Tax Research Network Conference 2025
Abstracts
Monday, 8 September
Parallel session 1: Tax Avoidance/Evasion

An Analysis of Tax Evasion Punishments Across Economic Sectors

Ranjana Gupta

Tax evasion cases have attracted much media attention with the increasing use of technology. However, it is questionable whether the increased media attention on the punishments imposed on tax evaders has changed taxpayers' views on this subject and whether they would take the information published by the media seriously. The public must believe that the laws of a country are legitimate. To assist with this, the present paper investigates the degree of punishments across various sectors of activity and the parameters the judiciary considers when deciding on the appropriate degree of sanctions by analysing the selected published legal cases. The stratified random sampling method was utilized to select the cases. The qualitative data analysis package NVivo 12 was used to analyse tax evasion.

The analysis found variations in punishments issued by the courts to taxpayers involved in different sectors of activity. Accountants engaged in tax evasion were given harsher punishments than other activity sectors. Further, the reference to various cases in the different sectors demonstrates that the non-custodial sentences were imposed on taxpayers who had pleaded guilty at the earliest opportunity, were of good character, took responsibility for their actions, were cooperative with the Inland Revenue Department (IRD), had severe medical issues, had no previous convictions, were the sole income earners in their family or did not use the evaded money themselves. A custodial sentence was imposed when the taxpayers did not show remorse for their actions, had gone to extreme lengths to conceal their offending, had previous convictions, did not cooperate with the IRD and had used the proceeds of their crime to fund a luxurious lifestyle. The prison sentences for the tax evaders convicted under the Crimes Act 1961 were much higher. It is asserted that this research will provide an overview of dynamics for policymakers or tax authorities to consider if looking at sentencing.

Pressure, Incentives and Opportunity on Individuals' Tax Evasion in Malaysia: The Moderating Role of Rationalization

Rosnazida Razali

This study investigates individual tax evasion in Malaysia, focusing on the direct effects of pressure, incentives, opportunity and rationalization, and the moderating role of rationalization between pressure, incentives and opportunity to tax evasion. Using the Fraud Triangle Theory, the results provide insightful analysis of tax compliance and economic behaviour, pointing out rationalization's moderating role and the elements causing tax evasion. The methodology incorporates pooled cross-sectional data derived 1,910 notices of additional assessment from

IRBM data 2020-2024 and will be analysed using Stata. The study contributes significantly to the existing body of knowledge by expanding the Fraud Triangle framework, incorporating incentives into the pressure prong to provide more comprehensive understanding of the factors driving tax evasion. Additionally, the study highlights the moderating role of rationalization, offering a deeper theoretical perspective on individual taxpayer. Practically, the study benefits tax authorities, particularly the Inland Revenue Board of Malaysia (IRBM), by enabling the development of a tax evasion profiling dashboard to identify high-risk taxpayers effectively. This tool improves the audit selection, ensuring more efficient and targeted enforcement efforts. Furthermore, the research evaluates the effectiveness of the Special Voluntary Disclosure Programme (SVDP), offering valuable insights for assessing its impact and refining future voluntary compliance strategies. Ultimately, these contributions enhance tax compliance, fostering a fairer and more effective tax system.

When Anti-Avoidance Measures and Property Rights Collide

Jeroen Lammers

This article explores when anti-avoidance provisions in (national) tax legislation violate the right to property. While the intersection of tax law and human rights gains increasing attention in global discussions on tax fairness, effective enforcement, and legal safeguards for taxpayers, the question of whether anti-avoidance measures infringe upon property rights remains under-explored in academic literature. Drawing on the European Court of Human Rights' method of examination, alongside analyses of recent cases from the Dutch and American Supreme Courts, the article argues that certain anti-avoidance rules—particularly those reclassifying income, such as the Danish provision taxing all shareholder loans as dividends upfront—may impose disproportionate burdens on taxpayers.

Building on these insights, the article introduces an analytical framework comprising five indicators to systematically identify tax avoidance measures that risk violating property rights. Through rigorous examination of both national and international jurisprudence, this study contributes to the evolving debate on reconciling the demands of effective tax administration with the imperative of safeguarding fundamental rights. The findings offer critical guidance for tax practitioners, policymakers, and authorities for identifying existing tax-avoidance measures and/or designing future ones that ensure robust and efficient tax compliance while aligning with constitutional and human rights standards.

An Approach to Justifying and Scoping Substance over Form in Tax Avoidance

Ross Pey

In aggressive tax avoidance cases, the UK courts, from Ramsay [1982] AC 300, have consistently discarded the legal form of the taxpayer's schemes, in favour of the true economic reality of the transactions, to hold that the taxpayer has not in reality arranged their affairs such that a tax benefit is accrued. It has also been implicitly acknowledged that this is not an issue of interpretative gap-filling or mistake correction.

For reasons of constitutional propriety, the courts may not develop judicial anti-avoidance rules. Any technique to disable aggressive tax avoidance schemes must be linked to the statute and principles of statutory interpretation. Viewed this way, the current justifications for the economically realistic approach are lacking. In Barclays Mercantile [2005] 1 AC 684, Hurstwoord [2021] 2 WLR 1125, and Cobalt Data Centre 2 [2024] 1 WLR 5213, the House of Lords and the Supreme Court merely assert that courts uphold the substance of the taxpayer's transaction. In UBS [2016] 1 WLR 1005, the Supreme Court sought (tenuously and unrealistically) to link it to the purpose(s) of a taxing provision.

In this paper, I argue that a better justification for preferring the economic reality of taxpayer transactions is to preserve the effectiveness of the tax statute. This ties the preference of the economic reality to the drafting and fundamental grain of the taxing statute. This is loosely related to Lord Hoffmann's speech in MacNiven v Westmoreland Investments [2001] UKHL 6, [2003] 1 AC 311.
A general economic reality approach might also be squared with the usual invocation of the legal form when characterising taxpayer transactions. It may be that, generally, the legal form is a good indicator of the economic reality of a transaction. But in extreme cases, the legal form may be out of step with economic reality. It is in these cases where the economic reality is explicitly invoked to disregard aggressive avoidance transactions.

Parallel Session 2 – Tax Compliance

Balancing The Books or Beating the Clock? Assessing Tax Audit Quality in Inland Revenue Board of Malaysia (IRBM)

Nor Asiah Taib

In today's increasingly complex fiscal landscape, tax compliance is essential not only for economic sustainability but also as a measure of transparent and fair governance. In Malaysia, the Inland Revenue Board (IRBM) plays a pivotal role in safeguarding financial integrity through effective tax audits. However, the surge in taxpayer numbers, the growing complexity of cross-border transactions, and intensified pressure to meet Key Performance Indicators (KPIs) within tight deadlines present a critical challenge: can IRBM auditors maintain audit quality and professionalism under such demanding conditions? If left unaddressed, these pressures could undermine tax law enforcement and erode public trust in the tax system. There is a limited body of past research on tax audit quality, often centered on narrow aspects such as auditor independence and procedures. Thus, this study examines how information system (IS) effectiveness and the role of tax agents influence tax audit quality at the IRBM, while also examining the moderating effects of KPIs and time pressure. The study is grounded in Attribution Theory and the De Lone & McLean Information System Success Model (D&M ISSM), with structured questionnaires sent to 1,552 IRBM auditors nationwide. The instrument was adapted from validated constructs and refined through expert review and reliability testing. Using Structural Equation Modelling (SEM) via SmartPLS, the study found that both the role of tax agents and IS effectiveness significantly improve tax audit quality. Ethical, transparent tax agents support more objective audits, aligning with Attribution Theory, while efficient information systems enhance audit performance, consistent with the D&M ISSM model. However, time pressure weakens the positive impact of IS effectiveness. These findings suggest policymakers revisit rigid KPIs and time-driven reporting, focusing on investing in IS and enhancing collaboration with tax agents to ensure high-quality audits.

Tax Fairness after the EU List of Tax Havens

Federica Casano

Since 2017, the EU list of tax havens has required non-EU countries, including developing jurisdictions, to comply with OECD and EU tax standards. Due to unbalanced bargaining powers, these standards are often imposed without allowing developing economies to adapt the reforms to their national developmental policies or engage directly with EU decision-makers. Based on empirical findings from interviews and document analysis, my latest research indicates that implementing EU-requested reforms is complex and may misalign with the developmental goals of developing countries.

This creates a dichotomy: the EU aims to preserve its tax revenues and combat harmful tax competition, while developing economies implement preferential tax regimes that support their economic and social development (e.g., manufacturing regimes). The two positions do not seem reconcilable through the EU tax list, as my research highlights its inadequacy in achieving collaborative goals from the perspective of developing countries

To solve the dichotomy, this may be approached from a fairness angle: which argument should prevail in light of fairness? Through a mix of theoretical and empirical approaches, the upcoming paper will analyse the treatment of developing countries in the context of the EU tax list through the lens of tax fairness in global governance. It will explore the meaning of tax fairness from a theoretical perspective via a multidisciplinary framework, operationalize tax fairness in global tax governance before and after the adoption of the EU tax list, and draw on theoretical and empirical implications to determine if and which argument—anti-tax avoidance or tax competition for social development—should be upheld by fairness. The conclusions can inform current international policymaking and negotiations.

Enhancing Tax Compliance Behaviour among Salaried Taxpayers in Malaysia: Enforcement or Encouragement Strategy?

Norul Syuhada Abu Hassan

Tax non-compliance is a global issue and remains a significant challenge for tax authorities, particularly in developing countries such as Malaysia. Increasing tax compliance through tax audits and penalties appears to be a common strategy adopted in many countries. This study attempts to explore and determine the strategies that best suit efforts to enhance tax compliance behaviour among salaried taxpayers in the Malaysian context. Whether through an enforcement or encouragement strategy? The study focuses on four existing strategies implemented by the tax authority in Malaysia: tax audit and penalty under enforcement, and tax education, tax authority fairness, and tax amnesty under encouragement. In line with several recent studies in Malaysia that propose the implementation of a tax reward as an additional strategy, this study further explores the tax reward strategy to provide more comprehensive input in assisting the tax authority in formulating a tax compliance model. The study used a survey method for data collection involving salaried taxpayers in two states (Selangor and Kuala Lumpur), which contribute the highest income tax revenue in Malaysia. The results revealed that tax audit and penalty, tax authority fairness, tax amnesty, and tax reward significantly influence tax compliance behaviour among salaried taxpayers. Among these, tax amnesty under encouragement emerged as the most influential factor, while tax rewards show strong potential for future implementation. The study offers valuable insights for tax authorities and policymakers, particularly the Inland Revenue Board of Malaysia (IRBM), in evaluating and refining tax compliance strategies, suggesting a balanced approach incorporating both enforcement and encouragement to enhance tax compliance behaviour among salaried taxpayers in Malaysia.

Could Legal Simplification Help to Close the Tax Gap?

Sam Sherwood

HMRC estimates that it lost £4 billion in tax to legal interpretation in 2022-23. This subset constituted 13% of the overall tax gap – the difference between what HMRC calculates should have been paid in tax and what it received. Tax commentator Dan Neidle has characterised this situation as “an admission of policy failure” representing “a grotesque waste of HMRC and taxpayer resources.” This paper will examine the extent to which this characterisation is true, whether simplification of tax law could help to close this element of the tax gap and, if so, to what extent.

While the tax gap has decreased as a proportion of revenue over the last decade, the legal interpretation subset has proved resilient. During the 2013-14 to 2017-18 period in which the tax gap saw its greatest decrease, revenue lost to legal interpretation rose both in cash terms and as a proportion of the overall tax gap. While a reduction was achieved in 2020-21 and 2021-22, 2022-23's disproportionate rise in the subset may indicate the beginning of a return to pre-pandemic levels. In this context, and that of the apparent failure of past efforts such as those of the Office of Tax Simplification, to achieve a persistent reduction in lost revenue, a renewed focus on the contribution of unclear and complex tax law to the tax gap seems appropriate.

The deleterious effect of complexity on tax compliance is well-established. This paper will transfer this general understanding to a specific study of the revenue impact of complexity in tax law, and draw focus on specific areas that either A) contribute significantly to lost revenue, such as VAT categorisations, or B) attract questions of their practical utility, such as UTT regulations.

