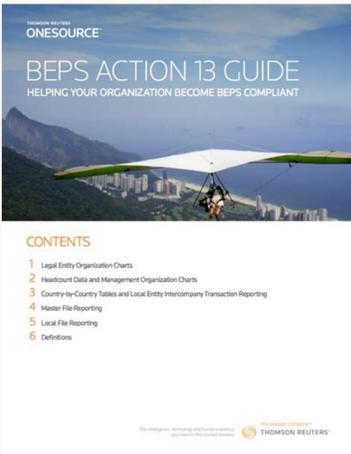


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## Hybrids

- What is a hybrid mismatch arrangement?
  - An arrangement that exploits the different tax treatment in two jurisdictions to produce a mismatch in tax outcomes
  - Mismatch is either two deductions for the same payment or a deductible payment that is not included in income by the recipient
- Where are we on the Action Item (Action Item 2)?
  - Early release of Public Consultation Draft on 19 March 2014
  - Comments due by 2 May 2014 and Public Consultation on 15 May 2014
- What are we trying to achieve?
  - Recommendations for domestic law changes and changes to OECD Model Convention to deal with hybrids.
  - Clear, automatic and comprehensive rules that neutralise the tax mismatch without disturbing the commercial or regulatory consequences.

<http://www.oecd.org/tax/discussion-drafts/action-2-hybrid-mismatch-arrangements.htm>

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RESEARCH ARTICLE



### Environmental efficiency of disaggregated energy R&D expenditures in OECD: a bootstrap DEA approach

Emrah Koçak<sup>1</sup> · Harun Kinaci<sup>2</sup> · Khurram Shehzad<sup>3</sup>

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#### Abstract

Two essential topics of Sustainable Development Goals (SDGs) are accessible which are clean energy (SDG-7) and climate change action (SDG-13). Developments and innovations in energy technologies play an essential role in achieving these goals. Therefore, any country should use energy R&D expenditures, which are the primary source of energy innovation, most optimally. This paper aims to investigate the environmental efficiency of R&D expenditures for energy efficiency, renewable energy, hydro and fuel cells, fossil energy, nuclear energy, and other power and storage technologies in OECD countries using data envelopment analysis (DEA) and bootstrap DEA. Estimation findings indicate that only the USA ensures the environmental efficiency in energy R&D expenditures among OECD countries. Although Japan, Canada, France, Germany, and Italy cannot provide environmental efficiency in energy R&D, their scores are very close to the efficiency frontier. Portugal, Hungary, and Slovak Republic are the countries with the lowest environmental efficiency in energy R&D expenditures. At the end of the investigation, this paper also provides an empirical estimation of the extent to which inefficient countries should change their R&D spending to achieve efficiency.

**Keywords** Sustainable environment · Environmental efficiency · Energy R&D expenditures · CO<sub>2</sub> emissions · Bootstrap DEA

#### Introduction

Energy is the primary input of production processes from agriculture to the industrial sector. All the economic activities require a transformation, which is realized only by power (Dogru et al. 2020). The growth in the energy demands of

countries is marked as a meter of economic development by economists (Keong 2005; Rühl et al. 2012). On the other hand, about 80–85% of global energy demand has been met with fossil resources in the last four decades (Dadley 2017; IEA 2018). In brief, world economies are dependent on fossil energy resources. Dependence on fossil resources is thought to be the most crucial cause of the problem of global warming and climate change (Chen and Geng 2017; Koçak and Kızılkaya 2020). Because, fossil energy consumption is the primary source of emissions of CO<sub>2</sub> gas, which increases at the most alarming rate for greenhouse gases in the atmosphere (Lin and Raza 2019; Bilgili et al. 2019; Fan et al. 2019; Khattak et al. 2020). For this reason, there is a need for a more environmentally sustainable energy conversion process that reduces dependence on fossil energy resources at a global level (Munasinghe 2002; Saygin et al. 2019; Bulut and Inglesi-Lotz 2019).

Undoubtedly, innovations and developments in energy technologies are critical to sustainable energy conversion (Wang and Zhu 2020; Wang et al. 2020). In particular, developments and innovations in renewable, efficient, and alternative energy sources will accelerate the energy conversion process (Kwon et al. 2017; Fernández et al. 2018). Thanks to

Responsible Editor: Rosita Inglesi-Lotz

✉ Emrah Koçak  
 emrahkoçak@erciyes.edu.tr

Harun Kinaci  
 hkinaci@erciyes.edu.tr

Khurram Shehzad  
 231189917@sou.edu.cn

<sup>1</sup> Faculty of Economics and Administrative Sciences, Department of Economics, Erciyes University, 38039 Melikgazi-Kayseri, Turkey

<sup>2</sup> Faculty of Economics and Administrative Sciences, Department of Business Administration, Erciyes University, 38039 Melikgazi-Kayseri, Turkey

