

My concerns are with the “methods” by which **multinational and importing corporations use to reduce their tax obligations** and I think these “methods” could be partially or fully offset as follows

“**transfer pricing**” is the minimising of the “profit” that is apparently made and could be offset by the introduction of an appropriate “import tax”

“**overseas direct invoicing for services**” again offset by the introduction of an appropriate “import tax” deducted from the invoice amount paid

“**overseas charges, such as, franchise fees, management fees, royalties etc** “ should not be allowed as tax deductible and should be treated as capital injections

“ **interest charges on overseas borrowings**” **a)** should not be allowed as tax deductible (ie treated as capital) or **b)** should be taxed at the corporate tax rate when paid out by the corporation unless they are paid to an Australian tax paying entity or **c)** limit the % of borrowings allowed and introduce a deeming interest rate, indicating the accepted interest rate, which would be allowed as tax deductible

Alan McGrath BE(hons) MBA
(retired Consulting Engineer and Project Manager)