

# Table of Contents

List of Figures and Tables	vii
List of Abbreviations	ix
Contributors	xiii
Acknowledgements	xvii
Chapter One – Global Tax Governance: What It is and Why It Matters <i>Peter Dietsch and Thomas Rixen</i>	1
<b>PART ONE – THE PROBLEM: INTERNATIONAL TAX COMPETITION</b>	<b>25</b>
Chapter Two – The Nature and Practice of Tax Competition <i>Kimberly A. Clausing</i>	27
Chapter Three – Winners and Losers of Tax Competition <i>Philipp Genschel and Laura Seelkopf</i>	55
Chapter Four – Tax Competition: An Internalised Policy Goal <i>Lyne Latulippe</i>	77
<b>PART TWO – SHORTCOMINGS OF THE CURRENT REGULATORY FRAMEWORK AND INITIATIVES</b>	<b>101</b>
Chapter Five – A Strange Revolution: Mock Compliance and the Failure of the OECD’s International Tax Transparency Regime <i>Richard Woodward</i>	103
Chapter Six – Redistributive Tax Co-operation: Automatic Exchange of Information, US Power and the Absence of Joint Gains <i>Lukas Hakelberg</i>	123
Chapter Seven – Does FATCA Teach Broader Lessons about International Tax Multilateralism? <i>Itai Grinberg</i>	157
Chapter Eight – The G20, BEPS and the Future of International Tax Governance <i>Richard Eccleston and Helen Smith</i>	175

<b>PART THREE – NORMATIVE PRINCIPLES FOR GLOBAL TAX GOVERNANCE</b>	<b>199</b>
Chapter Nine – Tax Competition: A Problem of Global or Domestic Justice? <i>Miriam Ronzoni</i>	201
Chapter Ten – International Taxation and the Erosion of Sovereignty <i>Laurens van Apeldoorn</i>	215
Chapter Eleven – Whose Tax Base? The Ethics of Global Tax Governance <i>Peter Dietsch</i>	231
<b>PART FOUR – FROM THEORY TO PRACTICE: JUST INSTITUTIONS FOR INTERNATIONAL TAX GOVERNANCE</b>	<b>253</b>
Chapter Twelve – Towards an International Yardstick for Identifying Tax Havens and Facilitating Reform <i>Markus Meinzer</i>	255
Chapter Thirteen – A Proposal for Unitary Taxation and Formulary Apportionment (UT+FA) to Tax Multinational Enterprises <i>Reuven S. Avi-Yonah</i>	289
Chapter Fourteen – International Financial Transaction Taxation, Public Goods and Justice <i>Gabriel Wollner</i>	307
Chapter Fifteen – Institutional Reform of Global Tax Governance: A Proposal <i>Thomas Rixen</i>	325
Index	351