

Preface

The European Commission is considering a fundamental change to the tax system for companies with taxable operations in the European Union. The new system is called the Common Consolidated Corporate Tax Base (CCCTB). Companies that are eligible for and opt in to the CCCTB would be taxed on their consolidated taxable profits across the participating Member States. Those profits would be allocated between the participating Member States based on a formula apportionment and taxed in each of the states at the corporate tax rate applicable in that state. This would replace the existing system where each Member State, based on its own rules, taxes the profits of companies with a taxable nexus in that country.

Given that a significant European investment comes from third countries, the CCCTB regulations and their relationship to those third countries require more analysis and careful thought. So far, not much thought has been given to how the CCCTB affects companies based outside Europe. Accordingly, the main purpose of this book was to fill this gap and to take the first steps toward research in that field. In a total of nine chapters, issues such as the taxation of EU and EU non-resident companies are dealt with. Great attention is also given to the issues of withholding taxation and the deductibility of expenses. Questions regarding the transfer of assets to third countries or the treatment of transparent entities are also of high importance.

This project was carried out by an international team based at the Institute for Austrian and International Tax Law of the Vienna University of Economics and Business (WU), composed of the editors, and several researchers, in particular Markus Seiler and Daniel Fuentes Hernández, whom the editors warmly thank for their enthusiasm, initiative and support. The editors would also like to thank the authors and commentators of every chapter. They have patiently revised their chapters in order to enhance the quality of this book. All chapters have been linguistically edited by Margaret Nettinga. Finally, special thanks to Renée Pestuka, who brought the whole team together and enthusiastically supported this project.

This book was supported with funds from the Oesterreichische Nationalbank (Anniversary Fund, project number: 14676).

Vienna, November 2012

