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explains the concepts that underlie international tax law and double tax treaties and provides an insight into how international tax policy  
law and practice operate to ultimately impose tax on international business and investment

international taxation is a vital issue for a growing number of business and individuals across the world the need to understand how the  
international system of taxation works is therefore a subject of importance to many people the international taxation system provides  
this understanding by bringing together experts from the most important fields in the subject who have each authored chapters  
especially for this book they each provide brief structured and easy to understand explanations of the key concepts edited together into  
one volume to provide a unique very readable guide to the field while this text is aimed at masters or advanced undergraduate level

students it will also be of interest to those requiring a professional understanding of the topic each chapter introduces a different aspect of the international taxation system explains the important issues to be understood in each case and provides suggestions for discussion and further reading

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this second edition provides an updated and succinct yet highly informative overview of the key issues surrounding taxation and international law from reuven avi yonah a leading authority on international tax this small but powerful book surveys the nuances of the varying taxation systems offering expert insight into the scope reach and nature of international tax regimes as well as providing an excellent platform for understanding how the principles of jurisdiction apply to tax and the connected tools that are used by countries in

imposing taxes it includes new material on beps the eu anti tax avoidance package and the us tax cuts and jobs act

the six papers in this volume represent state of the art empirical and conceptual research on various aspects of the taxation of multinational corporations they were commissioned for and presented at a conference organized by price waterhouse llp on behalf of the international tax policy forum held in washington dc in march 1994 the first four papers were originally published in the may 1995 issue of international tax and public finance the slemrod paper appeared in the policy watch section of the november 1995 issue of that journal the foregoing papers were subject to the normal refereeing procedures of the journal and the summaries that follow are drawn from there the leamer paper has not been previously published altshuler and mintz examine one aspect of the 1986 u s tax reform act the change in the rules for the allocation of interest expense between domestic u s and foreign source income in the absence of rules a parent with excess credits could reduce u s tax liability by allocating interest expense toward itself thus reducing its taxable domestic income without any compensating increase in either the u s tax due on foreign source income or the foreign tax due which is independent of u s rules

a groundbreaking reference this book provides a comprehensive review of tax policy from political legal constitutional administrative and economic perspectives a collection of writings from over 45 prominent tax experts it charts the influence of taxation on economic activity and economic behavior featuring over 2400 references tables equations and drawings the book describes how taxes affect individual and business behavior shows how taxes operate as work and investment incentives explains how tax structures impact different income

groups weighs the balanced use of sales property and personal income taxes traces the influence of recent tax changes and more

textbook examining the problems arising from the taxation of international business in a broad and general way designed for businessmen to understand the international tax environment

designed for use in law schools business schools and schools of management this casebook outlines the determination and administration of u s income tax liabilities resulting from international transactions textual discussion cases rulings and problems guides students through the basic tax considerations that confront foreign individuals and entities participating in the u s economy and u s individuals and entities seeking to derive income abroad covers both the u s tax rules applicable to international transactions and the tax policy considerations underlying those rules

provides a comprehensive consolidation of australian income tax and related legislation updated and consolidated for all amendments to 1 january 2011

in this book the authors provide a new treatment of international taxation one that focuses on the interactions between fiscal policies of sovereign nations and the magnitude and directions of international capital and goods flow in an integrated world economy

the provision of international services has increased enormously mainly due to the precipitous growth of the digital economy accordingly the interpretation and application of double taxation conventions dtcs to income from services has become a dominant focus in the

