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**Tax 730: Seminar in Betriebswirtschaftlicher Steuerlehre
(FSS 2020)**

Overview

No.	Topics	Adviser
1	Die staatliche Förderung von Wagniskapitalmärkten: Ein internationaler Vergleich Fiscal stimulation of venture capital markets: An international comparison	Bührle
2	Is the Tax Disclosure in Corporate Reporting Informative? A Critical Analysis → Only possible in English	Casi
3	Steuerliche Behandlung digitaler Geschäftsmodelle – eine international vergleichende Analyse	Davatolhagh
4	Country-by-country reporting: Erkenntnisse aus existierenden Initiativen und Empfehlungen für künftige Entwicklungen Country-by-country reporting: Lessons learned from existing initiatives and recommendations for future developments	Dutt
5	DAC 6: Eine kritische Analyse der Einführung einer Anzeigepflicht für Steuergestaltungsmodelle in Europa DAC 6: A critical analysis of introducing a mandatory disclosure rule for aggressive tax planning strategies in Europe	Fischer
6	Trends der effektive Unternehmenssteuerbelastung in Europa: Eine datenbasierte Analyse des aktuellen Reformbedarfs Effective Corporate Tax Rate Trends in Europe: An empirical analysis of the current need for reforms	Ludwig
7	Die Rolle von Steuern im CSR-Kontext: Eine kritische Analyse The role of taxes in the context of CSR: A critical analysis	Müller
8	Maßnahmen zur Reformierung der deutschen Unternehmensbesteuerung im Hinblick auf den internationalen Steuerwettbewerb – eine kritische Evaluation Measures to reform German corporate taxation with view to international tax competition – a critical evaluation	Stage
9	Einführung einer steuerlichen Forschungszulage in Deutschland– eine kritische Analyse Introduction of R&D Tax Incentives in Germany – A Critical Analysis	Steinbrenner

10	Ein Vergleich der digitalen Wettbewerbsfähigkeit der Umsatzsteuer: EU vs. USA A Comparison of the digital Competitiveness of EU VAT with the US Sales Tax System	Kock
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Topic 1:Description:

Start-ups are crucial for the development of new ideas and the future viability of an economy. One way to support young and innovative companies is venture capital (VC). VC investors help to overcome financing constraints. Empirical evidence also shows that they provide additional support and guidance, improving the efficiency and performance of the funded firms. Overall, a strong VC culture is seen as a cornerstone for innovation in a country. However, compared to the American market, the VC market in Europe is still underdeveloped.

Policy makers are aware of this shortcoming. Several fiscal initiatives aim at supporting VC investment. Apart from state-supported VC funds or grants, tax-related measures targeting individual investors (e.g. capital gains tax relief on VC investments), VC companies (e.g. special tax exemptions) or start-up (e.g. more generous tax loss relief) have been implemented.

The goal of the thesis is to provide an overview over existing instruments that aim to foster VC investment and start-up development. The scope of the topic can be defined by the student. Possibilities range from an overview over regulations in a wide variety of countries such as the EU28 Member States or the OECD, up to an in-depth analysis of certain types of tax incentives or the interaction of support schemes in a small selection of countries.

Further readings:

Bernoth, K., Colavecchio, R., 2014. The macroeconomic determinants of private equity investment: A European comparison. *Applied Economics* 46 (11), S. 1170–1183.

Da Rin, M., Nicodano, G., Sembenelli, A., 2006. Public policy and the creation of active venture capital markets. *Journal of Public Economics* 90 (8–9), S. 1699–1723.

European Commission, 2017. Effectiveness of tax incentives for venture capital and business angels to foster the investment of SMEs and start-ups, available at https://ec.europa.eu/taxation_customs/sites/taxation/files/final_report_2017_taxud_venture-capital_business-angels.pdf (7.11.2019)

Groh, A. P., Wallmeroth, J., 2016. Determinants of venture capital investments in emerging markets. *Emerging Markets Review* 29, S. 104–132.

