

# STEFANIE GERINGER

## CONTACT INFORMATION:

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<https://www.ssrn.com/author=3471245>

## CURRENT RESEARCH INTERESTS:

- Value added tax (VAT) law
- European Union (EU) fiscal law
- Environment-related tax measures and the implementation of the SDGs in the context of VAT
- Tax law enforcement
- Relationship and interaction between OECD work and EU tax law

## ACADEMIC EDUCATION:

2022: **Dr. iur. in Law**, University of Vienna (graded with honours)  
Supervisor: Prof. MMag. Dr. Sabine Kirchmayr-Schliesselberger

Thesis: ‘Der Grundsatz des Verbots missbräuchlicher Praktiken im Europäischen Ertragsteuerrecht und seine Implikationen für die Missbrauchstatbestände der Anti-BEPS-RL’  
[The principle of prohibition of abuse in EU personal and corporate income tax law and its implications for the abuse tests in the ATAD]

2014: **Mag. iur. in Law**, University of Vienna  
Specialisation: Corporate and commercial law

Top 2% in the 3rd study section (including tax law) and top 6% overall (academic year 2013/2014)

2025 (expected): **BA in Slavic Studies (main language: Czech)**, University of Vienna  
Theses: ‘Sprachpurismus im Tschechischen im „langen“ 19. Jahrhundert’;  
‘Der Surrealismus Vítězslav Nezval’s und seine konkrete Manifestation, dargestellt anhand ausgewählter Gedichte der Sammlung *Žena v množném čísle*’  
[Language purism in the Czech language in the ‘long’ 19th century; Vítězslav Nezval’s surrealism concept and its concrete manifestation, illustrated by selected poems from the collection *Žena v množném čísle*]

## PERMANENT ACADEMIC POSITIONS:

2022–Present: **Project Scientist (post doc)**, University of Vienna, Department of Tax Law

- Independent research and teaching at home and abroad
- Supporting and advising PhD guest researchers of the department
- Habilitation thesis: ‘Procedural Competences in EU VAT Law: A Principles-Based Approach’

- 2018–2022: **Project Scientist (prae doc)**, University of Vienna, Department of Tax Law
- Independent research and teaching at home and abroad
  - Conceptualised and used digital teaching tools for enhanced self-study since 2019
  - Initiated and organised the department’s international seminar series (keynote speakers: Prof. Ruth Mason, Prof. Neil H. Buchanan, Susanne Åkerfeldt)
- 2013–2014: **Student Assistant**, University of Vienna, Department of Criminal Law and Criminology
- Assisted Prof. Hannes Schütz in primary and secondary source research
  - Prepared and pre-checked course material and exams

#### **AFFILIATIONS:**

- 2028:  
*(Upcoming)* **BI Norwegian Business School (Oslo, Norway)**  
Visiting researcher, academic sponsor: Prof. Yvette Lind  
2 weeks (May)
- 2027:  
*(Upcoming)* **Max Planck Institute for Tax Law and Public Finance (Munich, Germany)**  
Scientific guest, academic sponsor: Prof. Wolfgang Schön  
2 months (March–April)
- 2026:  
*(Upcoming)* **University of Cambridge (Cambridge, UK)**  
Academic visitor, academic sponsor: Prof. Dominic de Cogan  
6 weeks (April–May)
- 2025:  
*(Upcoming)* **University of Melbourne (Melbourne, Australia)**  
Visiting scholar, academic sponsor: Prof. Miranda Stewart  
5 weeks (March–April)
- 2024: **UCLouvain (Louvain-La-Neuve, Belgium)**  
Visiting researcher, academic sponsor: Prof. Edoardo Traversa  
2 months (January–March)

#### **PROFESSIONAL EDUCATION:**

- 2023: **Advanced Professional Certificate in VAT/GST (APCVAT)**, IBFD  
Certification programme consisting of the three modules ‘Transfer Pricing, VAT and Customs’, ‘VAT in the Digital Economy’ and ‘Complex VAT/GST Topics’
- 2022: **Certified Tax Advisor**, Austrian Chamber of Tax Advisors and Auditors (KSW)  
Education consisting of five written exams (covering business administration, financial accounting, civil and commercial law, tax law) and a final oral exam (on the content of the five written exams in addition to professional law)

## PROFESSIONAL EXPERIENCE:

- 2023–Present: **Manager**, BDO Austria
- Give advice and conduct tax planning primarily in relation to VAT law
  - Contribute to statements on drafts of national legislation and administrative guidance
  - Provide in-house training on various issues of VAT law
  - Specialisations: EU law aspects of VAT law, VAT grouping, fixed establishments, VAT planning in multinational groups of companies, financial transactions
- 2019–2022: **Senior Associate**, BDO Austria
- Give advice and conduct tax planning primarily for the purposes of VAT and international tax law
  - Contribute to statements on drafts of national legislation and administrative guidance
  - Provide in-house training on various issues of direct and indirect tax law
- 2018–2019: **Tax Advisor-in-Training**, HHP Steuerberatung
- Participated in bookkeeping, conducting accounting, and preparing tax declarations and documents for disclosure
  - Gave advice and conducted tax planning in diverse fields of national and international tax law
- 2015–2018: **Expert Editor**, Linde Verlag
- Edited books and volumes and acquired publications on tax law
  - Compiled documents for authors, especially citation standards and contribution guidelines
- 2014–2015: **Intern**, Austrian Ministry of Transport, Innovation and Technology
- Worked in administrative law concerning cross-border transports of goods and persons
  - Prepared a bilateral meeting with representatives of the Belarussian government
  - Prepared the department's first appeal to the Austrian Supreme Administrative Court under the new rules after the administrative judiciary reform
- 2013: **Trainee**, Dorda Brugger Jordis (now DORDA)
- Prepared contracts and conducted research in corporate law and M&A
- 2012: **Intern**, District court of Meidling (Vienna)
- Prepared judgments and conducted research in civil and criminal law
- 2010: **Trainee**, Austrian Chamber of Commerce, Vienna
- Advised and conducted research in civil law, civic procedural law, corporate law and administrative law

