



**INTEGRATING
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ECONOMIES**

Taxation in an Integrating World

Vito Tanzi

Taxation Integrating World

Michael Kobetsky



Taxation Integrating World:

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International Taxation in an Integrated World Jacob A. Frenkel, Assaf Razin, Efraim Sadka, 1991 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

Taxation in an Integrating World Vito Tanzi, 2000-07-26 Tanzi explores how foreign taxes on repatriated income should be treated how profits sales and ownership of property should be allocated among countries and to what degree various taxes should be coordinated As global markets for goods services and financial assets have become increasingly integrated national governments no longer have as much control over economic markets With the completion of the Uruguay Round of the GATT talks the world economy has entered a fresh phase requiring different rules and different levels of international cooperation Policies once thought to be entirely domestic and appropriately determined by national political institutions are now subject to international constraints Cogent analysis of this deeper integration of the world economy and guidelines for government policies are urgent priorities This series aims to meet these needs over a range of 21 books by some of the world s leading economists political scientists foreign policy specialists and government officials A volume of Brookings Integrating National Economies Series

The Elgar Guide to Tax Systems Emilio Albi, Jorge Martinez-Vazquez, 2011-01-01 Tax systems have changed considerably in the past three decades These fundamental changes have been the result of economic globalization new political stances and also of developments in public finance thought The chapters in this volume offer a critical review of those changes from the perspectives of tax theory policy and tax administration practice and the political economy of taxation The authors also consider what sort of reforms are worth undertaking in tax policy design tax administration and enforcement and the assignment of sub national taxes The authors in this volume are among the top scholars in the study of public finance The development of tax systems in OECD countries is examined as are various methods of taxation direct versus indirect corporate income tax value added tax and others

employed throughout the world. The politics of public finance and the institutions used to administer it are also analyzed. Reflecting on the influence of the research itself, Richard Bird closes the book with a chapter exploring whether or not economic literature has focused on the issues and problems that really matter to policymakers and whether it has influenced the development of tax systems. Publisher's website: *Tax Cooperation in an Unjust World* Allison Christians, Laurens van Apeldoorn, 2021. A demonstration of the role that tax systems play in achieving international justice, this book establishes that current international tax systems facilitate wealthy states claiming an unfair share of the global economy, shows how this system feeds off human suffering, and explains how to achieve justice using existing international structures.

The Interface of International Trade Law and Taxation Jennifer E. Farrell, 2013. This book explores the ill-defined and oft-underestimated relationship between the World Trade Organization (WTO) and taxation. By adopting a two-pronged approach, the relationship is examined in terms of the extent to which the WTO legal framework exerts influence upon domestic tax law and international tax policy, and whether it is appropriate for the WTO to play a regulatory role in the field of taxation. The book begins with an examination of the historical development of international trade law and international tax law and demonstrates that these two separate areas of law are closely linked in terms of their underlying principles and historical evolution. The work then goes on to offer a doctrinal analysis of the tax content found in the WTO legal texts and highlights ambiguities therein.

International Taxation of Permanent Establishments Michael Kobetsky, 2011-09-15. The effects of the growth of multinational enterprises and globalization in the past fifty years have been profound, and many multinational enterprises such as international banks now operate around the world through branches known as permanent establishments. The business profits article, Article 7 of the OECD model tax treaty, attributes a multinational enterprise's business profits to a permanent establishment in a host country for tax purposes. Michael Kobetsky analyses the principles for allocating the profits of multinational enterprises to permanent establishments under this article, explains the shortcomings of the current arm's length principle for attributing business profits to permanent establishments, and considers the alternative method of formulary apportionment for allocating business profits.

Globalization, Tax Competition and the Future of Tax Systems Mr. Vito Tanzi, 1996-12-01. This paper discusses the implications for tax systems of globalization of capital markets and of economies. It shows the extent to which particular taxes are affected by the globalization process. It speculates on future developments in this area and on tax competition.

E-commerce and Source-based Income Taxation Dale Pinto, 2003. The advent of electronic commerce has caused many to question the continued viability of sourced-based taxation. This thesis argues that source-based taxation is theoretically justifiable for income that arises from international transactions which are conducted in an electronic commerce environment.

