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Charting the Future of Base Erosion and Profit Shifting: A Bibliometric Insight into Emerging Trends and Research Gaps

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ABSTRACT

Objective— This empirical study provides a comprehensive bibliometric analysis of fifty years of Base Erosion and Profit Shifting (BEPS) research. It examines the field's evolution, identifying key contributors, seminal publications, and leading journals while tracing shifts in research focus and emerging thematic trends. The study also highlights critical gaps, particularly in assessing the long-term revenue effects of BEPS measures, the interaction between digital services taxes and OECD/G20 initiatives, and the interdisciplinary dimensions of tax policy analysis, offering an integrated perspective on BEPS research.
Methodology/Technique – A bibliometric analysis was conducted using data from the Web of Science and Scopus databases, employing performance analysis and scientific mapping techniques. VOSviewer software was used to analyze co-occurrence, co-citation, bibliographic coupling, and thematic clusters, providing a comprehensive overview of the evolution of BEPS research.
Findings – International taxation research has shifted in response to evolving policy priorities and global fiscal challenges. Early studies focused on multinational corporate income, BEPS, and tax competition, highlighting profit shifting and regulatory gaps. Attention has since expanded to tax evasion, tax havens, and investment, reflecting growing concerns over illicit financial flows and the effects of tax policies on capital mobility, while underscoring the need for stronger enforcement and coordinated policy responses. Tax harmonization within the European Union remains a significant challenge, balancing national sovereignty with OECD/G20 tax initiatives. Further exploration is required on the interaction between European Union policies and international reforms, particularly in managing policy differences and coordinating tax strategies among member states.
Novelty – This study presents empirical evidence on the evolution of BEPS research over five decades, highlighting key gaps in policy enforcement, digital economy taxation, and developing country implications. Challenges related to digital services taxes and evolving business models are addressed, with a call for innovative taxation solutions. An interdisciplinary approach is advocated, integrating public policy, political economy, and behavioral economics to improve tax compliance and policy outcomes.
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1. Introduction

Globalization, fiscal competition, and the complex operations of multinational corporations (MNCs) have created significant challenges for traditional taxation systems.

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The detrimental effects of harmful tax competition and the disparities in corporate taxation across countries have been significant drivers of profit-shifting strategies employed by an increasing number of MNCs (Devereux & Vella, 2014). The emergence of tax avoidance strategies, such as Base Erosion and Profit Shifting (BEPS), has significantly undermined nations' abilities to collect fair revenues. In response, coordinated international efforts have led to the Organisation for Economic Co-operation and Development (OECD) and the Group of Twenty (G20) consensus, aiming to address these challenges and restore fairness in the global tax landscape (OECD, 2025).

The OECD/G20 Inclusive Framework on BEPS has been instrumental in developing measures to counteract tax avoidance strategies employed by MNCs. The introduction of the BEPS framework and subsequent two-pillar solution, comprising Pillar One (reallocation of taxing rights) and Pillar Two (a global minimum tax), represents a pivotal moment in the evolution of international tax policy. This framework provides governments with rules and instruments to ensure that profits are taxed where economic activities generating them take place and where value is created. Through these coordinated efforts, the international community seeks to create a more equitable tax environment, ensuring that MNCs contribute their fair share to the economies in which they operate. The European Union (EU), with its diverse economic structures and tax systems, faces unique challenges in adopting and implementing these reforms. The EU's approach to the OECD/G20 BEPS framework has been multifaceted, involving the adoption of directives and regulations aimed at harmonizing tax policies across member states.

The European Union (EU) has prioritized the implementation of the global minimum tax (Pillar Two), ensuring that large multinational companies operating within its jurisdiction are subject to a minimum level of taxation. This initiative aligns with the EU's broader objective of creating a fair and transparent tax environment, thereby enhancing the integrity of the internal market and protecting member states' tax bases. In this context, the EU's measures have included the adoption of the Anti-Tax Avoidance Directive (ATAD) (Council Directive (EU) 2016/1164, 2025), which incorporates several BEPS actions into EU law, and the implementation of the "Directive on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union", ensuring a global minimum level of taxation for MNCs within the Union (Council Directive (EU) 2022/2523, 2025). These legislative actions reflect the EU's commitment to addressing the tax challenges arising from various forms of aggressive tax planning, countering non-cooperative tax jurisdictions, enhancing tax transparency, and ensuring that profits are taxed where economic activities generating them take place.

