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# Ernst And Young Tax Guide 2015

**John Abrahamson**



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**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

**The Philippine Economy** Ramon L Clarete, Emmanuel F Esguerra, Hal Hill, 2018-09-10 In this volume a leading group of scholars pose the question has the Philippine economy rejoined the dynamic East Asian mainstream and if so what set of policies and priorities are required to maintain the strong economic momentum of recent years Successive chapters address issues related to growth and poverty infrastructure and urbanization education health the environment energy development finance and governance and institutions The book has been written with a broad audience in mind First and foremost it is for readers in and interested in this fascinating and important country with a population that now exceeds a hundred million Second it will appeal to those in the broader development community with an interest in the analytical and policy challenges that democratic middle income countries face as they struggle to lift their citizens out of poverty and to achieve broad based and environmentally sustainable growth

**Gas, oil and the Irish state** Amanda Slevin, 2016-07-22 Gas and oil are pivotal to the functioning of modern societies yet the ownership control production and consumption of hydrocarbons often provokes intense disputes with serious ramifications Gas oil and the Irish state examines the dynamics and conflicts of state hydrocarbon management and provides the first comprehensive study of the Irish model Interpreting the Corrib gas conflict as a microcosm of the Irish state s approach to hydrocarbon management the book articulates environmental health and safety concerns underpinning community resistance to the project It emphasises how the dispute exposed broader issues such as the privatisation of Irish hydrocarbons in exchange for one of the lowest rates of government take in the world and served to problematise how the state functions its close relationship with capital and its deployment of coercive force to repress dissent Analysis of these issues occurs within an original account of decision making and policy formation around Irish hydrocarbons from 1957 to 2014 The book traces the development of the state s approach in tandem with occurrences in Irish political economy and examines the impact of global trends on different approaches to hydrocarbon management A comparative case study of Norway reveals ideological political social and economic forces which influence how states manage their hydrocarbons factors which the book uses as the basis for a rigorous critique of the Irish model

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*Revenue Statistics in Asian Countries 2017 Trends in Indonesia, Japan, Kazakhstan, Korea, Malaysia, the Philippines and Singapore* OECD,2017-07-20 This publication compiles comparable tax revenue statistics for Indonesia Japan Kazakhstan Korea Malaysia the Philippines and Singapore

**Just Energy Transitions and Coal Bed Methane** Theresia Betty Sumarno,2021-10-18 This book discusses how Coal Bed Methane CBM could help the acceleration of the energy transition in a just way in Indonesia due to the country s potential CBM reserves and current dependence on climate damaging coal Developing countries face multiple challenges in achieving their energy transitions CBM in Indonesia could potentially be a catalyst for energy transition and subsequently improve access to energy However CBM faces numerous challenges and although Indonesia first developed its domestic CBM sector over more than a decade ago they are still to implement this successfully This book exposes the challenges and opportunities of CBM exploring what lessons other countries could learn from Indonesia to improve the industry with a view to achieving energy transition and climate change targets This book will be an invaluable reference for researchers and practitioners working in this field

*Green Finance and Investment Inventory of Energy Subsidies in the EU's Eastern Partnership Countries* OECD,2018-06-04 This publication aims to provide the first comprehensive and consistent record of energy subsidies in the EaP region with a view to improving transparency and establishing a solid analytical basis that can help build the case for further reforms in these countries

*Informal Institutions in Policy Implementation* Anna Korppoo,Iselin Stensdal,Marius Korsnes,2020-11-27 At a time of global climate crisis this crucial book examines the prospects for implementing low carbon policies in the two global superpowers of China and Russia focusing on the role of informal institutions in achieving reductions in greenhouse gas emissions

**Revenue Statistics in Latin America and the Caribbean 2017** OECD,Inter-American Center of Tax Administrations,Inter-American Development Bank,Economic Commission for Latin America and the Caribbean,2017-03-23 The Revenue Statistics in Latin America and the Caribbean publication compiles comparable tax revenue statistics for a number of Latin American and Caribbean

economies The model is the OECD Revenue Statistics database backed by a well established OECD methodology

