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Tax havens
The perverse effects of globalization on national economies
Pax Economica

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Summary : Tax havens contribute to the degradation of available statistical information, they aggravate the public debt of many States, they participate in the plunder of developing countries and they call into question the principle of equality of citizens and businesses before the tax. In addition, by their action and the cover-up they allow on the "reality" of financial funds, they sometimes prevent developing countries from benefiting from the funds generated by the activities carried out on their territory.

Résumé : Les paradis fiscaux contribuent à la dégradation des informations statistiques disponibles, ils aggravent la dette publique de nombreux États, ils participent au pillage des pays en développement et ils remettent en cause le principe de l'égalité des citoyens et des entreprises avant l'impôt. De plus, par leur action et la dissimulation qu'ils permettent sur la «réalité» des fonds financiers, ils empêchent parfois les pays en développement de bénéficier des fonds générés par les activités menées sur leur territoire.

Mots clés : Tax havens, Developing Countries, globalization, Inequalities, statistics

Despite the actions of a few international and non-governmental organizations, and the warnings of researchers, tax havens are settling in the landscape of an economic globalization that is particularly carrying national and social inequalities. It is particularly difficult to obtain precise figures on its importance, in a banking and financial sector wishing to keep forms of secrecy which also make a significant part of their added value at the expense of other economic actors. Tax evasion and optimization are part of a proactive approach to reducing the burden of public effort, decided by themselves, companies or individuals. Often investments have existed in these territories sometimes for two generations and it is unclear whether, where and how they have been reinvested in other productive, real estate or precious metal investments. When countries grant tax amnesties, sums legally reintegrated into national economies

are not the subject of any specific information on offenders, including tax secrecy¹. The economic effects of tax heavens are very important, more important than what is usually analysed, because they produce a serious problem of international confidence. A lot of economic partners do not hesitate to use the famous “beggar thy neighbour”². The main problem is the real and not political definition of tax heavens³.

Tax havens contribute to the degradation of available statistical information, they aggravate the public debt of many States, they participate in the plunder of developing countries and they call into question the principle of equality of citizens and businesses before the tax. In addition, by their action and the cover-up they allow on the "reality" of financial funds, they sometimes prevent developing countries from benefiting from the funds generated by the activities carried out on their territory.

Deterioration in public finances

The indebtedness of the States is growing every year, and tax havens actively participate in this development. At the same time, the sums illegally diverted benefit first of all those who apply it to the detriment of the financing of public goods and services, but also a form of fiscal competition is set up between the States in order to attract the investments of the richest societies and individuals, through a significant reduction in taxes and miscellaneous taxes. Tax havens exert downward pressure on all states. The shortfall in tax evasion (legal or illegal) is both large and growing. It is therefore very difficult to estimate the size of these transfers, with estimates varying between \$ 200 billion and almost \$ 2,000 billion. To avoid too great a reduction in their capacity to finance public goods, States then come into debt, because their governments are led to limit tax rates themselves to avoid the threat of outsourcing of activities to maintain the attractiveness of investments in their territories. Large multinational firms are taking full advantage of this situation⁴. The National Assembly of France noted in 2011 that the implicit tax rate for SMEs was 39.5% compared to 18.6% for multinational companies (only 15 to 20% of corporate tax in France, with a total turnover estimated on average at 60% of the whole country)⁵. At the same time,

¹ Chavagneux, C. (2006), Les paradis fiscaux, piliers du capitalisme, Alternatives Economiques, n° 252

² Fontanel, J. (2016), Paradis fiscaux, pays filous. La fuite organisée des impôts vers les pays complices, L'Harmattan, Paris.

³ Fontanel, J. (2019), Tax heavens, a huge cost for public and social activities”, The 3th meeting of the International Advisory Board, St. Petersburg State University of Economy (UNECON), September 11.

⁴ Fontanel, J. (2019), GAFAM, a progress and a danger for civilization, X Jubilee International Scientific and Practical Conference « Financial Architecture : Forced Economic Development in the Context of External Shocks and Internal Inconsistencies, State University of Economics of Saint-Petersburg, Hotel Ambassador, Saint-Petersbourg, 12 April 2019. **hal-02102188**. Fontanel, J, Sushcheva, N. (2019), La puissance des GAFAM : Réalités, apports et dangers, AFRI, Annuaire Français des Relations Internationales, Paris.

