



9743 June 2003

**Maria Inmaculada Ihle-Masip**



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**Charity Crossing Borders** Sabine Heidenbauer, 2011-01-01 Throughout the European Union national income tax systems support charitable activities by way of preferential treatment However a number of Member States operate relief regimes which appear to trigger the question of compatibility with Union law with respect to the fundamental freedoms In this first study to examine charity and donor taxation regimes across a wide range of Member States the author focuses on compatibility with EU non discrimination law She examines twenty national regimes both comparatively and from the perspective of overarching EU law The countries covered are Austria Belgium Bulgaria Cyprus Estonia Finland Germany Hungary Ireland Italy Latvia Lithuania Malta The Netherlands Poland Portugal Slovakia Spain Sweden and the United Kingdom Although charity and donor taxation falls within the competence of the Member States they must nonetheless observe primary Union law and grant non discriminatory treatment where a fact pattern falls within the ambit of the fundamental freedoms In the course of defining this framework the study addresses such issues as the following types of relief schemes maintained for charities and donors administrative requirements international aspects both inbound and outbound privileged donations and capital gains treatment of in kind donations eligible donees whether and to what extent charitable entities and donors can actually rely on the fundamental freedoms specific applicability of each of the relevant fundamental freedoms the issue of comparability justifications for restrictive measures in Member State practice and the issue of proportionality

*The relationship of the Free Movement of Capital to the other Fundamental Freedoms* Maria Inmaculada Ihle-Masip, 2005-06-30 Inhaltsangabe Abstract The present diploma thesis was written in preparation for the annual Eucotax wintercourse 2005 celebrated in Tilburg Holland At this international conference the main findings of the paper were presented und further elaborated in cooperation with students from other participating universities and important international tax experts The aim of this diploma thesis is to analyze in great detail the relationship between the Free Movement of Capital and the other Fundamental Freedoms that is to say to answer the question whether there is a single theory characterizing the relationship or whether different criteria apply to the question of delimitation according to the Freedoms at issue Provided that an analysis of literature relevant law and case law does not rule out the possibility of simultaneous application of various Treaty Freedoms the question of relationship is considered at the level of the substantive scope and justifications with respect to transactions that combine aspects relevant under several Fundamental Freedoms However before proceeding to this core question it is necessary to elaborate on the basis of discussion Therefore the first chapter is dedicated to the structural approach to be used to discuss the four Freedoms in the following second chapter Thereby the ongoing convergence of shape and structure of the Fundamental Freedoms will become evident A detailed analysis of primary secondary and case law as well as the abundant range of literature concerning scope structure and shape of the Fundamental Freedoms provides the basis for addressing the core question of this thesis the relationship of the Free

Movement of Capital to the other Treaty Freedoms This question is addressed in the main chapter three which firstly elaborates on the general question of whether a consistent and clear delimitation is actually possible and to what extent it is of practical relevance Consequently situations that could be addressed from the angle of various Treaty Freedoms are considered in view of the in part quite inconsistent case law Thereby questions regarding the relationship and delimitation of the substantive scope of the Treaty Freedoms are discussed separately from issues concerning the application and possible interaction of diverging grounds of justification Generally the issue of relationship and delimitation is considered one of the most difficult questions regarding the Fundamental

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