**International Taxation of Manufacturing and Distribution** John Abrahamson, 2016-02-18 The most thorough treatment of its subject available this book introduces and analyses the international tax issues relating to international manufacturing and distribution activities extending from the tax regime in the country where the manufacturing activities are located through to regional purchase and sales companies to the taxation of local country sales companies The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends Among the topics and issues analysed in depth are the following foreign tax credits taxation in the digital economy tax incentives intellectual property group treasury companies mergers and acquisitions leasing derivatives controlled foreign corporation provisions VAT and customs tariffs free trade agreements and customs unions transfer pricing role of tax treaties hedging related accounting issues deferred tax assets and liabilities tax risk management supply chain management depreciation allowances and carry forward tax losses The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples Detailed up to date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting BEPS and other measures against tax avoidance As a full scale commentary and analysis of international taxation issues for multinational manufacturing groups including in depth consideration of corporate structures tax treaties transfer pricing and current developments this book is without peer It will prove of inestimable value to all accountants lawyers economists financial managers and government officials working in international trade environments

**Unequal Gains** Peter H. Lindert, Jeffrey G. Williamson, 2016-04-19 A book that rewrites the history of American prosperity and inequality Unequal Gains offers a radically new understanding of the economic evolution of the United States providing a complete picture of the uneven progress of America from colonial times to today While other economic historians base their accounts on American wealth Peter Lindert and Jeffrey Williamson focus instead on income and the result is a bold reassessment of the American economic experience America has been exceptional in its rising inequality after an egalitarian start but not in its long run growth America had already achieved world income leadership by 1700 not just in the twentieth century as is commonly thought Long before independence American colonists enjoyed higher living standards than Britain and America's income advantage today is no greater than it was three hundred years ago But that advantage was lost during the Revolution lost again during the Civil War and lost a third time during the Great Depression though it was regained after each crisis In addition Lindert and Williamson show how income inequality among Americans rose steeply in two great waves from 1774 to 1860 and from the 1970s to today rising more than in any other wealthy nation in the world Unequal Gains also demonstrates how the widening income gaps have always touched every social group from the richest to the poorest The book sheds critical light on the forces that shaped American income history and situates that history in a broad global context Economic writing at its most stimulating Unequal

Gains provides a vitally needed perspective on who has benefited most from American growth and why

**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

**Trends in Emerging Markets Finance, Institutions and Money** Duc Khuong Nguyen , Stéphane Goutte, 2020-12-02 Since the waves of financial liberalization in the 1980s emerging market economies have been accessible to foreign investors Altogether they contributed up to 43.8% of the global GDP in 2018 and many of them such as China India Bangladesh Philippines Myanmar and Vietnam from 2010 to 2019 are among the fastest growing economies in the world Given the high economic growth the assets issued by companies in emerging markets are viewed as a new set of investment opportunities for global investors and fund managers who seek to improve the risk adjusted performance of their portfolios In addition to their risky profile due to the lack of transparency as well as stable and matured institutions their recent development path faces a number of challenges arising not only from the slow pace of economic reforms but also from their increased integration with the world Geopolitical risks the US China trade wars and rising policy uncertainty around the world are expected to reduce their growth potential and performance This Special Issue dedicates special attention to the current dynamics of emerging financial markets as well as their perspectives of development as a key driver for sustainable firms and economies Accordingly the focus is particularly placed on market integration and interdependence valuations and risk management practices and the financing means for inclusive growth

**Understanding Energy Security in Central and Eastern Europe** Wojciech Ostrowski, Eamonn Butler, 2018-04-09 The purpose of this book is to move beyond the approach which views energy as a purely geopolitical tool of the Russian state and assumes a one size fits all approach to energy security in Central and Eastern Europe CEE It argues that in order to fully



understand Russian involvement in the regional energy complex the CEE Russian energy relationship should be analysed in the context of the political and economic transitions that Russia and the CEE states underwent The chapters on individual countries in the book demonstrate that although Russia has and will continue to play a substantial role in the CEE energy sector the scope of its possible influence has been overstated *Beyond Energy* Jacopo Maria Pepe, 2017-11-22 Jacopo Maria Pepe examines the rapid development of non energy transport infrastructure in the broader Eurasian space By doing so the author considers the ongoing structural transformation of the Eurasian continent against the backdrop of deepening commercial interconnectivity in Eurasia into broader areas of trade supported by the rapid development of rail connectivity He frames this process in a long wave historical analysis and considers in detail the geopolitical geo economic and theoretical implications of deepening physical connectivity for the relationships among China Russia Central Asia and the European Union

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