## PROFESSIONAL MEMBERSHIPS:

- International Fiscal Association (IFA), Austrian branch
- International Society of Public Law (ICON•S)
- Society of Legal Scholars (SLS)
- (Austrian) Chamber of Tax Advisors and Auditors (KSW)
- German Tax Law Association (DStJG)

### **OTHER SKILLS AND INTERESTS:**

- IT: Microsoft Office Suite (ECDL Standard, ECDL Advanced Word), Microsoft Edge, Google Chrome, Adobe InDesign, WordPress
- Languages: Fluent in English (C2; CPE, CAE, FCE: Grade A at each), Czech (C1), French (B2), basic knowledge of Italian (A1/A2) and Slovakian (A1/A2), with a German mother tongue
- Running: passionate marathon runner (training volumes around 250–300 km per month)
- Reading: both fiction and non-fiction in German, English, Czech and French
- Culture and arts: mainly theatre performances, classical music concerts and art exhibitions

### **PRESENTATIONS AT ACADEMIC CONFERENCES OR SYMPOSIUMS:**

1. 'The added value of applying a historical perspective to the discussion on the continuing importance of the procedural autonomy in EU VAT law', Society of Legal Scholars (SLS) 115th Annual Conference on 'Learning from Others: Lessons for Legal Scholars?', University of Bristol, 3–5 September 2024 (Bristol, UK)
2. 'Substantive harmonisation vs. procedural decentralisation: tracing the historical origins of the continuing importance of the procedural autonomy in EU VAT law', 12th biennial Tax Law History Conference, University of Cambridge, 8–9 July 2024 (Cambridge, UK)
3. 'The EU's own resources system and its potential to achieve convergence between taxation, spending and representation', University of Potsdam, 27 June 2024 (Potsdam, Germany)
4. 'Grenzüberschreitende Wirkungen der Organschaft', Umsatzsteuertagung am Juridicum, University of Vienna, 14 June 2024 (Vienna, Austria)
5. 'Ist die Verfahrensautonomie der Mitgliedstaaten im Mehrwertsteuerrecht in Gefahr? Europäisches Verfahrensrecht im Spannungsverhältnis zwischen richterrechtlicher Erfindung und prinzipieninduzierter Notwendigkeit', Steuerrechtstag 2024, University of Vienna, 10 May 2024 (Altlengbach, Austria)
6. '(In)congruence between taxation, spending and representation: the ambiguous character of tax-based contributions', Workshop by the Swedish Tax Force for the Future/University of Lund, 17–19 April 2024 (Lund, Sweden)
7. 'An increasing democratic deficit against the background of the EU's own resources system', Conference on the 'Fiscal future of the European Union', Max Planck Institute for Tax Law and Public Finance, 22–23 February 2024 (Munich, Germany)
8. 'Do state aid rules allow for a greening of national VAT systems?', 17th GREIT Conference on 'National (Tax) Autonomy and the European Union: Revival or Demise?', Maastricht University, 5–6 October 2023 (Maastricht, The Netherlands)
9. 'A change in the law or a guideline from the EU VAT Committee? Evaluating soft law instruments for clarifying EU VAT law through the lens of legitimacy', online workshop for the Intertax special issue on 'Legitimacy of the Decision-Making Process in Tax', University of Lisbon/UC Louvain/Geneva Graduate Institute, 14 September 2023 (online event)
10. 'Procedural autonomy vs. (tax) principles of EU (VAT) law: Determining the effective room for manoeuvre of national tax authorities', Circle U. Tax Forum Workshop on 'Democracy and Tax Administration', King's College London, 8 September 2023 (London, UK)
11. 'VAT as a policy tool to prevent, mitigate and overcome the negative economic and social effects of short-term crises', 32nd Annual Tax Research Network (TRN) Conference 2023, University of Cambridge, 5–7 September 2023 (Cambridge, UK)
12. 'Preserving the rule of law in the application of Union law by the Member States through CJEU jurisprudence: The case of VAT', CTL Sixth Tax Policy Conference on 'Tax, public finance and the rule of law', University of Cambridge, 3–4 July 2023 (Cambridge, UK)
13. 'What role do constitutional principles play in the Book-Tax Conformity discussion?', EATLP Annual Congress 2023 on 'Computation of Taxable Business Profits: Book-Tax Conformity and Other Issues', University of Luxembourg, 8–10 June 2023 (Luxembourg City, Luxembourg)