Given that promoting sustainable economic growth and investments in an efficient and equitable global market is a current economic priority, the analysis, evaluation, and concern for the effectiveness of the fiscal system have been subjects of interest for many researchers. This study aims to conduct a comprehensive qualitative and quantitative analysis of research developments over the past fifty years (1975–2025). The objective is to examine the evolving landscape of scholarly research on BEPS, highlighting key contributions and emerging trends. It aims to identify the most influential authors, foundational articles, and leading sources that have shaped the discourse on BEPS. Additionally, the study examines the role of academic journals in advancing discussions on the topic and traces how their focus has shifted over time. Finally, it delves into the dominant themes within BEPS research, analyzing how these areas of inquiry have developed and expanded, offering a deeper understanding of the field's progression.

To achieve this objective, the study employs bibliometric methodologies (Ding, 2020), (Chen, 2017), (Choi et al., 2011), leveraging data from both the Web of Science and Scopus databases. This study contributes to the existing literature by: (1) Providing a relevant synthesis of the literature using big data techniques, i.e. bibliometric analysis; (2) Identifying key historical milestones related to the topic under discussion; (3) It identifies gaps, particularly in assessing the long-term revenue effects of BEPS measures, the interaction between digital services taxes and OECD/G20 initiatives, and the interdisciplinary dimensions of tax policy analysis, while also offering recommendations for future research directions. The following section provides a literature review on the analyzed topic, followed by methodology and findings. The study concludes with conclusions and suggestions for future research.

2. Literature Review

The concept of a global minimum tax has steadily gained prominence over the past decade as governments grapple with the challenges of taxing MNCs in an increasingly interconnected and digitalized global economy. The evolution of this landmark tax framework is rooted in a growing concern about BEPS, where corporations strategically allocate profits to low-tax jurisdictions (Dharmapala, 2014), depriving governments of fair tax revenues. Initial discussions about curbing tax avoidance through international cooperation began gaining traction following the 2008 global financial crisis. As public scrutiny over corporate tax practices intensified, the OECD launched the BEPS project, culminating in 15 action plans designed to combat aggressive tax planning (OECD, 2024a). This effort ultimately led to the introduction of Pillars One and Two, designed to establish a more equitable and sustainable global tax system.

Pillar One seeks to modernize international tax rules by reallocating taxing rights to ensure that MNCs pay taxes in the jurisdictions where they generate economic value, even if they lack a physical presence. (OECD, 2024b). This represents a major shift from traditional tax principles, which have historically relied on the concept of permanent establishment (Englisch, 2017). Research on BEPS Action 1, which initially addressed tax challenges arising from digitalization, highlighted the inadequacy of existing tax treaties in capturing profits from highly digitalized business models (Brauner & Baez Moreno, 2015). Pillar One builds upon these insights by introducing a new nexus rule, redefining profit allocation mechanisms to better reflect modern economic realities. Scholars have debated the effectiveness of this approach, with some arguing that the new framework still faces implementation challenges, including defining the scope of in-scope companies and balancing tax allocations across jurisdictions (Eisenbeiss, 2016). The redistribution of taxing rights also raises concerns about preventing double taxation and ensuring compliance, particularly among digital giants operating across multiple tax regimes.

