Contents

	Preface	I_{s}
1	Introduction The present systems and associated problems (chapter 2) How well does the present system perform? Economic implications The process of reform (chapters 4-7) Leaving it to market forces Withholding taxes Bilateral treaties versus EC directives (chapter 6) Harmonisation of systems A federal tax system? Conclusions and recommendations	15 15 16 17 17 18 18 18 19 20
2	The present systems and associated problems Introduction The right to tax The taxpayer The tax base The system of corporate tax Relief from double taxation in a cross-border situation The taxation of mergers The rate of corporate tax and date of payment The problems Tax planning to equalise systems	21 21 22 23 24 24 26 29 30 31
3	Economic implications Capital import and export neutrality How important are CEN and CIN? Corporate tax and foreign investment Other resource savings	35 35 36 38 39
4	Competition between national tax authorities 'Fiscal degradation?' Tax competition in the industrialised countries Arguments for international tax co-ordination	41 41 42 43

8	THE FUTURE OF CORPORATE TAXATION IN THE EUROPEAN	Community
5	Harmonising withholding taxes Dividends from subsidiary to parent Other intercorporate dividends Dividends to non-corporate shareholders Royalties Interest Other income Conclusion	45 45 46 47 47 48 48
6	Using bilateral and multilateral treaties Progress by bilateral treaties? Current EC tax treaties What is the way forward? Conclusion regarding treaties	51 51 52 54 55
7	The corporate tax system Common system The credit or the exemption system The imputation or the classical system The imputation system The classical system Conclusion regarding system	57 57 59 60 61 64
8	A federal tax system Introduction What is a tax system? Is harmonisation a means or an end? A single corporate tax system A federal corporate tax system The consequences of fiscal unity	69 69 69 70 71 72 76
9	Conclusions and recommendations Recapitulation Other items Corporate tax system A common, single or federal system Recommendations	79 79 80 83 84
Αŀ	PPENDICES	
1	An outline of the corporate tax systems of the EC Belgium Denmark France	89 89 92 95

	Germany	98
	Greece	101
	Ireland	104
	Italy	107
	Luxembourg	110
	The Netherlands	113
	Portugal	116
	Spain	120
	United Kingdom	123
2	Overview of methods used to give relief for double taxation in the EC	127
3	Returns on investment in EC countries: an illustration	129
4	EC tax treaties in operation	147
5	Cross-border implications of different corporate tax systems	149
6	Summary of impact of alternative tax systems on investment within the EC	155
	Index	157