<sup>3</sup> School of Economics and Management, Southeast University, Nanjing, China



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project. Recommendations are expected to be published for domestic law limitations or tax deductions for both related and unrelated party interest expense and economically equivalent payments. Related Links: OECD.org; Discussion Draft: Revised guidance on profit splits (July 2016) OECD.org; Discussion Draft: Chapter IX TP Guidelines (July 2016) Back to top Please refer to comments above in relation to Actions 8, 9 and 10 collectively. A final report on Action 1 was released by the OECD on 5 October 2015 as part of its final package of measures. The OECD/G20 has set a number of deadlines to conclude on the BEPS Actions. Final reports on Actions 8-10 were released by the OECD on 5 October 2015 as part of its final package of measures. Related links: OECD.org; Country-by-country reporting OECD.org; List of CbC MCAA signatories (June 2017) OECD.org; Peer Review Documents (February 2017) Back to top Action 15 aims to develop a multilateral instrument to enable jurisdictions to implement measures developed in the course of the work on BEPS and to amend bilateral tax treaties. Related links: Back to top Action 4 aims to limit base erosion via interest deductions and other financial payments. Links to the final reports can be found below under the Shares. In May 2015 the OECD published an additional draft discussion comprising proposals on how to manage the follow-up work of action 6. In September 2014 the OECD published a report that identifies the issues deriving from the Development of a multilateral instrument that modifies bilateral tax treaties. On May 23, 2016, the OECD Council approved the changes to the transfer price guidelines for multinational companies and tax administrations, as indicated in the 2015 Beeps reports relating to 8-10 shares and action 13. a Further discussion project was published by the OECD in December 2014 and the related comments were published in February 2015. Following the observations of the interested parties, the document of the OECD on action 6 was published in September 2014. The OECD published public observations in May 2015, following which a public consultation took place. The discussion projects on action 2 were published by the OECD in the spring of 2014. On 5 October 2015, the OECD published a final report on the action 2 in the field of the final package of measures. In March 2015 a public consultation took place. In September 2014 a report was published containing guidelines on the documentation price documentation and country reporting per country. The instrument is designed to quickly implement the measures connected to the tax Treaty deriving from the BEPS project. The action 1 deals with the tax challenges of the digital economy and aims to identify and address the main challenges that the digital economy poses to current international tax regulations. Related links: back to the start of the action 13 aims to review the documentation relating to the transfer prices and processing rules on the documentation relating to the transfer prices to the end of us us obmaces of rep otazzidradnats ocitamrofni otamrof nu otacilbup ah ESCOål 6102 oilgul 11ÅL. 7102 erbotto 31 li ortne inoizavresso eratneserp a otativni onos etasseretni itrap eL .eserpmi el rep avitamron alla otmenaugeda id itsoc ied otnoc odnenet .elacisif enoizartsinimmaå rep aznerpart al between jurisdictions, the XML ETR schema and a user manual. On 4 July 2016 Å " a draft discussion was published on the amendments to the Guidelines, with amendments reflected in the 2017 edition of the OECD TP Guidelines for Multinational Enterprises and Tax Administrations, published on 10 July 2017. Action 9 specifically addresses risks and developments rules to prevent base erosion and profit shifting by transferring risks between group members or allocating excessive capital to those members. It should be noted that the G20 and the OECD intend the definitive transfer pricing recommendations to form a comprehensive and cohesive approach. Based on the existing guidance in the OECD TP Guidelines, as well as on the comments received in the July 2016 draft, the revised draft Å " aimed at clarifying the application of the profit-sharing method of transactions. Interested parties were invited to submit comments by 17 June 2015 and the OECD confirmed that they do not intend to hold a public consultation on the revised draft discussion. The OECD Explanatory Statement is available here. A draft discussion Å " was subsequently published in April 2015.Å The public comments were published by the OECD in May 2015, following which a public consultation took place. Related Links: OECD.org Peer Review Document (May 2017) Back to top Actions 8, 9 and 10 Å objective " that transfer-pricing results be in line with value creation, requiring that value attribution for tax purposes be consistent with the business value. On 5 October 2015, the OECD published a final report on Action 3 as part of the final package of measures. The also contains three models of agreements between authorities. facilitate the exchange of country-by-country relations between tax administrations. BEPS actions implementation matrices provide details on the progress made in the adoption of BEPS actions by and expected timing of implementation. In addition, depending on the reservations and notifications made by each party, optional changes to modify tax treaties in respect of permanent establishments, transparent entities, residence tie breakers, double tax relief, minimum shareholding periods, capital gains derived from immovable property, and a jurisdictioneÅÅAs right to tax its own residents will be facilitated. Following comments from interested parties and a public consultation meeting in April 2014, the OECD paper on Action 1 was published in September 2014. An updated report on Action 4 was released by the OECD on 22 December 2016. A further discussion draft