14. 'VAT and Environmental Policy: Possible Restrictions under State Aid Law and Questions of Effectiveness', Symposium on 'Sustainable Transformation of Corporate Taxation in Switzerland', University of St. Gallen, 4 April 2023 (St. Gallen, Switzerland)
15. 'VAT in Times of Crisis', IBFD Postdoctoral International Tax Forum (PITF), 30 January 2023 (online event)
16. 'The Influence of the OECD on EU Legislation in the Area of Exchange of Information', FAU-Seminar on International Taxation (FAU-SIT), University of Erlangen-Nuremberg, 25 January 2023 (Nuremberg, Germany)
17. 'Evolution of the Exchange of Information from a Global Perspective: The Influence of the OECD on EU Legislation', Workshop on 'Exchange of Information for Tax Purposes and Administrative Cooperation within the European Union: Taxpayers' Rights, Transparency and Effectiveness', Maastricht University (Brussels campus), 14–15 November 2022 (Brussels, Belgium)
18. 'The EU VAT Rate Reform 2022 from an Environmental Policy Perspective', 23rd Global Conference on Environmental Taxation (GCET), University of Parma, 21–23 September 2022 (Parma, Italy)
19. 'The EU VAT Rate Reform 2022 from an Environmental Policy Perspective', 31st Annual Tax Research Network (TRN) Conference 2022, University of Edinburgh, 5–7 September 2022 (Edinburgh, UK)
20. 'Changes in treatment and tone in the EU's external fiscal policy in comparison to the OECD's approach', 7th Global Meeting on Law & Society 2022, Law & Society Association (LSA), 13–16 July 2022 (Lisbon, Portugal)
21. 'VAT in Times of Crisis', 8th EANO VAT PhD Seminar on Indirect Taxes, 2 July 2022 (Münster, Germany)
22. 'Changes in treatment and tone in the EU's external fiscal policy in comparison to the OECD's approach', GLOBTAX Research Colloquium, GLOBTAXGOV Project/University of Leiden, 15 June 2022 (online event)
23. 'The OECD's influence, interaction and intervention with EU direct taxation law', IBFD Postdoctoral International Tax Forum (PITF), 31 January 2022 (online event)
24. 'Implications of the OECD MTC Commentary's dynamic interpretation in CJEU case law: the OECD as EU legislator?', SNELS Fall Conference 2021 on 'The Power to Tax in Europe', SNELS/Universities of Karlstad and Umeå, 25–26 November 2021 (Stockholm, Sweden)
25. 'The CJEU, the EU blacklist and the Member States' national tax laws: Shedding light on the EU's uncoordinated approach to tax abuse and tax avoidance in third-country situations', 2021 PhD Global Symposium, GLOBTAXGOV Project/University of Leiden, 30 September–1 October 2021 (Leiden, The Netherlands)
26. 'The future of the EU's financing in times of disruption and recovery: paving the way for a fiscal-induced green transition in the Member States', 22nd Global Conference on Environmental Taxation (GCET), University of Groningen, 23–24 September 2021 (online event)
27. 'The CJEU, the EU blacklist and the Member States' national tax laws: Shedding light on the EU's uncoordinated approach to tax abuse and tax avoidance in third-country situations', Tax Symposium on 'Critical Junctures/Critical Perspectives – A call for new voices in tax reform', Monash University, 15–16 July 2021 (online event)
28. 'The future of the EU's financing in times of disruption and recovery: paving the way for a fiscal-induced green transition in the Member States', CTL Fifth Tax Policy Conference on 'Tax law in times of disruption and recovery', University of Cambridge, 5–6 July 2021 (online event)
29. 'Harmonization of Anti-Abuse Provisions 'Through the Back Door'? The Impact of the ATAD's GAAR on the Member States' DTCs', Lisbon International & European Tax Law Seminars, University of Lisbon/University of Leeds, 11 February 2021 (online event)

30. 'Killing Two Crises with One Stone: The Member States' Plastic Packaging Contribution as a Means to Counterfinance COVID-19 Measures', International Seminar on 'Challenges of a Green Transition in Tax Law', University of Vienna, 23 November 2020 (online event)
31. 'Anti-tax avoidance provisions as a factor in modern tax planning? Inequalities arising from differing double tax treaties from the Austrian perspective', CBS Annual Conference on 'Inequality within International Taxation', Copenhagen Business School, 14 September 2020 (online event)
32. 'National approaches to tax the digital economy within the EU – A comparative analysis', International Seminar on 'Digitalization in Tax Law', University of Vienna, 19 November 2019 (Vienna, Austria)
33. 'Favorable treatment of electric vehicles in Austrian VAT law – a critical analysis of the status quo including a comparison with foreign VAT law', 20<sup>th</sup> Global Conference on Environmental Taxation (GCET), Cyprus University of Technology, 25–28 September 2019 (Limassol, Cyprus)
34. 'Targeting vehicles in consumption and transaction taxation: How might intelligent tax design promote eco-friendly alternatives?', Workshop on 'Sustainable Taxation', University of Gävle, 8–9 April 2019 (Gävle, Sweden)

*Upcoming:*

35. 'The quest for redistribution and justice in the context of VAT/GST', Major Conference on 'Justice and the Tax Base', University of Melbourne, 2–4 April 2025 (Melbourne, Australia)
36. 'Getting Value Added Tax Administration Right: The Deceptive Initial Appeal of Harmonisation and Centralisation', 16th International Conference on Tax Administration on 'Tax Administration: Getting It Right', University of New South Wales, 8–9 April 2025 (Sydney, Australia)
37. 'The Deceptive Initial Appeal of Harmonisation and Centralisation of VAT/GST Administration', Lunch Seminar, Singapur Management University, 15 April 2025 (Singapore)

## **INVOLVEMENT IN THE ORGANISATION OF ACADEMIC CONFERENCES**

### **OR SYMPOSIUMS:**

- Part of the working group for the 2025 Annual Congress of the European Association of Tax Law Professors (EATLP) on 'Taxing Real Estate (Ownership)' (Bergen, Norway)

### **CHAIRING AT ACADEMIC CONFERENCES OR SYMPOSIUMS:**

1. Chair of a parallel session at the Circle U. Tax Forum Workshop on 'Democracy and Tax Administration', King's College London, 8 September 2023 (London, UK)
2. Chair of a parallel session on VAT/GST-related papers at the 32nd Annual Tax Research Network (TRN) Conference 2023, University of Cambridge, 5–7 September 2023 (Cambridge, UK) (further information is available at [taxresearch.network/wp-content/uploads/2023/08/TRN-2023-timetable-v150823.pdf](https://taxresearch.network/wp-content/uploads/2023/08/TRN-2023-timetable-v150823.pdf))

### **PARTICIPATION IN PANEL DISCUSSIONS:**

1. 'VAT fixed establishments – recent developments', DACHLI @ HighNoon on Tuesdays 2022, webinar by the Women of IFA Network (WIN) branches of Austria, Germany, Switzerland and Liechtenstein (co-panelists: Andreea Dereli/PwC Switzerland, Caroline Heber/MPI and Sonja Wiesner/WTS Germany), 8 November 2022 (online)
2. 'How digitalization shapes the future of taxation: trends, opportunities, and challenges', webinar by the Joint Vienna Institute (JVI) (co-panelists: Dmitri Jegorov/IMF and Martin Riedler/Austrian Ministry of Finance), 16 September 2022 (Vienna, Austria) (presentation slides and a recording are available at [jvi.org/special-events/2022/jvi-webinar-how-digitalization-shapes-the-future-of-taxation-trends-opportunities-and-challenges.html](https://jvi.org/special-events/2022/jvi-webinar-how-digitalization-shapes-the-future-of-taxation-trends-opportunities-and-challenges.html))