international taxation this multiple award winning book is an indispensable tool for practitioners and a major contribution to the debate about tax reform it responds to the need for a comprehensive overview of the tax opportunities and risks relating to the provision of international services it also offers the first in depth analysis of the taxation of income from services vis à vis the multilateral instrument mli resulting from the oecd's base erosion and profit shifting beps initiative with the thorough analysis of the international taxation of income from services over the last two centuries the author sheds new light on present tax policy debates and develops workable proposals for bringing brick and mortar dtcs into the digital reality with an abundance of case studies treaty interpretations appraisals of policy discussions and practical solutions the author examines every aspect of the subject including the following the model dtcs of the oecd the united nations germany and the united states their similarities and differences relationships among the mli the model dtcs and specific dtcs development of the provisions dealing with services in the dtcs how tax authorities and courts of different countries e.g. the united states germany brazil india and china apply dtc provisions on the taxation of international services opportunities and risks relating to different business practices such as the subcontracting of services provisions the hiring out of labour the secondment of employees and the engagement of contract and toll manufacturers practical questions about the taxation of different distribution models from fully edged distributors to commissionaires challenges and proposals relating to the differentiation between various types of services under dtcs the permanent establishment concept to what extent the structure purposes and scope of dtcs differ from those of the general agreement on trade in services gats how changes in the us model dtc of 2016 affect international service provisions and proposed changes to amending the oecd and un model dtcs viable proposals to simplify dtc provisions dealing with service income and align

them with current challenges such as the digital economy and the increasing volume of remote services are offered particularly in light of the likely impact of the beps package and its subsequent mli this book is poised to become one of the key practice resources for tax lawyers in house counsel and policymakers in the coming years interested academics too will benefit from the author's skill in recognizing the ongoing role of taxation fundamentals in the major revolution currently underway

this thoroughly revised third edition of the advanced introduction to international tax law provides an incisive overview of the key issues surrounding taxation and international law reuven savi yonah explores the nuances of varying taxation systems using relevant and current case studies

the phenomenal internationalization of taxation occurring in recent years has called for a second edition of this classic handbook even though a quarter of a century has passed the farsighted first edition has remained in constant use worldwide and has even grown in importance now it has been thoroughly updated by the author who has brought his piercing insight to bear on the current world of international tax law while retaining the book's practical format structure of primary materials and detailed commentary emphasizing the need for an international consciousness in relation to issues of taxation professor qureshi focuses extensively on the problems associated with fiscal jurisdiction international constraints in domestic taxation double taxation and tax evasion and avoidance in particular the following are covered treaty law with specific reference to taxation fiscal aspects of international monetary investment and trade law enforcement of international tax claims exchange of information assistance in recovery of tax claims mechanisms for the

resolution of international tax disputes base erosion and profit shifting in the framework of public international law and contribution of international institutions to fiscal capacity development assimilating in one source the basic materials in public international law germane to taxation including cases texts of international agreements discourse in secondary sources and incisive commentary all updated to the present this new edition of the most authoritative and important book in its field will be of immeasurable value to tax practitioners worldwide national taxation authorities international institutions and the international tax community more generally

recent theoretical work has argued that a small open economy should use residence based but not source based taxes on capital income given the ease with which residents can evade domestic taxes on foreign earnings from capital however a residence based tax may not be administratively feasible leaving no taxes on capital income

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

this comprehensive and stimulating handbook examines the contribution of political economy to public policy it provides an overview of several strands of critical political economy supported by case studies from oecd countries latin america south africa and south and east asia

environmental taxes differ from each other according to the functions they serve and the manner in which they are implemented this study highlights the appropriateness of different kinds of environmental taxes against a rigorous framework of theory and case study evidence the purpose of this book is to analyse the way in which environmental taxes are categorized and which factors affect the effectiveness and efficiency of the different kinds of environmental taxes in practice this pragmatic approach is emphasized along with

the multiplicity of regulatory problems such as at what level should the environmental tax rate be set what is the proper time schedule for introducing an environmental tax what are the most appropriate taxable characteristics and how should they be determined what activities should be exempt from environmental taxation how can tax relief be implemented these are only some of the regulatory problems explored in this study which also encompasses an examination of the theory of regulation the author argues that economists have often paid too little attention to the administrative and legal issues concerning the implementation of legislation such as environmental tax laws which are of course vital to the success of any potential policy lawyers too have in turn neglected the theory of regulation which would assist in analysing problems in a future oriented way environmental taxes will therefore be of great interest to a wide audience of environmental economists law and economics scholars as well as policymakers back cover

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