allocation of taxing rights between States in a global digitalized economy and the bold push for minimum corporate taxation are some expressions of this shift This new era also demonstrates the increased influence of international standard setters such as the OECD the UN and the EU Each of these developments alone has the potential of being disruptive to the traditional world of international tax law but together they have the potential to reshape the international tax system The Oxford Handbook of International Tax Law provides a comprehensive exploration of these key issues which will shape the future of tax law Divided into eight parts this handbook traces the history of international tax law from its earliest days until the present including reflections on the developments that have characterized the last one hundred years The second section places tax law within the broader international context considering how it relates to public and private international law as well as corporate trade and criminal law Sections three and four consider key legal principles and issues such as regional tax treaty models OECD dispute resolution and transfer pricing versus formulary apportionment Subsequent analysis places these issues within their European and cross border contexts providing an assessment of the role of the ECJ state aid and cross border VAT Section seven broadens the scope of this analysis asking how trends in recent major

economies and regions have helped shape the current outlook The final section considers emerging issues and the future of international tax law With over sixty authors from 28 different countries the Oxford Handbook of International Tax Law is an invaluable resource for scholars academics and practitioners alike

International Taxation of Energy Production and Distribution John Abrahamson, 2018-04-20 Energy is a major global industry with rapid ongoing changes in areas such as carbon taxes emissions trading regimes and the development of renewable energy The cross border nature of the industry calls for the thorough expert and up to date analysis provided in this timely and practical book Taking a down to earth problem solving approach to policy and practice in the field worldwide the author focuses on the international tax framework and the tax regimes in leading energy producing and consuming countries The book introduces and analyses significant international tax issues related to energy production and distribution extending from the tax regime in the country where the oil gas or coal exploration and production activities are located through to cross border transportation using pipelines tankers and bulk carriers to the taxation of power stations and electricity transmission and distribution networks The taxation issues covered include the following upstream oil and gas and mining taxes incentives for renewable energy carbon taxes and emission trading regimes dividend interest and royalty flows foreign tax credits permanent establishments mergers and acquisitions taxation issues for derivatives and hedging transfer pricing regional purchasing marketing service and intangible property structures free trade agreements and customs unions dispute resolution and tax administration and risk management Detailed updates are included on the most recent international tax developments affecting the energy industry including the OECD Action Plan on Base Erosion and Profit Shifting BEPS and the 2017 OECD Transfer Pricing Guidelines Case studies offer an opportunity to apply international tax analysis to specific examples and gain practice in identifying and discussing relevant international taxation issues This book will be of significant value to corporate tax managers and in house counsel together with accountants lawyers economists government officials and academics connected with the energy industry and related international taxation issues

Studies in International Taxation Alberto Giovannini, R. Glenn Hubbard, Joel Slemrod, 1993-09-15 This book presents research on how taxes affect the investment and financing decisions of multinationals The contributors examine the effects of taxation on decisions about international financial management business investment and international income shifting They consider the influence of tax rules on dividend policy decisions within multinationals the extent to which tax incentives affect the level and location of research and development across countries and the fact that foreign controlled companies operating in the United States pay lower taxes than do domestically controlled companies

Racial Capitalism and International Tax Law Steven A. Dean, 2025 Global tax policy has long determined which states have access to the resources necessary to flourish Over the past quarter century even the wealthiest states have found themselves unable to tax wealthy individuals and multinationals Racial Capitalism and International Tax Law offers an in depth analysis of how Anti Black racism has hamstrung the ability of the global tax system to meet the

challenge posed by legions of lawyers and bankers **International Studies in Taxation** Leif Mutén,1999 The book contains 27 essays covering a wide range of tax areas mainly international and comparative tax law written by various authors as a tribute to professor Leif Mutén on the occasion of his 70th birthday *Global Tax Governance* Peter Dietsch,Thomas Rixen,2016-01-01 Commercial banks UBS and HSBC embroiled in scandals that in some cases exposed lawmakers themselves as tax evaders multinationals Google and Apple using the Double Irish and other tax avoidance strategies governments granting fiscal sweetheart deals behind closed doors as in Luxembourg the stream of news items documenting the crisis of global tax governance is not about to dry up Much work has been done in individual disciplines on the phenomenon of tax competition that lies at the heart of this crisis Yet the combination of issues of democratic legitimacy social justice economic efficiency and national sovereignty that tax competition raises clearly requires an interdisciplinary analysis This book offers a rare example of this kind of work bringing together experts from political science philosophy law and economics whose contributions combine empirical analysis with normative and institutional proposals It makes an important contribution to reforming international taxation International Tax Agreements ,1951 The Taxation of Corporations and Shareholders Martin Norr,2013-06-29 This monograph is principally the work of the late Martin Norr He completed a draft of the entire monograph but had not yet revised it when he died in late 1972 At that time the integration of corporate and shareholder taxation was just beginning to become of widespread interest in the United States With the increasing interest thereafter the International Tax Program began to revise his manuscript making as few changes as possible in the original draft We had the benefit of criticism and analysis from Professor Richard M Bird of the University of Toronto now Director of the Institute of Policy Analysis there In addition Mr Mitsuo Sato of the Ministry of Finance in Japan gave freely of his time in carefully suggesting changes throughout the manuscript The present version of Chapter 3 owes a great deal to his additions and suggestions Thanks are also due to Professor Hugh J Ault of Boston College Law School for the Appendix containing his description of the German integration system that became effective in 1977 which was first published in Law Policy in International Business Mr Norr's interest in the subject of corporate and shareholder taxation developed while he was writing the International Tax Program's World Tax Series volume Taxation in France published in 1966 The integration of French taxes on corporations and shareholders took place just after that volume was finished but had been under discussion in France for some time before then **International Tax Law** Christopher C. Dykes,2024 This research guide is designed to target a broad and diverse group of professionals including the tax attorney whose practice focuses on either international or U S domestic law Certified Public Accountants CPAs whose practice involves tax information specialists who serve those employed in these areas students who are training in these professions and those teaching in course work on international tax law The goal of this research guide is to introduce the reader to the importance of international tax law and to present a synopsis of the sources including primary sources and secondary sources as well as