Van Pottelsberghe De La Potterie, B., Romain, A., 2004. The Determinants of Venture Capital: Additional Evidence, Deutsche Bundesbank Discussion Paper Series 1, Nr. 19/2004 (2004), available at <https://www.econstor.eu/bitstream/10419/19486/1/200419dkp.pdf> (15.10.2019).

Topic 2:

Description:

Information accessibility is a key element to achieve efficient resource-allocation decisions and development in an economy (Bushman et al. (2003)). In particular in the context of firms' information availability not only it helps capital supplier (shareholders and creditors) to better judge their investment return before committing to it but also it supports them in monitoring their capital investment after committing to it (Beyer et al. (2011)). However, in case of tax information, the literature so far suggests that managers face a trade-off on whether to provide decision-useful information for stakeholders or conceal information from the tax authority (Inger et al. (2018)). On the one side, tax information proves to be valuable to investors when pricing a stock (Campbell et al. (2018)). On the other side, higher tax transparency in annual reports might lead to increase tax audits (Bozanic et al. (2017)). Given the peculiar nature of tax information, what suggests the current literature on the usefulness of tax information in financial statements?

Further readings:

Bozanic, Z., Hoopes, J., Thornock, J., Williams, B., 2017. IRS Attention. *Journal of Accounting Research* 55 (1), pp. 79-114.

Campbell, J. L., Cecchini, M., Cianci, A., Ehinger, A., Werner, E. M., 2018. Tax-Related Mandatory Risk Factor Disclosures, Future Profitability, and Stock Returns. *Review of Accounting Studies*, Forthcoming. Available at <https://ssrn.com/abstract=2837329>.

Ehinger, A. C., Lee, J. A., Stromberg, B., Towery, E., 2019. The Trade-Off between Reporting Complexity and Proprietary Costs in Voluntary Disclosure Decisions: Evidence from Voluntary Tax Disclosures. Working Paper (April 2019), available at https://krannert.purdue.edu/academics/Accounting/bkd_speakers/papers/stromberg.pdf.

Inger, K. K., Meckfessel, M. D., Mi Zhou, M. J., Fan, W. P., 2018. An Examination of the Impact of Tax Avoidance on the Readability of Tax Footnotes. *The Journal of the American Taxation Association* 40 (1), pp. 1-29.

Lisowsky, P., Robinson L., Schmidt, A., 2013. Do Publicly Disclosed Tax Reserves Tell Us About Privately Disclosed Tax Shelter Activity?. Journal of Accounting Research 51 (3): 583-629.

Topic 3:

Beschreibung:

Digitale Geschäftsmodelle sind mittlerweile zentraler Treiber des Wachstums unserer Gesellschaft. Im Rahmen der vorliegenden Seminararbeit sollen digitale Geschäftsmodelle identifiziert sowie deren Besteuerung im internationalen Vergleich analysiert werden.

Literatur:

Olbert, M., Spengel, C., 2017. International Taxation in the Digital Economy: Challenge Accepted?, World Tax Journal 2017, S. 3-46.

Nicolay, K., Olbert, M., Schmidt, F., Spengel, C., Steinbrenner, D., Werner, A.-C., Wolf, T., 2018. Steuerliche Standortattraktivität digitaler Geschäftsmodelle – Up-date. ZEW/PwC Studie, abrufbar unter [http://ftp.zew.de/pub/zew-docs/gutachten/Digital Tax Index 2018.pdf](http://ftp.zew.de/pub/zew-docs/gutachten/Digital_Tax_Index_2018.pdf).

Olbert, M., Spengel, C., Werner, A.-C., 2019. Measuring and Interpreting Countries' Tax Attractiveness for Investments in Digital Business Models, Intertax, S. 148-160.

Topic 4:

Description:

Following increased attention on the tax planning behavior of large multinational firms, several initiatives have developed measures that aim at curbing extensive profit shifting by increasing tax transparency. The so-called country-by-country reporting (CbCR) demands MNEs to disclose certain tax-related data for every country where they operate. The reporting requirement is supposed to help tax authorities in effectively detecting abusive tax sheltering and – in case the reports are made publicly available – to induce public pressure on the firms to pay their fair share of taxes. While several CbCR initiatives have already been implemented (Art. 89 Directive 2013/36/EU; Section 1504 Dodd-Frank Wall Street Reform and Consumer Protection Act 2010, Chapter 10

EU Accounting Directive, OECD BEPS Action 13), the introduction of a general public CbCR for large EU MNEs is still under discussion.