Taxation in Latin America Mr. Parthasarathi Shome, 1999-02-01. From the mid 1980s to early 1990s, Latin American tax policy provided rich lessons for other reforming countries. Meaningful innovations led also to perceptible revenue gains. Later in the 1990s, tax policies began to drift. Shining

examples of fundamental reform seemed to lose their luster Revenue in terms of GDP also stagnated partly reflecting over reliance on consumption taxes and neglect of taxable capacity on incomes The stagnation has been exacerbated by excessively simplified administrative practices Based on these developments and on the limited taxability of internationally mobile capital the paper anticipates a likely tax structure for the new century *Exploring the Nexus Doctrine In International Tax Law* Ajit Kumar Singh, 2021-05-14 In an age when cross border business transactions are increasingly effected without the transference of physical products revenue concerns of states have led to a multitude of tax disputes based on the concept of nexus This important and timely book is the most authoritative to date to discuss one of the major tax topics of our time the question of how taxing rights on income generated from cross border activities in the digital age should be allocated among jurisdictions Demonstrating in prodigious depth that it is the economic nexus of the tax entity or activity with the state and not the physical nexus which meets the jurisdictional requirement the author a leading authority on this area who is a Senior Commissioner of Income Tax and a Member of the Dispute Resolution Panel of the Government of India addresses such dimensions of the subject as the following whether a strict territorial nexus as a normative principle is ingrained in source rule jurisprudence detailed scrutiny of such classical doctrines as benefit theory neutrality theory and international equity comparative critique of the Organisation for Economic Co operation and Development OECD and United Nation UN model tax treaties whether international law and customary principles mandate a strict territorial link with the source state for the assumption of tax jurisdiction whether the economic nexus based tax jurisdiction and absence of a physical presence breach the constitutional doctrine of extraterritoriality or due process and whether retrospective tax legislation breaches the principle of constitutional fairness The book offers a politically informed analysis of the nexus principle and balances the dynamics of physical presence and economic nexus standards based on an in depth survey of the historical evolution of judicial pronouncements and international practices in this regard Dr Singh s book exposes an urgently needed missing link in the international source rule literature and takes a giant step towards solving the thorny question of appropriate tax apportionment It sheds brilliant light on the policies states may adopt when signing new tax treaties so that unintended results may be foreseen and avoided Tax practitioners taxation authorities and academic researchers in the field of international tax law and policy will greatly appreciate the book s forthright enhancement of the ability to defend challenges based on the nexus doctrine **Global Perspectives on Income Taxation Law** Reuven Shlomo Avi-Yonah, Nicola Sartori, Omri Marian, 2011 In *Global Perspectives on Income Taxation Law* Avi Yonah covers basic corporate and international tax law from a comparative perspective The book both supplements readings in U S tax law courses and serves as a textbook for a comparative tax law class It is arranged by subject matter in the order in which they are usually covered in U S tax law classes The materials are drawn from a wide variety of countries including developing countries Regressive Taxation and the Welfare State Junko Kato, 2003-09-01 Government size has attracted much scholarly

attention Political economists have considered large public expenditures a product of leftist rule and an expression of a stronger representation of labour interest Although the size of the government has become the most important policy difference between the left and right in post war politics the formation of the government's funding base is also important Junko Kato finds that the differentiation of tax revenue structure is path dependent upon the shift to regressive taxation Since the 1980s the institutionalisation of effective revenue raising by regressive taxes during periods of high growth has ensured resistance to welfare state backlash during budget deficits and consolidated the diversification of state funding capacity among industrial democracies This book challenges the conventional wisdom that progressive taxation goes hand in hand with large public expenditures in mature welfare states and qualifies the partisan centred explanation that dominates the welfare state literature

A Vision for the World Economy Robert Z. Lawrence, Albert Bressand, Takatoshi Ito, 2000-07-26 In this capstone volume in the INE series the authors review the growing pressure for deeper international integration explore the strengths and weaknesses of alternative approaches to dealing with these pressures and present concrete proposals to help achieve a global community that will balance openness diversity and cohesion A volume of Brookings Integrating National Economies Series