*Upcoming:*

3. ‘Standardization in VAT, indirect taxes and customs’, Conference on ‘Standardization of tax reporting and compliance: Exploring necessity, feasibility and challenges considering recent technological developments’ by the WU Tax Law Technology Center, 10–11 February 2025 (Vienna, Austria)

#### **PARTICIPATION IN POPULAR MEDIA/‘SCIENCE GOES PUBLIC’ FORMATS:**

- Guest on the ARS BONI podcast episode 364 on ‘Aggressive Steuervermeidung, Berufsgeheimnis und der EuGH’ [Aggressive tax avoidance, professional secrecy and the CJEU] (17 January 2023, a recording is available at [youtube.com/watch?v=jLhkj7wSPQc](https://youtube.com/watch?v=jLhkj7wSPQc))
- Guest on Prof. Leandra Lederman’s and Prof. Allison Christian’s YouTube channel ‘Break Into Tax’ in the video ‘Misconceptions About Tax’ (28 March 2022, available at [youtube.com/watch?v=JXulYNNDWT0&t=432s](https://youtube.com/watch?v=JXulYNNDWT0&t=432s))
- Guest on Prof. Leandra Lederman’s and Prof. Allison Christian’s YouTube channel ‘Break Into Tax’ in the video ‘#WhyTakeTax? The Top 10 Reasons!’ (9 April 2021, available at [youtube.com/watch?v=V-oDk6ayVJc](https://youtube.com/watch?v=V-oDk6ayVJc))
- Guest on Prof. Leandra Lederman’s and Prof. Allison Christian’s YouTube channel ‘Break Into Tax’ in the video ‘Why Take Tax? #WrongAnswersOnly’ (1 April 2021, available at [youtube.com/watch?v=V-oDk6ayVJc](https://youtube.com/watch?v=V-oDk6ayVJc))

#### **THIRD-PARTY FUNDING:**

2023–2024: **‘Erasmus+ Teaching Mobility’**  
Reimbursement of travel and accommodation expenses relating to guest lectures at Masaryk University, Brno (3 times overall)

#### **AWARDS:**

2023: **‘Dr. Maria Schaumayer Prize’**  
Awarded for the doctoral thesis ‘Der Grundsatz des Verbots missbräuchlicher Praktiken im Europäischen Ertragsteuerrecht und seine Implikationen für die Missbrauchstatbestände der Anti-BEPS-RL’

2022: **‘Young Researchers Award in Environmental Taxation’**  
Awarded in the course of the 23rd General Conference on Environmental Taxation (GCET) in Parma (Italy) for the paper ‘The EU VAT Rate Reform 2022 from an Environmental Policy Perspective’

#### **ACADEMIC TEACHING EXPERIENCE:**

2024:  
*(Upcoming)* **‘Rozmanitost v sazách DPH a příslušné výzvy pro podniky’**  
**[Diversity in VAT rates and related challenges for businesses]**  
Economic studies at graduate level, Prague University of Economics and Business (Czech Republic)  
Guest lecture (facilitator: Prof. Dr. Hana Zídková)  
(winter term)

2023–Present: **‘Fundamentals of EU VAT Law’**  
Legal studies at undergraduate/graduate level, Masaryk University, Brno (Czech Republic)  
3.0 ECTS (facilitator: Vice Dean Prof. Dr. Michal Radvan, Ph.D.)  
(winter and summer term; *funded by Erasmus+ Teaching Mobility*)

- 2023–Present: **‘The reform of the EU VAT rate system following BREXIT and its impact on (UK) businesses’**  
Economic studies at graduate level, Bournemouth University Business School (UK)  
Guest lecture (60-minutes unit) as part of the course ‘International Indirect Taxation’ (facilitator: Senior Lecturer Dr. Tahani Mohamed)  
(summer term)
- 2024: **‘The Role and Importance of the Procedural Autonomy of the Member States in EU VAT Law’**  
Legal studies at graduate level, UCLouvain (Belgium)  
Guest lecture (120-minutes unit) as part of the course ‘Taxe sur la valeur ajoutée’ (facilitators: Prof. Edoardo Traversa, Dr. Charlene Herbain, Emanuele Ceci)  
(summer term)
- 2024: **‘Enforcement of EU tax law’**  
Legal studies at graduate level, UCLouvain (Belgium)  
Guest lecture (120-minutes unit) as part of the lecture ‘European and International Tax Law’ (facilitators: Prof. Edoardo Traversa, Prof. Philippe Malherbe)  
(summer term)
- 2023: **‘EU Law Workshop’**  
Legal studies at undergraduate/graduate level, National University Chernivtsi (Ukraine)  
Joint guest lecture (5 × 120-minute units) with Fabian Barth, LL.M.  
(facilitator: Vice Dean Assistant Prof. Dr. Pavlo Krayniy)  
(winter term)
- 2021: **‘Trends in European and International Tax Law’**  
Legal studies at undergraduate/graduate level, Masaryk University, Brno (Czech Republic)  
3.0 ECTS (facilitator: Vice Dean Prof. Dr. Michal Radvan, Ph.D.)  
(winter term)
- 2019–2023: **‘Crashkurs Verkehrsteuern’**  
**[Block course on Austrian transaction taxes]**  
Diploma studies in Law, University of Vienna (Austria)  
4.0 ECTS  
(summer and winter term, 9 times overall)

