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A Multilateral Convention for TaxContribuições de Intervenção no Domínio Econômico (CIDE)Tax Treaty InterpretationCooperative Compliance e Medidas de Redução do Contencioso TributárioTaxing Global Digital CommerceMedidas de Redução do Contencioso e o CPC/2015Medidas De Redução Do Contencioso E O Cpc/2015 Sergio André Rocha Daniela Silveira Lara Sergio André Rocha Gisele Barra Bossa Arthur Cockfield Eduardo Perez Salusse Vários Autores

A Multilateral Convention for Tax Contribuições de Intervenção no Domínio Econômico (CIDE) Tax Treaty Interpretation Cooperative Compliance e Medidas de Redução do Contencioso Tributário Taxing Global Digital Commerce Medidas de Redução do Contencioso e o CPC/2015 Medidas De Redução Do Contencioso E O Cpc/2015 *Sergio André Rocha Daniela Silveira Lara Sergio André Rocha Gisele Barra Bossa Arthur Cockfield Eduardo Perez Salusse Vários Autores*

the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting mli is the most forceful multilateral initiative to coordinate tax regimes on a worldwide basis since the dawn of modern income taxation over a century ago this book evaluates two radically opposed viewpoints on the convention a momentous and revolutionary paradigm shift versus a mechanism that merely continues an ongoing flow of limited policy coordination with detailed investigations that bring to life the hopes and the realities of the current era of multilateral tax cooperation bringing together authors from national jurisdictions across the globe to scrutinize the mli and its likely future ramifications the book provides in depth commentary and analysis in the following sequence first a comprehensive discussion of the design and goals of the mli as a treaty and an institutional framework second an overview of the structure of the convention and its take up across

the globe to date and third the substantive implementation of the mli with a wide range of country reports practice areas covered include tax law international law and international relations the legal workings and implications of the mli might still seem mysterious to those whose daily work is impacted by it and there is as yet little jurisprudence regarding its legal nature or ultimate effect on the bilateral treaties coming within its scope for these reasons this pathbreaking book will be warmly welcomed by in house counsel and law firms advising cross border investors and firms nongovernmental organizations involved in policy analysis and issue advocacy researchers working on technical areas of international tax law and lawyers interested in international policymaking including the creation and diffusion of consensus based fiscal and related regulatory norms across jurisdictions of differing development levels

a partir de uma contextualização histórica constitucional do brasil bem como da grande transformação do setor de telecomunicações nas últimas décadas após a privatização e da necessidade de investimentos para sua massificação e desenvolvimento de novas tecnologias esta obra analisa o comportamento do supremo tribunal federal stf em contraposição ao entendimento da doutrina brasileira na análise dos principais requisitos de validade das contribuições de intervenção no domínio econômico cide com sua aplicação na principal cide cobrada do setor de telecomunicações a contribuição ao fundo de universalização do setor de telecomunicações fust tendo em vista tal análise crítica este livro apresenta uma solução prática para o impasse criado com a cobrança de uma contribuição que apesar de ser um importante instrumento para a promoção de eficientes políticas públicas nunca foi aplicada a seus fins constitucionais

because the normative concepts referred to in tax treaties are susceptible to contextual variation the rules embedded in such treaties cannot be applied without interpretation in this incomparable book an internationally known tax law practitioner and scholar draws on decades of knowledge gathering to present a deeply evolved general theory of tax treaty interpretation thoroughly discussing the starting points and elements of interpretation that should be considered by all stakeholders in the field of international taxation in the course of his rigorous commentary the author invokes the established

canons that apply to the interpretation of tax treaties including the vienna convention on the law of treaties and the oecd and un model conventions he presents a detailed investigation of the implications for tax treaty interpretation of such topics and issues as the following essential concepts such as context and qualification evolution of international taxation from bilateralism to multilateralism specific interpretation issues raised by bilateral tax treaties economic crises as drivers for changes in international taxation rules the oecd g 20 beps project digitalization of the economy pandemic war and deglobalization interpretation of international treaties versus interpretation of domestic laws and interpretation of double tax conventions in countries that are not oecd members in the absence of a declaration of international tax principles this book s in depth analysis of the theory of interpretation of international tax treaties given the risks of interpreting treaties with different jurisdictions and different languages will ensure an appropriate understanding of the current context of international taxation providing practitioners and policymakers with a fully informed background that will guide the interpretation of any international tax treaty