The aim of the thesis is to evaluate CbCR based on both theoretical/normative and empirical evidence and to derive recommendations therefrom in light of the ongoing political CbCR discussion in the EU.

In this view, the student should ideally consider the following tasks: short presentation of existing CbCR initiatives; discussion of the effectiveness/problems/open points of CbCR, based on theoretical/normative and empirical literature; development of policy recommendations to further improve the CbCR framework.

Further readings:

De Simone, L., Olbert, M., 2019. Real Effects of Private Country-by-Country Disclosure. Working Paper (August 2019), available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3398116 (22.10.2019).

Dutt, V. K., Nicolay, K., Vay, H., Voget, J., 2019. Can European Banks' Country-by-Country Reports Reveal Profit Shifting? An Analysis of the Information Content of EU Banks' Disclosures, ZEW Discussion Paper, No. 19-042 (October 2019), available at <http://ftp.zew.de/pub/zew-docs/dp/dp19042.pdf> (22.10.2019).

Dutt, V., Spengel, C., Vay, H., 2017. Der EU-Vorschlag zum Country-by-Country Reporting im Internet – Kosten, Nutzen, Konsequenzen. Study on behalf of the Foundation for Family Businesses, available at https://www.familienunternehmen.de/media/public/pdf/publikationen-studien/studien/Country-by-Country-Reporting_deutsch_Studie_Stiftung-Familienunternehmen.pdf (22.10.2019).

European Parliament, 2019. Disclosure of income tax information by certain undertakings and branches, European Parliament legislative resolution of 27 March 2019 on the proposal for a directive of the European Parliament and of the Council amending Directive 2013/34/EU as regards disclosure of income tax information by certain undertakings and branches (COM(2016)0198 – C8-0146/2016 – 2016/0107(COD)), P8_TA-PROV(2019)0309, available at http://www.europarl.europa.eu/doceo/document/TA-8-2019-0309_EN.pdf (22.10.2019).

Overesch, M., Wolff, H., 2019. Financial Transparency to the Rescue: Effects of Country-by-Country Reporting in the EU Banking Sector on Tax Avoidance. Working Paper (February 2019), available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3075784 (22.10.2019).

Topic 5:

Beschreibung:

In Anlehnung an Aktionspunkt 12 der BEPS-Initiative hat es sich die EU-Kommission zum Ziel gesetzt, Vorschriften für Meldepflichten grenzüberschreitender Steuergestaltungen für die Mitgliedstaaten zu entwerfen und setzte dies im Mai 2018 mit der Änderungsrichtlinie 2018/822/EU – DAC 6-Richtlinie genannt – entsprechend um. Ziel dieser Richtlinie ist es, durch eine EU-weite Offenlegung von grenzüberschreitenden Gestaltungen den aggressiven Steuerplanungsgestaltungen multinationaler Konzerne entgegenzuwirken. Im Rahmen der Seminararbeit könnte evaluiert werden, ob die ausgearbeitete Richtlinie zum Erreichen dieses Ziel geeignet ist oder für Mitgliedstaaten, Unternehmen und Intermediäre lediglich weitere administrative Lasten zur Folge hat. Beispielhaft könnte für diese Analyse der aktuelle Gesetzesentwurf (BR-Drs. 489/19) der deutschen Bundesregierung herangezogen werden.

Literatur:

Baker, P., 2015. The BEPS Project: Disclosure of Aggressive Tax Planning Schemes. Intertax 43 (1), S. 85–90.

Middendorf, O., Eberhardt, D., 2018. Anzeigepflicht für grenzüberschreitende Steuergestaltungen. StuB - Unternehmensteuern und Bilanzen 15, S. 549–553.

