

MANUAL OF THE LAW OF INCOME TAX IN AUSTRALIA. By K. W. Ryan.  
Second Edition by E. J. Hayek. [Australia: The Law Book Company Limited. 1968. xxi + 261 pp. (incl. index). A\$7.80].

The law of income tax in Australia is admirably served by two well-known practitioners' works — Gunn's *Income Tax Law and Practice in Australia* and *Income Tax Law and Practice* (Commonwealth) by Challoner and Greenwood. Both *Gunn* and *Challoner and Greenwood* are, however, not only costly but terrifying to students and to the uninitiated by reason of their massive volumes and overwhelming details. Indeed the latest edition of *Gunn* (8th ed.) is now in four separate volumes! The object therefore of providing an introductory and simple legal survey of the Australian income tax legislation and case law is highly laudable. The author, in his Preface to the first edition, expressly rejects any claim to providing an exhaustive statement of Australian income tax law or even a treatise on the fundamental principles of income taxation. His object is rather "to discuss those provisions of income tax legislation and those decisions which are of most significance in everyday legal and commercial transactions."

The book fulfils its object rather well, although it is apparent that in attempting to compress the law into some 255 pages the author can only confine himself to the salient features of the subject. Nevertheless the book is well-arranged and well-balanced; the exposition of the law is generally lucid and amply illustrated by leading Australian judicial decisions. It should serve as a useful introduction to students and non-specialists who often find income tax law too taxing. Of course on matters of detail one still has to consult *Gunn* or *Challoner and Greenwood*.

For local lawyers, accountants and students the book would be useful from a comparative point of view. Chapters 2 to 7 of the book are of special interest because they deal with the general principles of income and allowable deductions which are relevant to our own system of income tax. Chapters 8 to 11 deal with more specialised topics — companies, partnerships and trusts, superannuation funds and primary production — and would not be of much interest to the local reader because of the major differences between our tax system and the Australian one in these matters. The last chapter — chapter 12 — contains a useful summary of the administrative provisions of the Australian legislation and also the well-known section 260 dealing with arrangements to avoid tax.

In this edition the law is stated as at 31st December, 1967.