

**Եկ ուսչքին մյանեկի վելու [Աբ
իւլիս Աք ծ՛Նի Վելու Կցը Զե։**

ZfU7; H^{ij}YVW^baUVW^bdc]HW^cddgjh^bcdffg^bgdffhZ^bY^cdc]WadUZ^bfa/[hchY^bZ^bY^cg^bdffg^bY^cYVW^b
gWgg^b]J^bZfaJ^bdfifcZU[^bcjYfaY^bhbx^bfg^bW^bh^bf^bdcddg^bg^b]Y^bYZ^b]YX^bWaY^ble^bZ^bJ^bdb^bHYHU^bK^bf^b[J^b
; fci^bJ^b&SS^bWaY^bYmWgYle^bf^bWa^baY^bh^bU^b; Hzf^bBYk^bNLU^bX^bg^bdfifcZUd^bff^b]c^bcZ^b]dc]WadJ^bdg^bHY

HYUHnggj bXWU YbkjhjbWdFYYgj YH VgXzbáYkcf_k\JWdHgjMa YH lebhWdra J\Q\zXi gX
Zf J\ZUdb'HYUWWhb'WbgXgac\W\Jdgj\hgi\JXU\zXkcf 'VgXzb\hYXgj b'djBMygczYgj J\z
Y\Wb\zWb\zW " Z R Yh U\W\JY UX bR " R 1bWb\zW " .

darw²z*i* g²U²dc²W²m²l²j²y²U²b²k²h²y²W²g²z²W²l²j²y²g²k²h²a²c²V²z²b²X²y²d²h²g²U²X²W²g²h²f²y²g²U²X²H²y²W²b²W²x²g²v²i²j²k²h²f²W²a²y²U²h²g²l²U²D²W²W²g²g²i²X²U²; HW²U²b²c²a²X²U²dc²W²b²V²y²U²b²X².

.5i gԱյշակ| Վեհաշակ ՆԱՍԽԵցց VYFYZfa .

Digitized by srujanika@gmail.com

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**hY7cadfUj Y7; H7dzfFBW YXjb\chci fcZDcZggf\^fg9j Ub\Achig Ibj YglmYUe\Jm
&!& 'GfhaWf &%" HYUhcgf kci X\^ Yle\ hUb\ hYY\^gj\ hY dcfXWjb\ Y\le\z UXHb
Uhdaci c\Y\W\z\h\Y\Wa a Yle\hXc\ I\Y\h\h\k\ M\W\h Yladi\ W\h\Y\fl\W**

Yci fhuCZHI Fyglw

'BYk NUUBgjjY dmjyMEkjh wJU[UgbWU]dbUbXdc]WWcJWVgphZca 5iglU]

Yci fHUcZHI Fyglw

‘BYk NUUBgjN dMymekjN wJU| UgbN UjbUbXdcJWWcJWYghgZca 5iglU

Zlá Ykf_ k\ JWLdJYgjBka YK 1e bNhWbca JWQbzXg jXXzf hZUjvTHY
UfW h b VhgXg acXWjdg le hlg iPSUEZlá Ykf_ VgXcb hYXgj b
djbjTygcZe jhjVWbVgadMhig gUHW jhjUbXdcJWWgjWWH

5gUgMjH deJzWb HgYcZbbYXle XWfa jByk\ YhYhYikjg le JhfeXWU
7; HHH ubzgj Ugdjhgi bzhYfghc fUWghgj gglek\ UHmju| Ugb
UYcfk\ YhYhYigc XWmU XHmU

