Conflict of norms between Tax Treaties and Treaty on the functioning of European Union

Issue: Compatibility of the Tax Treaties with regard of the TFEU within the EU?

Is it a Tax or Treaty Law Issue? Or both?

Practical or theoretical issue? Or both?

Primacy of the TFEU on the Tax Treaties within the EU

Is there any concrete solution possible?

Tax Law solution?

International Law solution?

EU Law solution?

Miguel NICOLAS
PhD Student in European Tax Law
University of Cergy-Pontoise
miguellnicolas@hotmail.com