



Éléments de droit fiscal international (French Edition)

Philippe Malherbe

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L'impôt sur le revenu est le carburant et le vecteur de la politique économique denombre d'États.

Cet ouvrage concis, destiné aux étudiants, aux praticiens et aux acteurs politiques, expose les questions que soulève la taxation du revenu transnational dans un monde d'États souverains : comment prévenir une double imposition injuste et inefficace du même revenu, en répartissant la matière imposable entre les États de la source et de la résidence et en tenant adéquatement compte dans le second de l'impôt levé dans le premier ? Comment prévenir l'abus par les contribuables ou les États, qui engendre la fraude ou l'évasion fiscales et cause des injustices et inefficiences différentes, mais tout aussi dommageables ? Les solutions mises en oeuvre au fil d'un siècle de pratique sont analysées.

Ce champ de l'art et de la science juridiques est encore jeune et le paradigme de la taxation idéale dans le village global du XXI^e siècle est encore à inventer.

Une reproduction juxtalinéaire des modèles de conventions fiscales de l'ONU et de l'OCDE figure en appendice.

Cet ouvrage existe également en version anglaise aux éditions Bruylant : *Elements of International Income Taxation*.

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