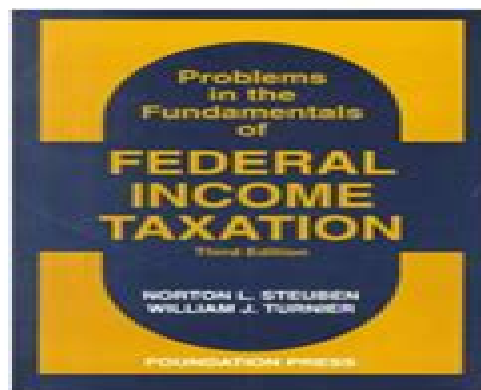


Problems in the Fundamentals of Federal Income Taxation (University Casebook Series)



Income Tax Fundamentals 2013 Comprehensive Problems

Anna Binder, Viktoria Wöhrer



Income Tax Fundamentals 2013 Comprehensive Problems:

Special Features of the UN Model Convention Anna Binder, Viktoria Wöhrer, 2019-10-01 Detailed research on the UN Model Convention's unique features. The UN Model Convention has a significant influence on international tax treaty practice and is especially used by emerging and developing countries as a starting point for treaty negotiations. Driven by the aim to achieve consistency in the international tax treaty practice, the structure and content is to a large extent similar in the UN Model and the OECD Model. However, whereas the OECD has historically focused its efforts on issues mainly relevant for developed countries, the UN Tax Committee has continuously attempted to specifically take into account tax treaty policies for developing countries when drafting and amending the UN Model Convention. Compared to the OECD Model Convention, the UN Model Convention aims at giving more weight to the source principle. Popular examples are the PE definition in the UN Model which provides for a lower threshold than Article 5 of the OECD Model or Article 12A on Fees for Technical Services which has been introduced with the latest amendment of the UN Model Convention 2017 and allows for a withholding tax to be levied on payments to non-residents when the payer of the fee is a resident of that contracting State irrespective of where the services are provided. Interestingly, in the discussions of the tax challenges arising from the digitalization of the economy, the OECD and the G20 are also exploring options to allocate more taxing rights to the jurisdiction of the customer and/or user, i.e. the market jurisdictions. As this has traditionally been the focus of the UN Model Convention, its unique features and developing countries' practices could be taken into account when exploring new nexus rules that are not constrained by the physical presence requirement. This book contains the master's theses of the full-time LL.M. program 2018/2019 for which *Special Features of the UN Model Convention* has been chosen as the general topic. With this book, the authors and editors do not aim at discussing each article of the UN Model Convention but rather focus on the unique features of the UN Model Convention which are explored in detail. This is supplemented with an evaluation of the function and relevance of the UN Tax Committee in the international tax policy discussion and with an analysis of the influences of the OECD's BEPS project on the UN Model. Tax and Technology Annika Streicher, Svitlana Buriak, 2023-10-13 The challenges and opportunities of new technologies in the tax field. Technological developments induced major reforms in the regulatory international and domestic tax landscapes as well as in the developments in the use of technology by tax administrations and taxpayers. New technology, especially the innovations in virtual asset, light cross-border business organizations, data analytics, service and process automation, on one hand disrupted the well-established legal tax principles and rules, and on the other stimulated informed data-driven and structured solutions in tax compliance. Technological advances affected nearly every area and each aspect of taxation. Direct tax regulations, indirect tax law, and tax procedures including tax compliance and tax control functions. International organizations such as the Organization for Economic Co-operation and Development (OECD), the United Nations (UN), and the European Commission

as a supranational organization fostered critical legislative reforms and proposals among which are the OECD Two Pillar Solution to Address the Tax Challenges Arising from Digitalisation of the Economy Article 12B of the UN Model Tax Convention to tax automated digital services new rules for tracing transfers of crypto assets in the EU as well as the EU's VAT e-commerce package and VAT in the Digital Age package While these proposals aim to address a wide range of the benefits and challenges of Economy 4.0 certain questions arise concerning the consistency of the legislative developments with their initial objectives the appropriateness of the legal form for the economic substance of the regulated relations for the effectiveness of the regulations as well as their coherence This volume contains a collection of scientific chapters on the general topic Tax and Technology that were successfully completed by the 2022/2023 LL.M. graduates of the Institute for Austrian and International Tax Law WU The volume is divided into three parts that contain the contributions dealing with the impact of the technology on international tax law indirect tax law and procedural law Each chapter provides an in-depth analysis of a unique research question aiming to innovatively contribute to the current debate and develop a practical approach for implementing the findings