⁵ Assemblée Nationale (2011), L'application des mesures fiscales contenues dans les lois de finance, Rapport présenté par Gilles Carrez, n° 3631, Paris.

the non-resident subsidiaries of French groups were the main international investors in France⁶.

Large companies pay proportionately less tax than SMEs, which gives them an undeniable additional competitive advantage⁷. A study published in 2015⁸, carried out on 20 member countries of the European Union shows that on average, multinationals have an effective tax rate lower than 3.5 points to national companies. The fight against tax evasion would significantly improve the competitiveness of small and medium-sized enterprises. Table 1 gives interesting information on this gap, but it provides an estimate that is particularly difficult to verify, because the information is incomplete and often protected by the secrecy of negotiations.

Table 1. Nominal and real tax rates of multinational corporations in 2011⁹

Countries	Nominal rate (in%)	Real rate (in%)
Belgium	39	10
Germany	37	4
Danemark	34	11
Spain	35	4
France	33	7
Italy	36	8

At the end of May 2013, the European Parliament estimated that public money lost in Europe each year is lost due to tax evasion¹⁰. He indicates that this sum corresponds to an annual shortfall of 2000 euros per European citizen. Direct taxes reduce personal income, indirect taxes raise commodity prices, and payroll taxes increase the cost of labour¹¹. This highlights the importance of optimal tax reduction strategies. This system increases injustice, for the benefit of the

⁶ Chavagneux, C. (2011), A quoi servent les paradis fiscaux ?, Les Amis de l'Ecole de Paris, séance 1 juillet 2011,

⁷ Sénat (2015), Commission d'enquête sur l'évasion des capitaux et des actifs hors de France et ses incidences fiscales, Travaux parlementaires, Rapport n° 673, de M. Éric BOCQUET, fait au nom de la Commission d'enquête Evasion des capitaux, déposé le 17 juillet 2012, http://www.senat.fr/rap/r11-673-1/r11-673-1_mono.html

⁸ VVA & ZEW. (2015). SME taxation in Europe – An empirical study of applied corporate income taxation for SMEs compared to large enterprises. European Commission CIP Programme 186/PP/CIP/12/F/S01C24, p.111: <http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetailDoc&id=11838&no=3>

⁹ Figures obtained from publish graph, page 41, par CCFD-Terre solidaire, L'économie déboussolée, 2011, http://www.leparisien.fr/event/pdf/RAPPORT_CCFD_101206_BD.pdf

¹⁰ Parlement européen (2013), Sur la lutte contre la fraude fiscale, l'évasion fiscale et les paradis fiscaux, Commission des affaires économiques et monétaires, 3 Mai, <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2013-0162+0+DOC+XML+V0//FR>

¹¹ However, if the government of France could charge all the tax revenues voted in Parliament, it could thus reduce by more than 60 billion a year the weight of the tax borne by all taxpayers. There are 36 million tax households, but only 19 million pay income tax. On average, tax fraud steals 3000 euros per year from taxpayers and probably more than 6000 euros for households taxed in the 30% bracket.

wealthy and the most mobile taxpayers. SMEs are clearly disadvantaged, as are employees who cannot avoid all or part of the tax. In the United States, the state of Delaware, with its particularly attractive tax system, saves American companies nearly \$ 300 billion a year.

Public indebtedness has increased considerably in two decades and the tax avoidance systems of large taxpayers have participated in it (Table 2). Note the differences in statistics between the International Monetary Fund and the OECD, based on different definitions. The differences are considerable, as must be the estimates concerning tax evasion and optimization that often escape any official information, especially when they are illegal on the substance and even more on the form.

The lack of financial resources is one of the leitmotifs of all the political speeches of all governments. In this context, public education and research, the health and welfare system for the weakest, the satisfactory remuneration of civil servants, aid to farmers and financial support for young companies, all these essential activities for a country suffer of credit cuts that prevent the achievement of their collective objectives.