WadFX Ybjj YRI 'Vgj² 'b UrniMfYhigJHq 'b ijkXlDacW'lgacKJYXleIUY
 JhC 'UWibhi hY cZb' WadMq ' jadnUj yg CZ Ye Jm 'YJWbWg gladMq
 gJHvJlriBXdCJWlWgglbWmHYZj YWBWbLgk\JWkYUj iYgcj 'XW
 VbgXWYXjb'hYXgj[b'cZU7; HfVJa YZfa XhYVggcZfWaa YbXljdg
 VbWjbxjbhYfVdfrhZhY5i gJUJUg; i hfyHJ 'GgJa fVdfrhZ&S 'fLbckbUg
 hY< YfniFy Jk UZf hYWfjcZhYFy Jk DibZhYbHqj fnGWMfnSf? Yb
 < Yfniik\JWkLghYacgjfwMfMadiX Ybjj Yfj Jk 'cZi gJUJUgJU 'fVJa Y
 5f i UWmhlg'Ug 'U Ygi gk hYbWg glfrhXWUjcb'cZodjaU RI 'hYfnijb
 k\JWlgefWbLgXhUj[cj Yba YhgtYfniH le fUgry Yb YbUb YbcanhUh
 lgby JUvnNgfWY³"

? Yb< YfniJa gYZg dLbfxUrniac YlekIfg UWadFX Ybjj YRI 'VgjXgjJY
 fWlHgH KXWbH hYfYJUg dLbfZfg WbLhdfrhW⁴ I 'Ja UYmboi gJUJUg
 LhdfrhWlgcbYk\JWWaVbYghYWadFX Ybjj YRI 'Vgj'acW'kjh'cdjaU RI

Yci fHUcZHI Fyglw

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'BYk NUUBgjjY dmjyMEkjh wJU[UgbWU]dbUbXdc]WWcJWVgphZca 5iglUJU

Xci fhu cZHI Fyglw

'BYk NUUBgjjY dmjyMEkjh wJU[UgbNU]dbUbXdc]WWcJWVgphZca 5iglUJU

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UBX/YI JI "the case for the introduction of a comprehensive capital gains tax in New Zealand is compelling"

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HYF Ygbc dMZWkUhle TU WqJU[UbglbUFU!kcf XjbMa YIU 'Bdi
TU Jb[H Yažcf tasing them in an ad hoc and inconsistent fashion as is done
in New Zealand invites unproductive tax avoidance, creates uncertainty for
taxpayers, and is inequitable."

9. **הַקְרָבָה יְהוָה לִפְנֵיכֶם כִּי־אַתֶּם זָהָב**

HYFNgb\lgf\WnhUBYkNUUbxXyghch\yYU7; HlgchMWs\gY
New Zealand policymakers fail to recognise the benefits of such a form of
taxation, but because they have been swayed by the perceived problems and
cost associated with it."

One of the advantages of being the last to adopt something is that you can learn from others' mistakes."Said Ngāti Whātua's Te Mana Rauhī, "We can learn from other countries' mistakes, and even in some cases, successes."

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JbUgMjYgcZfWma a YbBXcdJchZfa UcfNI 'dc' JWfYfa "GdMVWnhYHK;
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to understand just why they differ' H UHLXgIftY| fci dcZjbXj]XUgZca .
URb[YcZWW| fci bXg\ U YggW|g XKga YWaaacb| fci bXjbUklUicZ
hb JH Uci hHg|g|g|g Zg ZW|tW gYZf dUgYHYFYhthWbW
fXkjh JHmgibXdeJWu hceYJHmgibXdeY

G Vgei YHchYHK; rYbZih YYkIg| JlyXg|gjcbcbh Y|HfcX W|cbcZU; H
ZfBYk NUUbxgjy dmjyMekjh wJU| UghW UjdbUbxdeJWWcJWYgphZca 5iglUJU

AcgifWihñiHbzQb\!@OXlfUbX8gjYni bWiac_ Ugi fj YicZdUWJlcbMgUX
chYfU dcfZgdbUgglehYfj NkgdbhYVf\|B]bjngtH YmNbWXY'.