Multilateral Cooperation in Tax Law Martin Klok, Katharina Moldaschl, 2023-10-03 An in-depth analysis of various aspects of multilateral cooperation in tax law Tax evasion and aggressive tax planning causing base erosion and profit shifting BEPS has been a widely discussed topic among academics and tax policy makers over the past decades Increasing globalization and digitalization have contributed to the intensification of this issue in recent years At the same time states continue to largely insist on their sovereignty in the area of tax law However due to their cross border nature issues related to BEPS are shared problems among the states and can typically not be solved by a single nation Therefore multilateral cooperation represents an option to build a bridge between the states demand for sovereignty and the problems caused by BEPS In this regard the OECD the UN and the EU play an important role in introducing international tax standards in an attempt to effectively address tax evasion and aggressive tax planning in many ways The interaction and cooperation between different international supranational EU and regional organizations is an ongoing process In this context the topic Multilateral Cooperation in Tax Law was selected as the general topic for the master's theses of the part-time 2021/23 class of the postgraduate LL.M. programme in International Tax Law at WU Vienna University of Economics and Business This volume aims to develop academic insights provide practical guidance and enable an in-depth analysis of various aspects of this topic The book is divided into four parts The first part deals with a general overview of the understanding of multilateral cooperation the background that led to the need for multilateral cooperation and the different stakeholders that play a relevant role in it While the chapters included in the second part focus on the most important developments on an international level OECD and UN the chapters encompassed in the third part analyse the multilateral cooperation initiatives of the EU Finally the chapters included in part four deal with selected issues related to multilateral cooperation in tax law including mutual assistance and exchange of information dispute resolution mechanisms

and measures in digitalized businesses *Finance - Fundamental Problems and Solutions* Zhiqiang Zhang, 2013-06-13 As indicated by the title this book focuses on fundamental problems in finance a logical dilemma in valuation stock valuation methods models risk valuation and optimal capital structure It presents an innovative approach to logic and quantitative reasoning without advanced mathematics that delivers valuable results convincing solutions to these problems Readers in finance will definitely be interested in these solutions as well as the methods In fact these fundamental problems are essential in the field of finance and they have remained unsolved or partly unsolved for decades The solutions offered in this book are all sound in theory and feasible in practice and will hopefully benefit both theoretic al research and practical decision making **The Global Minimum Tax | Selected Issues on Pillar Two** Valentin Bendlinger, Pedro

Schoueri, 2024-10-18 Global Minimum Tax at a glance The OECD s Global Minimum Tax is amongst the most discussed topics in the recent international tax law debate The book provides for more than 25 individual but co ordinated essays on multiple relevant topics on Pillar Two is structured as follows General Topics including the legal status of the GloBE Model Rules their relation to tax treaties and EU Law the GloBE STTR the specifics of jurisdictional blending their impact on tax competition and on tax incentives Scoping topics including the computation of the EUR 750 million threshold the definition of MNE Group territorial allocation of CEs and excluded entities Charging provisions including GloBE s rule order and the impact of the GloBE Model Rules on minority shareholders Computation of GloBE Income and Loss including contributions on the adjustment of permanent differences and specifics of dividends and equity gains for purposes of the base determination Computation of Adjusted Covered Taxes including the notion of covered taxes the recognition of temporal differences and the territorial allocation of covered taxes Top up Tax computation including contributions on the general correspondence of covered taxes and GloBE Income the Substance Based Income Exclusion the specifics of Investment and Minority Owned Constituent Entities and the general role of the QDMTT within the framework of Pillar Two Selected topics on the administration of GloBE e g Safe Harbors and the identification of the taxpayer within the framework of Pillar Two

Justice, Equality and Tax Law Nevla Čičin-Šain, Mario Riedl, 2022-10-05 An in depth analysis of the specific aspects of justice equality and tax law Justice Equality and Tax Law is a topic that is both old and new at the same time Even if the society changes the demands that tax needs to be just and equal seem to be immutable What changes of course is the perception of the content of those demands International taxation post BEPS has been fraught with new challenges that warranted urgent responses These challenges were mainly provoked by the unprecedented rise of the digital economy which truly marked a change in the way business is conducted how value is created and how goods and services are produced and consumed Digitalization in turn had repercussions on all aspects of taxation direct taxation indirect taxation and even tax procedures For instance the quest for more justice and equality in profit taxes was the reason why in October 2021 a historical deal based on a two pillar solution to address the tax challenges arising from the digitalization of the economy was