Parallel Session 3 – Tax Compliance

Understanding Tax Compliance Intentions Among Gig Workers in Malaysia: A Decomposed Theory of Planned Behaviour Approach

Siti Fatimah Abdul Rashid

The rapid expansion of the gig economy has transformed employment models globally, introducing flexible work arrangements but also posing significant tax compliance challenges. Unlike traditional employees, gig workers, particularly digital freelancers, must self-manage their tax obligations without third-party reporting mechanisms. This study explores the factors influencing tax compliance intention among Malaysian gig workers, focusing on the mediating role of attitude within the framework of the Decomposed Theory of Planned Behaviour (DTPB). Using a structured survey distributed to 202 digital freelancers registered under the GLOW-PENJANA program, the study examines how moral reasoning, perceived fairness, and adoption of online tax services shape attitudes and influence compliance intentions. Structural Equation Modelling (SEM) revealed that both moral reasoning and adoption of online tax services significantly affect attitudes, which in turn strongly predict the intention to comply. Attitude also partially mediates the relationships between these variables and tax compliance intention, though no mediation was found for perceived fairness. This study makes a notable contribution by applying the DTPB in a developing country context, offering a nuanced understanding of psychological and behavioural drivers of tax compliance in the gig economy. It highlights the importance of promoting ethical awareness and enhancing digital tax infrastructure (e.g., MyTAX) to foster positive attitudes and voluntary compliance. The findings provide empirical support for designing targeted tax policies and educational programs to improve compliance among emerging, digitally-driven workforce segments. By addressing an understudied population, this research also fills a critical gap in the literature on taxpayer behaviour, supporting more adaptive and inclusive tax administration in the digital age.

Access to Justice for Unrepresented Taxpayers

Amy Lawton

Access to justice can influence which cases get heard before a court, and which case law subsequently shapes our interpretation of the law. In the UK, it is unlikely that someone will receive legal aid for a tax dispute. In the United States, civil legal aid is also limited, with a reliance on non-profit legal aid organisations. Access to justice is critical to the rule of law but riddled with obstacles (Rhode, 2014; Rhode, 2004), including financial, procedural, and emotional barriers for those seeking to access the courts (and tax courts) (Book, 2014).

This paper will seek to measure whether representation influences the likelihood of success in the tax court, and therefore whether pro bono representation could provide a stronger voice for marginalised taxpayers. Without this voice, our tax laws are skewed towards those who can afford to access the tax courts with representation.

Research in this field is extremely limited, but this project will build on existing work by adopting a similar approach to Hird and Fogg (Hird and Fogg, 2022), who looked at published court judgments to explore the contribution that pro bono and tax clinic representation could have in the United States. This paper will present preliminary findings on whether representation in the tax court matters by coding tax judgments, which is a recognised legal method of enquiry (Blackwell, 2021; Hall, 2023). Specifically, judgments from the First-Tier Tribunal (Tax) and the US Tax Court between January 2024 and March 2024 have been coded to identify a) whether there was representation, b) the outcome of the case, and c) the area of tax at dispute.

This data will enable an initial exploration of whether representation matters, whether unrepresented taxpayers contribute to the development of tax law, and whether there is a need for greater pro bono support in tax in the UK.

Enforcement, Facilitation and Trust: Can Tax Incentives Ever Be Enough To Shape Malaysian Compliance Landscape?

Umikalsom Mohamed Ariffin

Tax compliance is a fundamental pillar of fiscal sustainability and effective public governance. Improving voluntary tax compliance among individual taxpayers in Malaysia remains a national priority. This study investigates the multidimensional factors influencing tax compliance behaviour, positioning it as the central dependent variable within an integrative analytical model. Drawing on Attribution Theory and the Slippery Slope Framework, the study unifies key themes of enforcement, facilitation, and trust—often addressed in isolation—into a holistic and empirically tested framework. The research explores a range of determinants, including public governance quality, tax service delivery, perceived tax complexity, tax awareness, attitudes toward tax evasion, tax penalties, audit probability, tax fairness, and public spending. A distinctive contribution of this study lies in its focus on tax incentives as a moderating variable, investigating how these instruments condition the relationship between the aforementioned determinants and compliance behaviour. Despite extensive global research, the effectiveness of various tax incentives has remained contested. This study addresses the gap by offering a structured and data-driven examination of how tax incentives interact with both enforcement and trust mechanisms to influence taxpayers' decision-making. The findings reveal that good public governance, high-quality tax services, and perceptions of fairness significantly enhance compliance. Conversely, perceived complexity and leniency towards evasion negatively influence compliance behaviour. Tax incentives demonstrated a robust moderating effect, amplifying the positive impacts of governance and service quality while mitigating the adverse effects of complexity and weak deterrents. Notably, when

incentives were perceived as fair, transparent, and accessible, they strengthened trust in the tax system and encouraged voluntary compliance.

Parallel Session 4 – International Taxation

OECD Consistency Rule: The Way Forward

Amir Pichhadze and Jacob Pichhadze (online)

As I briefly explain in a forthcoming article in the Canadian Tax Focus (Vol.15, Number 2, May 2025), Canada is currently in the process of reforming its transfer pricing law. In its consultation paper (2023), Canada proposed to introduce, among other things, an OECD Consistency Rule. The consultation paper notes that Canada is considering how such as rule has been used in other countries. It points out, as examples, the rule in the UK, Australia, and New Zealand. In my paper, I called out the need to identify notable intricacies that differentiate the approaches taken in these different countries, because those differences could and/or would make a difference in the effect and implications of such a rule.

In this presentation, and in a more detailed research paper which I will be producing along with my co-author, Jacob Pichhadze, we will conduct a more extensive study of the different approaches to an OECD Consistency Rule, with the intention of providing proposals on how such a rule could and/or should be approached, both in Canada and elsewhere.

The Awkward Implication of the Undertaxed Profits Rule (UTPR)

Chidozie Chukwudumogu (online)

The Organisation for Economic Co-operation and Development (OECD) chiefly influences how countries design cross-border tax rules. It has influenced countries, including Australia, to adopt novel interlocking global minimum tax rules, encompassing an Undertaxed Profits Rule (UTPR). This paper views the UTPR under Australian law as an exemplary lens, indicating that the rule creates an awkward legal precedent when analysed in the context of logical legal principles in corporate law, income tax law, international tax law and property law. The UTPR enables taxing income that is not legally or economically connected to the taxing jurisdiction. Although the taxpaying entity under the UTPR has a nexus to the taxing jurisdiction, it neither owns nor controls the relevant income subject to taxation under the UTPR. Should a court uphold the UTPR in its current form, as illustrated in this paper, this outcome will create an awkward precedent that a country can tax its residents on whatever it feels like taxing, including (a) taxing residents on subject matters they do not control and have not authorised, and (b) taxing a sibling (natural person) because their sibling in another country has done something, even where the first sibling has no control over the second sibling.

Understanding International Tax Law Practice Through Case-Law: An Inherently Flawed Approach?

Sophia Piotrowski and Alice Pirlot

Tax law scholars often assume that they can draw general lessons for the understanding of international tax law (ITL) from the case-law of domestic courts on specific treaties. This becomes apparent in many textbooks and commentaries on tax treaty law. Yet, in this paper, we argue that this assumption is problematic. While attempts at understanding ILT through domestic case-law are absolutely necessary, they raise serious concerns. We identify two main reasons why a case-law based approach might be inherently flawed. First, findings from

domestic case-law are just that: findings on a specific domestic case. While it is true that the international tax system is largely based on often standardized bilateral tax treaties, one must keep in mind that even identical provisions might in fact refer to different things in different treaties depending on the jurisdictions that are involved. Moreover, the principle of common interpretation – when applied as a way to understand international tax practice in general, rather than the specific practice under a specific double tax treaty – is problematic because it necessarily leads to favour certain jurisdictions over others. Second, a significant dimension of tax treaty dispute resolution remains underexplored. Next to the decisions of domestic courts, tax treaties disputes can also be solved through mutual agreement procedures (MAP), potentially also supplemented by arbitration. While MAP is reportedly successful in practice, there are significant shortcomings due to the lack of transparency of the procedure. All this means that much is still unknown when it comes to the substantive outcomes of tax treaty dispute resolution. It might, therefore, well be that the practice of ITL is actually very different from the picture we get from only perusing domestic court decisions.

Parallel Session 5 – Digital Taxes

Decoupling in the Digitalisation of Public Sector Auditing: Institutional and External Dimensions from Malaysian Tax Authority

Nor Ashikin Mohd Nadzari (online)

Public sector auditing is experiencing a critical shift as tax authorities embrace digital technologies to improve audit accuracy, efficiency, and transparency. In Malaysia, the Inland Revenue Board (IRBM) has adopted digital tools and centralized analytics platforms in line with national digital agendas like MyDIGITAL. Despite formal implementation, the actual use of these tools in routine audit practices remains limited. This study explores the institutional and contextual factors contributing to this gap through the lens of decoupling, where formal reforms are not translated into practices. This study also introduces the concept of external-induced decoupling, where constraints outside the organization, including stakeholder readiness, hinder implementation. Using a qualitative single-case study approach, 14 semi-structured interviews were conducted with the top management, digital committees, and frontline auditors. Thematic analysis revealed five key findings: (1) symbolic compliance where digital tools are adopted ceremonially; (2) normative resistance due to auditors' preference for professional judgment in complex audits; (3) misalignment between system functions and audit needs; (4) external-induced decoupling driven by taxpayers' limited digital readiness; and (5) absence of performance incentives linked to digital tool usage. The study adds to Institutional Theory by showing that decoupling is influenced not only by internal factors within the organization but also by external challenges in the surrounding environment. It highlights the need to view digital transformation more broadly by considering human behavior, professional values, system suitability, and the organization's interactions with key external stakeholders such as taxpayers, government agencies, and international bodies.

“From Bricks to Clicks”: Rethinking Nexus in the Age of Dematerialized Business

Anna Miotto and Marco Greggi

The advent of the digital economy has profoundly reshaped global economic structures, enhancing collective welfare while undermining traditional tax systems' effectiveness. One of the most significant challenges lies in the inadequacy of the concept of permanent establishment, historically predicated on the existence of a “fixed” place of business, in capturing the value created through highly dematerialized digital business models.

This presentation will examine the extent to which digitalization has disrupted established nexus criteria, revealing a structural misalignment between existing legal frameworks and the operational realities of modern enterprises. The Action 1 of the OECD's BEPS Project, introduced the notion of significant economic presence as a preliminary attempt to redefine taxable presence in the digital age. A similar approach was subsequently reflected in the European Commission's Proposal for a Council Directive No. 147/2018. Nonetheless, these developments have yet to be incorporated into either the OECD Model Tax Convention or binding Union law.

In this context, the Italian legislator has taken an innovative (isolated) step by introducing paragraph 2, letter f-bis of Article 162 of the Italian Income Tax Code, which qualifies as a permanent establishment a "significant and continuous economic presence" within the State, even in the absence of a physical establishment. However, the provision lacks detailed criteria and implementing guidelines, thereby raising serious concerns regarding its practical enforceability and legal certainty.
Given these shortcomings, a comprehensive and coordinated reform of international tax principles is imperative. Such reform should aim to mitigate the risks of double taxation and aggressive tax planning while ensuring that digital multinational enterprises contribute equitably to the tax base of market jurisdictions. Only through multilateral cooperation can an effective and fair digital tax framework be achieved.

Digital Services Taxes in the EU: Towards an EU DST?

Dionysios Pelekis

The Two Pillar solution devised by the OECD under the Inclusive Framework on Base Erosion and Profit Shifting (IF BEPS) now seems moribund; with the USA withdrawing from Pillar Two, and Pillar One being stuck in limbo. While the Two Pillar solution had its merits, including it consensus-oriented approach, its non-completion can, especially in the current global context, represent an opportunity – especially for the European Union. The Multilateral Convention putting in place Pillar One contains provisions which would have, once coming into effect, required the disapplication of existing Digital Services Taxes, and prohibiting the introduction of new ones – with good reason, within the context and underlying rationale of Pillar One. However, with the completion of the Two Pillar solution now seeming extremely unlikely, DSTs seem to be back on the menu.

In this context, this contribution will argue for the adoption of a DST at the EU level. First, the concept of DSTs will be discussed, with a particular focus on the EU's 2018 proposed (but never adopted) Directives on the taxation of 'significant digital presence' and of revenues resulting from certain digital services. This analysis will outline the characteristics of the then proposed EU DST, which will be used both to contextualise the rest of the analysis, and as a basis for the advocated EU DST. Second, due to the existence of numerous Member State DSTs, the issue of competence will be briefly examined. Third, and following from the preceding analyses, this contribution will outline the benefits and drawbacks of an EU DST as opposed to Member State measures, on two levels. The first level will analyse the legal complications of national DSTs – from internal market law to state aid control – as opposed to the seeming simplicity of EU-level DST. The second level will discuss the potential benefits of an EU DST from a broader perspective, including the creation of new streams of Union resources; before concluding.