dividida em duas partes centrais i cooperative compliance e métodos alternativos de redução do contencioso tributário no brasil e ii pontos críticos relacionados ao incremento do contencioso tributário brasileiro esta obra pretende contribuir com efetivos avanços teóricos na formulação de propostas e melhorias das medidas existentes para aprimorar as relações entre a administração tributária e os contribuintes com a participação de autoridades da organização para a cooperação e desenvolvimento econômico ocde procuradoria geral da fazenda nacional pgfn receita federal do brasil rfb e conselho nacional de justiça cnj bem como do empresariado do grupo de estudos tributários aplicados getap e da associação brasileira de direito financeiro abdf esta iniciativa é ferramenta relevante para superação de potenciais conflitos de interesses que norteiam a administração fiscal e seus administrados e dá voz ao exercício da cidadania fiscal mais do que um ganha ganha esperamos que todos esses trabalhos promovam estímulos positivos à doutrina e aos labores dos formuladores de tax policy das administrações tributárias do nosso federalismo além de fomentar a especialização das novas gerações para que mais profissionais se tornem aptos a operar

a partir de critérios científicos seguros com a experiência empírica e efetivo exercício da cooperação

digital commerce the use of computer networks to facilitate transactions involving the production distribution sale and delivery of goods and services has grown from merely streamlining relations between consumer and business to a much more robust phenomenon embracing efficient business processes within a firm and between firms inevitably the related taxation issues have grown as well this latest edition of the preeminent text on the taxation of digital transactions revises updates and expands the book s coverage it includes a detailed and up to date analysis of income tax and vat developments regarding digital commerce under the oecd and g20 base erosion and profit shifting beps reforms it explores the implications of digital commerce for us state sales and use tax regimes resulting from the 2018 us supreme court decision in wayfair it discusses cross border tax in the united states while continuing to focus on tax developments throughout the world analysing the practical tax consequences of digital commerce from a multijurisdictional perspective and using examples to illustrate the application of different taxes to digital commerce transactions the book offers in depth treatment of such topics as the following how tax rules governing cross border digital commerce are increasingly applied to all cross border activities how tax rules and institutional processes have evolved to confront challenges posed by digital commerce how an emerging tax war is developing whereby different countries are unilaterally imposing new tax rules on cross border digital commerce how technology enhances tax and cross border tax information exchanges how technology reduces both compliance and enforcement costs cross border consumption tax issues raised by cloud computing and different approaches to the legal design of vat place of taxation rules the authors offer insightful views on the likely development of new approaches to taxing cross border digital commerce this edition while building on the analysis of the relationship between traditional tax laws and the internet in the first edition and its predecessors contains a more explicit and systematic consideration of digital commerce issues and the ongoing policy responses to them tax professionals and academics everywhere will welcome the important contribution it makes towards the design of cross border tax rules that are both conceptually sound and practical in application a tour de force

much larger and richer than its predecessors a massive contribution to the growing literature on the taxation of e commerce rita de la feria british tax review provides important understandings for ongoing policy discussions i would warmly recommend p rendahl world journal of vat gst law

o que se deve fazer quando determinado sistema ou instituição caminha para o colapso em um ambiente bastante hostil e pouco cooperativo o contencioso tributário emperra frente a problemas de ordem cultural normativa administrativa política e econômica tais adversidades estimularam a organização da presente obra e trouxeram o desafio de trabalhar os temas a partir de pilares desenvolvimentistas e solucionadores se é verdade que a situação do contencioso tributário é crítica não é menos verdadeiro que as crises impulsionam o desenvolvimento o desconforto do contencioso tributário já ultrapassou todos os limites do razoável e do que se poderia minimamente ser nominado de eficiente É tempo de escrevermos uma nova história calcada na isonomia boa fé e cooperação processual devemos encarar este momento como oportunidade de amadurecimento e estreitamento da relação entre fiscos e contribuintes os profissionais que compõem esta obra fazem parte da elite do direito tributário nacional demonstram engajamento técnico e o espírito público necessário para contribuir com sugestões para a superação da crise e para o fortalecimento das nossas instituições

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