

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

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