The state is stolen from part of its income while the prevailing idea among the population is the excessive importance of compulsory taxes. It should be noted that countries that are accused of being tax havens, such as Luxembourg, the Netherlands (47.3%), Ireland or the United Kingdom have low public debt relative to the other countries of the world. 'European Union and that these are rather decreasing.

Table n ° 2 - Percentage public debt/GDP in 2015 and 2018, for OECD and IMF.¹²

Country	% Country Public debt/GDP in 2019,OECD ¹³	% public debt GDP in 2015 IMF ¹⁴	% public debt / GDP in 2018 IMF ¹⁵
Germany	81	80	55,7
Brazil	ND	59	93,9

¹² The figures provided are relatively random, according to sources from the OECD, the IMF, the European Union and the World Bank. In addition, it is also necessary to take into account the related interest rates (higher in Greece compared to the United States, for example), the reimbursements to be committed each year, the length of contracts, the size of the economy national in view of the wealth produced worldwide. In short, this table provides only an interesting indication which should of course be refined to make a more rigorous analysis. Economics help (2014) List of National Debt by countries, <http://www.economicshelp.org/blog/774/economics/list-of-national-debt-by-country/>

¹³ Dupray, La dette publique s'envole, <http://www.centralcharts.com/fr/forums/133-analyse-economique-fondamentale/139-la-dette-publique-mondiale-s-envole>.

¹⁴ OECD Data. <https://data.oecd.org/gga/general-government-debt.htm>

¹⁵ IMF (2019), General government gross debts https://www.imf.org/external/datamapper/GGXWDG_NGDP@WEO/EURO/EU/USA/JPN/CHN/

China	ND	22	60,9
Spain	117	94	95,2
France	121	93	99,2
Greece	183	175	171,4
India	ND	52	68,5
Ireland	88	124	57,7
Italy	157	133	133,7
Japan	237	226	237,6
Luxembourg	31	23	21,1
Portugal	148	128	114,8
United Kingdom	108	91	84,8
Russia	ND	8	17,7
USA	136	72	108,0

Questionable macroeconomic statistics

National GDP statistics, an otherwise questionable concept, influence the more or less optimistic economic behaviour of citizens and businesses¹⁶. With the transfer price system, the overall added value of countries is questionable today, they are notoriously undervalued in countries victims of tax havens that do not improve their attractiveness and weighs on wages. Thus, multinationals can demonstrate that workers in tax havens are producers of wealth in a different way than those who bring in products that are subject to price transfers.

It should also be remembered that the underground economy represents between 5 and 20% of the European Union's GDP¹⁷, this gap clearly indicating that the statistical information provided is inaccurate. If the GDP calculated by the official bodies of the States seeks to determine the total production of the underground economy, they are nonetheless confronted with trade secrets or illegal actions. With globalization and the evolution of digital techniques, controls are becoming more and more difficult to implement with sufficient reliability. In the definition of underground production, along with illegal activities, the "underreporting" of real turnover constitutes the most important source of loss of public revenues. In this context, multinational companies are masters of controlling in great detail their declarations in relation to those of all their subsidiaries. Non Governmental Organizations, for political reasons, produce some general data on tax heavens¹⁸.

¹⁶ Fontanel, J., Guilhaudis, J-F. (2019), Les effets pervers de l'usage du PIB pour la décision politique et les relations internationales. Comment en sortir ? , AFRI, Annuaire Français des Relations Internationales , Paris.

¹⁷ Lequiller, F. (2014), L'économie souterraine dans le PIB : avancées et limites, OCDE. http://www.economie.gouv.fr/files/francois_lequiller_ocde.pdf

¹⁸ Bensahel-Perrin, L., Fontanel, J., Corvaisier-Drouart, B. (2009), Les organisations non gouvernementales, ou l'homme au cœur d'une mondialisation solidaire, L'Harmattan, Paris.