negotiated within the OECD G20 Inclusive Framework on Base Erosion and Profit Shifting and agreed upon by 137 member countries. It was also the motive behind the shift from a typical vendor collection model to an intermediary collection model supported by centralized registration points in indirect taxes, notably the VAT/GST. Abundant data from the European Union or the OECD signaled an ever-increasing gap between expected VAT revenues and VAT actually collected, making it obvious that the classical system of VAT/GST collection was unable to respond to challenges posed by the digital economy. Therefore, new solutions based on the participation of digital platforms as intermediaries had been introduced. Finally, new technologies such as blockchain paved new avenues in enhancing tax compliance. In this context, this volume entitled *Justice, Equality and Tax Law* contains not only a selection of the best master's theses of the full-time LL.M. programme in 2021/2022 but also represents an in-depth analysis of various aspects of this evergreen topic.

Concept and Implementation of CFC Legislation
 Nathalie Bravo, Alexandra Miladinovic, 2021-09-21. An in-depth analysis of various aspects of CFC legislation. This volume provides an in-depth analysis of various aspects of the topic. The volume is divided into four parts. The first part comprises chapters discussing the historical background, policy considerations, and different CFC approaches that have been implemented in domestic legislation. While the chapters included in the second part focus on the recommendation for the effective design of CFC rules found in BEPS Action 3, the chapters encompassed in the third part analyse the implementation of these criteria in Articles 7 and 8 of the ATAD and the compatibility of these provisions with EU primary law. Finally, the chapters encompassed in part four deal with selected issues related to CFC rules, including the compatibility of CFC legislation and tax treaties, the relationship between these rules and general anti-abuse rules, the implications of the proposed CCCTB Directive on CFC rules, alternative approaches to CFC legislation such as the Global Anti-Base Erosion proposal of the OECD G20, the interrelationship between CFC rules and transfer pricing legislation, and the balance between effective CFC rules and compliance burdens.

CJEU Case Law in Direct Taxation: Territoriality and Fundamental Freedoms
 Stephanie Zolles, 2023-07-13. The principle of territoriality and the fundamental freedoms. The tension between the fundamental freedoms and the sovereignty of the Member States is omnipresent in the CJEU's case law on direct taxation. A significant number of cases concerned one of the core principles in national tax laws: the principle of territoriality. Although this principle is continuously mentioned in cases concerning the compatibility of direct tax measures with the fundamental freedoms, the case law seems to provoke more questions than answers. This book provides guidance on the meaning of territoriality in the CJEU's case law on direct taxation as well as on the role which this principle plays in the compatibility of domestic direct tax measures with the fundamental freedoms. During a critical and dogmatically oriented journey through the CJEU's case law, the reader can enjoy a comprehensive analysis containing references to more than 300 cases. Without a doubt, this timeless reflection of the tension between the principle of territoriality and the fundamental freedoms is not only interesting from a dogmatic perspective but also from a tax policy one.

Access to

Treaty Benefits Desiree Auer, Christina Dimitropoulou, 2021-09-21 A rigorous analysis of various aspects related to treaty access Tax treaty access is an ongoing challenge for both taxpayers and tax authorities This volume provides a rigorous analysis of various aspects related to treaty access Schematically the volume is divided into four parts The first part deals with general interpretative issues and principles the second and third parts cover a wide range of sub aspects relating to the subjective and objective scope of tax treaties and the recent challenges posed to tax treaty access while the fourth part focuses on the knotty issues of treaty shopping and abuse The structure of the volume reflects the necessity to approach access to treaty benefits in a holistic way and view the recent trends through a wide lens All chapters contain a complete examination of the relevant topics starting from a historical perspective and continuing with tax treaty law principles and tax practice analysis Where appropriate a domestic law and domestic courts jurisprudence perspective was added as well as a comparative analysis of several jurisdictions thus complementing the examination of each topic Finally special attention is given to treaty abuse and the new GAAR introduced in the 2017 OECD Model together with its interrelation with other treaty and domestic anti abuse provisions and the impact of these provisions on tax treaty access and tax policy in general

