

Comparative Taxation Why Tax Systems Differ

Equity issues are again attracting attention from academics and policy analysts concerned with taxation. This book makes a substantial contribution to this new awareness by emphasizing the important role that gender, like other social stratifications such as race and income, often plays in determining the impact of taxation on well-being. Richard Bird, University of Toronto, Canada This groundbreaking volume examines the gender dimensions of tax systems in seven developing and one developed country and is the first systematic treatment of its kind. The conceptual framework that it poses should.

Report in a six chapters enumerates the major types of consumption taxes, discusses different ways of calculating VAT, analyses the possible tax effects on major tax policy issues, provides a basic outline of the tax systems of some of the US major foreign competitors (the tax systems reviewed include those of Japan, Canada and the EEC), briefly discusses the major VAT tax bills that have been proposed in the USA, and finally the report offers conclusions and observations. Eight chapters cover short selling and corporate tax avoidance, Fin48 and earnings management, the U.S. Jobs and Growth Tax Relief Reconciliation Act of 2003, the impact of social identity on reasonable compensation cases, FACTA, corporate tax compliance in Bangladesh, enforced tax compliance behavior in Malaysia, and tax morale in Greece. This book integrates legal, economic, and administrative materials about value added tax. Its principal purpose is to provide comprehensive teaching tools - laws, cases, analytical exercises, and questions drawn from the experience of countries and organizations from all areas of the world. It also serves as a resource for tax practitioners and government officials that must grapple with issues under their VAT or their prospective VAT. The comparative presentation of this volume offers an analysis of policy issues relating to tax structure and tax base as well as insights into how cases arising out of VAT disputes have been resolved. The authors have expanded the coverage to include new VAT related developments in Europe, Asia, Africa and Australia. A chapter on financial services has been added as well as an analysis of significant new cases.

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.

An approach to taxation that goes beyond an emphasis on tax rates to consider such aspects as administration, compliance, and remittance. Despite its theoretical elegance, the standard optimal tax model has significant limitations. In this book, Joel Slemrod and Christian Gillitzer argue that tax analysis must move beyond the emphasis on optimal tax

rates and bases to consider such aspects of taxation as administration, compliance, and remittance. Slemrod and Gillitzer explore what they term a tax-systems approach, which takes tax evasion seriously; revisits the issue of remittance, or who writes the check to cover tax liability (employer or employee, retailer or consumer); incorporates administrative and compliance costs; recognizes a range of behavioral responses to tax rates; considers nonstandard instruments, including tax base breadth and enforcement effort; and acknowledges that tighter enforcement is sometimes a more socially desirable way to raise revenue than an increase in statutory tax rates. Policy makers, Slemrod and Gillitzer argue, would be well advised to recognize the interrelationship of tax rates, bases, enforcement, and administration, and acknowledge that tax policy is really tax-systems policy.

Virtually all objections to taxation schemes spring from perceptions of unfairness. Is tax fairness possible? The question is certainly worth investigating in depth, and that is the purpose of this book. Today, as governments are busily making new tax rules in the wake of staggering budget deficits, is perhaps an appropriate time to pay heed to fairness so it can be incorporated as far as possible into tax reform. With twelve contributions from some of the world's most respected international tax experts—including the late Paul McDaniel, in whose honor these essays were assembled—this invaluable book focuses on tax expenditure analysis, the quest for a just income tax, and division and/or harmonization of the income tax base among jurisdictions. Among the areas of taxation ripe for reform from a fairness point of view the authors single out the following: tax expenditure budget construction; tax expenditure reporting; modern welfare economics as a driver of tax reform; grantor trust rules; the notion of “horizontal equity”; the international tax norm of “income source”; transfer pricing; and jurisdictional application of VAT. Specific ongoing reforms in the United States, Australia, and other countries—as well a detailed analysis of the EU's proposed common consolidated corporate tax base (CCCTB)—are also examined for fairness. As a timely, high-quality resource that effectively tackles an array of salient issues, this is a book that will be read and studied by tax practitioners, corporate tax experts, government tax policy makers, advisers and consultants on the reform and design of tax systems, and international organizations involved in standard setting related to tax administration, as well as academics and researchers.