#### **PROFESSIONAL TEACHING EXPERIENCE:**

- 2024: **‘EU VAT in Case Studies’**  
Course at the Chamber of Tax Advisors in the Czech Republic (KDP ČR)  
3 × 60-minute units
- 2022: **‘Dealing with Aggressive Tax Planning in the Specific EU Context’**  
Part of the course ‘Future of Taxation’, Joint Vienna Institute (JVI)  
60-minute unit

#### **EDITORIAL WORK FOR ACADEMIC AND PROFESSIONAL PUBLICATIONS:**

- 2024–Present: Member of the editorial board of the journal ‘taxlex’  
(published by Manz, Vienna, Austria)



## **PEER REVIEWER:**

### Articles:

- 2024–Present: ‘British Tax Review’ (BTR)
- 2024: ‘eJournal of Tax Research’ (eJTR) (Special Issue)
- 2023–Present: ‘Nordic Tax Journal’
- 2023–Present: ‘European Law Review’ (ELR)
- 2022–Present: ‘Intertax’
- 2022: ‘Journal of Contemporary European Research’ (JCER)

### Monographs:

- 2023: ‘IBFD Doctoral Series’

### Book series proposals:

- 2024: ‘Edinburgh University Press’

### Awards:

- 2023: ‘Gustav Figdor Award’ (Austrian Academy of Science, ÖAW)

### Research grants:

- 2023: ‘ERC Consolidator Grant’ (European Research Council, ERC)

## **PARTICIPATIONS IN UNIVERSITY RANKINGS:**

- 2024: THE 2025 Global Academic Reputation Survey

## **PUBLICATIONS:**

### **Monographs:**

#### ***Non-peer-reviewed:***

1. S Geringer, *EU-Anti-Missbrauchsgrundsatz: Implikationen für die Anti-BEPS-RL, § 10a KStG und § 22 BAO*, Schriftenreihe zum Konzern- und Unternehmenssteuerrecht vol 13 (Linde 2023)  
Review (in English): N Zimmermann, ‘Stefanie Geringer, *EU-Anti-Missbrauchsgrundsatz*, Linde, 2023’ (2024) 52(8/9) *Intertax* 579–581

### **Chapters in edited volumes:**

#### ***Peer-reviewed:***

2. S Geringer, ‘The evolution of the exchange of information standards from a global perspective: the influence of the OECD on EU legislation’ in M Serrat Romani, J Korving and M Eliantonio (eds), *Exchange of Information in the EU: Taxpayers’ Rights, Transparency and Effectiveness* (Edward Elgar 2024) 177–195
3. S Geringer, ‘Is the OECD Able to Exert Influence on the Essence of OECD-Inspired EU Secondary Law?’ in A Huldqvist and J Lindholm (eds), *The Power to Tax in Europe*, Swedish Studies in European Law vol 16 (Hart Publishing 2023) 251–272, doi.org/10.5040/9781509964048.ch-013 (open access)
4. S Geringer, ‘The Future of the EU’s Financing in Times of Disruption and Recovery: Normative and Technical Issues of Greening the EU’s Own Resources System’ in D de Cogan, A Brassey and P Harris (eds), *Tax Law in Times of Crisis and Recovery* (Hart Publishing 2023) 247–261
5. S Geringer, ‘Incentivizing favorable treatment of electric vehicles – developing best practices in the EU from the Austrian perspective’ in T Zachariadis, J E Milne, M Skou Andersen and H Ashiabor (eds), *Economic Instruments for a Low-Carbon Future*, Critical Issues in Environmental Taxation vol 22 (Edward Elgar 2020) 57–69

#### ***Non-peer-reviewed:***

6. S Geringer and S Kirchmayr, ‘Austria’ in A Baez Moreno (ed), *Computation of Taxable Business Profits: Book-Tax Conformity and Other Issues*, EATLP International Tax Series vol 22 (IBFD 2024) 147–169
7. S Geringer, ‘Die Scheidung als außergewöhnliche Belastung’ in K Hirschler, S Kanduth-Kristen, B Zinnöcker and K Stückler (eds), *SWK-Spezial Einkommensteuer 2023* (Linde 2023) 130–143
8. S Geringer, ‘Gründerwerbsteuer’ in C Steiner, J Neubert and K Stückler (eds), *Handbuch Personengesellschaften* (Manz 2023) 331–402
9. S Geringer and M Holzer, ‘Krypto-Assets und Umsatzsteuer’ in S Kirchmayr-Schliesselberger, M Miernicki, A Weilingner, A Wild and A Wimmer (eds), *Handbuch Besteuerung von Kryptowährungen* (Facultas 2023) 229–258
10. S Geringer and K Stückler, ‘Ertragsteuerliche Fallstricke bei der Umstrukturierung von Betrieben mit Beteiligungen im Betriebsvermögen’ in K Hirschler, S Kanduth-Kristen and B Zinnöcker (eds), *SWK-Spezial Einkommensteuer 2022* (Linde 2022) 137–148
11. S Kirchmayr and S Geringer, ‘Austria’ in W Haslehner and M Lamensch (eds), *Taxation and Value Creation*, EATLP International Tax Series vol 19 (IBFD 2021) 215–234
12. S Geringer, E Höltschl and K Stückler, ‘Influencer und Blogger im Ertragsteuerrecht’ in K Hirschler, S Kanduth-Kristen and B Zinnöcker (eds), *SWK-Spezial Einkommensteuer 2020* (Linde 2020) 121–137
13. S Kirchmayr and S Geringer, ‘Ausgewählte Fragen zur Hinzurechnungsbesteuerung und zum Methodenwechsel „neu“’ in S Kirchmayr, G Mayr, C Schlager and H Zöchling (eds), *Handbuch Hinzurechnungsbesteuerung* (Linde 2020) 33–62