Concern regarding the bright line test is well founded and the authors note that the similar opinions from participants should bear indication that further policy consultation and development is required. Edm\ldgZfaJh hYVdg
ZfZfhYfYgjFWY UfXf\| hYmNgZD\|JcbUdcJWic\ghUHs XY
i gXleJhYfUybkRl fi Ygjle hYgMifYVoc g<ckY Yzit is accepted that the bright line test will likely aid the Ireland Revenue Department in some way. Yb]Zc fWVgca YY YcZWadJUbWbNDxh JhgJUcbVgic.
hUhYfJa]PXYgci fWVgca YYgXYgk YY'

Kjh hYgj\| i dcZhYbdk; cj Yba Yhjb'UY&%\|hUgXYj YXXcbJlgdcaJgY
kjh TbYfMgcbcZhyVf\| \|r]bMfgh\|fjcXfca hYmfYfhlkcnMfgleZjYnMfgy
kjh YZMfica & 'AUW&%'** HYfgj hZhljgYfMgcbcJghUihYdcj lgdg
bk' Rl a Wja!fia [Ubg fthY hUb gcfhfa [Ubg UghYmXcJ]HUrh
7cbMfg\| YUg Vmb fUgXUfcibXhY]a]PXY YadJdgk JWfYj JkXlg
Vf\| bcbdfmgl YbfcgghY5igU(b) SdmVfHMBWgdbZfJbXj PkUg'

HYjbHUlkcmMfdm\|cXZf hYVf\| \|r]bMfghg hXjbUei YgjdbUfcibXk\|hYf
hYdcj lgdg]a dgXUZfa 'cZWf]U [Ubg M 'cfXhfrjbm\|a YfU' -hlgkY'
YgVf\|g XhUfUgjndi fwgXZf hYf fdgjcfjnh\|jdbcZg Vgei Yh\|ggbU
lgUDXa\|U VYf\|gBma YUbXh Yf\|fexWjdbcZM\| \|r]bMfgha Yfmidcj PXXb
cvWYj Yf 'Yle hYdi fdgjYfZf VpYfYg ZM\| PXY Zf hYf]QZ<c\|Yf Tl

ei UjhicZhYkf^c Xby^c dky^c YW^c dgfuh^c YZ^c Wga^c gMcb^c qH^c H^c
VW^c fd^c M^c.

The success of a CGT, or any tax, will depend on a clear policy rationale which informs the design, consultation and implementation phases.⁵ If it is kept firmly in mind throughout the process, it can help to ensure that pressure from lobby groups does not derail the tax.

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5i gJUfVjaYgWlgYgaU'VgbygfvfyaYHMBWgdgViHjbVhigle
5i gJUJaUVcbnei JYjaPXXdkgjgbzffyjzzfwfUlggUFDXiakbX
HugjhdUdijlgdgjtgAifYgdbjgciEifYuklulgUXZWhggYleXUkjh
UbX5i gJUJUgi bci YjbRfa gicZlgjfbxahYqfDzK\UifY lckblgjdY7; HD
UgjgH YdodgJUf i Uvnug KXhchDwci UvnDXfvggYdchHUVhawXWcb
ljc j XjbgyH 'le' UXfYg\cigb' UZfXWJmimBMBgjb'hYglUpbk'YY
5i gJUJU UbX chY 1fgNldg byYhYgg \jY ga]f cf [fNlf\cigb' UZfXWJmimBMBgjb'hYglUpbk'YY
dclVYagkci XWkcfMjkjhci hY7; HfYjaYgjb'dUWfhci [\k\YhYhggy
dclVYagkci XWkcfMjkjhci hY7; HfYjaYgjb'dUWfhci [\k\YhYhggy

HY a cglf Mdia Ucf WhlVl jcb le h YXWUlg UglM Ulgj Yc ZlfWg b h Y New Zealand Journal of Taxation Law and Policy Jb & %¹¹ HYUfWg Uf Ym Ma Yfca . UWbzf bW \ YXjb &% hUhkYfYd ffcZUk Xf Yla JbUjcb cZhY_Yn ggi Yg Jl j c j YXjb h YXggl b cZ7; HfY ja Yg¹² h klg JbWxle Jbzfa h YXWUzbch d fca chYfYJbfex Vjcb cZU7; H-bhYfYXlfU29 YZUbx@JlkccXWaaYhi hUhkY_Yn ggi YexVle XWxWx¹³

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gMfUgJbXUcbYU/'

¹ '50% > A Udgjij 7cadXYgj Y7(dJU; ɿbgHl ɿBYk NNUBXEBC@dYDcJMW<uf?uf3 5 7dgXWUdb'cZhY@WifDfmlDfcdgjCZ&%DRS(E&P) New Zealand Journal of Taxation Law and Policy (%27+1%ad%bf) XXXI.'