The request by governments to obtain all the information concerning the declarations of subsidiaries located abroad should provide significant means of determining the need for possible tax adjustments, but it is nonetheless difficult to oppose the prices offered by the parent company, which can rely on the interests of the governments of tax havens to challenge the estimates of the tax administration. Thus, according to the CCFD-Terre solidaire report¹⁹, in 2011, the British Virgin Islands invested four times more than Japan in China. Each inhabitant theoretically invested nearly 700,000 dollars per year in the ten most powerful world economies. Luxembourg is still the second largest investment fund after the United States; it is the first international wealth management centre in the euro zone, thanks to the advantages granted to holding companies (more than 15,000 holding companies holding nearly 2,300 billion euros). The activity of tax havens is considerable; it represents 20% of private global wealth, illicit activities, on the basis of very empirical reasoning, being estimated at a quarter of these amounts²⁰.

The “tax havens” are particularly suited to the implementation of purely financial strategies that escape the control of the States and even of certain owners. The result is financial instability, producing a particularly high systemic risk, the consequences for growth and employment of which can be particularly dangerous. Natural or legal persons carrying out illegal activities may escape the control of national courts, because tax havens allow them to conceal the origin of the funds. Terrorist groups know how to use the financial techniques proposed by "rogue" states. Piracy cases sometimes benefit certain tax havens such as London, Dubai or Kenya. Few countries fully meet the standards defined by the organization in the fight against the financing of terrorism.

A non-united sovereign fiscal policy

Partner states of the European Union are reluctant to enter into negotiations on the content of their budgets because it is an essential economic policy instrument that each government wishes to maintain. It is on this sticking point that the large multinational corporations intervene to benefit from optimal advantages in view of the differences in legislation of the partner countries. They intervene at several levels in the process of resources collected for the funding of public services. First, they compete for the location of their economic activities. Then, they act on electoral processes by supporting candidates in order to recover the influence of elected officials on collective choices. Finally, they exercise considerable lobbying action, in particular by directly or indirectly controlling the information provided by the newspapers or media which belong

¹⁹ CCFD-Terre solidaire, L'économie déboussolée, 2011, http://www.leparisien.fr/event/pdf/RAPPORT_CCFD_101206_BD.pdf

²⁰ Assemblée Nationale (2013), Lutte contre les paradis fiscaux : si l'on passait aux actes, Rapport n° 1423, présenté par Alain Bocquet et Nicolas Dupont-Aignan, <http://www.assemblee-nationale.fr/14/rap-info/i1423.asp>

to them and by walking the corridors of public decisions in Brussels, Berlin, London, New York, Washington, Geneva or Paris. . The big firms support the states practicing “fiscal dumping”; they exercise their veto for any proposal for negotiated collective control. By the very fact of the different nature of the economic structures of the countries, the policy of "every man for himself" has enabled the big companies to make play the competition between the States on the question of the contents and legislations relating to the compulsory deductions.

Thanks to this collective situation of "benign neglect" of each partner, legal or physical entities were thus able to escape fully or partially from tax. The result is a form of wealth predation, which allows business leaders and shareholders to increase their personal income. The banks supported their wealthy customers in this process, even though, in a crisis, they were bailed out with public money. States are today in great debt, and banks are organizing strong pressure to be reimbursed "ruby on the nail". Moral hazard is widely exercised, at the expense of responsible collective ethics²¹.

The equality of citizens and businesses before taxes is not effective

The rules of democracy concerning the fair contribution of each citizen or company to the financing of collective goods are no longer really respected. Banks and financial law firms support their wealthy clients in optimizing their wealth, looking for any loopholes existing in the system of compulsory levies of all the countries thus put in competition²². Tax evasion, when exposed, is then the subject of negotiations with the state, which will recover, most of the time, at most, the amount that should have been paid.

After the financial crisis of 2008-2009, multinational corporations obtained great financial advantages regarding the difference between the nominal rate and the effective tax rate, which, in turn, weakened the purchasing power of consumers and middle classes, especially employees. We can then see the differences in tax treatment between multinational companies capable of using all the arguments to set up profitably in a territory, with the support of the State, with regard to the obligations to which small and medium-sized enterprises are subject. . In addition, beyond negotiating with state authorities, multinational companies are able to reduce their effective tax rate by transferring part of their profits to subsidiaries located in "tricky" or less tax-demanding countries.