BEPS Actions 8, 9, and 10 aimed to ensure that transfer pricing practices accurately reflected where value was truly created within MNCs (OECD, 2015a). These actions addressed the manipulation of pricing in intercompany transactions, which allowed profits to be shifted to low-tax jurisdictions despite minimal economic activity. By aligning transfer pricing rules with actual functions, assets, and risks, these measures were meant to ensure that profits were taxed where the value was generated, preventing tax avoidance and promoting fairness in the global tax system (Tracana, 2017), (Meharia, 2022). BEPS Actions 11 and 12 focused on enhancing transparency and improving the measurement of BEPS (OECD, 2015b), (OECD, 2015c). These actions were meant to promote greater tax transparency, enable better policymaking, and empower governments to take more informed steps to counter BEPS and protect national tax bases (Klein et al., 2021).

BEPS Action 13 focused on enhancing transparency by requiring MNCs to provide country-by-country (CbC) reports (OECD, 2015d). By increasing transparency, Action 13 supported fairer tax practices and helped protect national tax bases from erosion (Brauner, 2015).

BEPS Actions 14 and 15 focused on improving dispute resolution mechanisms and developing a multilateral instrument to facilitate the implementation of BEPS measures (OECD, 2015e), (OECD, 2015f). These actions aimed to strengthen international tax cooperation, reduce tax disputes, and ensure more effective implementation of BEPS reforms (Broekhuijsen & Vording, 2016). As the BEPS 15 Actions set the foundation for addressing base erosion and profit shifting through comprehensive measures, the international tax landscape continued to evolve. In response to these challenges, Pillars 1 and 2, introduced by the OECD, represent a significant step toward adapting the international tax system to reflect the changing dynamics of global business.

Pillar Two addresses the issue of tax competition by introducing a global minimum tax rate to limit profit shifting to low-tax jurisdictions (OECD, 2021). While BEPS Actions 3 and 4 aimed to curb tax avoidance through controlled foreign company (CFC) rules (OECD, 2015g) and interest deduction limitations (OECD, 2015), loopholes remained, allowing aggressive tax planning strategies to persist (Feinschreiber & Kent, 2015), (Ruchelman & Shah, 2015). Pillar Two sets a minimum tax floor, ensuring that large MNCs pay a baseline level of tax regardless of where they operate. Studies on prior BEPS initiatives indicate that while measures like anti-tax avoidance directives have reduced harmful tax practices in some jurisdictions (Eisenbeiss, 2016), the absence of a coordinated global approach has allowed tax competition to persist (Brabazon, 2018), (De Boer & Marres, 2015)The implementation of a minimum tax aims to harmonize tax policies and deter jurisdictions from engaging in harmful tax competition. However, concerns remain regarding enforcement and the impact on investment flows and economic competitiveness in both developed and developing economies.

To the best of my knowledge, there has been limited bibliometric analysis conducted on BEPS, despite its growing significance in global tax policy. Most existing studies have primarily focused on specific areas, such as transfer pricing (Mijoč et al., 2024), (Capatina-Verdes, 2022), (Gangoș, 2024), (Sumantri et al., 2024), (Muhmad et al., 2024), (Mabel et al., 2024). A comprehensive bibliometric analysis could provide valuable insights into the evolution of BEPS-related research, identify key trends, and highlight the most influential authors, journals, and articles in this field. This approach would not only shed light on the academic discourse surrounding BEPS but also reveal gaps in the literature, offering an opportunity for scholars to explore under-researched areas further.

3. Research Methodology

This study employs bibliometric analysis, a systematic and quantitative method for examining and interpreting extensive bodies of scientific literature (Donthu et al., 2021). This approach facilitates the identification of research trends, citation patterns, and key contributions within BEPS as the subject of investigation by leveraging advanced analytical techniques.

The analysis relies on works that include keywords relevant to the studied concepts, either as specified by the author or as indexed within the database (Camară, 2024). The selection of keywords is grounded in a thorough understanding of the core concepts related to BEPS, aiming to capture a broad spectrum of studies that explore its various dimensions, including tax base erosion, tax avoidance, global minimum tax, and digital taxation. Additionally, the analysis considers the perspectives and influences of EU countries on the topic. The objective is to ensure that the chosen keywords encompass the BEPS-related research while filtering out irrelevant studies, thereby providing a comprehensive overview of the current state of knowledge in global tax policy. Appendix 1 explains the standardization of keywords.