Parallel Session 6 – VAT/GST

GST/VAT Diffusion and Exemption Policies in ASEAN: Comparative Insights from Tax Law and Political Economy

Tu Anh Tran

Except Singapore, similar fiscal illusions surrounding GST/VAT exemption policies are prevalent among Southeast Asian (ASEAN) countries, contributing to widespread public misperceptions about GST/VAT exempt products and services. Despite this, there remains limited comparative research on the rationales behind VAT adoption and exemption implementation, leaving many channels of ASEAN GST/VAT diffusion and the drivers of exemption policies underexplored.

This article aims to fill that gap by offering a comprehensive comparison of ASEAN VAT systems, focusing on their initial GST/VAT adoptions and exemption policies. It addresses two key questions: (i) Why did seven ASEAN countries choose to replace turnover taxes with GST/VATs? and (ii) What are the underlying rationales for implementing their GST/VAT exemptions?

Adopting a political economy lens within a comparative tax law framework, this study situates its analysis within the broader political, economic, and social contexts of each country. The comparative tax law method reveals both the convergences and divergences among tax systems and explores the dynamic interplay between two key perspectives: law as a reflection of society and the transnational borrowing of legal ideas. It offers an analytical framework for understanding the legal transplantation of GST/VAT laws, particularly from the Global North—such as the European VAT and New Zealand GST/VAT models—to ASEAN countries. To deepen the understanding of GST/VAT reforms across seven ASEAN nations, this article conducts a structural comparison based on four key political economy factors: (i) political leadership, (ii) economic reform programmes, (iii) global trajectories and international pressures, and (iv) local dynamics. Ultimately, this article contributes to comparative tax law scholarship by proposing a structured research framework for what may be defined as "comparative tax law."

Paradigms of Law and Taxation: A Case Study of the United Kingdom Value-Added Tax

Michal Chodorowski

Paradigmatic analysis is a well-established method in both the social and natural sciences; however, its application within legal scholarship remains limited. Although legal scholars increasingly recognise the influence of underlying ideas and institutional frameworks in shaping legal systems, the specific role of paradigms in the evolution and operation of law has been insufficiently examined. My doctoral thesis addresses this gap by developing a framework for identifying and analysing legal paradigms, with a focus on taxation. It establishes how legal paradigms function as the interface between cognitive, ideational, and institutional structures, shaping the interpretation, design, and implementation of tax law. The study is interdisciplinary, drawing on theories of social learning, institutional change, and ideational analysis to inform its conceptual framework.

The empirical basis is a qualitative, doctrinal, and historically grounded case study of the United Kingdom's Value-Added Tax (VAT). My research examines the socio-economic conditions that preceded its introduction, the political and ideational drivers behind its adoption, and its long-term influence on the structure of tax law in the UK. The thesis

establishes that VAT marked a paradigmatic shift in British tax law. The tax institutionalised and operationalised a new legal paradigm centred on neutrality, efficiency, and consumption-based revenue. This shift continues to influence contemporary legislative and policy discourse. The thesis concludes that legal paradigms offer a compelling lens for understanding both legal change and continuity, providing a conceptual foundation for more reflective and responsive tax reform.

The Quest for Redistribution and Justice in the Context of the VAT or GST

Stefanie Geringer

Redistributive justice has been a concern of humankind throughout history, often at times when a society has found itself at a crossroads – as is arguably the case now. Recent years have been marked by the emergence of several crises that have fuelled public debt and widened income and wealth inequalities. This has prompted policymakers to take appropriate action. Making everyone pay their 'fair' share of tax has become the dominant narrative of tax policy in both direct and indirect taxation. Related measures have usually targeted alleged or actual problematic tax strategies including evasion, avoidance, and abuse of law. However, ensuring just taxation for all could more generally mean spreading the tax burden appropriately across different income and wealth groups and, where feasible, redistributing resources within society. Given the widely assumed inherent regressivity of general consumption taxes, calls for redistributive measures to ensure (tax) justice can be particularly vociferous in the context of value added taxes (VAT) and goods and services taxes (GST).
Against this background, this paper explores how redistribution and justice can be, should be, and are currently being pursued in the context of the VAT or GST. While the EU VAT system is used as an anchor point for this assessment, its approach is contrasted with that of the Australian GST throughout the argument, to illustrate the different merits and deficits of different approaches, drawing on the body of knowledge from different disciplines. Recent policy proposals for a real-time technology-based progressive VAT or GST to improve the tax's performance in terms of redistribution and justice are also considered in the analysis, to achieve the paper's objective of developing useful benchmarks for future VAT and GST policy making.

Legal Efficacy of Value Added Tax Collection and Enforcement in the Digital Transformation Era: A Case Study of the United Kingdom's Making Tax Digital Framework

Suzzy Egbi Ochonu

Previously, paper trails were used to cross-check Value Added Tax (VAT) remittance. VAT generates a large amount of data along the supply chain, which requires detailed tracing to achieve accountability. In recent years, technology has become an increasingly useful tool to facilitate enforcement, in particular through the introduction of the Making Tax Digital (MTD) framework by the United Kingdom (UK) in 2019, to streamline the processes.

The MTD framework has been analyzed in literature, but this is largely limited to the extent of its technical and operational components, the rationale for its adoption, its cost effectiveness, and its benefits as an innovative step to simplify tax compliance. Beyond this, discussions on the effectiveness of the UK legal system in achieving the intended outcomes of MTD framework is wanting, let alone a comparative analysis with similar initiatives in other countries. For that reason, this research discusses legal and compliance efficiency in the era of digital transformation, while examining innovative approaches to maintaining integrity of the tax system. Accordingly, the primary research questions are:

1. To what extent is the MTD framework effectively regulated?

2. How has the implementation of the MTD framework impacted the legal efficacy of VAT collection and enforcement?
3. What lessons can be drawn from other countries' experiences of digitalization of VAT enforcement?

Firstly, this is achieved through a doctrinal method which provides the scope of the inquiry, then a comparative method that provides a wider dimension and finally a qualitative method that evaluates factors and generate suggestions. Consequently, the aim of this research, is to provide insight into the intersection of legal, technological and regulatory aspects of VAT enforcement, which will offer guidance to policy makers and stakeholders involved in VAT compliance.

Value Added Tax, Making Tax Digital, Legal Compliance, Digital Transformation

Parallel Session 7 – Tax Evasion/Avoidance

The Impact of Tax Avoidance on Stakeholder Behaviour

Madeleine Stiglingh

Over the last several years, much attention has been paid to the nature and extent of corporate tax avoidance strategies. In this study, we examine whether stakeholders' knowledge of legal tax avoidance impacts their perceptions of an avoiding firm's overall CSR and, if so, the resulting consequences of that impact on stakeholders' assessments of firm value and their willingness to invest in and patronise the firm. Most research examining the consequences of corporate tax avoidance has been archival, focusing on the direct effects of avoidance on firm value. We experimentally investigated the assessments and behavioural intentions of 751 participants across countries in which perceptions of the firm's broader role in society have been suggested to differ: France, South Africa, and the United States. We find that a firm's nontax CSR activities and its stakeholders' financial sophistication, but not the tax avoidance strategy itself, moderate the impact of avoidance on CSR perceptions. Further, we find that, although these CSR perceptions have no impact on assessments of firm value, they do mediate the impact of avoidance on stakeholders' willingness to invest in and patronize the firm. Finally, we find evidence that reactions to avoidance differ across countries whose residents hold different views regarding the roles and responsibilities of corporations. The study corroborates and extends prior research examining the reputational costs of avoidance and provides insight to firms considering the nature and extent of their avoidance activities and to regulators considering related disclosures.

Keywords: tax avoidance; tax planning; tax aggressiveness; corporate social responsibility.

The Effect of Online Service Competence on Citizens' Perceived Trustworthiness and Trust in Interacting with Tax Administration

Clare Maudling and Oliver James

E-government services were launched with high hopes, including that they would improve citizens' trust in government (Parent et al 2005; Welch, Hinnant & Moon, 2005). Evidence about macro relationships between e-government use and citizens' trust is mixed but broadly positive (McNeal, Hale and Dotterweich, 2008; Morgeson III, VanAmburg, & Mithas, 2011; Pérez-Morote et al., 2020). However, much less is known about effect of citizens' experiences of using online services, ncluding tax services, on their trust. In particular, competence of administration potentially influences citizens' trust and perceptions of the trustworthiness of online systems and, in turn, these beliefs feed into attitudes about cooperation, use of e-govt

and legitimacy (Kirchler, Hoelzl & Wahl 2008; McNeal, Hale & Dotterweich, 2008; Van Ryzin, 2007).

We estimate the effect of e-government service competence on citizens' perceptions of the trustworthiness of the administration and trust in the interaction. We use a realistic online income tax administrative task and experimentally vary competence through introducing errors in the process. Trust is particularly important for tax administration because cooperation is necessary for tax authorities to work -as deterrence is insufficient (Kirchler, Hoelzl & Wahl, 2008 Morgeson III, VanAmburg, Mithas, 2011). We experimentally manipulate different forms of error to compare citizens' experience of competence with those experiencing administrative interaction containing errors. We estimate effects on multi-item measures of participants' trust and their perceptions of trustworthiness of administration, using measures similar to those adopted in related contexts (Grimmelikhuijsen and Meijer 2014). We hypothesise that incompetence will negatively affect both trust and perceived trustworthiness. The findings will improve understanding of the relationship between administrative competence and citizens' trust in online government.

Tax Lawyers as Gatekeepers

Hans Gribnau

Gatekeepers serve in various roles. Lawyers may also be required to report fraud, money laundering and suspicious activities. There is increasing pressure from various quarters for lawyers to reject certain clients or cases or mitigate their involvement. This may include clients seeking tax advice. Nowadays, tThere is increasing awareness of the societal relevance and moral dimensions of taxation.

Unsurprisingly, tax advisers are reflecting on the societal impact and moral aspects of tax advice, and thus about the profession's gatekeeping responsibilities. To what extent must they in their role of trusted adviser act to close – instead of open – the gate and prevent (indirectly) their clients engaging in tax minimisation at the expense of government spending and other taxpayers? The changing societal and legal landscape impacts tax advisers, both external and in-house tax advisers; they are urged to align the client's interests with the wider public interest. They therefore have to examine their professional role as ethical gatekeepers within wider society and clarify the ethical responsibilities and obligations of tax advisers when providing tax services.

The foregoing leads to the research question to be answered in this paper: what kind of (legal and ethical) gatekeeping obligations must tax advisers consider and take into account when engaging in a conversation about tax planning arrangements with their clients?

Tax Avoidance, Ethics, and Citizens' Well-Being: A Critical Accounting Perspective on Accountability and Social Justice

Sara Closs-Davies

This paper engages with the issue of tax avoidance in the UK through a critical accounting lens, interrogating the ethical and moral dimensions of tax compliance behaviour of large corporates, how the State holds them to account, and their implications for the provision of citizens welfare, well-being and prosperity. Large corporate tax avoidance remains mostly within legal boundaries, generating increased profits for corporate shareholders. There exists a body of literature that examines the moral grounding of tax avoidance in several disciplines: Tax, Public Administration, and Business Ethics. However, it is lacking within critical accounting. Thus, this paper contributes to critical accounting scholarship by challenging the

moral and ethical nature of the legality and practices of corporate tax avoidance by exposing how regulatory frameworks and practices often privilege corporate interests at the expense of social equity, in particular low-income and vulnerable citizens. Our analysis of the literature and publicly available documents draws on theories of public accountability, critical tax theory, and distributive justice, by examining the socio-political role of accounting. The paper reveals how accounting practices are embedded within broader power structures that shape public perception and institutional accountability. This paper offers deeper understanding of how corporate tax avoidance contributes to systemic inequalities, eroding state capacity to provide public goods and services to citizens, whilst bailing out large corporates through taxpayer money. In short, we argue that the tax system has become a welfare programme to address the needs of large corporates, and not so much the needs of citizens. The study concludes that a more ethically grounded approach to taxation, supported by critical accounting inquiry, is essential for fostering fiscal justice and enhancing collective well-being.

Parallel Session 8 – Tax Transparency/Fairness

What Can We Learn About Uncertain Tax Positions from IFRIC 23?