The least mobile economic players and the middle classes bear most of the tax and therefore the funding of public services, often offered almost free of charge to large multinational companies. The first victims of capital flight are the middle classes and the poor. The flight of savings to tax havens also increases the interest rates of national and local banks, which then run out of cash.

²¹ Fontanel, J. (2009), Questions d'éthique, L'Harmattan ; Paris.

²² Joly, E. (2016), Pour en finir avec l'impunité fiscale, Le Monde Diplomatique, Juin.

In France, the Commissions aux Infractions Fiscales (CIF) itself chooses the files, which will ultimately be handed over to the judicial authorities. Out of the 50,000 in-depth checks, 16,000 give rise to financial sanctions for intentional fraud. A total of 1,000 of them will be presented to the CIF, which will only examine nine out of ten, without having to justify its decisions²³. In addition, the Minister of Finance has a kind of "pardon right" which has been applied in the cases of Bernard Tapie or Karl Lagerfeld. Sanctions before judges remain weak, as if the theft of state legal resources were less severe than that affecting the private sector. The number of controllers has decreased since 2008; the fault seems to be of public debt, which is deepened by tax fraud²⁴. Banks play a very ambiguous role in this context; they do not always respect the rules concerning the reporting of financial movements that could result from money laundering or crimes.

Developing countries, new victims

UNCTAD²⁵ has highlighted the effects of tax avoidance in developing countries. In 2014, the contribution of multinational firms to the budgets of the States in these countries was around 730 billion dollars, i.e. 23% of the contributions of all the companies concerned and 10% of the government's total revenues (14% in Africa). In this context, around 30% of foreign direct investment goes through tax havens.

The report considers that this results in a loss of around \$ 100 billion in tax revenue that goes to "offshore hubs" due to the "artificial" absence of profits from these investments, which would have as a consequence a loss of production of at least 300 billion dollars, which thus reduces the potential for economic development of the poorest states²⁶. The estimated loss in terms of tax revenue represents a third of this amount. By applying a profit reinvestment rate of around 50%, \$ 165-225 billion could be made available each year to finance the national economies of developing countries. By adding tax losses and profits

²³ The number of examining magistrates increased from 27 in 2001 to 8 in 2012. Most European countries have reduced the number of inspectors' posts. Regarding the list of fraudsters submitted by Hervé Falciani (nearly 3000 files), 3) only 4% were prosecuted before a judge, despite the overwhelming evidence. The 150,000 largest taxpayers in France are part of a separate service (National Directorate of Verification of Tax Situations), which in 2010 ordered 900 adjustments and only 17 complaints.

²⁴ While France no longer replaces one in two civil servants in the Tax Department, the American administration has just hired nearly 1,000 people to fight against tax evasion by individuals and businesses.

²⁵ UNCTAD, Investment and Enterprise Division (2015) FDI, Tax and Development. The fiscal rôle of multinational enterprises: towards guidelines for coherent international tax and investment policies, <http://investmentpolicyhub.unctad.org/Upload/Documents/FDI,%20Tax%20and%20Development.pdf>
International Centre for Tax and Development (2015), New UNCTAD Paper on Corporate Tax in Developing Countries, April, A working paper for review and feedback 3/26/2015. <http://www.home.walsingham.com/en/new-unctad-paper-corporate-tax-developing-countries-0>

²⁶ UNCTAD (2015), FDI, Tax and development, The fiscal role of multinational enterprises: towards guidelines for Coherent International Tax and Investment Policies, <http://investmentpolicyhub.unctad.org/Blog/Index/42>

that do not reinvest locally, the loss of financing for growth in developing countries is estimated between 250 to 300 billion dollars per year²⁷.

In sub-Saharan Africa, the illicit or uncontrollable flight of capital considerably limits the budget allocated to agriculture, while 30% of the population suffers from undernourishment. According to the FAO, the deficit in public finances of the southern states caused by tax evasion alone represents 5 times the amount necessary to eradicate hunger in the world²⁸. If the investments made by multinationals in Africa pass through tax havens, the same goes for the assets of the heads of state of the least democratic countries, who favour investments in Switzerland. Despite the international will to limit these harmful effects on the reputation of “rogue” countries, the use of screen structures constituted by trusts and non-resident companies promotes the maintenance of a certain maintained opacity (sometimes by corruption measures) and protected (by "oriented" laws).

