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Introduction to Federal Income Taxation in Canada

44th Edition,
2023–2024

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Advanced Issues in International and European Tax Law Christiana HJI Panayi, 2015-12-03 This book examines recent developments and high profile debates that have arisen in the field of international tax law and European tax law Topics such as international tax avoidance corporate social responsibility good governance in tax matters harmful tax competition state aid tax treaty abuse and the financial transaction tax are considered

The OECD G20 project on Base Erosion and Profit Shifting BEPS features prominently in the book The interaction with the European Union's Action Plan to strengthen the fight against tax fraud and tax evasion is also considered Particular attention is paid to specific BEPS deliverables exploring them through the prism of European Union law Can the two approaches be aligned or are there inherent conflicts between them The book also explores whether when it comes to aggressive tax planning there are internal conflicts between the established case law of the Court of Justice and the emerging policy of the European institutions By so doing it offers a review of issues which are of constitutional importance to the European Union Finally the book reflects on the future of international and European tax law in the post BEPS world

Strengthening Tax Governance Through Legal Design Ms. Lydia E Sofrona, Mr. Christophe J Waerzeggers, Brendan Crowley, 2025-01-17 Well functioning tax systems anchor their governance arrangements in law This paper develops an analytical framework from which the core legal principles for sound tax governance can be derived to inform the design of countries legal frameworks for administration and tax procedure It then applies this analytical framework to derive key legal features that should be embedded in laws for tax administration including additional considerations for semi autonomous revenue authorities and tax procedure to ensure a balance between tax administration powers and adequate taxpayer protections

International Tax Disputes Hans Mooij, 2024-06-05 Bringing together global experts from diverse legal backgrounds this comprehensive book offers a rigorous analysis of the complexity of resolving and preventing international tax disputes covering arbitration mediation and dispute management Presenting an authoritative overview of international tax disputes this book will be indispensable to practitioners in corporate and international tax controversy and dispute specialists and investment arbitration lawyers

United Nations Practical Manual on Transfer Pricing for Developing Countries 2017 United Nations, 2017 The Manual is a response to the need often expressed by developing countries for clearer guidance on the policy and administrative aspects of applying transfer pricing profit shifting analysis to some of the transactions of multinational enterprises MNEs in particular

Klaus Vogel on Double Taxation Conventions Ekkehart Reimert, Alexander Rust, 2022-01-18 Klaus Vogel on Double Taxation Conventions is regarded as the international gold standard on the law of tax treaties This article by article commentary has been completely revised and updated to give you a full and current account of double tax conventions DTCs DTCs form the backbone of international taxation but they raise many interpretational questions This market leading work will provide you with the answers Based on the OECD G20 Multilateral Instrument the OECD MC and Commentary published in 2017 and the most recent amendments to the UN MC the book also includes relevant case law and scholarly literature upto and including 2020 Previous editions of the Vogel have been routinely relied on by courts around the world including Australia Canada Germany India South Africa the Netherlands and United Kingdom What's new in this edition There have been many important developments in this area since the last edition in 2015 The authors discuss these developments and the effect they will have upon practitioners working in this area

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Judicial Interpretation of Tax Treaties Carlo Garbarino, 2016-10-28

Judicial Interpretation of Tax Treaties is a detailed analytical guide to the interpretation of tax treaties at the national level The book focuses on how domestic courts interpret and apply the OECD Commentary to OECD Model Tax Convention on Income and on Capital Adopting a global perspective the book gives a systematic presentation of the main interpretive proposals put forward by the OECD Commentary and analyses selected cases decided in domestic tax systems in order to assess whether and how such solutions are adopted through national judicial process and indeed which of these are of most practical value The book operates on two levels firstly it sets out a clear and comprehensive framework of tax treaty law

which will be an important tool for any tax practitioner Secondly the book provides crucial guidance on issues of tax treaty law as applied at domestic level such as investment or business income dispute resolution and administrative cooperation

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Food Insecurity Among Members of the Armed Forces and Their Dependents Beth J. Asch, Stephanie Rennane, Thomas E. Trail, Lisa Berdie, Jason M. Ward, Dina Troyanker, Catria Gadwah-Meaden, Jonas Kempf, 2023-01-03 The National Defense Authorization Act for fiscal year 2020 directed the Secretary of Defense to report on food insecurity among members of the armed forces and their dependents The directive includes the following elements an assessment of the current extent of food insecurity among not only service members and their dependents but also those living on post and presumably not receiving the basic allowance for housing BAH participation in food assistance programs barriers to accessing this assistance a description of other sources of income to meet basic needs an assessment of the feasibility and advisability of a basic needs allowance BNA for low income members and three sets of recommendations for policies programs and activities to address food insecurity among military families RAND researchers examined these elements and developed answers along with listing areas requiring additional analysis

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