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EDITORIAL

In the first article, Dr Tom O'Shea looks at some of the issues that would arise upon the introduction of a Common Consolidated Corporate Tax Base and suggests that some criticisms of the ECJ and its recent case law are unfounded.

The second article is by Alexandre Polak. Alexandre looks at the changes made to the UK's CFC rules in the wake of the *Cadbury Schweppes* judgment and concludes that further litigation might follow in this area. A companion article, looking at the French CFC rules, is expected to be published shortly in the Offshore and International Taxation Review.

In the third article, Tiago Rodrigues analyses the key recent cases concerning cross-border loss relief. A companion article in the OITR will consider the application of these principles in the context of the Portuguese tax code

Finally, Martin Schuh provides a commentary on the background and outcome of the ECJ decision in *'Thin Cap' GLO* and, in particular, the consequences of the decision that the UK's thin capitalisation provisions infringed only Article 43 (and not Article 56) of the EC Treaty.

Robert Venables QC
November 2008

Ian Hutton

Keith M Gordon