Preventing Treaty Abuse Daniel Blum, Markus Seiler, 2016-09-19 Analysis of notion roots und measures of treaty abuse The OECD initiative on Base Erosion and Profit Shifting has put the issue of treaty abuse and the means to counter it on top of the global political agenda Preventing treaty abuse is therefore currently one of the most debated topics in international tax law Diverging national legal traditions in combatting abuse both under domestic and tax treaty law have led to a globally diversified legal framework in this respect and make the OECD s agenda to harmonize these attempts even more challenging The aim of this book is to analyze the notion of treaty abuse its historical roots and the measures to counter it The book s topics cover a wide range of both policy and legal issues The contributions main focus lies on analyzing the proposals put forward by the OECD in BEPS action items 6 and 7 In addition this book analyzes the lessons which can be learnt from the US tax treaty policy and elaborates on the effects the intensified fight against treaty abuse will have from a Non OECD member state perspective Also EU law is taken into account and the question raised which impact the fundamental freedoms might have on the development of new anti avoidance rules Finally the relation between domestic and treaty based anti avoidance is analyzed in great detail identifying the methodical problems of ensuring a sound and abuse safe legal framework With this book the authors and editors hope to contribute to the discussion on selected issues of preventing treaty abuse and the challenges they present to policy makers judges tax administrations and tax advisers

Transfer Pricing and Value Creation Raffaele Petruzzi, Romero J.S. Tavares Esq., 2019-09-02 Value Creation and its effects on Transfer Pricing and tax law Emerging from the OECD G20 BEPS Project a new somewhat fuzzy notion of Value Creation came to permeate not only Transfer Pricing language but also wider allocation rules and anti abuse provisions in international tax law The notion of Value Creation reframes the interpretation and application of the Arm s Length Principle ALP that is embedded in Articles 7

and 9 of the OECD Model Convention This new Value Creation notion and approach assist in understanding key enterprise functions while different industry sectors manifest these concepts in various ways Situating such notions and this approach within the law of tax treaties and analyzing terms of the OECD Transfer Pricing Guidelines alongside their factual context is the aim of this book Here law students address Transfer Pricing and Value Creation in sectors as varied as commodities trade automotive consumer products food and beverages pharmaceutical and life sciences telecommunications and the key topic of value creation in a digitalized economy Our LL M students were required to address issues not explored in legal research and to discuss factual topics relevant for Transfer Pricing All students focused on topics that are new to the international tax debate that keep evolving and on factual matters that often escape legal research

Limiting Base Erosion Erik Pinetz, Erich Schaffer, 2017-08-30 Limiting base erosion from different viewpoints Hybrid mismatch arrangements CFC rules transfer pricing rules Limiting Base Erosion the general topic for the master theses of the part time LL M program 2015 2017 has been one of the most controversial topics in international tax law ever since the initiation of the OECD BEPS Project in 2013 Even though the final reports of the 15 BEPS Actions were released by the OECD in as early as October 2015 the question how to effectively target base erosion practices still has not lost any of its topicality Following the efforts of the OECD in developing a new international tax environment the focus of attention has now partly shifted to the OECD Member countries that have to properly implement the OECD recommendations in their domestic laws as well as in their tax treaty practice In this respect a comprehensive analysis in the literature of all the issues related to base erosion proves to be of the utmost importance in order to provide practical guidance to the Member countries during that the process of implementation This book deals especially with four key areas of interest Limiting base erosion by neutralizing the effects of hybrid mismatch arrangements Limiting base erosion by strengthening CFC rules Measures against base erosion via interest deductions and other financial payments Limiting base erosion by improving transfer pricing rules On that basis 27 concrete topics were chosen in order to address the four key areas of interest from different viewpoints Base erosion and the challenges they present read more in *Limiting Base Erosion*

Hybrid Entities in Tax Treaty Law Sriram Govind, Jean-Philippe Van West, 2020-09-03 Tax treaty law and EU tax law in connection with hybrid entities Hybrid entities have traditionally been used as an avenue for international tax planning and extending benefits under tax treaties to such entities has been a source of controversy for many years now Although the OECD Partnership Report provided solid policy footing on this issue there was still no common legal basis that countries could rely on for such positions The increasing focus of countries towards the curbing of tax avoidance and abuse involving hybrid mismatch arrangements culminated in a specific action plan in the BEPS Project being dedicated to the design of domestic rules and the development of treaty provisions that would neutralize the tax effects of such arrangements This volume provides an in depth analysis of various aspects of this topic It is divided into two parts the first dealing exclusively with tax treaty issues arising in connection with hybrid entities and the second dealing

with EU tax law issues surrounding hybrid entities The former part comprises chapters analysing how tax treaties have historically dealt with this issue with a focus on domestic court jurisprudence the positions in the OECD and the UN Model Conventions the developments that have come about owing to the BEPS Project and the impact of several existing measures regimes and vehicles on these tax treaty provisions The latter part comprises chapters on how hybrid entities are dealt with under primary EU law under various secondary law directives including the newly enacted Anti Tax Avoidance Directives and an analysis of policy solutions offered in this direction **J.K. Lasser's Your Income Tax 2012** J.K. Lasser