Rodney Brown

Tax transparency has received increased global attention in recent years, with much of the focus directed at increasing the quantity and quality of disclosures relating to the tax affairs of multinational firms with the goal of minimising corporate tax avoidance. In 2017, the IFRS Interpretations Committee (IFRIC) issued IFRIC 23 Uncertainty Over Income Tax to provide guidance for dealing with 'uncertain tax positions' (UTPs). Effective for financial years commencing on or after 1 January 2019, firms preparing financial statements in accordance with International Financial Reporting Standards are required to apply IFRIC 23. If it is 'probable' that the tax authority will not accept the firm's treatment of a specific tax position, the UTP must be reflected in the income tax related balances in the financial statements (e.g., income tax expense, income tax liabilities). Scant evidence exists on the possible consequences of the introduction of IFRIC 23. Accordingly, this study takes a step toward filling this void by exploring UTP disclosures made between 2018 and 2023 by publicly listed firms in the United Kingdom (UK), Australia, and New Zealand. Surprisingly, we find relatively few firms disclose substantive qualitative and quantitative information about their UTPs, although UK firms disclose more, on average, compared to firms listed in Australia and New Zealand. Our findings raise questions about compliance and the interpretation's efficacy. IFRIC 23 is a relatively new mandatory tax-related financial reporting obligation and thus our findings should be informative to standard setters, regulators, and tax authorities interested in the impacts of increased tax transparency and the efficacy of IFRIC 23.

Separation of Powers: Is it Time to Remove the Commissioner's Policy Information Gathering Power from his Administrative Functions?

Adrian Sawyer

The New Zealand (NZ) Commissioner of Inland Revenue's (Commissioner's) powers were increased in 2020 in a manner that not only further impinge upon taxpayers' rights, but grants a power to support tax policy making rather than tax administration. This power, set out in s 17GB of the Tax Administration Act 1994 (TAA), was enacted under urgency during the COVID-19 restrictions without wider consultation, reflecting what was then an emerging erosion of NZ's highly valued Generic Tax Policy Process (GTPP) (Sawyer, 2021). The Commissioner's principal role is to administer the tax system, although Inland Revenue is in a unique position internationally with the revenue authority having a major input into tax policy setting beyond that of the NZ Treasury. Nortje's (2022) examination of s 17GB TAA

encompasses the ‘politicalised’ use of this provision to facilitate the High-Wealth Individuals Research Project that provided data for the then Labour Government that was seeking to provide evidence to support its assertions of tax system unfairness in NZ. Concurrently the NZ Treasury undertook its own review (using differing methodology) and a third review was commissioned by a private sector organisation. Inland Revenue’s current Tax Policy Work Program (TPWP) includes a review of this provision, the first review since its enactment. This paper will argue that the risks of misuse of this provision, along with the lack of mandate for its enactment, necessitates a thorough review. The Commissioner’ powers have a mandate to support tax administration but not to gathering information from taxpayers for tax policy purposes. A much wider issue is whether Inland Revenue (and the Commissioner) should have the policy input role removed, leaving this to the NZ Treasury.

How is the Automatic Exchange of Information (AEOI) Operating in Practice? Evidence from Indonesia

Riska Marlinda Darmanti

Adopting the Automatic Exchange of Information (AEOI) based on the Common Reporting Standard (CRS) on a global scale would provide a tool for tax administrations to counter cross-border tax evasion and improve tax compliance. The Global Forum on Transparency and Exchange of Information for Tax Purposes reported that as of 2024, 111 jurisdictions have successfully commenced the AEOI. However, implementing such standards creates challenges as the maturity level of tax administrations is uneven. Indonesia has been one of the participants in the tax information exchange under the CRS framework since 2018 and receives offshore financial information of Indonesian citizens annually. This data is crucial in supporting compliance supervision by the Indonesian tax authority. Considering the pivotal role of this global initiative, this study aims to critically analyse how the AEOI operates in practice, as well as the challenges tax administrations face. It then draws some lessons learned for tax administration to improve the AEOI implementation. This study includes qualitative interviews with 20 respondents from the tax administration and citizens in Indonesia. The finding suggests three themes associated with challenges in AEOI implementation in tax administrations: complexity regulation, data management, and institutional capacity. These themes generate an impact on taxpayers, which could hamper institutional trustworthiness. Previous studies acknowledged that trust is an essential element in establishing tax compliance. The result suggests that tax administrations must be trustworthy institutions to gain taxpayers' trust. This could be secured by showing the tax administration's competence, value, or underlying principle.

Relational and substantive equality of profits tax base shares

Benita Matthew

Recent proposals for long-term international business tax reform have been criticised for misattribution of the tax base and the lack of support for developing jurisdictions, inter-nation equity and economic justice goals worldwide. Despite calls for equality of tax rights and fiscal self-determination, international business tax literature does not provide a protocol to diagnose inequality of tax rights over multinational enterprises (MNEs). Coordinating tax rights over MNEs requires a range of components of the effective tax rate to be comparable. These are taxable business activity factors, tax base valuation per factor, and the tax rate. As Pillar 2 regulates tax rate competition, the pressure for tax competition then falls on taxable profits per unit of taxable factor. To coordinate taxable profits per unit of taxable factor, this paper presents the concept of relational and substantive equality of tax base shares.

Relational equality is concerned with host tax jurisdictions' maximum comparative shares of the consolidated profits tax base. Equal comparative shares of the tax base require that economic allegiance is equally valuable in each host jurisdiction. Substantive equality consists of the numeric taxable profits per unit of business activity of the same MNE in various host jurisdictions. Substantive equality ensures that the maximum taxable profit per unit of economic allegiance is not discriminated against by the type of taxable factor or its location for the same MNE. In the context of the current international business tax regime, relational equality is compromised by incomplete MNE representation and limitations on tax base shares imposed by bilateral tax agreements. Arm's length transfer pricing ignores the comparability of profit value per unit of taxable activity of the same MNE across host tax jurisdictions. Relational and substantive equality promotes fairness and efficiency in international business tax.

KEYNOTE ADDRESS

Raising Standards, Building Trust: Oversight and Opportunity in the Tax Advice Market

Chris Irwin

The tax advice market plays a vital role in supporting taxpayer compliance and shaping public confidence in the tax system. Yet concerns about inconsistent standards and poor behaviour have prompted renewed focus on how best to strengthen oversight of the sector. This keynote talk will explore HMRC's recent work to raise standards in the tax advice market — including mandatory registration, enhanced powers to tackle non-compliance, and the ongoing consideration of the regulatory framework. The talk will reflect on the challenges and opportunities of building trust, and ensuring effective oversight in a diverse and evolving sector. Attendees are invited to consider the implications for research, teaching, and practice — and to contribute to the wider debate about the future of the tax advice market in the UK.

Tuesday, 9 September

Parallel Session 9 – International Taxation

Institutional Complexity in Digital Tax Mandates: The Normative Buffering Role of Accountants

Karolis Matikonis

Digital tax administration underpins public-finance reform, yet SMEs' responses to coercive digital mandates remain underexplored. We examine HMRC's Making Tax Digital (MTD), launched April 2019, which requires UK VAT-registered firms above £85,000 turnover to file returns digitally. Using eight waves (2015–2023) of the Longitudinal Small Business Survey, we apply a regression-discontinuity–inspired difference-in-differences design, comparing firms around the VAT threshold to isolate MTD's impact, and extend to a triple-difference framework to assess accountants' moderating role.

Institutional theory suggests coercive mandates drive compliance, but normative and mimetic forces—professional norms, peer imitation, and accountants' intermediary work—moderate digital uptake. We hypothesise that mandated SMEs will show smaller software uptake than peers; accountant engagement will dampen it further; perceived burden will temporarily decline; and outsourcing will negate this relief.

Our findings show all firms boost software use post-MTD, but mandated SMEs do so less, and those engaging accountants even less. An event-study reveals a two-year drop in perceived compliance burden before a return to baseline. Outsourcing to accountants reverses this relief, re-embedding costs via fees and reduced autonomy.

By demonstrating how external pressures interact and highlighting accountants' agency, our study refines institutional theory and informs policymakers that early collaboration with professional bodies and targeted support during the first two years of rollout are vital to maximise efficiency gains and avoid a return to high compliance burdens.

Cross-Border Assistance in the Recovery of Tax Debts: Future Challenge for Tax Transparency?

Wilfried Meidom

A lot has been done in the field of International Tax Cooperation especially in the field of exchange of information for tax purposes in the recent years. These developments aimed at abolishing tax secrecy and thus, enhance tax transparency. The Global Forum has played a key role in the implementation of standards both on exchange of information on request and automatic exchange of information.
However, it seems that Cross-Border Assistance in the Recovery of tax debts (CBAR) has not yet received enough global interest whereas it also constitutes an important aspect of tax transparency. CBAR is an effective mean of combating international tax evasion and tax avoidance in cases where a taxpayer has sought to organize his insolvency outside the national territory. It lays down the operating rules governing cooperation between the tax authorities of two or more States. CBAR comprises exchange of information (with a view to recovery), enforced recovery (including precautionary (including precautionary measures) and notification of documents.
This document will highlight the reasons why CBAR is not as effective as it should be. While bilateral tax treaties can in some cases serve as effective legal instruments, the OECD

Convention on Mutual Administrative Assistance appears to be ineffective in practice. Reservations and declarations by States limit the scope of recovery assistance based on this multilateral instrument.
However, regional initiatives do provide a response. For example, Directive 2010/24 has established an effective framework for cross-border debt collection within the European Union. The European Union has also signed agreements with third countries such as Norway to combat tax fraud.
Finally, the paper will ask whether the time for an international standard for cross-border debt collection has come.

Citizens' Preferences for Tax Administration: Evidence from Canada, UK and US

Oliver James and Clare Maudling

Citizens' preferences about tax rates and the distribution of tax burden have received researchers' attention. However, we know much less about citizens' preferences about tax administration when paying tax. These preferences matter for legitimacy of the systems and potentially affect tax compliance. We field a conjoint experiment embedded in nationally representative surveys in the United States, Canada, and the United Kingdom.

Respondents were shown pairs of hypothetical tax systems that varied across key administrative dimensions—including filing mode, audit method and likelihood, treatment of reporting mistakes, information access, and appeals procedures—and asked to select the system they preferred. Our results show strong and consistent preferences across countries: citizens tend to favour features that reduce individual time, effort, and exposure to risk. These findings suggest that administrative design choices matter to citizens, and that support appears to be shaped by pragmatic concerns rather than by commitments to procedural norms. The results have implications for the design of citizen-facing institutions, highlighting opportunities to enhance public engagement and improve services.

The Evolution of International Services Taxation: Institutional Structures, Agency, and Implications for Ongoing Reforms

Faith Amaro

Services have become central to economic growth, with a general 'servicification' of the economy. As a share of GDP, they rose to 62% of value added worldwide by 2023. With the advancement of globalization and digitalization, services are increasingly provided across borders with minimal or no physical presence. This evolution has exposed weaknesses in the current international tax framework. Taxation of income from cross-border services is a high priority issue and an early protocol to be negotiated in parallel with the United Nations Framework Convention on International Tax Cooperation.

This research explores the socio-legal processes that have shaped the key legal principles governing services taxation within the UN and OECD Model Tax Conventions, including taxable nexus, permanent establishment, profit attribution, residence and source, the arm's length principle and the definition of key concepts such as royalties. It focuses on developments from the onset of the exponential growth of trade in services in the 1990s to the present.

The aim of the research is to frame key challenges of the existing international services taxation framework and help inform tax policy reforms and approaches that aim at simpler and fairer international tax rules. It addresses the central question: How have socio-legal factors

shaped the development of the international services taxation framework, and what insights can be drawn to inform ongoing global tax policy reforms?

The research combines qualitative and quantitative tools. A qualitative review of digitalized and archival documents traces the evolution of service taxation principles within their broader socio- legal context, complemented by semi-structured interviews with key actors to validate findings, fill information gaps, and seek clarification as required. This is accompanied by a quantitative analysis of cross-border service trends using data from the OECD's Balanced Trade in Services dataset and the World Bank.

Parallel Session 10 – Gambling/Other Issues

Why Does Gambling Receive Preferential Tax Treatment in New Zealand?

Lisa Marriott

Tobacco and alcohol are typically taxed as Pigouvian goods. Pigouvian goods generate an externality that is incurred by society and are, therefore, generally discouraged. Gambling can be thought of in a similar way. However, in New Zealand, the government actively supports gambling through preferential regulatory and tax arrangements to facilitate their ongoing and increased operations.

Several taxes apply to the gambling industry. Some of them are intended to shore up the domestic industry, so are directed at international online gambling operators. Duties collected from domestic gambling are small both by measure of government revenue collected and the rates applied. The industry's income is mostly tax exempt, and in some cases a proportion of the taxes and duties collected are returned to the industry. This preferential treatment contrasts with how Pigouvian goods are usually taxed.

This research quantifies some of the assistance provided to the industry. It also provides a brief case study of the New Zealand Totalisator Agency Board, which pays little tax, and benefits from a regulatory environment that allows for most profit to be redistributed to the sector. The aim of the study is to critique state support for an industry that is harmful and whose financial viability is reliant on problem gamblers and preferential policy arrangements. The research aims to highlight the harm generated by the government to some of its citizens by prioritising the needs of the gambling industry above those of society.