Richtlinie 2018/822/EU des Rates vom 25. 05. 2018 zur Änderung der Richtlinie 2011/16/EU bezüglich des verpflichtenden automatischen Informationsaustauschs im Bereich der Besteuerung über meldepflichtige grenzüberschreitende Gestaltungen, Amtsblatt der Europäischen Union, p. L 139/1-13.

Schnitger, A., Kopec, A., 2019. Die Mitteilungspflichten für nationale und grenzüberschreitende Gestaltungen in Polen. IStR, S. 776–784.

Topic 6:Description:

In the past decades the national corporate tax systems have followed the well-known trend of tax-rate-cuts-cum-base-broadening. I.e. many nations have lowered their nominal corporate tax rates but simultaneously extended the taxable income. To evaluate the effective average corporate tax burdens, it is useful to rely on models that estimate the tax burden of an exemplary corporate investment project taking into account country-specific tax regulations. For over twenty years the ZEW has calculated effective average tax rates (EATRs) on behalf of the European Commission for 35 countries. The annually calculated parameters have grown to a rich dataset that allows to draw inferences on the developments over time. In light of many current developments (e.g. the U.S. tax reform) it is questionable if high tax countries such as Germany and France should follow the trend and reduce their tax rates.

Tax reforms could stimulate corporate investment and thus support economic growth. Adding macroeconomic country data to the tax estimates allows to infer correlations between economic outcome variable such as GDP or FDI and the tax characteristics of European nations.

The thesis provides students with a first introduction to empirical tax research and allows students to work with a toolset to analyze big data. Deep statistical knowledge or know-how on statistical programs is not required (Excel is sufficient). The project should encourage students to understand how to work with data and how models help to evaluate tax burdens across nations.

Further readings:

Bräutigam, R., Heinemann, F., Schwab, T., Spengel, C., Stutzenberger, K., 2018. Internationaler Steuerwettbewerb - Bewertung, aktuelle Trends und steuerpolitische Schlussfolgerungen, Stiftung Familienunternehmen, München. Available at: https://www.familienunternehmen.de/media/public/pdf/publikationen-studien/studien/Internationaler-Steuerwettbewerb_Studie_Stiftung-Familienunternehmen.pdf

Endres, D., Finke, K., Heckemeyer, J. H., Spengel, C., 2013. Corporate Taxation Trends in Europe. *Intertax*, 41(10), pp. 499–506.

Steinmüller, E., Thuncke, G. U., Wamser, G., 2019. Corporate income taxes around the world: A survey on forward-looking tax measures and two applications. *International Tax and Public Finance*, 26(2), pp. 418–456.

Topic 7:Description:

In the latest years, corporate tax planning strategies made it to the headlines of international newspapers. In some cases, consumers boycotted products of companies identified as tax avoiders. Also policy makers and international organizations react by promoting additional disclosure requirements on taxes for corporations. Examples are the new tax framework in sustainability report promoted by GRI or the adoption of a tax code of conduct as promoted by governments in UK and Australia. Empirical evidence shows that multinationals consider tax scandals a serious reputational threat, but results are unclear as to what extent firms change their corporate tax strategy. The aim of this thesis is to evaluate the emergence of tax as a source of reputational risk for corporations and to assess how corporations react by changing the disclosure and tax planning behavior. The analysis could be supplemented by evaluating recent disclosure initiatives.

Further readings:

- Davis, A. K., Guenther, D. A., Krull, L. K., Williams, B. M., 2016. Do Socially Responsible Firms Pay More Taxes?. *The Accounting Review* 91 (1), pp. 47-68.
- Dyreng, S., Hoopes, J., Wilde, J., 2016. Public Pressure and Corporate Tax Behaviour. *Journal of Accounting Research* 54 (1), pp. 147-186.
- GRI, 2018. Exposure Draft Standard for Tax and Payments to Governments, available at https://www.globalreporting.org/standards/media/2071/item_02_-_gssb_exposure_draft_standard_for_tax_and_payments_to_governments.pdf.
- Hardeck, I., Inger, K., Moore, R., Schneider, J., 2019. Cross-cultural evidence on tax disclosures in CSR reports – a textual analysis approach, SSRN Working Paper, available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3308467.