* HYUW M JEW XXX b hlg GMV U gg YfY DfM J Južibk NUUBER8 HI 'gugý? ia uUHES% E & 88 New Zealand Journal of Taxation Law and Policy% /8g jxk \njaDgdu7dju; UbghI Ufb FYZW dgc b h Y-HZ YWcZ9Mba JWh YfribdHI FYZfa Tdcgjg PR8% E & 88 New Zealand Journal of Taxation Law and Policy% /G Y Yia f jhngjiiHY; la YgBdKcsh hY7ubxj. 91 dcqj h hY@UWcZU7cadY Ygj Y7dju; UbghI 'jbBVk NUUBER8% E & 88 New Zealand Journal of Taxation Law and Policy % /UW Gdcb Yz15 QBM (frácska h YHla uB HY8yj bczH YD)la Isfin FygXbW9 YadqjhdE8% E & 88 New Zealand Journal of Taxation Law and Policy% /7UJ '97zz i? Yingj Ygj b HY8yj bcz7dju; UbghI 'Fy la Yg HI H 'BdI FygXbW9 PR8% E & 88 New Zealand Journal of Taxation Law and Policy% /G U gbgjG la UUb< cktuxsj yirr\lUWjgjyCz UDYzffyx7dju; UbghI Fy la YjbBVk NUUBER8% E & 88 New Zealand Journal of Taxation Law and Policy% /zubX5UfbEi HUz8j jxgbY' UXBWc lg\lubz? Yingj Ygj b HY8yj bcz7dju; UbghI Fy la Yg HY-a dWibdHI DfM UVER8% E & 88 New Zealand Journal of Taxation Law and Policy% /".

Capital Gains Taxation: A Comparative Analysis of Key Issues

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f u d f y j k w b i x c b c d j a l g h w b c a M f c k h z k h j y n j l y z w g c b y e j l m
u b x d b i n g a y f w a b j l c b c z h y a d f f b w c z g a d v m i t b x v i l h i n H Y k x i h i
a y c x v i f y b m D o d P X v i s i g l U g b l b y k h h Y T U D l b a c v z k l y c h Y f
i f g y M d b g g W l g D f s l U z t l y b x G l b a U h l b u a y c x c l n h u l u y g h b e
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għu ja b'wa yu! ggħidha leh YEMMEX ja għixx. Ww WILF YEXXe:
Vil-Wid iż-Wid ja għixx. Widgħi U-Wid h-Y U-Wid c-H-Y-Wid ja għixx.
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Kjh BYk NUUBXcdmUj[lgj; YbWbH 'D' JwDfWgDh HDZhYYlg hY
odtobibjzlfWgXfUVYjbd hfcia gUYc Kmgjbe Voh hYd' JWMadgjUcb
UbxH YXZUjY lgUcbTHY; HDWfjYghYFVgdgM] JYgUbxWbHv] JYgcZ
hYkca Ucf Xdfla YgUj Ynjjcj YkbhYdcWgHla YribUbXfj Yi YbX
HYHfjg fmN-hUg YbWf fUgYf] YbXacfYd'MWbgXfUcb'cZ_YrhU .
de' JhYya YbgbXfXWcZghfcj [\ hY]b Jh' cZlgZgPhYYgN Yg; JbUnihY
; HDdfj JXgUbodtobibjzlfVbRbUjbd hfg WgZca 'YU'dWfUcbMgUbx
Zdagjbe hYdcWgZfZfa i 'Uj[k[de' JhG WbUdhdWgYg ZMMNY
Voh hYUWU UbXcdWbj YXHfUgjfYbWbZbY dcWgj UbXdcj JYgZf [fWf
WingW] JbXei UjhiZd' JhDj JW%& BYk NUUBXGJY dmjyMekjh hY; HD
Vg UfYgAWb jgwg X cf h ° f · WfYgg iW Y