information available through online databases While this research guide offers a background on international tax law including the authority of documents how that authority relates to domestic law and a comparison of the different model tax conventions its purpose is to simply provide an overview of these sources It is intended to assist the reader in choosing sources for research in international tax law but it is not a treatise on the subject area However it does supply information on such treatises and other secondary sources that include instruction on international tax law Publisher **Principles of International Taxation** Lynne Oats,2021-09-30 The book provides a clear introduction to international taxation and presents its material in a global context explaining policy legal issues and planning points central to taxation issues primarily from the viewpoint of a multinational group of companies It uses examples and diagrams throughout to aid the reader s understanding and offers more in depth material on many important areas of the subject Traditionally published every 2 years in both print and digital formats this content is a core requirement for student reading lists at both undergraduate and post graduate level Fully updated to cover all new tax legislation and developments in light of the OECD BEPS project implementation key areas to be included in this new edition are changes proposed by BEPS 2 0 in relation to taxation and the digital economy including Pillar Two and the proposed new UN Model Article 12B further progress on the implantation of OECD Base Erosion and Profit Shifting implementation including an update on the implementation of BEPS recommendations including artificial avoidance of permanent establishment status and prevention of treaty abuse the implementation of transfer pricing documentation and country by country reporting multilateral instrument implementation the impact of Covid 19 on international taxation further developments in European direct taxation including the transparency package directives on anti tax avoidance and the common corporate tax base and state aid cases Apple in particular and updates to the Directive on Administrative Cooperation and the new communication on Business Taxation for the 21st Century Proposals in relation to the taxation of digital business in particular the OECD s unified approach and the UN modifications to the Model Double Taxation Convention Proposals for a global minimum corporate tax rate to curb base erosion and tax competition

International Co-operation in Tax Matters United Nations. Ad Hoc Group of Experts on International Co-operation in Tax Matters,2005 International Tax Coordination Martin Zagler,2010-06-30 The book combines interdisciplinary teams from business economics information science law and political science to offer a unique and innovative interdisciplinary approach to the issue of international tax coordination **Tax Notes International** ,2003 **Annual Report** John Crerar Library,1897 Time and Tax: Issues in International, EU, and Constitutional Law Werner Haslehner,Georg Kofler,Alexander Rust,2018-12-20 Time is a crucial dimension in the application of any law In tax law however where an environment characterized by rapid change on the national European and international levels complicates the provision of accurate legal advice timing is particularly sensitive This book is the first to analyse the relationship between time and three key areas of tax treaties EU law and constitutional law issues such as legal certainty and individual rights Among the

numerous timing issues arising out of applying tax rules the book addresses the following time limits within which relief must be requested statutes of limitation for claiming a tax refund transitional issues relating to changes in tax treaties attribution of profits and expenses to a moving or closed down business effect of tax related CJEU decisions and EU directives compliance of exit tax regimes with free movement limits of retroactivity under principles protected by the EU Charter and the ECHR and conflict between efficiency of taxation and individual rights Derived from a recent conference organized by the prestigious ATOZ Chair for European and International Taxation at the University of Luxembourg the book brings together contributions from leading tax experts from various areas of tax practice academia and the judiciary Among other issues the book notably expands on how economic theory can inform a constitutional analysis of the timing of taxation There is no other work that concentrates so usefully on the difficulties associated with applying tax rules whether arising from treaties jurisprudence or policy to changing circumstances over time This book will quickly prove itself to be an indispensable resource for European tax lawyers policymakers company counsels and academics

International Applications of U.S. Income Tax Law Ernest R. Larkins, 2003-11-20 A clear concise explanation of United States tax law s international aspects In tackling a sometimes thorny set of laws and treaties international tax expert Ernest Larkins emphasizes their economic effects showing how to avoid hazards while reaping rewards which often go ignored Coverage includes Special issues arising when a foreign person invests in U S real estate as well as the best structures for holding such real estate What a controlled foreign corporation is and what consequences result from this status Acceptable transfer pricing methods and what penalties apply when taxpayers do not follow arm s length principles International Applications of U S Income Tax Law also contains many useful tools which allow readers to build understanding through practice as well as formulate and solve the complex problems international taxes can present Order your copy today

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International Law of Taxation Peter Hongler, 2021-09-17 In this fresh objective and non argumentative volume in the Elements of International Law series Peter Hongler combines a comprehensive overview of the technical content of the international tax law regime with an assessment of its crucial relationship to wider international law Beginning with an assessment of legal principles and foundations the book considers key general principles treaty based regimes and regional integration in tax matters In the second half of the work Hongler places international tax law in the context of its wider relationships with human rights law and trade and investment law He concludes by considering major legal successes and failures and what might be done to address these

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