## **Contributions in legal commentaries:**

### ***Non-peer-reviewed:***

14. S Kirchmayr and S Geringer, ‘Commentary on Article 7’ in W Doralt, S Kirchmayr, G Mayr and N Zorn (eds), *Einkommensteuergesetz Kommentar*, special update (covid-19 measures) (loose-leaf edition, Facultas 2021)
15. S Kirchmayr and S Geringer, ‘Commentary on Article 25’ in W Doralt, S Kirchmayr, G Mayr and N Zorn (eds), *Einkommensteuergesetz Kommentar*, 21st update (loose-leaf edition, Facultas 2020)
16. S Kirchmayr and S Geringer, ‘Commentary on Articles 10–13 of the double tax treaty between Germany and Austria’ in D Gosch, H-K Kroppen, S Grotherr and G Kraft (eds), *DBA-Kommentar*, 43rd update (loose-leaf edition, NWB 2020)

## **Contributions in Festschriften:**

### ***Non-peer-reviewed:***

17. P Bartos, K Stückler and S Geringer, ‘Ausgewählte Fragen der Finanzberichterstattung und ertragsteuerliche Aspekte deutscher Anteilsinhaber an österreichischen Kapitalgesellschaften’ in J Freiberg, N Otte and K Yadav (eds), *Wirtschaftsprüfung im Wandel: Relevanz von Nachhaltigkeit, Digitalisierung und Regulierung für die geprüfte Finanzberichterstattung: Festschrift zum 70. Geburtstag von Dr. Holger Otte* (Schaeffer Poeschel 2022) 481–504

## **Journal articles:**

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18. S Geringer, ‘A change in the law or a guideline from the EU VAT Committee? Evaluating soft law instruments for clarifying EU VAT law through the lens of legitimacy’ (2024) 52(3) *Intertax* 239–252 (as part of the special issue on tax legitimacy) (double-blind peer-review)
19. S Geringer, ‘Alignment of financial and tax accounting standards from a constitutional perspective’ (2024) 34(1) *Rivista di Diritto Tributario V*, 1–16
20. S Geringer, ‘(In)congruence between Taxation, Spending, and Representation: The Ambiguous Character of Tax-based Contributions’ (2024) 52(8/9) *Intertax* 550–560 (as part of the special issue on the fiscal future of the European Union) (double-blind peer-review)
21. S Geringer, ‘Reconciling environmental VAT differentiations with EU state aid law’ (2024) 33(1) *EC Tax Review* 8–18
22. S Geringer, ‘Substance test and function-risk analysis in the ATAD’s CFC rule as two sides of the same coin: Strengths and limits of a uniform concept of abuse’ (2023) 60(1) *Common Market Law Review* 141–172 (double-blind peer-review)
23. S Geringer, ‘The EU VAT Rate Reform 2022 from an Environmental Policy Perspective’ (2023) 32(1) *EC Tax Review* 16–25
24. S Geringer, ‘Differing abuse concepts in double tax conventions: At what level and to what extent can equality be realized?’ (2022) 5(1) *Nordic Journal of Law and Society* 1–65, doi.org/10.36368/njolas.v5i01.195 (open access, double-blind peer review)
25. S Geringer, ‘The EU’s uncoordinated approach to tax avoidance and tax abuse in relation to ‘uncooperative’ tax jurisdictions’ (2022) 50(3) *Intertax* 205–217 (double-blind peer-review)
26. S Geringer, ‘The Implementation of the ATAD by Austria’ (2022) 50(4) *Intertax* 356–366 (upon request of the series editors) (double-blind peer-review)
27. S Geringer, ‘National digital taxes – lessons from Europe’ (2020) 35(1) *South African Journal of Accounting Research* 1-19, doi.org/10.1080/10291954.2020.1727083 (open access, double-blind peer review)

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29. S Geringer, 'Ein- und Mehrzweck-Gutscheine im mehrstufigen Vertrieb' (2024) 84(12) *Österreichische Steuer-Zeitung* 338–343
30. S Geringer, 'Die Zukunft der umsatzsteuerlichen Organschaft im Licht der EuGH-Entscheidungen in den Rs *Norddeutsche Gesellschaft für Diakonie* und *Finanzamt T gegen S*' (2023) 83(1/2) *Österreichische Steuer-Zeitung* 15–21
31. S Geringer, 'Differenzbesteuerung in grenzüberschreitenden Sachverhalten mit einem Wiederverkäufer – Status quo und mögliche Änderungen aufgrund der ViDA-Initiative' (2023) 83(20) *Österreichische Steuer-Zeitung* 568–572
32. S Geringer, 'Dissemination of tax good governance standards by the EU and the OECD: A comparative analysis of changes in treatment and tone' (2023) 77(4) *Bulletin for International Taxation* 148–156
33. S Geringer, 'Ungültigkeit der DAC-6-Mitteilungspflicht zwischen (Rechtsanwalts-)Intermediären' (2023) 19(2) *taxlex* 65–67
34. S Geringer and R Haller, '(Keine) Steuerschuld kraft Rechnungslegung – Bedeutende Änderungen bei USt-Korrekturen' (2023) 98(17) *Steuer- und Wirtschaftskartei* 726–734
35. S Kirchmayr and S Geringer, 'An Innovative Approach to Overcoming the “Joint-Decision Trap”: EU Law Requirements for AVMSD-based Financial Contributions From a Tax Policy Perspective' (2023) 63(1) *European Taxation* 12–17
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37. S Geringer, 'Kriterien für die Vermittlung einer festen Niederlassung durch eine verbundene Gesellschaft nach der Rs *Berlin Chemie A. Menarini*' (2022) 18(10) *taxlex* 310–315
38. S Geringer, 'Teilkünstliche Gestaltungen im Kontext nationaler Quellenbesteuerungsregime: Schlussanträge in der Rs *Viva Telecom Bulgaria*' (2022) 32(2) *Steuer und Wirtschaft International* 94–102 (abstract in English)
39. S Geringer, 'Umsatzsteuerliche Fragen zu Hilfsgüterlieferungen im Kontext des Ukraine-Kriegs' (2022) 18(4) *taxlex* 127–129
40. S Geringer, 'Umsatzsteuerliche Highlights des AbgÄG 2022' (2022) 18(6) *taxlex* 217–223
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42. S Geringer and R Haller, 'Vorsteuerberichtigung auch ohne vorgelagerten Vorsteuerabzug?' (2022) 97(20/21) *Steuer- und Wirtschaftskartei* 863–869
43. S Geringer and K Stückler, 'BFG zur verteilten Berücksichtigung von Abfindungszahlungen im Kontext des Abzugsverbots für „Managergehälter“' (2022) 18(2) *taxlex* 47–50
44. S Geringer and K Stückler, 'Die ökosoziale Steuerreform 2022' (2022) 6(1) *Der Jahresabschluss* 21–24
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46. S Geringer, 'Accelerated depreciation and loss carry back: Income tax measures to strengthen the economy in times of COVID-19 in Austria' (2021) 61(4) *European Taxation* 162–164
47. S Geringer, 'Defining the terms “taxpayer”, “permanent establishment” and “corporate tax” for purposes of the ATAD' (2021) 1 *Tax News* 141–147, [taxnews.it/Tool/Evidenza/Single/view\\_html?id\\_evidenza=273](https://taxnews.it/Tool/Evidenza/Single/view_html?id_evidenza=273) (open access)
48. S Geringer, 'Die neue Zinsschranke im unionsrechtlichen Kontext' (2021) 31(2) *Steuer und Wirtschaft International* 82–91 (abstract in English)
49. S Geringer, 'Umsetzung und Anwendung der EU-Blacklist in den Mitgliedstaaten' (2021) 31(2) *Steuer und Wirtschaft International* 415–424 (abstract in English)