This volume is the only book to provide a comparative and systematic analysis of the tax systems of the major industrialized nations (the G7 plus Netherlands, Spain, and Sweden) over the last decade. An introductory chapter compares the tax levels, structures, and systems of the ten, notes differences between government preoccupations in mid-1980s and mid-1990s, and unusual tax features of particular countries, before speculating on likely changes in the remaining years of the century. In the ten main chapters, individual national experts provide in a standardized format to facilitate comparison details of all the significant taxes and important changes in relation to specific policy considerations such as fiscal deficits, savings and investment incentives, income distribution effects, and administrative and compliance costs. The country chapters conclude with a summary of recent and prospective tax reforms, which in each case takes account of the underlying economic conditions and political climate.

Tax scholars traditionally emphasize economics and assume that all tax systems can be evaluated in more or less the same way. By applying the insights of anthropology, sociology, and other social sciences, Michael A. Livingston demonstrates that tax systems frequently pursue different values and that the convergence of tax systems is frequently overstated. In *Tax and Culture*, he applies these insights to specific

countries, such as China and India, and specific tax issues, including progressivity, tax avoidance, and the emerging area of environmental taxation. Livingston concludes that the concept of a global tax culture is, in many cases, merely a reflection of Western hegemony, and is unlikely to survive the changes implicit in the rise of non-Western nations and cultures.

This volume examines the tax systems of some twenty countries to determine whether their tax laws are used to support growth and development across borders in lower-income and poor countries. Given the critical economic development needs of poorer countries and the importance of stability in these regions to the security of populations throughout the world, the use of a country's tax laws to support investment in the developing world gains crucial significance. This book explores whether international standards promoting the fundamental values of the major tax systems of the world accommodate incentives for these nations. In addition, it analyzes the way in which adoption of principles by higher income nations to protect their own revenue bases has a spill-over effect, impairing the ability of developing countries to sustain their economies. Following an introduction that synthesizes worldwide trends, the volume contains separate chapters for a variety of countries detailing the underlying goals and values of each system and the way in which the decision to employ (or not employ) incentives accommodates those ends. The chapters include reports for: Australia, Belgium, Brazil, Croatia, Czech Republic, France, Hong Kong, Israel, Italy, Japan, the Maldives, the Netherlands, Poland, Portugal, South Africa, Uganda, United Kingdom, United States, and Venezuela. The volume memorializes the work of the General Reporter and National Reporters at the Taxation and Development session of the 19th Congress of the International Academy of Comparative Law held in July, 2014, in Vienna, Austria.

This research identifies and quantifies horizontal and vertical inequities resulting from selected owner-occupied housing tax policies through micro-simulation. The simulations are spreadsheet constructions underpinned by the respective UK and US tax systems. Within each country-specific simulation case families are established varying with regard to income levels and investment choices. The specific tax policies analysed are the acquisition taxes, property taxes, elements specific to housing affecting income taxes (i.e. mortgage interest relief) and capital gains taxes. In addition to the specific tax policies, the overall tax obligations (the sum of the four specific taxes) are considered. The time frame of the study is a twenty-year period from 1990 through 2009. A recurring theme in the literature is that homeowners ought to be taxed as investors in rental properties to ensure tenure neutrality or, alternatively, taxed as any other investor to ensure tax neutrality. This research considers the corresponding effects on horizontal and vertical equity by modifying the UK and US tax systems for increased levels of neutrality through further micro-simulation analysis. Finally, the respective owner-occupied housing tax policy changes and reforms that occurred within the twenty-year period studied are evaluated in terms of enhancements to or hindrances of horizontal and vertical equity. This is accomplished by simulating sixteen five-year periods within the twenty-year time frame and evaluating horizontal and vertical equity on a within-country and a cross-country basis. What appears to be lacking in the literature is an extensive comparative analysis of the specific owner-occupied housing tax policies and their interrelationship with respect to the complex overall tax system in which they are present. The aim of this research is to contribute to the middle/high range of comparative analytical work. The research is set within a comprehensive theoretical framework and systematically compares the two countries' specific tax policies and their overall impact on the respective tax systems. The methodology used is consistent between the two countries, ensuring a robust dual-nation comparison. The US specific tax policies relevant to homeownership and the overall tax system were found to have greater inherent horizontal inequities when compared with the UK tax policies and tax system. Both countries' specific tax systems were found to have varying inherent vertical inequities. The UK homeowner occupiers experience more vertical equity (progressivity) in the acquisition tax system when compared with the US investors.