Institute,2011-12-21 America s number one bestselling tax guide offers the best balance of thoroughness organization and usability For over half a century more than 39 million Americans have turned to J K Lasser for easy to follow expert advice and guidance on planning and filing their taxes Written by a team of tax specialists J K Lasser s Your Income Tax 2012 includes all the outstanding features that have made this book the nation s all time top selling tax guide It covers some of the most important topics associated with your taxes from what must you report as income and strategies that will save you on taxes to how much tax you actually owe and what deductions can you claim As an added value you can gain direct access to bonus materials through jklasser.com including links to the latest tax forms from the IRS up to the minute tax law changes small business help and much more Filled with in depth insights and timely advice this is the guide of choice for today s serious taxpayer Contains over 2 500 easy to use tax planning tips and strategies and easy to understand coverage of the year s tax law changes Includes filing tips and instructions to help you prepare your 2011 return Comprised of a quick reference section that highlights what s new for 2011 as well as a topic index to help pinpoint the biggest money saving deductions Offers instruction for customers who use software or CPAs to file their taxes Filled with practical tax guidance you can t find anywhere else J K Lasser s Your Income Tax 2012 will help you plan and file your 2011 tax return in the most efficient way possible **Auditing and Corporate Governance** Dr. Preeti Rani Mittal,Dr. Anshika Bansal,Dr. R.C.

Bhatia,2021-07-19 This book presents a broad introduction to the field of Auditing and Corporate Governance realistically and practically while offering the largest and most diverse collection of issues on the company or organization This book is divided into two parts The first part covers Auditing which consists of 13 chapters that express the detailed concepts of auditing concisely and clearly The second part covers Corporate Governance which consists of 11 chapters that express corporate governance s detailed concepts simply and lucidly The material presented in this book revolves around the following themes Audit Planning Audit Process Audit Report Auditing Standard Whistle Blowing Business Ethics and Corporate Social Responsibility etc **OECD/G20 Base Erosion and Profit Shifting Project Addressing the Tax**

Challenges of the Digital Economy, Action 1 - 2015 Final Report OECD,2015-10-05 Addressing base erosion and profit shifting BEPS is a key priority of governments In 2013 OECD and G20 countries working together on an equal footing adopted a 15 point Action Plan to address BEPS This publication is the final report for Action 1 **Tax by Design for the**

Netherlands Sijbren Cnossen, Bas Jacobs, 2021-12-16 The Dutch tax system distorts economic decisions treats equal economic positions unequally for tax purposes and is extraordinarily complex Following in the footsteps of the Mirrlees Review prominent economists from academia and the policy arena at home and abroad provide independent evidence based analyses of the system s shortcomings as well as detailed proposals for reform Tax by Design for the Netherlands spans the whole spectrum of taxes on labor and capital income profits consumption wealth inheritance and charges to correct for market and individual failure including the environment

The OECD's Global Minimum Tax and its Implementation in the EU - A Legal Analysis of Pillar Two in the Light of Tax Treaty and EU Law Valentin Bendlinger, 2023-10-17

