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2017 Comparative Taxation: Why tax systems differ Fiscal Publishers: Birmingham STAFF MEMBER Current supervision allocation Number of available positions for 2021 Mr M van Dyk (Tax) Mark van Dyk is a senior lecturer in the Department of Taxation and is a TABL5544/3044 Comparative Tax Systems Course Outline ...

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This book compares and contrasts tax systems in developed and developing countries. It addresses; the taxation of incomes, wealth and consumption at the local, national, supranational and international levels; environmental taxes; modern trends in tax admin; and tax reform.

Analysis and comparison of taxation in different countries, looking at what tax systems have in common, how they differ and trying to explain both the similarities and the differences. The first part concerns tax structures. The second part looks at individual taxes or related groups of taxes. The third section deals with some aspects of policy-making and tax administration.

Although the details of tax law are literally endless--differing not only from jurisdiction to jurisdiction but also from day-to-day--structures and patterns exist across tax systems that can be understood with relative ease. This book, now in an updated new edition, focuses on these essential patterns. It provides an immensely useful introduction to the core common knowledge that any well-informed tax lawyer or policy maker should have about comparative tax law in our times. The busy reader will welcome the compact nature of this work, which is shorter than the first edition and can be read in a weekend if one skips footnotes. The authors elucidate the commonalities and differences across countries in areas including (much of the detail new to the second edition): general anti-avoidance rules; court decisions striking down tax laws as violating constitutional rules against retroactivity, unequal treatment of equals, confiscation, and undue vagueness; statutory interpretation; inflation adjustment rules and the allowance for corporate equity; value added tax systems; concepts such as "tax", "capital gain", "tax avoidance", and "partnership"; corporate-shareholder tax systems; the relationship between tax and financial accounting; taxation of investment income; tax authorities' ability to obtain and process information about taxpayers; and systems of appeals from tax assessments. The information and analysis pull together valuable material which is scattered over a disparate literature, much of it not available in English. Especially considering the dynamic nature of tax law, whose rate of change exceeds that of any other field of law, the authors' clear identification of the underlying patterns and fundamental structures that all tax systems have in common--as well as where the differences lie--guides the reader and offers resources for further research.

The purpose of this book is to compare different solutions adopted by nine industrialized countries to common problems of income tax design. As in other legal domains, comparative study of income taxation can provide fresh perspectives from which to examine a particular national system. Increasing economic globalization also makes understanding foreign tax systems relevant to a growing set of transnational business transactions. Comparative study is, however, notoriously difficult. Full understanding of a foreign tax system may require mastery not only of a foreign language, but also of foreign business and legal cultures. It would be the work of a lifetime for a single individual to achieve that level of understanding of the nine income taxes compared in this volume. Suppose, however, that an international group of tax law professors, each expert in his own national system, were asked to describe how that system resolved specific problems of income tax design with respect to individuals, business organizations, and international transactions. Suppose further that the leaders of the group wove the resulting answers into a single continuous exposition, which was then reviewed and critiqued by a wider group of tax teachers. The resulting text would provide a convenient and comprehensive introduction to foreign approaches to income taxation for teachers, students, policy-makers and practitioners. That is the path followed by Hugh Ault and Brian Arnold and their collaborators in the development of this fascinating book. Henceforth, a reader interested in how other developed countries resolve such structural issues as the taxation of fringe benefits, the effect of unrealized appreciation at death, the classification of business entities, expatriation to avoid taxes, and so on, can turn to this volume for an initial answer. This book should greatly facilitate comparative analysis in teaching and writing about taxation in the US and elsewhere.

Marginal income tax rates in advanced industrial countries have fallen dramatically since the mid-1980s, but levels and progressivity of income taxation continue to differ strongly across countries. This study offers a new perspective on both observations. It blends theoretical inquiry with focused quantitative analysis and in-depth investigation of seven countries: Germany, Australia and New Zealand as well as Denmark, Finland, Norway and Sweden. The Politics of Income Taxation highlights the equity-efficiency tradeoffs that structure the politics of income taxation, and analyses how income taxes are embedded in broader tax systems. It explains the limited but enduring importance of political parties and democratic institutions. Finally, the study paints a nuanced picture of the role of globalisation and thus sheds light on the pros and cons of tax coordination at European and international levels.

The comparative study of income taxation provides fresh perspectives from which to examine and evaluate a particular national system. Comparative Income Taxation presents a comparative study of different solutions adopted by nine industrialized nations to the common problems of income tax design. In this informative work, a distinguished group of tax experts examines the treatment of important structural issues such as taxation of fringe benefits, child care deductions, taxation of disputed income, and the classification of business entities in their national systems. The study covers Australia, Canada, France, Germany, Japan, the Netherlands, Sweden, the United Kingdom, and the United States. Comparative Income Taxation comprises several parts: Part One presents individual country descriptions outlining how each system developed its own set of approaches and principles; Part Two deals with basic income taxation, Part Three covers taxation of business organisations, Part Four addresses international taxation, and Part Five concludes the study with a detailed bibliography. Within each part, the subparts and sections outline various structural issues or problems which have arisen in the area under consideration. The author describes the countries – responses to the problems with a view toward identifying common patterns or approaches and highlighting unique or interesting solutions. This innovative work provides a comprehensive introduction to foreign approaches to income taxation for academics, practitioners, and policymakers.

Basic features of the tax systems in some European countries, Canada and Japan explained in the view to evaluate the need for reform written by various contributors.

The eighth edition of the OECD's Tax Administration Series, this report provides internationally comparative data on aspects of tax systems and their administration in 58 advanced and emerging economies. The publication presents the results of the 2018 International Survey on Revenue Administration (ISORA), a multi-organisation international survey to collect national-level information and data on tax administration governed by four partner organisations: CIAT, the IMF, IOTA and the OECD. For the 2018 survey round, the Asian Development Bank (ADB) agreed to participate along with the four partner organisations.

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