with draft examples was issued on the treaty entitlement of non-CIV funds on 6 January 2017. Related links: Back to top Action 5 aims to identify and counter harmful tax practices, taking into account transparency and substance. Amendments were reflected in the 2017 edition of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations, released on 10 July 2017. A revised discussion draft on the use of the profit split method was released by the OECD on 22 June 2017 which replaces the July 2016 draft. The peer review document which will form the basis of the peer review of the Action 6 minimum standard on preventing the granting of treaty benefits in inappropriate circumstances was released by the OECD on 29 May 2017. Following the report, the UK and Germany put forward proposals endorsing the eÅÅÅmodified nexuseÅÅÅ approach, which is predicated on a link between the expenditure incurred to develop patents and the income that those patents generate.Å Å On 6 February 2015, the OECD announced that the proposals had been agreed by all OECD and G20 countries, and therefore represented a consensus position. The draft covers Actions 8, 9 and 10. The OECD released an Implementation Package for country-by-country reporting on 8 June On 5 October 2015, the OECD published a final report on Action 4 as part of the final package of measures. Consequently, even if one of the proposed solutions have been agreed, they are not yet finalized and could be affected by other actions or decisions and future work on the BEPS. In March 2014, the OECD published a draft discussion. Work on the development of the multilateral instrument started on 27 May 2015. On 7 June 2017, 68 jurisdictions signed the multilateral instrument, others subsequently signed or committed to sign. His focus was mainly on intangible schemes such as patent boxes. To this end OECD intends to develop recommendations on indicators of the scope and economic of BEPS and to ensure that tools are available to monitor and evaluate effectiveness and effectiveness. Related Links: Action 3 aims to develop recommendations regarding the design and strengthening of the rules on companies foreign subsidiaries, to address concerns about the possibility to create affiliated non-resident taxpayers and to route the income of a resident through the company non-resident subsidiary to reduce or avoid taxation. Interested parties were invited to submit comments by 6 February 2015 and a public consultation was held in February 2015. A draft discussion on follow-up work was published in November 2014. In December 2014, the OECD published a draft discussion. Youre possibly trying to access the site from a secure browser on the server. 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The plan take in view of development recommendations on the definition of harmful tax practices and development of a strategy to be extended to non-members of OECD. Public comments published by the OECD in May 2015, following which a public consultation took place. On 5 October 2015, the OECD published a final report on Action 12 as part of the final package of measures. On 22 September 2017, the OECD published a request for contributions on the fiscal challenges posed by digitalization and possible options to address these challenges as part of the ongoing work of the Digital Economy Task Force (TFDE). CiÅ² includes further guidance on the design and operation of the group ratio rule and approaches to address risks posed by the banking and insurance sectors. In February 2015, the G20 and the OECD published further guidance on the implementation of transfer pricing documentation and country-by-country reporting. Related Links: OECD.org Peer review evaluation and BEPS monitoring Action 5 OECD.org; Peer Review Documents (February 2017) Action 6 aims to prevent Treaty abuses by developing Treaty model provisions and recommendations regarding the design of internal rules to prevent Treaty benefits being granted in inappropriate circumstances. Related Links: Action 12 aims to require taxpayers to disclose their aggressive tax planning mechanisms. Draft discussions published by the OECD on 29 February 2016 and 24 March 2016 concerned the rights of pension funds and non-CIV funds respectively under the Treaty. Following comments from interested parties, the OECD document on Action 2 Å " was published in September 2014. In March 2015, the OECD published a draft discussion. In April 2015, the OECD published a draft discussion. Enable scripts and reload the page. Related Links: Action 2 aims to neutralize the effects of mismatches Hybrids. Consequently, the proposed solutions, if agreed, are not yet finalized and could be influenced by decisions and future work on the Beeps in 2015. A discussion project on the revisions of Chapter 1 1 The guidelines on transfer prices (including risk, recharging and special measures) were released in December 2014. A final report on action 6 was issued by the OECD on October 5, 2015 as part of his latest package of measurements. More than 100 jurisdictions participated in the ad hoc group that works at action 15 and a discussion project was issued by the OECD on May 31, 2016. The report concluded that a multilateral tool is desirable and feasible, and that 1 Negotiations for this instrument should be summoned quickly. Part 1 of the document contains recommendations for the design of domestic rules and part 2 of the document contains the OECD recommendation on the problems of the Treaty. During 2016 and 2017 the OECD has issued further guidelines on various aspects of implementing the documentation of transfer price and reporting requirements of international reports in stock 13, including local storage requirements, the exchange of reporting information COUNTRY-BY-COUNTRY. Comments received from interested parties in response to this project were published in January 2015, following which a public consultation was carried out at the end of January 2015. 2015.

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