Topic 8:Beschreibung:

Die deutsche Unternehmensbesteuerung muss reformiert werden, um die Wettbewerbsfähigkeit des Standorts Deutschland im international bestehenden Umfeld sinkender

Unternehmenssteuerbelastungen zu sichern. Spätestens seit der US-Steuerreform 2018, welche erhebliche Steuerbelastungsreduktionen für Unternehmen mit sich brachte und somit starke Investitionsanreize für ausländische Unternehmen setzt, besteht erhöhter Handlungsbedarf. Ziel dieser Arbeit soll es daher sein, vorliegende Vorschläge zur Reform der deutschen Unternehmensbesteuerung zu evaluieren (u. a. Körperschaftssteuersenkung, Anrechnung der Gewerbesteuer, zusätzliche Abschreibungsmöglichkeiten, Besteuerung nicht entnommener Gewinne, zusätzliche F&E-Förderung). Nach einer einführenden Darstellung der Maßnahmen, ist zunächst anhand einer Modellrechnung („100er Rechnung“) zu zeigen, wie sich die einzelnen Maßnahmen auf die Steuerbelastung deutscher Unternehmen auswirken könnten. Im Weiteren sollen sie anhand der Prinzipien der Rechtsformneutralität und der Finanzierungsneutralität der Besteuerung bewertet werden.

Literatur:

Wissenschaftlicher Beirat beim Bundesministerium der Finanzen, 2019. Stellungnahme zur US-Steuerreform 2018: Steuerpolitische Folgerungen für Deutschland, online abrufbar unter https://www.bundesfinanzministerium.de/Content/DE/Downloads/Broschueren_Bestellserie/2019-03-15-WB-US-Steuerreform-2018.pdf?__blob=publicationFile&v=6 (07.11.2019).

Sachverständigenrat, 2018. Jahresgutachten des Sachverständigenrates zur Begutachtung der gesamtwirtschaftlichen Entwicklung 2018/2019 – Vor wichtigen wirtschaftspolitischen Weichenstellungen, Ziffern 589ff, online abrufbar unter https://www.sachverstaendigenrat-wirtschaft.de/fileadmin/dateiablage/gutachten/jg201819/JG2018-19_gesamt.pdf (07.11.2019).

Handelsblatt , https://www.handelsblatt.com/politik/deutschland/neues-steuerpaket-altmaier-will-soli-kippen-und-unternehmen-um-milliarden-entlasten/23173918.html?nlayer=Politik-News_11247984 (07.11.2019).

Bärsch, S. E., Olbert, M., Spengel, C, 2018. Analyse der neuen internationalen Unternehmensbesteuerung in den USA – Implikationen für international tätige Konzerne und den deutschen Gesetzgeber. Der Betrieb, S. 1815-1824.

Topic 9:Beschreibung:

International greifen immer mehr Staaten auf eine steuerliche Förderung von Forschungs- und Entwicklungstätigkeiten zurück, um Innovationen durch Unternehmen zu stimulieren. Vor dem Hintergrund des aktuellen Gesetzesentwurfs bezüglich der Einführung einer steuerlichen Forschungszulage zur Förderung von Forschungs- und Entwicklungstätigkeiten soll im Rahmen dieser Seminararbeit eine kritische Analyse des aktuellen Entwurfs erfolgen. Hierbei könnte der Student anhand bestehender Stellungnahmen zum Referentenentwurf Kritikpunkte darstellen und gruppieren, bestehende Rechtsunsicherheiten sowie internationale Lösungsansätze aufzeigen und darauf aufbauend mögliche Reformoptionen ableiten.

