

This text is already extremely popular and will remain so. It is comprehensive but still retains the simplicity necessary to allow all levels of students to obtain an understanding of the tenets of corporate law.

The fifth edition is also important in that it includes a disk with interactive tutorials. The structure of these broadly follows the text and allows the undergraduate a method of continuous self-assessment and revision. Each part begins with a series of short one-line questions followed by a small problem question. A brief explanation of the answer is given and the student is provided with an overall result. The graphics on the program are excellent and the program is easy to follow. The provision of interactive discs with texts is an avenue that publishers are likely to follow in the future and as a means of providing continuous assessment to the student is something to be applauded.

Overall this text is fast becoming a standard for corporate law students and this latest edition will do nothing to stop this from occurring.

*Lynden Griggs\**

GS Cooper, RL Deutsch and RE Kreever, **Cooper, Kreever & Vann's Income Taxation: Commentary and Materials**, 2nd ed, Law Book Co, 1993, pp lxiv, 1-1 - 25-50, 51 (index) \$89.50 (pbk), \$121.00 (hb).

By virtue of the dynamic nature of taxation law in Australia, any text purporting to deal with the law must either be the subject of frequent revisions or alternatively adopt a thematic and policy perspective which transcends the minutiae of changes. Irrespective of the approach adopted, the text must emphasise the unique role of taxation law as an economic tool of government, and recognise that shifting governmental policies may dictate change, sometimes substantial, to the structure of the income taxation system.

In the second edition of *Income Taxation: Commentary and Materials* the authors attempt to provide a thematic approach to what is an increasingly complex area of law, whilst retaining a level of currency which would not render vast portions of the work out of date within a short period of time. This thematic approach is

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\* Lecturer in Law, University of Tasmania.

illustrated by the frequent reference to relevant policy perspectives at the commencement of important chapters. Chapter 1, entitled 'Tax Objectives', is particularly useful in this regard in its discussion of alternative tax bases. This chapter sets the tone for later chapters, in which readers are encouraged to critically assess Australia taxation law against its bases and objectives. Building upon the material contained in the first chapter is Chapter 3, 'Fundamental Principles of the Income Tax System'. The comparison between the lawyer's and economist's concepts of income invites the reader to analyse the underpinnings of the Australian system of income taxation and thereby assess the relative merit of the examples of judicial approaches to the concept of income. Moreover, the segment of the chapter entitled 'Integrating the Elements of the Taxation System' provides a unique and helpful schema through which the reader can understand the intended relationship between different elements of the system.

Chapter 5, dealing with income from the provision of services, includes an interesting discussion entitled 'Taxation and work effort' in which the authors briefly examine some of the potential consequences for modern societies of policies which collect large proportions of governmental revenue by taxes on wages. Again the reader is called not merely to understand the niceties of the law, but further consider the justifications and consequences of the legal structure adopted. This chapter also addresses retirement policies, regarding which the authors provide an excellent concise outline of what is an extremely complex and dynamic field of practice. The treatment of Fringe Benefits Tax in this chapter is also noteworthy for not merely containing a brief and logical description of the law, but also for its analysis of methods of taxing fringe benefits. Chapters 18 (company taxation) and 20 (international taxation) also contain extended treatment of policy objectives.

The text also introduces readers to several topical areas often not the subject of separate coverage in texts of this nature. Take for example the discussion regarding salary packaging in Chapter 5, that respecting the interaction between the income tax and social security systems in Chapter 7, and the separate chapter dealing with business trusts (Chapter 19). Chapter 10 devotes several pages to the tax implication of leasing, an increasingly popular form of financing (although it is suggested that reference should have been made to the relevant accounting standard for leases). Another frequent omission from taxation texts is the ethics of tax practice. Given the escalating public concern about the ethics of lawyers and accountants, Chapter 24 ('Professional Responsibility and Ethics') is a particularly apposite inclusion in a work of this type.

Difficult and/or topical areas are illustrated by means of a case study. The case studies dealing with salary packaging (Chapter

5), termination of partnership (Chapter 16), corporation reorganisations (Chapter 18) and international taxation (Chapters 21 and 22) deserve special mention in this regard.