Entrenchment Paul Starr, 2019-05-21 An investigation into the foundations of democratic societies and the ongoing struggle over the power of concentrated wealth Much of our politics today Paul Starr writes is a struggle over entrenchment efforts to bring about change in ways that opponents will find difficult to undo That is why the stakes of contemporary politics are so high In this wide ranging book Starr examines how changes at the foundations of society become hard to reverse yet sometimes are overturned Overcoming aristocratic power was the formative problem for eighteenth century revolutions Overcoming slavery was the central problem for early American democracy Controlling the power of concentrated wealth has been an ongoing struggle in the world's capitalist democracies The battles continue today in the troubled democracies of our time with the rise of both oligarchy and populist nationalism and the danger that illiberal forces will entrench themselves in power Entrenchment raises fundamental questions about the origins of our institutions and urgent questions about the future

Globalization and Corporate Taxation Mr. Manmohan S. Kumar, Mr. Dennis P. Quinn, 2012-10-26 This paper analyzes the extent to which the degree of international economic integration both financial and trade affects corporate tax rates It explores this issue in the context of strategic behavior by countries taking into account other global and domestic political economy factors Tax rates are analyzed using a unique tax dataset for advanced and developing economies extending over five decades We report a number of novel results there is no general negative relationship between financial globalization and corporate tax rates and revenues results vary according to country grouping with OECD countries showing a positive relationship the United States exhibits a Stackelberg type of leadership on other countries trade integration is inversely correlated with tax rates and public sentiment and ideology affect tax rates The policy implications of these findings particularly given budgetary pressures in the

aftermath of the global crisis are noted **The Role of Allocation in a Globalized Corporate Income Tax** Mr. Jack M. Mintz, 1998-09-01 The internationalization of business activity has created significant pressures on national corporate tax systems Rather than abandon the corporate tax field this paper predicts that governments will develop arrangements to further globalize the corporate income tax The paper assesses the merits and limitations of allocation methods for attributing income to different jurisdictions according to formulas measuring business activity Such methods are being used as part of transfer pricing regimes and are likely to be enhanced over time Whatever international arrangements develop in the future there is a role for new institutions to improve cooperative discussions among governments *International Cooperation in Tax Matters* United Nations. Ad Hoc Group of Experts on International Co-operation in Tax Matters, United Nations. Department of Economic and Social Affairs, 1998 Report of the Ad Hoc Group of Experts on International Cooperation in Tax Matters on the work of its eighth meeting which was held from 15 to 19 December 1997 in Geneva including selected papers presented at the meeting *Global Tax Fairness* Thomas Pogge, Krishen Mehta, 2016 This book is on tax justice and why it is important for peace human rights and a more sustainable future It addresses sixteen different reform proposals that are urgently needed to correct the fault lines in the international tax system as it exists today and which deprive both developing and developed countries of critical tax resources It offers clear and concrete ideas on how the reforms can be achieved and why they are important for a more just and equitable global system to prevail *WTO and Direct Taxation* Michael Lang, Judith Herdin, Ines Hofbauer, 2005-01-01 WTO Law and Direct Taxation are linked in numerous ways The WTO Agreements thereof especially the GATT and GATS Agreements contain several explicit provisions on the subject of direct taxes or even on its delimitation from Tax Treaty Law To some extent the scope of application of WTO Law has been broadened by case law to comprise also direct taxes This entails overlappings particularly with regard to the law of subsidies prohibitions of discrimination and most favoured nation obligations This book highlights increasingly relevant interdependencies between WTO Law and Direct Taxation from the viewpoint of 21 States Special emphasis is placed on the conformity of national taxes on profits with WTO Law as well as on specifics of interpretation in several Member States 21 National Reports from nearly all EU countries as well as Colombia Israel New Zealand Norway and the USA dealt with this topic and were compiled and published in this volume Additionally a General Report prepared by Servatius van Thiel summarises the results of the National Reports Moreover experts in this field joining the Conference among them Reuven Avi Yonah Michael Lennard and Raymond Luján have volunteered contributions dealing with specific problems of WTO and Direct Taxation

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