Literatur

- Licht, G., Peters, B., Rammer, C., 2019. Steuerliche Forschungsförderung in Deutschland - Eine Bewertung des Vorschlags des Bundesfinanzministeriums für ein neues Forschungszulagengesetz, ZEW Expertise, online abrufbar unter https://www.zew.de/fileadmin/FTP/gutachten/ZEW_Expertise_ForschZulG_2019.pdf
- Peters, B., Hud, M., Rammer, C., Licht, G., 2018. Zur Notwendigkeit einer steuerlichen FuE-Förderung auch für „Midrange Companies“, VDMA e.V., Mannheim, online abrufbar unter <http://ftp.zew.de/pub/zew-docs/gutachten/EndberichtVDMAZEWSteuerlicheFuE2018.pdf>
- Spengel, C., Rammer, C., Nicolay, K., Pfeiffer, O., Werner, A.-C., Olbert, M., Blandinières, F., Hud, M., Peters, B., 2017. Steuerliche FuE-Förderung, Studien zum deutschen Innovationssystem Nr. 15-2017, Berlin, online abrufbar unter https://www.e-fi.de/fileadmin/Innovationsstudien_2017/StuDIS_15_2017.pdf

Topic 10:Description:

By 2021, the so-called “VAT E-Commerce Package”, adopted by the Council in 2017, will be fully implemented in national legislations in the EU. In light of the challenges posed to the current VAT system (e.g. fraud, administrative hurdles), the goal of this seminar thesis will be to assess

how these changes to the VAT system will affect the competitiveness of the Single Market, in particular with respect to ongoing digitalization. As a benchmark against which to evaluate EU VAT, the sales tax system in the US seems appropriate, both because of a similar market size and because it also faces the challenge of digitalization.

The analysis requires first a theoretical consideration of the principles and criteria which determine the efficiency and effectiveness of consumption taxes. Second, a short overview about previous legislative and legal developments in the EU and US is warranted to provide an institutional background. Third, the central part of this seminar thesis will focus on identifying similarities and differences between the US sales tax regime and EU VAT, and examine potential tax-induced consequences for the competitiveness of each market. As an option, modern empirical literature could be used to substantiate arguments, depending on the background of the student and his/her familiarity with the methods used in applied economic analysis.

Further readings:

- Bal, A.M., 2018. Managing EU VAT Risks for Platform Business Models. Bulletin for International Taxation 72 (4a/ Special Issue), available at https://www.ibfd.org/IBFD-Products/Journal-Articles/Bulletin-for-International-Taxation/collec-tions/bit/html/bit_2018_4a_e2_1.html (10.11.2019).
- Baugh, B., Itzhak, B.-D., Park, H., 2018. Can Taxes Shape an Industry? Evidence from the Implementation of the “Amazon Tax”. Journal of Finance, American Finance Association, vol. 73(4), pages 1819-1855.
- Benzarti, Y., Tazhitdinova, A., 2019. Do Value-Added Taxes Affect International Trade Flows? Evidence from 30 Years of Tax Reforms. NBER Working Paper No. 26195 (August 2019), available at <https://www.nber.org/papers/w26195.pdf> (10.11.2019)
- Einav, L., Knoepfle, D., Levin, J., Sundaresan, N., 2014. Sales Taxes and Internet Commerce. American Economic Review, American Economic Association, vol. 104(1), pages 1-26.
- European Commission, 2015. Green Paper - On the future of VAT Towards a simpler, more robust and efficient VAT system, COM(2010) 695, available at [https://ec.europa.eu/taxa-tion_customs/sites/taxation/files/resources/documents/common/consultations/tax/future_vat/com%282010%29695_en.pdf](https://ec.europa.eu/taxation_customs/sites/taxation/files/resources/documents/common/consultations/tax/future_vat/com%282010%29695_en.pdf) (10.11.2019)

Hellerstein, W., 2016. Taxing Remote Sales in the Digital Age: A Global Perspective. 65 American University Law Review, 1195-1239.

OECD, 2019. The Role of Digital Platforms in the Collection of VAT/GST on Online Sales, available at https://ec.europa.eu/taxation_customs/sites/taxation/files/resources/documents/common/consultations/tax/future_vat/com%282010%29695_en.pdf (10.11.2019).

Supreme Court, 2018. Verdict in the case of South Dakota v. Wayfair, Inc., et al. on 21.06.2018, 585 U.S. 138 S. Ct. 2080; 201 L. Ed. 2d 403.