Playing for Stakes: Constitutional and Fiscal Challenges in India's Online Gaming Taxation

Pankhuri Agrawal (online)

This paper examines India's recent shift in indirect tax policy, introduced through the 2023 amendments to the Central Goods and Services Tax (CGST) Act and the Integrated Goods and Services Tax (IGST) Act, which levy a flat 28% GST on the Contestant Entry Amount (CEA) for online gaming. This levy, irrespective of whether the game is one of skill or chance, has placed online gaming within the same tax bracket as activities traditionally classified as gambling and betting.This paper addresses whether India's high-rate and broad-based GST framework for online gaming can be sustained in light of established jurisprudence and global tax practices. Using a doctrinal legal research methodology, it assesses relevant statutory changes, GST Council deliberations, constitutional entries concerning taxation and judicial precedents.

The paper also draws upon international taxation models, especially those based on Gross Gaming Revenue (GGR) in jurisdictions like the UK, the EU, and Australia. India's current model is based on taxing the total entry amount, which significantly amplifies the tax burden. Moreover, the added liability of 30% Tax Deducted at Source (TDS) on net winnings, creates a higher effective tax incidence.

The paper also highlights a contradiction, i.e., the Ministry of Electronics and Information Technology (MeitY) has introduced regulatory frameworks recognizing online gaming as a legitimate and structured digital service. Hoiwever, the GST treatment of the same sector equates it with sin goods, which undermines regulatory recognition and deter domestic and foreign investment.

The paper contends that the present tax treatment stems more from a presumption of social harm than a clear legal or economic rationale. It argues for reclassifying skill-based gaming in alignment with constitutional principles and for transitioning to a GGR-based taxation model, in line with international standards, to support the long-term growth of the online gaming industry.

Bottom-Up Framework for Taxing the Informal Sector and Financing Infrastructure in Zimbabwe's Home Industries

Simbarashe Show Mazongonda (online)

Efforts to promote entrepreneurship, support small businesses in Zimbabwe's home industries, and broaden the tax base have been ongoing. However, existing literature shows these initiatives often follow a top-down approach, with limited input from informal sector stakeholders. A decade ago, the Government of Zimbabwe proposed a national informal sector database to better understand the sector and explore tax models suited to its needs. This study introduces a self-financing infrastructure framework tailored to the informal sector. It explores how home industries are structured, how operators interact and network, and their understanding of taxation and infrastructure financing. Prior research highlights key factors affecting tax compliance, including operational characteristics, governance quality, tax morale, and past and current strategies. While a conceptual framework linking these factors exists, it lacks empirical validation. To fill this gap, the study conducted a cross-sectional survey in selected home industries, gathering primary data from informal operators. Confirmatory Factor Analysis (CFA) was used to assess the measurement model, ensuring the reliability and validity of the key variables. Governance quality, for instance, was measured using indicators such as professionalism, accountability, performance, impartiality, and political trust. The structural model further tested the significance of relationships among these factors and the predictive strength of the framework. The study's core contribution is the empirical validation of a bottom-up, participatory framework that reflects the realities of informal sector actors. By fostering a sense of ownership, this inclusive model increases the likelihood of acceptance and successful implementation of infrastructure financing and taxation strategies.

Ability to Pay: A Misleading Consensus

Ira Lindsay

Ability to pay' theories of taxation have been ascendant since the late nineteenth century. Although occasionally challenged by the older 'benefit' theory or the newer optimal tax theory, ability to pay is a common touchstone for tax policy. Yet this façade of consensus conceals deeper tensions. Ability to pay is an attractive principle for many reasons, but these often come into conflict when high-level principles must be translated into concrete policies. There are at least five separate potential justifications for 'ability to pay' theories: fair apportionment

of burdens, downward redistribution to serve distributive aims, declining marginal utility of income, neutrality between different segments of society, and the administrative advantages of focusing resources on collecting taxes from those best able to pay. These differing justifications explain many of the policy tensions in contemporary tax systems. Some of these, such as the long-running debate over the merits of progressive and proportionate taxation, are well-known.

But others are more subtle. For example, administrative considerations suggest limiting the tax base to items that are easier to collect (e.g. realised income). But ease of collection is in tension with apportioning tax burdens in proportion to the taxpayer's overall economic situation, which implies taxing some forms of unrealized income. Likewise, tax reliefs or exemptions, such as for educational or medical expenses, require consideration of the precise nature of ability to pay. Considerations of political neutrality, taxation in proportion to economic advantage and administrability may provide very different answers. This paper will illustrate how the competing justifications of 'ability to pay' explain persistent tensions in income and consumption tax systems, provide a framework for the trade-offs that must be made when setting policy, and classify contemporary tax systems by how they navigate these trade-offs.

Parallel Session 11 – Sustainability

Ethics and Oil and Gas Taxation – the Case of the UK

Hafez Abdo and Jane Frecknall-Hughes

The purpose of this paper is to examine whether the UK's 'Maximisation of Economic Recovery' (MER) objective for its oil and gas industry meets sustainable development and climate change goals; and how MER sits alongside the various long-standing tax incentives for 'green' energy, for example, enhanced capital allowances on energy efficient equipment/assets and initiatives such as the Climate Change Levy and the CRC Energy Efficiency Scheme (formerly known as the 'Carbon Reduction Commitment'). In the light of climate change, these are key ethical issues, further highlighted by recent Conference of the Parties Conferences (COPs) in recent years.

The UK government's continued commitment to MER from the UK Continental Shelf (UKCS), alongside the tax incentives and allowances provided to oil and gas companies, presents serious ethical dilemmas in the face of a worsening climate crisis. While these strategies are often framed in terms of economic stability, energy security, and job preservation, they raise profound moral questions.

The UK's has made a legal commitment to net zero carbon emissions by 2050 and has positioned itself as a leader in global climate policy. However, policies that promote continued fossil fuel extraction – such as MER and tax breaks for oil and gas development – are fundamentally at odds with this goal.

Through 25 semi-structured interviews with experts in the oil and gas sector, we explore the various ethical dilemmas inherent in a tax system which simultaneously supports the maximum extraction of fossil fuels which damage the climate and promotes initiatives which sustain it.

Informing Environmental Taxation in the GCC: Evidence from Literature, Policy Review, and International Benchmarking

Muhammad Khawar

Environmental taxation in the Gulf Cooperation Council (GCC) remains underdeveloped despite growing climate pressures and international emphasis on fiscal policies for sustainable development. Our study employs an integrated approach, drawing on institutional theory, legitimacy theory, and policy transfer theory, combining a thematic literature review, regulatory landscape analysis, and international benchmarking to inform fiscal policy recommendations across the GCC.

The literature review uses a robust, multi-stage thematic analysis combining topic modelling and validated phrase matching, focusing on carbon emissions, waste management, and plastic pollution. It reveals uneven treatment of fiscal instruments: while carbon-related studies discuss pricing and incentives, the plastic and waste literature rarely addresses tools such as landfill taxes or extended producer-responsibility frameworks. A complementary review of national strategies and regulatory layers confirms that although GCC countries articulate strong environmental visions, sector-specific policies and fiscal mechanisms remain underdeveloped and fragmented.

To contextualise these findings, we benchmark high-performing countries from the Environmental Performance Index, notably Estonia, demonstrating how coordinated legislation, fiscal innovation, and EU-aligned reforms deliver tangible outcomes. Building on these insights, our study proposes six interconnected strategies for the GCC: carbon reform, plastic reduction, advanced landfill and wastewater management, institutional coordination, and international cooperation. Additionally, we account for member states' institutional, legal, and policy variations.

Finally, our study proposes developing the Gulf Environmental Taxation Research Network (GETRN), which would provide an evidence base to inform fiscal alignment with sustainability goals, foster regional collaboration, and guide future policymaking.

Recycling Carbon Tax Revenues: Examining Impacts on Renewable Energy Growth and CO_2 Emission Reductions—Evidence from Nordic and Swiss Countries

Shene Abdulla

Reducing carbon dioxide (CO_2) emissions and promoting renewable energy initiatives remain among the most pressing global sustainability challenges. A critical component in addressing these issues is the implementation of carbon tax policies and the strategic allocation of the revenues they generate. While efficiently recycling carbon tax revenues to support environmental sustainability and fund green investments continues to pose policy challenges, this study examines the impact of recycling carbon tax revenue on the growth of renewable energy projects and the reduction of CO_2 emissions within selected Nordic and Swiss countries.
Focusing on five countries— Norway, Denmark, Finland, Sweden, and Switzerland—this study draws on their pioneering approaches to carbon taxation and longstanding commitment to environmental stewardship. These nations provide a relevant context to explore the real-world effects of carbon pricing mechanisms and revenue allocation strategies. To address temporal dynamics and cross-country heterogeneity, this study uses panel data spanning from 1990 to 2021. The analysis applies Fixed Effects (FE), Random Effect (RE) and Two-Step Generalized Method of Moments (GMM) models. Further, sectoral regressions are conducted

to evaluate the differentiated impact of recycling carbon tax revenues on CO_2 emissions across various economic sectors within the selected countries.
By concentrating on these environmentally progressive economies, this study aims to generate empirical evidence on the effectiveness of carbon tax revenue recycling and to identify strategies that can enhance its environmental impact. The research addresses three key questions: (1) Are there heterogeneous impacts of carbon tax policies across the selected economies? (2) Does recycling carbon tax revenue significantly enhance investments in green energy projects? (3) How does the magnitude of carbon tax revenue affect CO_2 emission reductions within these countries?

Parallel Session 12 – Tax Policy

Conflicts of Qualifications: When Tax Technicalities Surrender to Tax Policy(?)

Francesca Amaddeo and Laura Allevi (hybrid)

"International taxation is marked by a complex web of bilateral treaties aiming to prevent double taxation, mostly inspired by OECD or UN models. These agreements attempt to standardize definitions and allocate taxing rights, but interpretation issues persist, especially when domestic laws differ or concepts remain undefined.

A recurring issue is the interpretation of key terms—such as “employee”—which can determine access to favorable tax regimes. This is particularly evident in the case of cross-border commuters between Switzerland (Canton Ticino) and Italy. Despite the existence of a 1976 Double Tax Convention and a specific agreement (1974–2020) granting favorable treatment to commuters, conflicts arise. Recently, Italian tax authorities have challenged the status of certain individuals—shareholders of their own companies who also work as employees—arguing they no longer meet the employment criteria required by Italian law. This leads to a requalification of income and denial of commuter status. Conversely, Swiss law recognizes these individuals as employees, maintaining their entitlement to the regime.

This divergence has triggered concern among taxpayers, professionals, and institutions. While scholars tend to support the Swiss view, Italian authorities continue with unilateral assessments. Political and professional bodies in both countries have called for a harmonized solution, but with limited success. The issue underscores how deeply tax technicalities are intertwined with political decisions and how such misalignments can cause legal uncertainty and shift taxing powers.

The article explores how legal interpretation, tax certainty, and policy choices are tightly connected—often to the detriment of coherent international tax cooperation.

When Legal Principles are Replaced by Tax Policy … How do we Enforce Legal Certainty in the XXI century? Pillar Two as a Case Study

Ricardo Garcia Anton

Globalization has prompted the rise of international norms, standards, and principles that overlap and challenge the traditional, or even parochial, ways of making law and adjudicating. Such a regulatory framework introduces a high level of complexity not seen before. The enactment of the global minimum tax (Pillar Two/GloBE Rules) offers a good example. Implementing GloBE Rules has triggered extensive and detailed rules plus two rounds of comments, amounting to more than 400 pages. How will judges solve the forthcoming interpretative conflicts regarding Pillar Two? In the contribution, I will argue that the strong focus on detailed, complex, and technical rules to achieve these tax policy goals jeopardizes

applying traditional legal principles like proportionality, prevention of abuse of law, fairness, and neutrality. The adjudicators are left with a linguistic interpretation of the GloBE Rules. How do we enforce legal certainty in this ""rule madness""? Is legal certainty today a mere "rhetorical" principle? Does it have a normative dimension that entrusts judges to disapply specific provisions, for example in Pillar Two, in potential breach of the legal certainty? As I will argue in this contribution, legal certainty resorts to safeguarding the basic principles of the legal system to protect the legitimate expectations of the taxpayer. There is thus a need to reload the legal certainty principle in the contemporary context in which tax policy occupies such a prevailing role in the design of tax norms. Law cannot be longer constrained to the mere legal exegesis of norms and should be contextualized into a broader picture aiming at the social, political, and economic transformation of our societies. Therefore, it is crucial to build a solid network of principles that can be enforced under the principle of legal certainty as an effective way in the hands of judges to reduce the margin of indeterminacy that "rules-madness" produces.

