

ESTATE AND GIFT TAXATION — A Comparative Study. Edited by G. S. A. Wheatcroft. [London: Sweet & Maxwell, British Tax Review Guides No. 3. 1965. x + 158 pp. £1. 15s. 0d.]

This volume represents the fruits of a group study of estate and gift taxation in Australia, Canada, Great Britain and the United States of America, which was carried out at the London School of Economics during the academic year 1963-4 under the supervision of Professor G. S. A. Wheatcroft, well-known for his contributions on British taxation law.

The book is divided into six chapters. The first four, written by specialist contributors, are devoted to a general survey of the estate and gift tax laws in the four countries. The last two chapters, contributed by Professor Wheatcroft himself, attempt to draw comparison between the four systems under study and to suggest general solutions to the main problems posed by such taxation. Four of the six chapters (Chapters 1, 2, 4 and 5) have already appeared as articles in the British Tax Review.

Though the book seems to be intended for lawyers as well as laymen (A glossary of legal words and terms is provided for non-lawyers) it is primarily a legal study. Estate duty law is a notoriously intricate subject as even a cursory glance at any of the English standard textbooks such as *Green* or *Dymond* or *Hanson* will show. The survey of each of the four systems occupies less than thirty pages. A lot therefore has to be compressed into each survey so that for the uninitiated it will be no easy reading.

As in Great Britain there is no gift taxation in Singapore and Malaysia. However the Singapore and Malaysian estate duty laws (being based on the English Finance Act, 1894) are very similar to those under study in this book. Hence the book should be of interest and value to lawyers here.

The sixth chapter in which Professor Wheatcroft examines proposals for a system of estate and gift taxation deserves careful study by our tax administrators who may have to make recommendations for reforms.

It is hoped that similar comparative tax studies will be undertaken in future. Such studies are badly needed and to quote Professor Wheatcroft are "an extremely valuable form of legal education, so long as the systems which are studied are reasonably comparable."

The book does not have an index or table of cases or statutes. This is not however, a serious omission as it is clearly not designed to be a practitioner's or student's textbook.