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CONTENTS

- 245 Editorial
Nolan Cormac Sharkey and Kathrin Bain
- 247 Hong Kong's new tax treaty network
Jefferson Vanderwolk
- 254 A comparative study of the OECD model, UN model and China's treaties with respect to rights to tax income and capital
Bin Yang and Chun Ping Song
- 268 An Australia-Hong Kong double tax agreement: Assessing the costs and benefits
Nolan Cormac Sharkey and Kathrin Bain
- 294 Some distinctive features of Australian tax treaty practice: An examination of their origins and interpretation
C. John Taylor
- 339 Recent changes in international taxation and double tax agreements in Russia
Evgeny Guglyuvatyy

Editorial

This special edition of the journal provides significant coverage of Double Tax Agreements (DTAs) in the East Asia/Australia region. It thereby provides some redress to the overwhelming coverage of DTA issues in Europe and North America that exists in the academic and professional literature. Is there any need to consider the regions differently? Yes, there is. DTAs operate with significant differences in different legal, economic and social environments despite their structural similarities. The region that is the focus of this special edition is also one that is growing rapidly in global economic significance and its needs must be considered by the tax community as much as by other communities. This special edition is also the first of at least two that will collect the papers that are being prepared by authors from various other regional jurisdictions on the topic of DTAs.

In this edition, papers are provided from a variety of jurisdictions and approaches. Overviews of DTA policy and approach in both China and Russia are provided. These are highly significant given the recent emergence and rapid progression of both these transition economies. The authors have done an excellent job of capturing the priorities of China and Russia in establishing their relatively recent DTA networks. It is suggested that more subtle insights into how these two countries view their role in the globalised world may be garnered from a careful contemplation of their treaty policy.

From a completely different background, Australia's long and careful evolution of its DTA network emerges in the paper by Professor John Taylor. This stands in remarkable contrast to China and Russia. However, the paper suggests that Australia is not always so careful in its approach to establishing DTAs! The paper by Professor Vanderwolk on Hong Kong provides another completely different approach, with Hong Kong rapidly changing from a jurisdiction with no DTAs to one intent on a large number in a very short period of time. The final paper by Sharkey and Bain then considers what would happen if a DTA was negotiated between Australia and Hong Kong, considering both country's different priorities.

Together these papers make fascinating reading and demonstrate clearly that whilst the conclusion of DTAs is a growing trend worldwide, all countries come at the task with different priorities and approaches.

Finally, we would like to note that the genesis of this special edition of the journal was a conference jointly organised by Atax, UNSW and the Centre for Financial Regulation and Economic Development at the Chinese University of Hong Kong (CUHK). The conference was held on 13 December 2010 in Hong Kong and attracted a significant local audience. We would like to thank Jeff Vanderwolk at CUHK who jointly organised it with us, as well as the Faculty of Law at UNSW that provided some funding by providing us with a faculty grant.

The occasion saw a group of five Atax academics present in Hong Kong which has proved a successful initiative for further joint research programs.

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