Arrivals and Departures for Capital Gains Tax: International Experience and Design Issues

Sebastian Gazmuri Barker and Andy Summers

Tax competition can lead policymakers to worry about the 'international competitiveness' of the UK's CGT regime, with the implication that keeping CGT rates low is crucial for attracting and retaining mobile individuals. However, much less well-appreciated (yet likely much more important for international mobility) is variation in how different countries treat people who arrive or depart the country for CGT purposes. It is this feature of the CGT regime where the UK most stands out from other countries.

The UK typically only charges CGT on disposals made while they are tax resident in the UK. Thus, by leaving the UK they will escape UK CGT on any unrealised gains, including those that accrued whilst they were UK resident (subject to temporary non-resident rules). Emigration therefore can result in a major 'leak' in the UK's CGT base. The flipside is the treatment for new arrivals, who are potentially liable to UK CGT on all of the gains that they made prior to arrival. This potentially discourages immigration by individuals holding substantial pre-arrival gains. Thus, the current UK's CGT regime is hard to justify on any principled basis, as it disincentivises immigration by those holding accrued gains, and it encourages emigration by those who made substantial gains in the UK.

The papers considers options for reforming the UK's CGT regime for arrivals and departures. We first assess a range of options for dealing with arrivals and departures for CGT purposes, drawing on international comparisons from a sample of 21 countries. We show that the UK is unusual amongst international peers in not imposing CGT on emigrants.

After this assessment we present our proposal that the UK should move towards a policy of rebasing on arrival with deemed disposal on departure ('ROA-DDD'). We show there are no domestic or international legal constraints to adopt a ROA-DDD. We also discuss key design issues to develop an initial blueprint for implementing ROA-DDD in the UK.

Parallel Session 13 – Topical Issues

Aligning International Tax Cooperation with Human Right Obligations

Mary Cosgrove

The terms of reference for the United Nations Framework Convention on International Tax Cooperation, which were adopted in 2025, set out the principles which should guide the drafting process. These include that the framework convention should ""be aligned, in the pursuit of international tax cooperation, with the States' obligations under international human rights law"".

The explicit inclusion of human rights obligations in a tax convention would be novel. However, a review of the more than 50 interventions of the united nations' human rights bodies in the areas of corporate tax give a clear picture of the how these two areas interact. In this paper, the concluding comments of the human rights treaty bodies, the final reports of the universal periodic review process and general comment 24 of the Committee on Economic Social and Cultural Rights are reviewed to extract their pronouncements on corporation tax.

International Human Rights obligations in corporation tax can broadly be split between domestic obligations and international obligations. Domestic obligations relate to quantum of corporate tax raised to through the rate and base in order to raise the "maximum available resources" to finance human rights, the application of taxation policy in a fair manner and the use of targeted corporate tax reliefs to support human rights. More controversially, the international obligations refer to the extraterritorial obligations of states to consider the impact of their corporate tax policies on other states. This not only obliges states to cooperate with other states, but also to avoid policies that specifically "lure" international investment through exemptions, reliefs or low rates.

While the paper foreshadows the human rights influence on the final convention, due in 2027, it also highlights some potential points of friction between the narrow economic focus of tax treaties and the broader teleological interpretation of international human rights conventions.

Tax Policy Ex Machina: The Role of Artificial Intelligence on Tax Policy Development

Vasiliki Koukoulioti

The purpose of this paper is to explore the ways in which the use of artificial intelligence (AI) by tax administrations intersects with tax policy making. Tax administrations contribute to the policy making process mostly in three ways. They provide most of the data that allow policy teams to develop and evaluate proposals, they provide inputs to policymakers on the administrative aspects of new policy initiatives, and they are responsible for policy maintenance and compliance. The increasing use of AI by tax administrations could interfere with these three roles, especially in the implementation and maintenance of the law, but also its development. AI has the power to play a crucial role in the life cycle of tax rules by increasing access to knowledge base, analyzing large volumes of data, and enhancing the ability of tax policymakers to declutter the regulatory stock. However, potential benefits are not without risks. The intrusion of AI into facets of governance previously dependent on human judgment creates challenges, due to the machine's inadequacy to understanding causality and cultural nuances, or the policy-relevant concepts of fairness and equity. The development of AI solutions, including both the underlying programme and data used, poses risks of structural biases, as well as infrastructure limitations. The lack of transparency in AI could impact the extent of legal challenge tax policy proposals can be subjected to, which further links with democratic accountability. The use of AI could also exacerbate the asymmetry of

expertise and information that currently favors the executive against the legislature in tax policy development. The findings of this paper aspire to contribute to the ongoing discourse on the responsible and effective integration of AI in public policy development through the examination of the role of tax administrations in tax policymaking in a digitalized world.

International Tax Law as a System of Anarchy

Sam van der Vlugt

This paper explores the foundational principles of system formation within the international tax law framework amidst current developments in global tax governance. Despite the emergence of competing frameworks by the OECD and the UN, the author argues that the inherent nature of international tax law remains anarchic, relying heavily on domestic law adoption for norm implementation.

The paper highlights the identified research gap concerning the systemic functioning of international tax law, asserting its anarchic nature before establishing any hierarchy. This anarchic character impedes the maturity and emergence of a cohesive system. The paper demonstrates this through current frameworks and their self-contradictory approaches, undermining their systemic objectives.

Revisiting the debate on system formation initiated by Rosenbloom in 1998, the paper engages with Avi-Yonah's counter-arguments favouring the existence of an international tax system based on single tax and benefit principles. Wolfgang Schön's more recent reflections are also discussed, which acknowledge the institutionalization yet highlight the ongoing uncertainty within the adopted norms.

The paper advocates for viewing international tax law as inherently anarchic, emphasising the absence of central authority and a priori claims to authority as organising principles. This perspective, lacking in current scholarly literature, underscores the systemic construction of tax law, which exacerbates anarchic tendencies.

The paper argues that current multilateral initiatives by the OECD and UN apply self-contradictory approaches, unable to overcome anarchic tendencies, thus hindering systemic maturity. The author refrains from engaging in the desirability of a unified system, instead challenging the burden of proof on those who assume its existence. By grounding the reasoning in anarchist principles, the paper aims to realign international tax law discourse with more theoretical clarity and logic.

Parallel Session 14 – Tax Justice

Tax Structures and Inequality: Revisiting Income, Capital, and Wealth Taxation in the Western Balkans

Elena Neshovska Kjoseva (online)

Over the past five years, Albania, Montenegro, North Macedonia, and Serbia have initiated tax reforms aimed at improving equity, motivated by persistent socio-economic disparities and EU accession pressures. While Serbia and Albania have introduced mildly progressive personal income tax systems, North Macedonia and Montenegro have retained flat or nominally progressive models, reflecting political resistance and administrative limitations.

Despite these shifts, tax systems across the Western Balkans remain structurally regressive. Capital income continues to be taxed at low flat rates, while property and inheritance taxes

are weakly enforced and poorly designed. These gaps not only reduce the redistributive capacity of tax systems but also disproportionately burden labor and low-income households, undermining fiscal equity and limiting state capacity to fund essential public services.

Structural challenges, including widespread informality, weak tax administration, and public distrust, further hinder reform effectiveness. Although EU accession serves as a reform catalyst, its influence is largely normative, offering limited support on the legal and institutional reforms required to make taxation more progressive or redistributive. This paper argues that achieving meaningful redistribution in the Western Balkans requires a broader rethinking of tax architecture—one that integrates capital and wealth more fully into the tax base, strengthens administrative capacity, and fosters political and public support for equitable reform.

Designing Sustainable Tax Clinics in South Africa: A Collaborative Framework Approach

Hanneke du Preez, Kerry de Hart, Fezile Ncongwane, Tanya Hill, Neo Molefi-Kau, Jerry Netshandamamj, Juanita Venter, Werner Uys and Lindelani Mathobo

The overarching study aims to conceptualise a framework for sustainable South African (SA) Tax Clinics. SA Tax Clinics have multiple objectives, including, taxpayer education, social justice for unrepresented taxpayers, tax awareness, voluntary compliance, influencing tax policy and stakeholder engagement. The current phase is gathering insights from SA stakeholders regarding the design and operation of a SA Tax Clinic.

The research question is: What are the perceptions of the LegoTM Serious Play TM (LSP) workshop participants on the application of tax clinics in South Africa? The study contributes towards the ideation and co-creation of a tax clinic framework tailored to SA's unique socio-economic context as an African developing country.

Tax clinics exist in countries such as the US, Australia and UK, but their models operate in different environments. SA faces the triple challenges of poverty, inequality, and unemployment. Developing work-related skills and improving digital financial literacy are essential to economic participation and the promotion of tax compliance, including SDGs and Africa 2060 wellbeing imperatives. The tax administration system is driven by technological advances, widening the skills, knowledge, and digital divide, making skills development more critical. Aside from Nigeria's tax clubs, there appears to be no evidence of operational tax clinics existing elsewhere in Africa, highlighting the novelty and significance of this initiative.

This phase uses a LSP facilitated workshop to collect the participants' insights on a SA Tax Clinic. This technique promotes creativity, collaboration, and critical thinking. Through the construction of LegoTM models, participants visually articulate ideas, align perspectives, and explore solutions in an interactive, engaging format. The data and visual outputs from the LSP workshop will be analysed to reflect the main themes and perceptions on the application of tax clinics in SA.

The Perceived Role of Tax Clinics in Addressing South African Taxpayers' Needs in Supporting Tax Compliance

Tanya Hill, Hanneke du Preez and Juanita Venter

Tax compliance continues to be a growing concern in South Africa as many individual and small business taxpayers face challenges in fulfilling their tax obligations. A common challenge hindering tax compliance is the lack of tax education. A lack of proper knowledge and

understanding of the various tax types, laws and administrative procedures can make taxpayers hesitant to file their tax returns and fulfil their tax obligations (Naape, 2023).

Tax clinics, an established concept in developed countries such as the US, UK, Australia and Ireland, have proven to be an effective means of addressing the issues faced by individual taxpayers by providing low-cost, accessible tax assistance and education to unrepresented taxpayers (Lawton, Morgan, Massey & Castelyn, 2023). The concept of tax clinics is largely absent in developing countries, especially in Africa (Lawton, et al., 2023).

The research question is: "What do South African taxpayers perceive as tax-related needs to stay compliant, and how can tax clinics be designed to effectively address these needs?"

This study will collect data from two groups of South African taxpayers, individuals and small business owners, using online questionnaires. These will be distributed to known contacts via online platforms and expanded through snowball sampling. Business owners from a University-supported Business Hub will also be invited to complete the questionnaire. The study follows a mixed-methods approach, with a focus on statistically analysing quantitative data.

This study, therefore, aims to gain an in-depth understanding of the challenges faced by individual and small business South African taxpayers in fulfilling their tax obligations, as well as their tax-related needs to improve tax compliance behaviour. Furthermore, this study aims to provide insight into how tax clinics may be effectively designed to address the identified challenges and needs of unrepresented taxpayers.

Balancing Protection and Progress: The Interplay Between U.S. Tariff Policy, SME Governance, and the Critical Role of Domestic Industrial Strategy

Daniel Hebert (online)

This paper investigates the relationship between U.S. tariff policy and the governance of small and medium-sized enterprises (SMEs). By exploring recent literature and empirical evidence, this study examines how tariff policies impact SMEs' operational environments, competitiveness, and growth potential. Additionally, it highlights the critical need for aligning tariffs with comprehensive domestic industrial policies to mitigate their negative impacts. Through case studies, the paper demonstrates the consequences of failing to pair tariffs with industrial strategies, as well as the transformative potential of coordinated policy approaches. Ultimately, the findings underscore the importance of targeted interventions, including tariff exemptions, financial support, and supply chain resilience measures, to foster sustainable economic growth.

Parallel Session 15 – Topical Issues

Tax Rebellion in Israel: Feasibility and Potential Implications

Nellie Munin

Tax rebellion refers to the act of resisting or refusing to pay taxes, typically as a response to perceived injustices or inequities within the tax system. Such movements often emerge during times of crisis, such as pandemics, wars, or economic depressions, when tensions between government policies and public interests become especially pronounced.

In Israel, which has been embroiled in a severe conflict for the past 18 months and is currently governed by a highly controversial administration, calls for a tax rebellion have been gaining

traction. These appeals are driven by two primary factors: first, the genuine economic hardship resulting from the prolonged war; and second, political dissent against contentious government actions.

This paper explores the feasibility and potential consequences of such a tax rebellion, drawing on both historical and contemporary national and global contexts.