*Income Taxation: Commentary and Materials* is no doubt designed as a teaching text. Consequently, it does not meet the ready reference needs of practitioners. Moreover, it appears to be directed towards law students rather than students who study taxation law as part of an accounting or economics degree. The coverage largely focuses on legal issues, and, apart from case studies, numerical exposition is limited. As one of the objectives of legal education (and this applies even more forcefully to the teaching of taxation law) is the development of skills of statutory construction, it is curious that certain specific sections of the *Income Tax Assessment Act* are not extracted in full.

The authors highlight the fact that tax law cannot be viewed in isolation. For example, the chapters dealing with the taxation of partnerships, trusts and companies are all prefaced with a brief discussion of the nature of these legal structures. Perhaps the trust, more so than other business entities, deserves greater explanation given the difficulty students and lay persons have with the concept of legal and equitable interests. Another example is the concise refreshment of property law principles relating to assignments in Chapter 15. Yet it is surprising that the text largely fails to address the relation between tax practice and accounting standards, a prime example of the potential interaction between tax law and other disciplines.

One of the main strengths of the text is its attempt to interrelate different elements of the taxation system rather than present each topic as if it were a discrete field of practice. But by doing so the authors run the risk not merely of repetition, but of confusing the first time reader without a basic appreciation of taxation law. These perils have largely been avoided by careful sequencing of material and adequate explanation of the topics in issue. The main subject area which frequently recurs is that of capital gains tax. The initial treatment of Part IIIA in Chapter 4 is rather brief (and would be further benefited by a diagrammatic schema of its workings) whereas the relevant legal principles pertaining to the accounting for capital gains are relegated to Chapter 14. This segmentation, although logical, tends towards separation of clearly interrelated capital gains tax issues. Moreover, particularly in relation restrictive covenants (Chapter 5) and compensation receipts (Chapter 7), the discussion devoted to capital gains tax implications appears too brief, especially given the important ramifications of Part IIIA in these areas.

Yet these minor concerns should in no way be seen to down play the high quality of Cooper, Deutsch and Krever's work. They

have succeeded in completing a work which furnishes students not merely with a comprehensive understanding of the principles of Australia taxation law, but also one which encourages readers to critically analyse our current system of taxation.

*Gino Dal Pont\**

Keith Bryett, Emma Craswell, Arch Harrison and John Shaw, **An Introduction to Policing, Volume 1: Criminal Justice in Australia**, Butterworths, 1993, pp vi, 138, \$29 (pbk); Keith Bryett, Arch Harrison and John Shaw, **Volume 2: The Role and Functions of Police in Australia**, Butterworths, 1994, pp vi, 190, \$29 (pbk); Keith Bryett and Arch Harrison, **Volume 3: Policing in the Community**, Butterworths, 1993, pp iv, 170, \$29 (pbk); Keith Bryett and Arch Harrison, **Volume 4: Trends and Procedures in Policing**, Butterworths, 1994, pp vi, 106, \$29 (pbk).

In an earlier review,<sup>1</sup> I mentioned that lecturers in Griffith University's School of Justice Administration planned to produce textbooks on policing. The four volumes listed above are the products of their labours. The four volumes are meant to be self-contained. Each can be read on its own with profit. They are designed to make readers 'aware of the issues and to stimulate interest in future research'. Certainly anyone who reads these four volumes will be left in no doubt that policing in a modern liberal democracy is a very complex business indeed and that the issues raised in these books (accountability for example) provide ample ammunition for heated debate inside and outside the seminar room.

Volume 1 provides an introduction to the criminal justice system in Australia and assumes no knowledge on the reader's part. It is hardly the 'important landmark' described in the Foreword but does provide a convenient context in which to understand the role of the police. Section 1 looks at theoretical issues such as methods of social control; power, authority, and legitimacy; and the goals and standards of the system. Section 2 considers problems and limitations. Section 3 summarises the nature of difficult issues such as organised crime, white collar crime, environmental crime, drugs, and terrorism.

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\* Lecturer in Law, University of Tasmania.

1 (1993) 12 *U Tas L Rev* 129-131.