The data for this analysis were sourced from Scopus and Web of Science (WoS), the primary databases for citation and bibliometric research. The analyzed results primarily focus on the WoS database due to its strict indexing criteria, which ensure a higher level of quality and consistency in the selected publications (Mongeon & Paul-Hus, 2016)The search protocol was designed to create a relevant and sufficiently comprehensive dataset while maintaining a balanced database, ensuring both breadth and specificity to generate results that effectively address the research questions. Appendix 2 outlines the criteria used for database selection. Using the specified query, 148 documents from the WoS database and 397 from Scopus were retrieved. After removing duplicates, addressing inconsistencies in the raw data, and reviewing abstracts for relevance, these records were selected for further analysis.

Two primary techniques were employed in the bibliometric analysis: performance analysis and scientific mapping. As outlined by (Moral-Muñoz et al., 2020), performance analysis focuses on assessing various scientific entities (such as researchers, institutions, and countries) through bibliographic indices derived from publication and citation data (Narin & Hamilton, 1996). On the other hand, scientific mapping focuses on the relationships between research constituents (Cobo et al., 2012), (Donthu et al., 2021). The study uses VOSviewer software (Van Eck & Waltman, 2010) to visualize similarities through the creation of network maps. VOSviewer employs a similarity measure called association strength, which is defined as the similarity s_ij between two elements, i and j, and is calculated as follows:

$$s_{ij} = \frac{c_{ij}}{w_i w_j}$$

(1)

where c_ij represents the number of co-citations of items i and j, and where w_i and w_j represent the total number of citations of items i and j, or the total number of co-citations of these items. The most direct and objective measure of a publication's impact and significance is the number of citations it receives (Donthu et al., 2021). Co-citation refers to the situation in which two publications are linked by appearing together in the reference list of another publication (Vaz da Fonseca & Nascimento Jucá, 2020).

The VOS mapping technique is based on a two-dimensional map where elements 1,…,n are arranged such that the distance between any pair of elements i and j reflects their similarity s_ij as accurately as possible, according to the chosen distance criterion (Van Eck & Waltman, 2010). Items with high similarity are positioned closer together, while those with lower similarity are placed farther apart. The VOS mapping technique is grounded in the concept of minimizing the weighted sum of the squared Euclidean distances between all pairs of items (Mijoč et al., 2024). Typically, the greater the similarity between two elements, the higher the weight of their squared distance in the overall sum:

$$V(x_1, \dots, x_n) = \sum_{i<j} s_{ij} \|x_i - x_j\|^2 \qquad (2)$$

where the vector x_i = (xi1, xi2) represents the position or location of item i in a two-dimensional map and where ||•|| represents the Euclidean norm. The minimization of the objective function is carried out subject to the following constraint:

$$\frac{2}{n(n-1)} \sum_{i<j} \|x_i - x_j\| = 1$$

(3)

Based on the methods and principles outlined above, the bibliometric structuring and analysis enable a detailed examination of research trends and potential relationships between key constructs. This approach provides valuable insights into the intellectual development, thematic evolution, and scholarly impact of BEPS-related research.

4. Results

This section outlines the results of the bibliometric analysis, which is divided into performance analysis and scientific mapping.

The performance analysis offers a comprehensive overview of BEPS research, examining key categories such as annual publication trends, leading authors, influential articles, journal impact, and citation patterns. It critically discusses the contributions, trends, and scholarly influence shaping the BEPS research landscape.

Publications per year: Since (Liu, 1985) initial exploration of global progressivity and analysis of the impact of income distribution on the structural aspects of the tax schedule, academic interest in BEPS has evolved significantly, especially following the OECD's launch of the BEPS Action Plan in 2013, aimed at countering aggressive tax planning. As illustrated in Figure 1, WoS and Scopus exhibit similar trends, with WoS recording 124 publications over the past decade, accounting for 84% of total BEPS-related research, while Scopus has documented 384 publications, representing 97% of the total output on the topic.