On the global level, it will examine past instances of tax resistance, their outcomes, and the lessons learned, including a review of OECD recommendations designed to alleviate taxpayer burdens during the COVID-19 pandemic.

On the national level, the paper will reference a prior study conducted by the author and a colleague during the COVID-19 crisis, which analyzed taxpayers' motivations. It will compare the current wartime stress with pandemic-induced stress to assess the applicability of previous findings to today's situation.

Building on this analysis, the paper will propose possible strategies for preventing tax rebellions and evaluate their potential effectiveness.

The UN's Prospective 'Comeback' to the International Tax Regime: Analyzing Challenges Ahead for Developing Countries

Opeyemi Bello

Should the UN's ongoing efforts to establish a more inclusive forum for the international tax regime (ITR) succeed, the organization may reposition itself and reclaim its leading role in the ITR after several decades of playing a second-fiddle role behind the OECD. However, the UN's potential comeback presents promises and challenges for developing countries, particularly African countries, which initiated this historic transformative process with their proposal in the UN General Assembly in November 2022. With a mix of descriptive and analytical-qualitative methods, this paper argues that while the UN's objective of creating a more inclusive forum may help African countries achieve their demands for global tax reforms, the African Union's (AU) admission to the G20 in September 2023 could undermine their reform efforts. Admitting the AU to the G20 shortly after African countries successfully sponsored the UN resolution raises concerns about the potential influence the G20 may have on them, shifting their focus from reform advocacy to supporting the OECD's work on digital tax problems, which does not protect their interests. By relying on the socialization theory and acknowledging that political negotiations significantly drive the ITR, the paper explores how the G20 can serve as a strategic forum where developed countries can accomplish what they could not achieve in the UN in November 2022, when they seemed to have reluctantly voted (albeit with reservations that the UN's reforms might conflict with the OECD's works) in favour of the African Group proposal for an inclusive ITR. Despite this institutional barrier, this paper proposes how African countries can turn the 'curse' into a blessing, remaining focused on their reforms rather than allowing the G20 to place them on the menu.

Navigating the Nexus: R&D Tax Credits, Corporate Tax Strategy, and Innovation Outcomes – A State-Level Analysis

Anh Do (online)

State-level R&D tax credits aim to spur innovation, yet firms integrate these incentives into broader optimal tax strategies. This research investigates the impact of U.S. state R&D tax credits on corporate tax avoidance (measured by Effective Tax Rates - ETRs) and real innovation outcomes (R&D investment, patenting), with a primary focus on how a firm's

existing R&D intensity moderates these relationships. Using a comprehensive panel of U.S. public firms and meticulously constructed effective state R&D credit rates (building on Wilson, 2009; Glaeser & Yoo, 2024), we test several hypotheses. We predict R&D credits mechanically reduce ETRs and stimulate R&D spending and patenting. Crucially, we hypothesize that higher R&D intensity amplifies the ETR reduction from credits but may yield diminishing marginal returns on new patentable innovation. We employ panel fixed effects models and modern staggered Difference-in-Differences (DiD) estimators, leveraging the quasi-experimental variation from state R&D credit law changes over time to enhance causal inference. Control variables include firm-specific characteristics, state economic and tax conditions (including those for headquarters vs. incorporation state), and proxies for geographic spillovers. Preliminary findings suggest R&D credits do lower ETRs and boost R&D. The core analysis will focus on the significance and economic magnitude of the interaction between credit generosity and firm R&D intensity. We also explore potential tax planning trade-offs and the "beggar-thy-neighbor" effects of R&D relocation. Results aim to inform policymakers on the nuanced effectiveness and strategic corporate responses to R&D tax incentives, highlighting how pre-existing firm characteristics shape policy impact on both tax behavior and real innovation. This research bridges tax, corporate finance, and innovation economics by examining the strategic corporate use of a key innovation policy tool.

What is Wrong with Inheritance Tax Agricultural Property Relief (APR)?

Luke Busbridge

APR has existed since at least the 1890s. Broadly, it provides relief from inheritance tax (IHT) so that when an individual gifts farmland inter vivos or on death, the taxable value of such property is reduced by either 50% or 100% for IHT purposes.

The policy behind APR was to shield a family farm from a 40% IHT charge on a working farmer's death, so that the holding does not have to be sold in order to pay the IHT arising at that point. When APR was introduced (at 50%) in 1975, an individual needed to have generated at least 75% of their income from farming over the preceding five years, in order to qualify for relief. In other words, APR was available only to full-time working farmers. Landlords could not claim it.

This "working farmer" provision, however, has been eroded over the ensuing decades. In 1981, APR was extended, at 30%, to tenanted farmland. Since 1981, APR has been widened further. In 1992 the top rate of relief was increased to 100%, whilst the rates for working farmers and landowners were harmonised as well.

Allowing APR at 100% has turned farmland into a fiscally attractive investment for individuals who are not working farmers. This is harming wealth inequality. The very richest taxpayers can shelter significant amounts of wealth from a 40% IHT charge by simply buying farmland and gifting it inter vivos or retaining it until death. Accordingly, these individuals can secure a lower effective rate of IHT on their estates than taxpayers who are over the IHT threshold but who lack the "spare" wealth to shelter it in favoured assets such as farmland.

APR has therefore become divorced from its policy objective. It is exacerbating wealth inequality, and needs reform.

KEYNOTE ADDRESS

The use of AI in tax: a study of the digital transformation of tax administration and tax practice

George Hardy and David Hadwick

Unbeknownst to most practitioners, revenue and customs authorities have been using artificial intelligence (AI) and machine learning for more than two decades, to perform an outstanding range of functions.

In the European Union, the tax administrations of every member state have integrated AI systems to (at least) operate core compliance processes, some systems being common to all EU States such as Transaction Network Analysis and CRMS2. In 2024, the OECD reported that among the 52 jurisdictions, including the UK, that participated in the International Survey on Revenue Authorities (ISORA), 96.6% implemented advanced analytics tools and 80% declared using AI. These figures underscore a global trend, supported by International Organizations, toward the digital transformation of revenue and customs.

Meanwhile, in response to a series of increasing regulatory reporting obligations, tax advisors have sought to utilise the new technologies, powered by the rapidly evolving AI methodologies, to handle the large quantities of data required to meet these challenges. This in turn has driven an increased awareness of the opportunities provided to automate tax systems and processes. The recent rapid development of Gen AI has provoked interest in the accelerated use of Agentic AI, as this seems to offer the opportunity to increase the degree of autonomy within the AI process, exponentially increasing the scope of the tasks that the technology could perform.

These recent developments raise important questions, particularly: ***'can tax practice and administration be automated to such degree and if so, what will be the impact on the tax market, particularly for entry-level workers?'*** This presentation outlines the functional taxonomy of AI systems leveraged by tax authorities and by tax practitioners, the types of systems used and for what purposes. Further, the presentation delineates possible challenges and opportunities for the highly dynamic market of taxation and its stakeholders.

Wednesday 10 September – Education Day

AI/ Digital Issues in Teaching

Analysing AI's Performance in Taxation Educational Assessments Across Different Academic Levels Using the Revised Bloom's Taxonomy

Hanneke du Preez and Madeleine Stiglingh

This study investigates the accuracy of artificial intelligence (AI) models in answering tax assessments across multiple academic levels in South African higher education. The research question asks: How accurately can AI models respond to tax assessments when evaluated against the Revised Bloom's Taxonomy (RBT) cognitive framework? The objectives are: (1) to evaluate the accuracy of AI-generated answers across varying levels of cognitive complexity; (2) to compare AI responses against solutions from selected assessments; and (3) to determine how AI performance differs across undergraduate, honours-level, and professional tax examinations.

The methodology involves sampling tax assessments from 2 undergraduate, 2 honours-level tax modules at the University of Pretoria, and the professional examinations of the South African Institute of Chartered Accountants (SAICA). These questions will be inputted into selected AI models, namely Chat GPT Pro, Gemini 2.0 flash and Claude. The AI-generated responses will then be categorised according to the cognitive levels of the RBT. Accuracy will be assessed by comparing AI answers to the solutions using a rubric aligned with both content correctness and cognitive categorisation.

The integration of AI into education is rapidly transforming pedagogical practices. Literature (Chan, 2023; Opesemowo & Adekomaya, 2024; Habibi et al., 2023) highlights both the benefits and ethical risks of AI in education, including issues related to plagiarism, misrepresentation of understanding, and inflated performance. This study contributes to the body of knowledge by examining the appropriate and effective use of AI in tax education. Given the limited empirical research (Siebielec et al., 2024), the study offers practical insights for educators and curriculum designers. Ultimately, it aims to enhance tax teaching and assessment strategies by aligning AI tools with pedagogically sound principles and cognitive benchmarks.

Students, Meet Your New Teammate - GenAI

Nicky Thomas

As generative AI (Gen AI) continues to transform professional environments, there is an increasing need to equip students with the skills to effectively, and critically, utilise available AI tools. How well do we prepare our students for this?

Recent literature on AI in the workplace has begun to examine various facets of the human–AI interface, with growing attention to the concept of AI as a distinct team member. The integration of AI into teams has raised concerns about the effectiveness of its use, with some studies reporting a decline in decision quality when individuals became overly reliant on or excessively trusting of AI, despite notable productivity gains. This is a reality the students will face in their future careers.

I would like to present an innovative approach to incorporating AI in to learning and assessment design - introducing “Gen AI” as a ""6th group member” in a summative group assignment.

Guiding students in the ethical and effective use of Gen AI, supports students to develop and critique AI skills. Formalising the use of AI in assessment enhances both group and individual accountability, promoting greater transparency and responsibility within teams.
Incorporating an individual reflection task encourages students to consider how Gen AI impacts group dynamics and productivity, fostering critical thinking and self-awareness. It also offers academics insights to better support students for future AI-integrated environments.

In addition to drawing on my own experiences, this session will offer opportunities for discussion around experiential learning with AI, including its impact on group dynamics and overall team effectiveness.

[Written in collaboration with “Gen-AI”, based on factual information.]

Simulating Client Interactions Using AI: Developing integrative and computational thinking in Taxation Students

Andrew van der Burgh, Pieter Pienaar, Madeleine Stiglingh and Lanise van der Burgh

Purpose: This paper explores using an AI-powered client-simulation chatbot to develop both integrative and computational thinking, along with communication skills for taxation students. Students had to be able to identify and source information without being prompted, a challenge commonly reported by graduates during their transition into practice.

Design/methodology: Students were asked to prepare a tax return for a retailer without structured financial data. Instead, they received a broad task brief and access to a custom-developed AI chatbot ("Lerato Moloi"), a simulated client. Lerato purposefully misinterpreted vague queries and asked students for clarification, replicating real-world communication. Seventeen overlapping documents allowed students to reach the same answer using a relevant combination of documents or a line of questioning.

Findings: The simulation required students to integrate technical knowledge with business understanding, communicate clearly, and demonstrate emotional intelligence when facing miscommunication. Students used varied strategies to solve the same problem, made possible by the AI's ability to adapt based on context. Early career Accountants in the pilot group noted this assignment would have benefited them at university by better preparing them for practice.

Originality/value:
The use of AI to simulate client interactions offers a scalable, resource-efficient alternative to traditional case studies, enabling broader implementation of high-fidelity professional training in accounting education.

Digital Literacy for In-House Tax Practitioners – A Competency Framework for Tax Operations Officer

Emmanuelle Deglaire

The tax function sits at the crossroads between accounting and legal functions. One typically becomes a tax specialist by pursuing either an accounting curriculum or a legal education.

Both of these disciplines have increasingly recognized the importance of developing new technical competencies for an effective entry into the profession.

In accounting, research has focused on the new skills required due to digital transformation (Mbizi et al., 2022; Stumke, O., 2021). Similarly, in the legal field, awareness is growing around the need to develop new competencies (Barney and Ginsberg, 2019). However, recent studies conclude that, as of today, course syllabi have not yet fully embraced this new mission (Wittman & Brown, 2024).

At times, technological competence is discussed in relation to tax specifically — for instance, to assess auditor effectiveness (Nugrahanto, A., & Alhadi, I., 2021). Tax considerations have also been included in information systems research, where findings suggest that higher competence levels play a moderating role in the adoption of expert systems and in achieving better corporate performance (Faina, I., Alturas, B., & Almeida, F., 2020). However, such work typically does not conclude with a clear list of key competencies needed for successful operational implementation.

Meanwhile, the European Union developed the Digital Competence Framework (DigComp), last updated in 2021 in DigComp 2.0. This is a rich, general-purpose tool, yet it does not include any consideration of tax professions (Vuorikari, R., Kluzer, S., & Punie, Y., 2022).