If investments from or to tax havens are not all linked to corruption or other criminal activities, they represent more than 20% of the world total of cross-border investments, which is out of proportion in light of the weight economic realities of these states²⁹. Such figures should prompt governments to study the size, origin and destination of these flows.

Globalization has favoured entities capable of mobility and enjoying the interstices between the laws. Because of their national economic importance, multinational firms use all the financial and political means at their disposal to improve their private incomes, by asking countries to improve the fiscal conditions that are made for them in a situation of competition between national economies. The action taken by the European Union on the GAFAM highlights the power of these firms, protected by the White House and US laws that often require international laws.

The developing countries are often impoverished by tax and capital evasion, without the international authorities, however well informed, being given the means to intervene³⁰. States often condemned speculation, but it is also a profit factor for some national economies³¹. Morality is not respected when thieves

²⁷ Cobham, A. (2015), UNCTAD Study on corporate tax in developing countries », 26/03/15, <http://uncounted.org/2015/03/26/unctad-study-on-corporate-tax-in-developing-countries/>

²⁸ CCFD-Terre solidaire (2011) L 'économie déboussolée, http://ccfd-terresolidaire.org/ewb_pages/i/info_2378.php

²⁹ http://www.transparency-france.org/ewb_pages/div/Projet_de_mesure_des_investissements.php

³⁰ Coulomb, F., Fontanel, J. (2006), Spéculation et instabilité financière internationale, in « Des flux et des territoires. Vers un monde sans Etats ? ». Sous la direction de Bernard Jouve et Yann Roche, Presses de l'Université du Québec, Montréal, 2006. Fontanel, J. (2006), Spéculation internationale et géopolitique, *Annuaire Français des Relations Internationales*, Vol. VI. 2006. Coulomb, F., Bensahel, L., Fontanel, J. (2007), The concepts of economic war and economic conflicts in a global market economy, in « Arms, War, and Terrorism in the global economy today, Ed. Wolfram Elsner, Ed. LIT Verlag, Bremen Schriften zur Konverzion, Band 13, Hamburg. Fontanel, J. (2016), La science économique en débats et en défaut face à la crise, Document de Travail, Université Grenoble-Alpes, EDDEN, Grenoble, à paraître. Fontanel, J. (2016), La Finance, prédatrice des richesses, Document de Travail, Université Grenoble-Alpes, EDDEN, Grenoble, à paraître.

³¹ Fontanel, J. (2007), Ethique, démocratie et économie mondialisée. Quelle éthique ? in « Questions d'éthique », Coll. « Les idées et les théories à l'épreuve des faits, J. Fontanel, (Ed). L'Harmattan, Paris. Fontanel, J. (2007), Questions d'éthique, Coll. « Les idées et les théories à l'épreuve des faits, L'Harmattan, Paris.

sometimes become judges for enforcing unsuitable or partisan rules and laws. Financial crime has no visible effect and is therefore not very well understood by citizens. There is rooted in the collective information the idea that these centres "offshore" are necessary for the functioning of capitalism and the market economy under the premise that a little "manure" enriches the earth. Multinational companies have a field to use the country to transfer to maximize their profits. This "white collar" crime is located in the wealthy strata of society, surrounded by legal and economic advisers responsible for finding all the interstices of the laws to enhance their heritage, to the detriment of the already unfair rules of income distribution produced by the 'market economy.

The states primarily contest the "tax havens" that are not in their spheres of influence. The United States accuses the Cayman Islands carrying no look at many Wall Street companies registered in Delaware. Washington has managed to appropriate new rights to Switzerland's banking secrecy policy, without proposing such openness to other countries concerning Delaware or the Bahamas. Countries "thieves" often undertake similar procedures to those of a State in war. They secretive, they protect all of their operations, they have multiple launchers alert, they most distracting activities to make more complex their reading by external elements and controls. They find the interstices of national laws to generate new activities or profits. Capitalism "maximalist" has become difficult to control, politicians do not master more the economic situation, the worst is possible, because of greed, as the folly of men, has no limit. War or threat of civil or international wars often invite the international negotiating table, especially when poverty fell more and the social capillary action becomes a requirement for all citizens³². Economic globalization has enabled the development of all excesses for the wealthy, for which economic life is casino game, with speculation that enriches or impoverishes, without ever leaving you in the class of the wealthy and privileged.