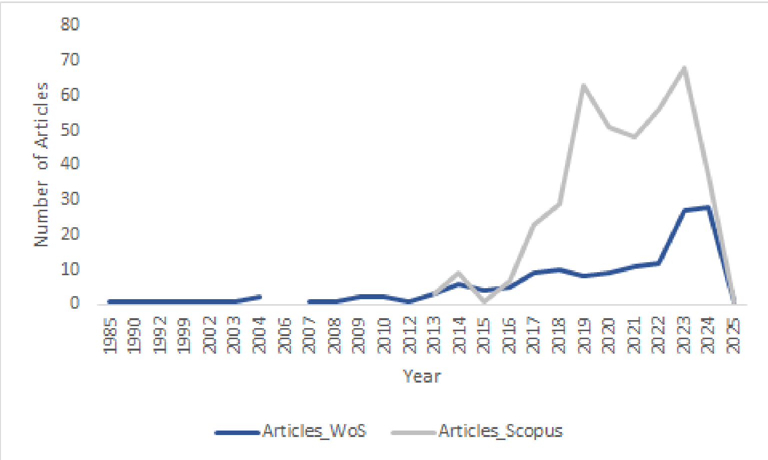

Figure 1. Evolution of articles published per year

Source: Author's research based on the WoS and Scopus databases.

Publications by authors: **Error! Reference source not found.** provides a ranking of authors who have published more than three papers on BEPS in the WoS database. The findings indicate that five authors have made notable contributions to BEPS-related research, underscoring the concentrated expertise within this area. Over the analyzed period, 130 authors have contributed one or two publications on the topic, with an average of 53 citations per author. These figures highlight the growing influence and academic engagement surrounding BEPS, reinforcing the importance of ongoing collaboration in advancing the field.

Table 1. Most contributing authors

No.	Author	Total publications	Total citations	Publication years	Affiliation, Country	Research Area
1	Chaisse, J.	4	299	2018-2023	City University of Hong Kong, China	Business Finance; Economics

2	Cui, W.	4	143	2017-2024	University of British Columbia, Canada	Business Finance; Economics; Law
3	Devereux, M.P.	4	93	2014-2023	University of Oxford, United Kingdom	Business Finance; Economics
4	Jansky, P.	3	114	2015-2018	Charles University Prague, Czech Republic	Economics
5	Konrad, K.A.	3	58	1999-2021	University of Berlin, Germany	Economics

Source: Author's own research based on the WoS database.

In comparison, in Scopus, 14 authors have published at least three papers on BEPS, with an average of just 4 citations per author. This stark contrast to the results from the WoS highlights significant differences in the research visibility and academic impact between the two databases. While WoS includes a smaller number of authors who contribute more substantially to the field, as indicated by higher citation counts, Scopus presents a broader distribution of authors with less influential individual contributions. This discrepancy suggests that WoS may be a more established source for high-impact research on BEPS. In contrast, Scopus encompasses a wider range of publications, possibly including works with less academic visibility or influence. Therefore, the differences in citation patterns and author rankings across these two databases highlight each platform's unique strengths and underscore the importance of considering both in bibliometric analyses of academic fields, with a particular emphasis on WoS.

The most cited publications: Citation analysis serves as a critical tool for identifying the most influential publications within a specific research area, such as BEPS. Examining citation frequency allows for the identification of publications that have garnered substantial attention and made a significant impact in the field, in contrast to those with lower citation counts. Appendix 3 presents the articles that have received at least 100 citations, highlighting the focus area of each paper. The overarching theme across these studies is global tax reform, especially in addressing tax avoidance and evasion in MNCs, and the interplay between international tax laws and domestic regulations. The papers focus on OECD BEPS initiatives and the international cooperation needed to curb profit shifting and tax evasion.