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Conversely, the US homeowner occupiers experience more vertical equity (progressivity) in the property tax, income tax and capital gains tax systems. Overall, the US investors experience a more progressive tax system when compared directly with the UK investors. The abolition of the UK Mortgage Interest Relief at Source (MIRAS) resulted in a less progressive income tax system for homeowner occupiers but one that is more horizontally equitable with other investors. The erosion of the benefits realised from the US mortgage interest and real estate tax deductions has resulted in a more vertically and horizontally equitable income tax system for all but the most wealthy. Vertical equity was improved by the adoption of the UK council tax in that it is a less regressive form of property taxation when compared with its predecessor. The recent reforms to the UK stamp duty (land tax) have made the system of acquisition taxation more vertically equitable but have exacerbated the horizontal inequity of the system with respect to other capital investors. The US capital gains tax system as it relates to the homeowner occupier changed significantly with the Tax Reform Act of 1997, resulting in a simpler but less equitable system depending on circumstances. With regard to the equity of the overall tax systems of the two countries, the UK's progressivity has decreased while the horizontal equity has improved during the twenty-year period, whereas the progressivity of the US system has remained relatively flat with an improvement in horizontal equity. iii The author concludes with a call for the gradual repeal of the mortgage interest relief in the US, a subsidy shown to be extremely vertically inequitable in this study and one that was estimated to cost the exchequer \$79 million in lost tax revenue in 2010 by the US Office for Management and Budget. While a taxable imputed rental income may be theoretically optimal, the well-recognised administrative and compliance issues associated with such tax reform make it untenable. Therefore, the second best option and the one adopted by the UK and most other developed nations, is not to allow a deduction for a cost in generating untaxed income. This research contributes a unique synthesis of methodological techniques to the housing equity literature. The combined analyses of horizontal equity under the classical definition with the chosen structural and distributional techniques in evaluating vertical equity have never been done before. The analysis of the overall tax system comprising four specific tax systems is also original in this area of research and employs the Suits (1977) method for determining overall progressivity. There is an attempt within this research to replicate the results derived from the Suits indices by similarly extending the structural indices, thus testing the transferability of the methodology established by Suits. This is the first attempt to extend the structural indices established decades earlier to researcher's knowledge. The results from two of the three structural measures are inconsistent with each other and the results from the Suits indices and therefore not believed to be informative. However, the results from the extended Liability Progression of both countries are indeed consistent with the results of Suits indices. This is an interesting research observation and may be indicative of the transferability of the Suits methodology. This area of research continues to be discussed by academics and policymakers given the conflicting underpinning theories and continued fiscal favouritism in many developed countries. This research area has become even more topical in the last few years given the recent financial crisis. The multi-layered, comparative micro-simulation technique employed within this research provides a solid platform from which to appraise conventional wisdoms and proposals for future policy with regard to owner-occupied housing taxation and beyond.

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.

First published in 1999, this volume aims to add to the existing body of knowledge with regard to application of ad valorem property taxation in various countries. To this end, the present volume has essentially focused on updating, revising and extending the coverage of material included in the earlier book, 'Comparative Property Tax Systems'. The contributors discuss issues including property tax in Singapore,

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Ireland, Pakistan, Poland and Cyprus.

This report is the ninth edition of the OECD's Tax Administration Series. It provides internationally comparative data on aspects of tax systems and their administration in 59 advanced and emerging economies.

Provides an introduction to the study of comparative tax law. The coverage is on many countries and types of taxes, as well as the general legal framework for tax law and tax procedure. Emphasis is on the income tax and, to a lesser extent, value added tax. Focus is on underlying structural differences in legal systems, including constitutional issues, judicial interpretation of tax laws, judicial and legislative anti-avoidance doctrines, different approaches to defining income, alternative systems for taxing corporations and shareholders, and problem areas in the VAT (including international services and e-commerce).

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 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.

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.

Compilation of the 16 English language contributions of "Staaten und Steuern (States and Taxes)", the original festschrift to honour Klaus Vogel.

Modern society cannot function without a high level of investment, just as it cannot function without a high level of taxation (or its equivalent in communist countries). Both investment and taxation (as a source of government revenue) are important for the level of production and employment. No wonder then that governments are faced with an increasing dilemma between higher taxation on the one hand and the need for stimulating investment by tax reductions or allowances on the other. Related to this is the choice between a market economy which is as free as possible and detailed governmental measures for monitoring and steering investments, not only with the intention to promote economic growth but to further a number of other social interests as well. This is to some extent a political issue but the decisions it involves should still be based on sound economic facts and considerations. In many countries one of the important instruments for stimulating and steering investment is the introduction or modification of investment incentives within the framework of the tax system. The present book gives a lot of information on this subject. It endeavours to create a conceptual order in the somewhat chaotic multitude of incentives practised by the main industrial countries and studies their economic effects. The authors are well equipped to do this because they were closely involved in the study on this subject made by Erasmus University Rotterdam at the request of the Common Market Commission.