50. S Geringer, 'Zweifelsfragen zur neuen degressiven AfA' (2021) 17(1) *taxlex* 20–23
51. S Geringer, 'Beihilfenrechtliche Aspekte der ertragsteuerlichen COVID-19-Maßnahmen' (2020) 95(15) *Steuer- und Wirtschaftskartei* 812–817
52. S Geringer, 'Beihilfenrechtliche Aspekte der Zweckwidmung der österreichischen Digitalsteuer im Vergleich zu anderen nationalen Medienförderungen' (2020) 80(13) *Österreichische Steuer-Zeitung* 374–380
53. S Geringer, 'Criteria for the Application of Anti-Abuse Provisions to Holding Companies under ECJ Case Law: Their Significance in Interpreting and Applying ATAD Provisions' (2020) 60(10) *European Taxation* 443–450
54. S Geringer, 'Gigworking – nichtselbständige Arbeit im Sinne des § 25 EStG?' (2020) 16(1) *taxlex* 8–12
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56. S Geringer, 'Niedrigbesteuerung und Hinzurechnung bei inländischen Einkünften' (2020) 16(12) *taxlex* 369–373
57. S Geringer, 'Unionsrechtliche Aspekte einer KEST-Befreiung nachhaltiger Investitionen' (2020) 13(3) *BFGjournal* 110–119
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61. S Geringer and K Stückler, 'Homeoffice im Zeitalter der COVID-19-Pandemie aus steuerlicher Sicht' (2020) 80(7) *Österreichische Steuer-Zeitung* 187–193
62. S Geringer and K Stückler, 'Zweifelsfragen bei Veräußerung eines ausgebauten Dachbodens im Ertragsteuerrecht' (2020) 16(10) *taxlex* 306–309
63. S Kirchmayr and S Geringer, 'Implikationen der EuG-Entscheidung zur ungarischen Werbsteuer für die Beihilfenkonformität der österreichischen Digitalsteuer' (2020) 30(5) *Steuer und Wirtschaft International* 241–250 (abstract in English)
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65. E Komarek, K Stückler and S Geringer, 'Steuerliche Behandlung von Zuschüssen aus dem Härtefallfonds' (2020) 95(12) *Steuer- und Wirtschaftskartei* 612–616
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67. S Geringer, 'Abzugsfähigkeit der Aufwendungen und Vorsteuerabzug bei Pkw und Kombi' (2019) 94(9) *Steuer- und Wirtschaftskartei* 466–471
68. S Geringer, 'Der Entwurf für das Digitalsteuergesetz 2020 aus Sicht des EU-Beihilfenrechts' (2019) 79(15/16) *Österreichische Steuer-Zeitung* 393–403
69. S Geringer, 'Förderung der privaten Alters- und Pflegevorsorge in Österreich – Status quo und Reformpotenzial im Ertragsteuerrecht' (2019) 79(13) *Österreichische Steuer-Zeitung* 333–340
70. S Geringer, '„Infizierung“ früherer Umsätze durch nachgelagerten Umsatzsteuerbetrug?' (2019) 15(6) *taxlex* 177–179
71. S Geringer, 'Nachforschungspflichten bei Rechnungsmängeln in Fällen von Umsatzsteuerbetrug' (2019) 5(1) *Zeitschrift für Wirtschafts- und Finanzstrafrecht* 42–46
72. S Geringer, 'Neuerungen in der umsatzsteuerlichen Behandlung von Gutscheinen' (2019) 15(7/8) *taxlex* 215–218
73. S Geringer, 'Substanznachweis im Zeitalter der Share and Gig Economy' (2019) 29(11) *Steuer und Wirtschaft International* 541–549 (abstract in English)
74. S Geringer, 'Umsatzsteuerliche Bemessungsgrundlage beim Tausch' (2019) 29(7) *Steuer und Wirtschaft International* 352–359 (abstract in English)
75. S Geringer and B Renner, 'An der Weggabelung: politische Äußerungen auf Kosten der steuerlichen Gemeinnützigkeit?' (2019) 94(12) *Steuer- und Wirtschaftskartei* 577–582