In comparison, only two papers in Scopus have been cited at least 100 times (Sharman, 2006) with 184 citations and (OECD, 2013) with 119 citations), which supports the earlier idea that papers published in WoS have a more significant impact, are more reliable, and exert more influence. These highly cited publications provide valuable insights into the key contributions that have shaped the academic discourse on BEPS, offering a foundation for understanding the evolution of research and the central themes that have emerged over time.

Publications by journal: Table 2 presents the leading journals that have published at least three articles on the researched topic. International Tax and Public Finance ranks first with 11 published articles, followed by the Journal of Public Economics, National Tax Journal, and Fiscal Studies, each with eight published articles.

Table 1. Publications by journal

Journal	Impact factor (2023)	Number of articles	Number of citations	Rank WoS
International Tax and Public Finance	1.4	11	503	1
Fiscal Studies	4.3	8	163	0.7
Journal of Public Economics	6.5	8	299	0.5
National Tax Journal	1.9	8	315	0.6
Asia Pacific Law Review	1.1	5	217	0.5
Journal of International Economic Law	0.3	5	195	0.1
Review of International Political Economy	5.2	5	490	0.9
Columbia Journal of Transnational Law	0.9	3	269	0.3
European Economic Review	3.3	3	143	0.5
Journal of Public Economic Theory	1.1	3	119	0.5
Journal of International Economics	4.8	3	101	0.7

Source: Author’s research based on the WoS database.

To assess the quality of these contributions further, it is essential to consider the impact factor and citation counts of these journals. International Tax and Public Finance is the most cited journal, with an impact factor of 1.4, suggesting its significance in the field of international tax research. Similarly, journals like the Review of International Political Economy, National Tax Journal, and Journal of Public Economics are highly cited and have a high impact factor, indicating that the articles published in these journals receive substantial attention from scholars and policymakers alike.

Intertax has the highest number of citations in Scopus and the most published articles, with 73 articles and an impact factor of 0.5. The second journal is the Bulletin for International Taxation, based on the number of published articles (36) and citations (47).

Science mapping. Co-occurrence analysis: This section presents a graphical representation of keyword co-occurrence to obtain an extensive understanding of the BEPS research landscape. Co-occurrence refers to the frequency with which a keyword appears alongside other keywords. (Donthu et al., 2021). This quantitative method examines the frequency and relationships between co-occurring keywords, shedding light on the underlying structure and emerging trends within the research area. A clustering analysis was conducted using VOSviewer to visualize the network of co-occurring keywords and identify key research trends. To ensure a representative sample, keywords with a minimum of five occurrences were selected, resulting in 36 frequently recurring terms. The analysis identified five distinct clusters, each defined by its core themes. As presented in Appendix 4, these clusters vary not only in the number of keywords they contain but also in the specific topics they cover, offering valuable insights into the thematic structure of the research field. The software generates color-coded clusters, with each cluster representing a group of closely related keywords, while connecting lines indicate their associations (Van Eck & Waltman, 2010) (Figure 2). The size of each circle corresponds to the relevance of the keyword, with larger circles signifying higher importance (Van Eck & Waltman, 2010). Additionally, shorter distances between keywords indicate stronger relationships.