Rarely in the history of international tax law have there been so many evolutions in such a short space of time In a dizzying array of reports work programmes consultations and announcements the OECD with the active support of the EU has created a framework for a global minimum tax Pillar Two or GloBE In the meanwhile jurisdictions are faced with the practical difficulties of incorporating an incredibly complex set of rules into their domestic legal systems This book aims to shed light on the fundamental and technical issues surrounding the global minimum tax It seeks to unravel the complex ramifications of GloBE s technical framework and aims to explore the relationship between the OECD s soft law materials including the OECD s GloBE Model Rules and the GloBE Commentary tax treaties and the EU s recently adopted GloBE Directive The author not only analyses Pillar Two from a technical and a policy perspective but also provides for a comprehensive examination of the compatibility of Pillar Two with tax treaties and EU law To this end the analysis also includes practical examples and illustrates solutions to numerous technical and policy issues of Pillar Two Among the seminal matters covered are the following History and Background of the global minimum tax discussion Detailed technical considerations on the design of Pillar Two including its scope the determination of both the GloBE Income as well as the Adjusted Covered Taxes and the computation of the effective tax rate as well as the computation and collection of the final Top up Tax liability including the application of the QDMTT IIR and UTPR Tax policy implications and deficiencies of the final design of Pillar Two The relation of Pillar Two to the current distribution of taxing rights under bilateral tax treaties The analysis includes the compatibility of the QDMTT IIR and UTPR with existing tax treaties and the resolution of potential normative conflicts both between tax treaties and domestic implementations of Pillar Two as well as between tax treaties concluded by EU Member States and the EU s GloBE Directive The role of the GloBE Directive within the EU s legal order including the issue of EU internal and external competence as well as the substantive compatibility of Pillar Two with primary law such as the fundamental freedoms Detailed comparisons between the OECD s GloBE Model Rules and the EU s GloBE Directive elucidate common points and deviations In addition to comprehensive technical considerations the book also provides a comprehensive tax policy perspective on the global minimum tax For its unparalleled clarification of the issues alone this book will prove invaluable to practitioners tax authorities policymakers and academics concerned with the implementation and application of

Pillar Two Valentin Bendlinger's book is an outstandingly remarkable work on a highly complex topic. The structure, clarity of thinking, and legal argumentation are excellent, and the legal and policy results throughout are profoundly argued. The book successfully ties together broad concepts of international and European tax law with highly complex and novel issues of the taxation of multinational enterprises. It should be highlighted that Valentin Bendlinger succeeded in leading the reader from the history and policy through a jungle of unprecedented rules to overarching fundamental issues of how the new taxation framework is to be placed in the international and European legal order. Prof. DDr. Georg Kofler, LL.M., NYU, Vienna University of Economics and Business.

Fiscal State Aid Schemes Sophia Piotrowski, 2025-01-22. Fiscal State Aid Schemes: Selectivity and Limits to Enforcement. Sophia Piotrowski. Taxation is a core area of a State's sovereignty and therefore highly sensitive to State aid control. This thoroughgoing study fully explains the architecture of EU State aid law as applied to fiscal aid schemes and elucidates the legal consequences of infringements in the context of State aid. Focusing on the criterion of selective advantage under Article 107(1) TFEU and on the limits to recovery in the enforcement of State aid law, the author explores the current state of play after nearly 25 years of an ever more significant role of fiscal State aid law, emphasizing its ongoing uncertainties and potential modifications. The analysis relies on a case law approach that reveals the ways in which the objectives of State aid control are limited both by Member States' fiscal sovereignty and by taxpayer rights. Issues and topics include the following: the role of the general principles of EU law as case-by-case limits to State aid enforcement; how the application of the selectivity test depends on the design of the tax measure in question; particularities of different types of taxes under State aid law; the role of the principle of protection of legitimate expectation in State aid law; and the structural problem that taxpayers are not in a position to notify aid to the Commission. The author confronts the allegedly overly broad reading of material State aid law and the supposedly unjust consequences of infringements of State aid law, offering deeply informed recommendations and an outlook for future developments. This comprehensive and well-structured exposition provides an in-depth understanding of the status quo of EU State aid law as applied to Member States' tax measures. With extensive detail on the highly controversial legal consequence of recovery, it places the debate on fiscal State aid law in a broad context, exploring a wide range of taxes and tax measures and identifying an analytical framework underlying the case law of the CJEU. Professionals concerned with taxation in Europe, whether legal practitioners, jurists, policymakers, or academics, will have everything they need to understand the current dynamics.

International Taxation and the Extractive Industries Philip Daniel, Michael Keen, Artur Świstak, Victor Thuronyi, 2016-09-23. The taxation of extractive industries exploiting oil, gas, or minerals is usually treated as a sovereign national policy and administration issue. This book offers a uniquely comprehensive overview of the theory and practice involved in designing policies on the international aspects of fiscal regimes for these industries, with a particular focus on developing and emerging economies. *International Taxation and the Extractive Industries* addresses key topics that are not frequently covered in the literature, such as the geo-political

implications of cross border pipelines and the legal implications of mining contracts and regional financial obligations The contributors all of whom are leading researchers with experience of working with governments and companies on these issues present an authoritative collection of chapters The volume reviews international tax rules covering both developments in the G20 OECD project on Base Erosion and Profit Shifting and more radical proposals identifying core challenges in the extractives sector This book should become a core resource for both scholars and practitioners It will also appeal to those interested in international tax issues more widely and those who study environmental economics macroeconomics and development economics

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