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77. S Geringer and K Stückler, 'Die neue Hinzurechnungsbesteuerung im Spannungsverhältnis zur Gruppenbesteuerung?' (2019) 15(4) *taxlex* 108–113
78. S Geringer, 'Abzugsfähigkeit „erlaufener“ Spenden – Unterschiede bei Zuwendungen aus dem Betriebs-/Privatvermögen' (2018) 14(12) *taxlex* 377–381
79. S Geringer, 'Allgemeine Voraussetzungen für die Abzugsfähigkeit „erlaufener“ Spenden' (2018) 14(11) *taxlex* 343–346
80. S Geringer, 'Die DBA-rechtliche Beurteilung von Gesamtproduktionen' (2018) 28(11) *Steuer und Wirtschaft International* 529–535 (abstract in English)
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82. S Geringer, 'Nachforschungspflichten bei Rechnungsmängeln – österreichische Rechtsprechung zum Vertrauensschutz im Lichte der Rechtssache Geissel/Butin' (2018) 28(10) *Steuer und Wirtschaft International* 480–486 (abstract in English)
83. S Geringer, 'Vermögensverwaltung durch gemeinnützige Privatstiftungen' (2018) 10(3) *Die Privatstiftung* 120–123
84. S Geringer and B Renner, 'Checkliste für die Satzung gemeinnütziger Rechtsträger' (2018) 93(23/24) *Steuer- und Wirtschaftskartei* 1083–1088

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#### ***Non-peer-reviewed:***

85. S Geringer, 'Book Review: Anti-Tax Avoidance in Corporate Taxation under EU Law: The Internal Market Narrative, by Ivan Lazarov, (IBFD, 2022), 328pp., €110, ISBN: 9789087227418' (2023) 70(3) *British Tax Review* 345–347 (upon request of the literature review editor)
86. S Geringer, 'Literature Review: M. Surmann, *Hybride Gestaltungen nach der ATAD II: Umgang mit harmonisierten Korrespondenzregeln im Ertragsteuerrecht*. Otto Schmidt, 2022' (2023) 51(10) *Intertax* 712–714 (upon request of the literature review editor)
87. S Geringer, 'Book Review: *A Guide to the Anti-Tax Avoidance Directive*, edited by Werner Haslehner, Katerina Pantazatou, Georg Kofler and Alexander Rust (Cheltenham: Edward Elgar Publishing, 2020)' (2021) 58(5) *Common Market Law Review* 1630–1633 (upon request of the journal editors)

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#### ***Non-peer-reviewed:***

88. S Geringer, 'SC Adient Ltd & Co KG: (still no) procurement of a fixed establishment by a legally independent entity' (2024) 71(4) *British Tax Review* 666–673
89. S Geringer, 'Cabot Plastics Belgium: procurement of a fixed establishment by a legally independent entity' (2023) 70(4) *British Tax Review* 534–541
90. S Geringer, 'GIS. VAT on a public broadcasting activity. Supply of services for consideration. Court of Justice' (2023) *Highlights & Insights on Taxation* 2023/336
91. S Geringer and M Holzer, 'Umsatz- und ertragsteuerliche Folgen der insolvenzbedingten Unwirksamkeit des Immobilienverkaufs' (2023) 16(2) *BFGjournal* 49–56 (upon request of the journal editors)

## **Submitted publications:**

### ***Peer-reviewed:***

92. S Geringer, 'Preserving the Rule of Law in the Application of Union Law by the Member States through ECJ Jurisprudence: The Case of VAT' in D de Cogan, A Brassey and M Hen (eds), *Tax, Public Finance, and the Rule of Law* (Hart Publishing 2025; accepted for publication)
93. S Geringer, 'Should the Green End Justify All Means? Some Reflections on Possible Limitations of Environmental Measures in VAT Secondary Law on Grounds of Equality' (2025) *European Law Review* (accepted for publication)
94. S Geringer, 'United in Diversity: Historical Explanations for the Limited Harmonisation of VAT Procedural Law in the EU' in P Harris and D de Cogan (eds), *Studies in the History of Tax Law vol 12* (Hart Publishing 2025; accepted for publication)

### ***Non-peer-reviewed:***

95. S Geringer, 'Extraterritoriale Effekte der Mehrwertsteuergruppe' (2024) 20(12) *taxlex*
96. S Geringer, 'Literature Review: Y. Lind and R. Avi-Yonah (eds), *Taxation, Citizenship and Democracy in the 21st Century*, Edward Elgar, 2024' (2025) 53(1) *Intertax*

## **Other publications:**

### ***Publications on EU and tax law blogs:***

1. S Geringer, 'Analysis: "A Rose by any other Name would smell as sweet: the VAT Treatment of the charging of electric Vehicles following Digital Charging Solutions (C-60/23)"', EU Law Live Blog, 20 November 2024, [eulawlive.com/analysis-a-rose-by-any-other-name-would-smell-as-sweet-the-vat-treatment-of-the-charging-of-electric-vehicles-following-digital-charging-solutions-c-60-23](https://eulawlive.com/analysis-a-rose-by-any-other-name-would-smell-as-sweet-the-vat-treatment-of-the-charging-of-electric-vehicles-following-digital-charging-solutions-c-60-23)
2. S Geringer, 'An EU-Based Solution to Incongruence between Taxation and Representation within the Union?', Kluwer International Tax Blog, 17 June 2024, [kluwertaxblog.com/2024/06/17/an-eu-based-solution-to-incongruence-between-taxation-and-representation-within-the-union](https://kluwertaxblog.com/2024/06/17/an-eu-based-solution-to-incongruence-between-taxation-and-representation-within-the-union)
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4. S Geringer, 'Do we still need national and EU lawmakers when we already have the OECD?', Tax Research Network (TRN) Blog, 7 June 2022, [taxresearch.network/blog-welcome/do-we-still-need-national-and-eu-lawmakers-when-we-already-have-the-oecd](https://taxresearch.network/blog-welcome/do-we-still-need-national-and-eu-lawmakers-when-we-already-have-the-oecd)

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