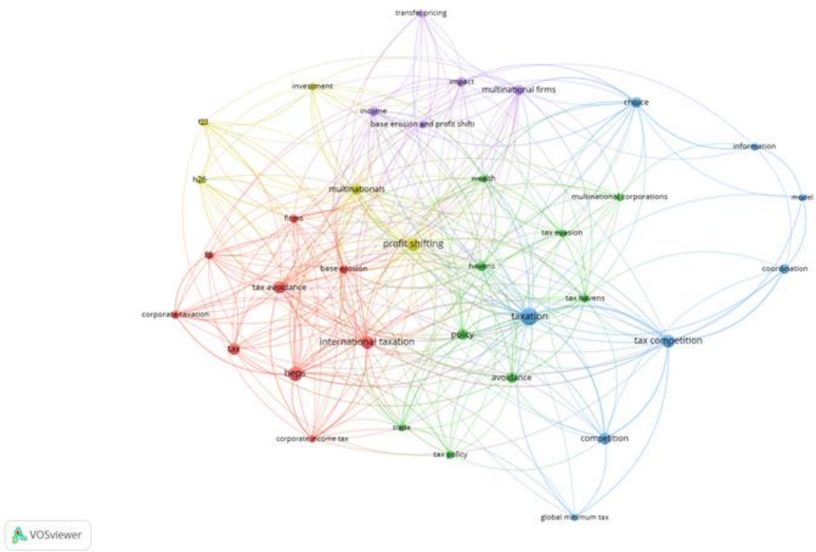

Figure 2. Keyword map

Source: Authors' own research results based on the WoS database and VOSviewer.

The findings reveal that "taxation" is the most frequently mentioned keyword, appearing 28 times, followed by "BEPS" with 19 occurrences. Other frequently used terms include "international taxation", "tax competition", and "profit shifting", each occurring 15 times, while "tax avoidance" appears 14 times and "tax" 13 times. The remaining keywords have fewer than 12 occurrences overall. This analysis suggests that research trends in this area have explored a broad spectrum of topics related to legislative gaps and the measures proposed by the OECD. However, it also highlights areas that require further investigation, such as digital taxation and the implications of Pillar One for EU countries.

Figure 3 illustrates the temporal distribution of each cluster, providing valuable insights into the evolution of various research streams over time. Each color represents the year in which a keyword emerged, with blue indicating earlier occurrences and greener shades signifying more recent appearances.

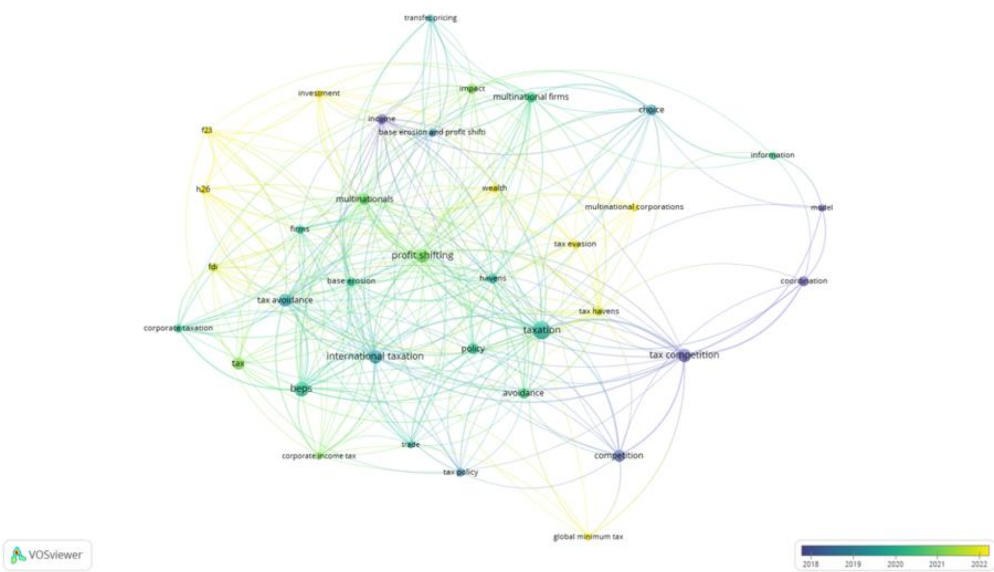

Figure 3. Keyword time chart (overlay visualization)

Source: Authors' own research results based on the WoS database and VOSviewer.

The evolving research focus over time reflects the shifting priorities and challenges in international taxation. Between 2018 and 2019, studies predominantly examined MNCs' income, BEPS, and tax competition, highlighting concerns over profit shifting and regulatory loopholes. The emphasis in 2020 and 2021 on base erosion and profit shifting suggests a growing urgency to address these issues through global tax reforms, particularly in response to OECD initiatives. More recent research trends, centered on tax evasion, tax havens, and investment, indicate a deeper exploration of illicit financial flows, the role of offshore jurisdictions, and the impact of international tax policies on global capital allocation. This shift underscores the need for continued research into enforcement mechanisms and the effectiveness of policy interventions in curbing aggressive tax avoidance.