Essay from the year 2004 in the subject Business economics - Accounting and Taxes, grade: Distinction (83%), The University of Sydney (Faculty of Law), course: Comparative Corporate Taxation, language: English, abstract: This essay briefly describes the main different theoretical approaches (tax systems) designed to alleviate the double burden of corporation tax and shareholder income tax under Part 2. Parts 3- 5 explain how the problem of dividend double taxation was tried to be solved in the heterogeneous tax systems of the Germany, the UK and the US. However, the essay will not

cover the different double tax avoiding treaties in force in those countries.

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.

Comparative Income Taxation A Structural Analysis Fourth Edition Hugh J. Ault, Brian J. Arnold & Graeme S. Cooper In complex national income tax systems, structural and design variations from one country to another present major obstacles to the kind of comparative understanding that economic globalization requires. Hence the great significance of this outstanding book, highly acclaimed through three previous editions and now thoroughly updated to encompass the latest changes and trends. In it, leading authorities from eleven of the world's most important national taxation systems each contribute their particular expertise to a study of specific crucial problems of tax design. In addition to the nine countries covered in previous editions—Australia, Canada, France, Germany, Japan, the Netherlands, Sweden, the United Kingdom and the United States—China and India have now been added to provide the perspective of developing countries. Individually authored country descriptions outline the climate and institutional framework in which each of the eleven national taxation systems' substantive rules operate. All the country descriptions are analyzed in accordance with a common format to facilitate comparisons of the ways in which the countries' tax systems are similar and in which they differ. They form the background to an expertly informed comparative analysis focusing on three major areas: basic income taxation, taxation of business organizations and international taxation. Most of the rules especially important for international business and investment are dealt with here, including (among many others) rules on the following: classification of business entities; taxation of corporations and their shareholders; corporate organization and restructuring; taxation of partnerships; residence and source taxation; controlled foreign company rules; restrictions on the deduction of interest; courts dealing with tax matters; and effect of tax treaties. Several new topics—including the classification of employees and independent contractors, the taxation of pensions, patent box regimes, the taxation of indirect transfers and the tax challenges of the digital economy—have been added. Especially timely are discussions of changes stemming from the G20/OECD Base Erosion and Profit Shifting project. The introduction has also been expanded to include a new section on European Union (EU) law as it affects the tax laws of EU Member States. This new edition of a classic source of information and analysis for students, professors, researchers, tax practitioners and tax policy officials on the different ways that countries design their income tax systems will be widely welcomed by the international tax community.

Taxation—both corporate and personal—has been held responsible for the low investment and productivity growth rates experienced in the West during the last decade. This book, a comparative study of the taxation of income from capital in the United States, the United Kingdom, Sweden, and West Germany, establishes for the first time a common framework for analysis that permits accurate comparison of tax systems.

Around the world, there are concerns that many tax codes are biased against women, and that contemporary tax reforms tend to increase the incidence of taxation on the poorest women while failing to generate enough revenue to fund the programs needed to improve these women's lives. Because taxes are the key source of revenue governments themselves raise, understanding the nature and composition of taxation and current tax reform efforts is key to reducing poverty, providing sufficient revenue for public expenditure, and achieving social justice. This is the first book to systematically examine gender and taxation within and across countries at different levels of development. It presents original research on the gender dimensions of personal income taxes, and value-added, excise, and fuel taxes in Argentina, Ghana, India, Mexico, Morocco, South Africa, Uganda and the United Kingdom. This book will be of interest to postgraduates and researchers studying Public Finance, International Economics, Development Studies, Gender Studies, and International Relations, among other disciplines.

A collection of studies that explore the extractive systems of twelve ancient states and societies from across the ancient world The studies collected in Ancient Taxation explore the extractive systems of twelve ancient states and societies from across the ancient world, ranging from Bronze Age China to Anglo-Saxon Britain. Together, the

The book contains contributions by various authors on property tax systems as implemented in 13 different jurisdictions. Attention is focused on one aspect, namely, the taxation of property to finance local authority expenditure for the provision of local services. Some of the chapters in this book have been revised and updated in "Property tax : an international comparative review" (1999).

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