Bibliography

Assemblée Nationale (2011), L'application des mesures fiscales contenues dans les lois de finance, Rapport présenté par Gilles Carrez, n° 3631, Paris.

Assemblée Nationale (2013), Lutte contre les paradis fiscaux : si l'on passait aux actes, Rapport n° 1423, présenté par Alain Bocquet et Nicolas Dupont-Aignan, <http://www.assemblee-nationale.fr/14/rap-info/i1423.asp>

³² Smith, R., Fontanel, J. (2010). International security. Politics, Policy, Prospects. Prospects. Smith, R., Fontanel, J. (2008), International security, defence economics and the powers of nations, in « War, Peace and Security », Contributions to Conflict Management, Peace Economics, and Development, Volume 6, edited by Jacques Fontanel and Manas Chatterji, London, Emerald, London, 2008. Fontanel, J., Corvaisier-Drouart, B. (2014), For a General Concept of Economic and Human Security, in R. Bellais (Ed.), The Evolving Boundaries of Defence : An Assessment of Recent Shifts in Defence Activities, Emerald, Bingley. Fontanel, J. (2016) La sécurité économique et sociétale : pour une conceptualisation humaniste multidimensionnelle, PSEI, Politique de Sécurité Européenne et Internationale, n° 3. 2016-<http://revel.unice.fr/psei/index.html?id=822>

Bensahel-Perrin, L., Fontanel, J., Corvaisier-Drouart, B. (2009), Les organisations non gouvernementales, ou l'homme au cœur d'une mondialisation solidaire, L'Harmattan, Paris.

CCFD-Terre solidaire, L'économie déboussolée, 2011, http://www.leparisien.fr/event/pdf/RAPPORT_CCFD_101206_BD.pdf

Chavagneux, C. (2006), Les paradis fiscaux, piliers du capitalisme, Alternatives Economiques, n° 252

Chavagneux, C. (2011), A quoi servent les paradis fiscaux ?, Les Amis de l'Ecole de Paris, séance 1 juillet 2011.

Cobham, A. (2015), UNCTAD Study on corporate tax in developing countries », 26/03/15, <http://uncounted.org/2015/03/26/unctad-study-on-corporate-tax-in-developing-countries/>

Coulomb, F., Fontanel, J. (2006). Mondialisation, guerre économique et souveraineté nationale, in La question politique en économie internationale (Rd. Berthaud, Kebabdjian), la Découverte, Paris.

Coulomb, F., Fontanel, J. (2006), Spéculation et instabilité financière internationale, in « Des flux et des territoires. Vers un monde sans Etats ? ». Sous la direction de Bernard Jouve et Yann Roche, Presses de l'Université du Québec, Montréal, 2006.

Coulomb, F., Bensahel, L., Fontanel, J. (2007), The concepts of economic war and economic conflicts in a global market economy, in « Arms, War, and Terrorism in the global economy today, Ed. Wolfram Elsner, Ed. LIT Verlag, Bremen Schriften zur Konverzion, Band 13, Hamburg.

Dupray, La dette publique s'envole, <http://www.centralcharts.com/fr/forums/133-analyse-economique-fondamentale/139-la-dette-publique-mondiale-s-envole>.

Economics help (2014) List of National Debt by countries, <http://www.economicshelp.org/blog/774/economics/list-of-national-debt-by-country/>

Fontanel, J. (2006), Spéculation internationale et géopolitique, Annuaire Français des Relations Internationales, Vol. VI. 2006.

Fontanel, J. (2009), Questions d'éthique, L'Harmattan ; Paris.

Fontanel, J. (2007), Ethique, démocratie et économie mondialisée. Quelle éthique ? in « Questions d'éthique », Coll. « Les idées et les théories à l'épreuve des faits, L'Harmattan, Paris.