There is a clear gap in the current literature: What are the essential technical skills that tax expert need to acquire during their training in order to become effective in-house tax practionners ? Or to copy the vocabulary developed in law (legals ops'), what are the competencies of a tax operations officer?

Research Methodology

This research gathers field data through semi-structured interviews with in-house tax professionals from legal backgrounds who have led or significantly contributed to the implementation of technological solutions within their organizations. It lists the competencies they applied in practice and analyses the ones learned during their curriculum from the ones they had to develop by themselves, and the ones they still feel like needing.

Given the wide scope and rapidly evolving nature of the topic, this research must be precisely focused to maximize impact. Its ambition is to:

- Identify and list the core new competencies that students must acquire.
- Encourage educators to adapt their curricula accordingly;
- Empower young professionals to pursue targeted self-learning;
- Enable employers to define job profiles for a new kind of professional: the tax operations officer — a team member who can leverage their tax expertise to ensure seamless operational integration within the different departement of their company.

The ultimate goal is to help tax practitioners to become fully relevant in a digitalizing environment, would it be in their relations with their in-house clients (e.g. other departments), with their external tax consulting partners, with their IT or tax tech suppliers or with the tax authorities themselves.

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Employability

Relevance Recalculated: The Evolving Skillset for Tax Professionals in a Digitally Disrupted World

Geraldo Jansen

The tax profession in South Africa is undergoing rapid transformation due to technological advances, regulatory shifts, and evolving socio-economic conditions. In response, there is growing concern among employers about a ""skills mismatch"", described as the disconnect between the proficiencies of new entrants and the demands of a digitally disrupted workplace (Jackson, 2021:182; Alpin, 2021:13). This study investigates the relevance of the tax profession in South Africa by exploring the essential skills needed by tax professionals as the tax profession continues to evolve into the future.

Adopting a mixed methods research design, the study draws on qualitative insights from three Interactive Qualitative Analysis (IQA) focus groups. The participants included tax professionals from three generational cohorts, namely, Generation Z, Millennials, and Generation X and older, offering a multi-generational perspective on future-ready competencies in the tax profession.
Using the IQA approach developed by Northcutt and McCoy (2004), the research identified essential skills and explored their interrelationships. Discussions were facilitated by an independent facilitator who guided participants through the central research question: What are the essential skills required for tax professionals in South Africa to remain relevant in the evolving tax profession?

The findings provide valuable insights for shaping educational, institutional, and policy strategies to support skill development in the tax profession. This research contributes to the discourse on professional development and underscores the need for responsive, future-focused education and training in the South African tax profession.

On Independence of Tax Law Professors

Jan Vleggeert, Laurens van Apeldoorn and Elody Hutten

Should tax law professors seek, and be permitted to simultaneously also hold paid positions in private practice, consultancy or government? In many academic fields, such as biomedical sciences, the prevalence of dual affiliations has long been subject to scrutiny and debate. In the discipline of tax law, this debate is still in its infancy. Regrettably so, because tax research frequently impacts tax policy, and biased research could therefore form an obscured pathway for private interests to influence democratic decision-making. In this paper we draw on existing literature on conflicts of interest and bias, to identify (1) the compatibility of dual affiliations with the role specific responsibilities of professors, and (2) the desirability of dual affiliations in light of the function of universities in a democratic society. First, we clarify the professional duties of tax law professors and the societal function of universities. Briefly, we submit that tax law professors have a professional duty to take reasonable precautions against the risk of bias. We perceive this duty as linked to the privilege of academic freedom, and to the function of universities in a democratic society. We argue that universities, to fulfil their societal function, must foster an environment in which knowledge production is unguided by vested interests and subject to organized critique and investigation. Second, we sketch the phenomenon of combining a part-time position as a professor of tax law with a role in legal practice. Thirdly, we assess the impact of such dual affiliations as far as bias and conflicts of interest is concerned in light of the professional duties of tax law professors and the societal function of universities. Our preliminary conclusions are (1) that the risk of bias in research is real, and that this may render dual affiliations incompatible with professional duties, and (2), that universities may wish to regulate and limit the prevalence of dual affiliations.

Engaging Students to Become 'Practice Ready' and 'Digitally Proficient' Taxation Graduates

Claire Scott McAteer

Rationale
Generative artificial intelligence (AI) is a topical issue in academia and professional tax practice. The importance of users being able to recognise the quality of outputs is crucial. Bearman et al. (2024) state that 'university graduates should be able to effectively deploy the disciplinary knowledge gained within their degrees to distinguish trustworthy insights from the 'hallucinatory'.' Ballentine et. al (2024) suggest that generative AI provides an opportunity to move away from assessment that relies on rote learning to the use of critical assessment including authentic scenario-based examples. As a result of the increased use of generative AI and the emphasis on the graduate competency goals set by Queen's Business School, it was identified that engagement with professional practice was crucial to effectively deploying an authentic scenario-based assessment incorporating generative AI. In addition, the need to link module content to current affairs was crucial to drive engagement.

Innovation in a taxation module
Professional services firms were engaged at key points in the module delivery. The continuous assessment was jointly drafted with a professional practitioner to ensure that it simulated a 'live' case in professional practice. The integration of multiple taxes, the use of ChatGPT including the assessment of its accuracy and the need for students to use excel and the Lexis online database were embedded.

Impact

Students confirmed that they are much more informed about a tax career, that the 'live' case helped them become work-ready and fostered their professional identity aiding their transition to the labour market.

It Doesn't Need to be so Taxing: A Scoping Review Exploring Online Clinical Education

Kerry de Hart and Neo Molefi-Kau

Tax clinics have demonstrated that service-learning pedagogy is effective in equipping students with practical, work-integrated learning experiences. The benefits reported from such initiatives include improved sense of community, belonging and inclusivity, a sense of pride and purpose, an appreciation and understanding of the link between theory and practice, soft and technical skills development, workforce readiness on graduation (Castelyn et al., 2020; Le & Hoyer, 2020).

Beyond the advantages for students, tax clinics also serve as a mechanism for community engagement. The Higher Education White Paper of 1997 positioned community engagement alongside teaching, learning and research as a core pillar of the academic framework. Additionally, the 2013 White Paper on Post-School Education & Training highlighted the critical challenge presented by the scarcity of learning opportunities.

Tax clinics can offer a solution to both these challenges by equipping students with hands-on experience while also providing unrepresented taxpayers with free tax advice. Recognising the importance of social justice through community engagement and expanding access to in work-integrated learning experiences in a digital world, the University of South Africa (Unisa), an Open Distance e-Learning (ODeL) institution, is exploring ways to adapt clinical education to an online format. This would allow students across South Africa to participate in and benefit from experiential learning, regardless of their geographical location.

This study uses a scoping review methodology to examine the existing landscape of online clinical education. Guided by the research question: What is known about online clinical education? The review investigates legal clinical education in an online setting. The findings contribute to the broader understanding of how clinical education can evolve in digital environments to ensure meaningful student engagement and skills development.

Modes of Teaching

Student perception and marks of Tax 300 hybrid teaching compared to Traditional Face to Face teaching

Lizanne Barnard

The 3rd-year TAX 300 course presentation at the University of Johannesburg has undergone significant changes and refinements since the onset of the COVID-19 pandemic. Prior, the course was taught entirely through face-to-face lectures. However, following the shift necessitated by COVID-19, a hybrid teaching model was adopted. This model integrates the delivery of technical content through prerecorded videos, which students are required to review before attending in-person classes. The on-campus sessions focus on the practical application of the knowledge acquired , using real-life scenarios to enhance the learning experience.

The rationale behind this transition is to foster lifelong learning by ensuring that students come to class prepared to apply their theoretical knowledge. The aim is to enhance student engagement and academic performance, with the expectation that students will actively participate in applying the knowledge gained from the technical content in a practical, interactive setting. However, while there has been an improvement in student marks, some challenges persist.

This study seeks to evaluate the efficiency of this new hybrid teaching approach. A Google Form questionnaire was distributed to all students enrolled in the course from 2021 to 2024 to

gather feedback on their perceptions of the teaching model. The findings from the feedback will be compared to assess how students' views have evolved over time and to analyze the correlation between student engagement with the online content and their academic performance. Additionally, a comparison of Tax marks from the pre-COVID period with those since the implementation of the hybrid model will be conducted.
The results of this study will provide valuable insights into whether the hybrid teaching model has achieved its intended outcomes and whether adjustments, such as changes to the timetable or course structure, are needed to further enhance student success.

Enhancing Tax Education: Reflections on Gamification

Nadia Bauer

A tax game, initially developed by Edhec Business School in collaboration with Anthropo-lab, assigns students roles as either revenue authorities or taxpayers who may or may not move between jurisdictions, each necessitating strategic decision-making. When the original host withdrew, the University of Pretoria acquired the copyright and continued its development in 2024, collaborating with multimedia students to enhance its design and functionality. These enhancements include cross-platform compatibility, incorporating elements like leader boards, ensuring the game's interface is user-friendly, and implementing toggle options supporting decolonisation in the learning environment.
The study investigates how gamification in tax education fosters the development of pervasive skills, specifically focused on ethical awareness, critical thinking and decision making. The study reflects on the transformative potential of gamified learning in tax education, emphasising its role in deepening understanding and fostering active learning. The research question is: To what extent does gamification in the classroom aid in the development of certain pervasive skills? An added advantage of the research is the evaluation of the game's design, usability, entertainment value, and level of engagement experienced by students.

Gamified learning in tax education provides a unique platform for students to engage directly with the complexities of tax laws. In this game, students encounter challenges such as income reporting, meeting their responsibilities as taxpayers, and comprehending their taxpayers' rights. Findings from this experiential learning approach aid in addressing the challenge of bridging tax knowledge gaps, developing work-readiness skills and meeting the professional competency standards established by regulatory bodies.

Can Virtual Reality (VR) become mainstream for accounting and finance students?

Terry Filer

Purpose
Swansea University has pioneered the use of virtual reality (VR) to deliver immersive and engaging case studies in taxation, auditing, and financial accounting. Student feedback has been overwhelmingly positive, highlighting VR's strong potential to transform accounting and finance (A&F) education. This study explores how VR can be integrated more widely into A&F curricula and become a mainstream teaching tool.

Methodology
Building on prior success, this study collaborates with A&F faculty with the aim to extend VR case studies into additional modules. Voluntary questionnaires will be used to gather insights from final year undergraduate accounting students, evaluating both their enjoyment and the perceived benefits of VR across their modules. A successful pilot will pave the way for VR's adoption across all year groups in the BSc Accounting and Finance and BSc Accounting programs.

Findings
Early feedback from students enrolled in 2024/25 tax and audit modules has been highly encouraging, reflecting strong engagement and appreciation of the immersive learning experience. Additional responses from other modules will be collected in 2025. If current trends continue, an expanded suite of VR case studies will be developed for widespread use in the 2025/26 academic year, with ongoing evaluation and refinement.

Practical limitations
While access to VR headsets and their upkeep are logistical considerations, these can be manageable within the broader goal of enhancing student learning.

Originality/value
This research champions the integration of innovative VR technology into mainstream A&F education. It fosters interdisciplinary collaboration, brings real-world practice into the classroom, and enhances learning opportunities, especially for students with limited exposure to professional environments. The initiative reflects a commitment to innovation, accessibility, and academic excellence.

Enhancing Tax Law Education Through Legal Design: A New Pedagogical Approach

Francesca Amaddeo and Eleonora Barbaglia (hybrid)

In the evolving landscape of tax law education, especially international tax, the need for more effective and engaging learning methodologies is paramount. Traditional methods often fall short in translating complex legal concepts into accessible and understandable formats for students and professionals alike.
Legal Design, an innovative discipline at the intersection of law, design thinking, and user experience, provides a solution to this challenge.
By employing visual tools, clear communication strategies, and user-centered design principles, Legal Design simplifies intricate tax regulations, improves comprehension, and fosters a more interactive learning environment.
This paper explores how Legal Design can improve the teaching of tax law by creating more intuitive learning experiences that demystify complex legislative texts and enhance cognitive retention.
Furthermore, it examines case studies where visual contracts, infographics, and interactive guides have successfully facilitated understanding in areas of international taxation, compliance, and fiscal regulations. Emphasizing clarity, engagement, and accessibility, Legal Design not only empowers students and professionals to grasp tax concepts more effectively but also promotes a deeper appreciation for regulatory frameworks.
Through this pedagogical shift, Legal Design emerges as a powerful tool in advancing education in tax law, contributing to the development of more knowledgeable and confident practitioners. Our idea is to provide some examples of the impact of legal design in international tax law, for instance, dealing with tie-break rules of art. 4 OECD Model.