Fontanel, J., Corvaisier-Drouart, B. (2014), For a General Concept of Economic and Human Security, in R. Bellais (Ed.), The Evolving Boundaries of Defence : An Assessment of Recent Shift in Defence Activities, Emerald, Bingley.

Fontanel, J. (2016) La sécurité économique et sociétale : pour une conceptualisation humaniste multidimensionnelle, PSEI, Politique de Sécurité Européenne et Internationale, n° 3. 2016-<http://revel.unice.fr/psei/index.html?id=822>

Fontanel, J. (2016), Paradis fiscaux, pays filous. La fuite organisée des impôts vers les pays complices, L'Harmattan, Paris.

Fontanel, J. La finance, prédatrice des richesses, pré-publication, hal-02151866

Fontanel, J. (2019), GAFAM, a progress and a danger for civilization, X Jubilee International Scientific and Practical Conference « Financial Architecture : Forced Economic Development in the Context of External Shocks and Internal Inconsistencies, State University of Economics of Saint-Petersburg, Hotel Ambassador, Saint-Petersbourg, 12 April 2019. hal-02102188.

Fontanel, J. (2019), Tax heavens, a huge cost for public and social activities”, The 3th meeting of the International Advisory Board, St. Petersburg State University of Economy (UNECON), September 11.

Fontanel, J., Guilhaudis, J-F. (2019), Les effets pervers de l'usage du PIB pour la décision politique et les relations internationales. Comment en sortir ? , AFRI, Annuaire Français des Relations Internationales , Paris.

Fontanel, J, Sushcheva, N. (2019), La puissance des GAFAM : Réalités, apports et dangers, AFRI, Annuaire Français des Relations Internationales, Paris.

IMF (2019), General government gross debts https://www.imf.org/external/datamapper/GGXWDG_NGDP@WEO/EURO/EU/USA/JPN/CHN/

International Centre for Tax and Development (2015), New UNCTAD Paper on Corporate Tax in Developing Countries, April, A working paper for review and feedback 3/26/2015. <http://www.home.walsingham.com/en/new-unctad-paper-corporate-tax-developing-countries-0>

Joly, E. (2016), Pour en finir avec l'impunité fiscale, Le Monde Diplomatique, Juin.

Lequiller, F. (2014), L'économie souterraine dans le PIB : avancées et limites, OCDE. http://www.economie.gouv.fr/files/francois_lequiller_ocde.pdf

OECD Data. <https://data.oecd.org/gga/general-government-debt.htm>

Parlement européen (2013), Sur la lutte contre la fraude fiscale, l'évasion fiscale et les paradis fiscaux, Commission des affaires économiques et monétaires, 3 Mai, <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2013-0162+0+DOC+XML+V0//FR>

Smith, R., Fontanel, J. (2008), International security, defence economics and the powers of nations, in « War, Peace and Security », Contributions to Conflict Management, Peace Economics, and Development, Volume 6, edited by Jacques Fontanel and Manas Chatterji, London, Emerald, London, 2008.

[Transparency France, http://www.transparency-france.org/ewb_pages/div/Projet_de_mesure_des_investissements.php](http://www.transparency-france.org/ewb_pages/div/Projet_de_mesure_des_investissements.php)

UNCTAD (2015), Investment and Enterprise Division (2015) FDI, Tax and Development. The fiscal rôle of multinational enterprises : towards guidelines for coherent international tax and investment policies, <http://investmentpolicyhub.unctad.org/Upload/Documents/FDI,%20Tax%20and%20Development.pdf>

Sénat (2015), Commission d'enquête sur l'évasion des capitaux et des actifs hors de France et ses incidences fiscales, Travaux parlementaires, Rapport n° 673, de M. Éric BOCQUET, fait au nom de la Commission d'enquête Evasion des capitaux, déposé le 17 juillet 2012, http://www.senat.fr/rap/r11-673-1/r11-673-1_mono.html

¹ VVA & ZEW. (2015). SME taxation in Europe – An empirical study of applied corporate income taxation for SMEs compared to large enterprises. European Commission CIP Programme 186/PP/CIP/12/F/S01C24, p.111: <http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetailDoc&id=1838&no=3>