Co-citation analysis is a bibliometric technique used for mapping scientific research, based on the premise that authors and publications frequently cited together share thematic similarities (Donthu et al., 2021). In a co-citation network, two publications are linked when they appear together in the reference list of another work. This method helps identify the most influential studies and reveals key thematic clusters by analyzing citation patterns. To obtain a representative sample, only authors with a minimum of 25 citations were selected, leading to the identification of 14 highly cited authors The analysis revealed three distinct clusters, each characterized by its core thematic focus as presented in Appendix 5.

The findings indicate that publications by the OECD are the most frequently cited, with a total of 316 citations, underscoring the institution's central role in shaping international tax policy discussions. Following OECD, Devereux, M.P. stands out with 50 citations, reflecting his significant contributions to the field of corporate taxation, international tax competition, and global minimum tax. Other influential authors include Dharmapala, D., with 43 citations, Clausing, K.A., with 42 citations, and Keen, M., along with European Commission publications, each garnering 40 citations. The remaining authors have received fewer than 40 citations, highlighting a concentration of influence among a select group of scholars and institutions. These citation trends suggest that research on BEPS is heavily influenced by institutional reports and key academics who have shaped the discourse on tax avoidance, corporate taxation, and global tax governance (Figure 4).

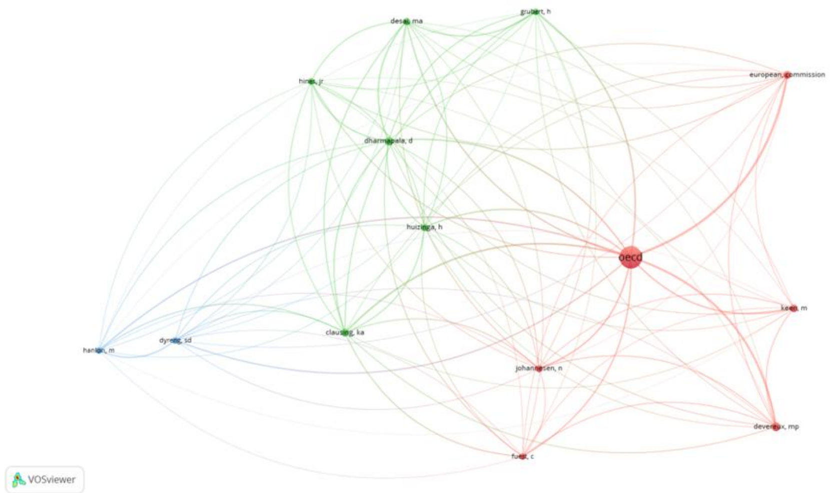

Figure 4. Co-citation map

Source: Authors’ own research results based on the WoS database and VOSviewer.

Bibliographic coupling is a science mapping technique based on the premise that publications with shared references exhibit thematic similarity (Donthu et al., 2021). This method focuses on grouping publications into distinct thematic clusters by analyzing their common citations and is particularly effective when applied within a defined timeframe.

Bibliographic Coupling by Author identifies connections between authors whose works cite the same references. The primary theme revolves around corporate tax systems and the implementation of a global minimum tax (Figure 5). Key authors contributing to this research stream include: Devereux, M.P. – focuses on corporate tax systems and the implications of a global minimum tax on multinational corporations; Johannesen, N. - examines the role of tax havens and their interaction with the global minimum tax framework; Keen, M. – explores the principles and challenges of implementing a minimum corporate tax at the international level; Hanlon, M. – investigates the effects of the OECD's Pillar 2 global minimum tax on corporate tax planning and compliance. The red cluster highlights the increasing academic focus on international tax harmonization and the measures aimed at curbing BEPS. It underscores the growing consensus on the necessity of a global minimum tax to prevent aggressive tax avoidance while ensuring a fairer distribution of tax revenues across jurisdictions.

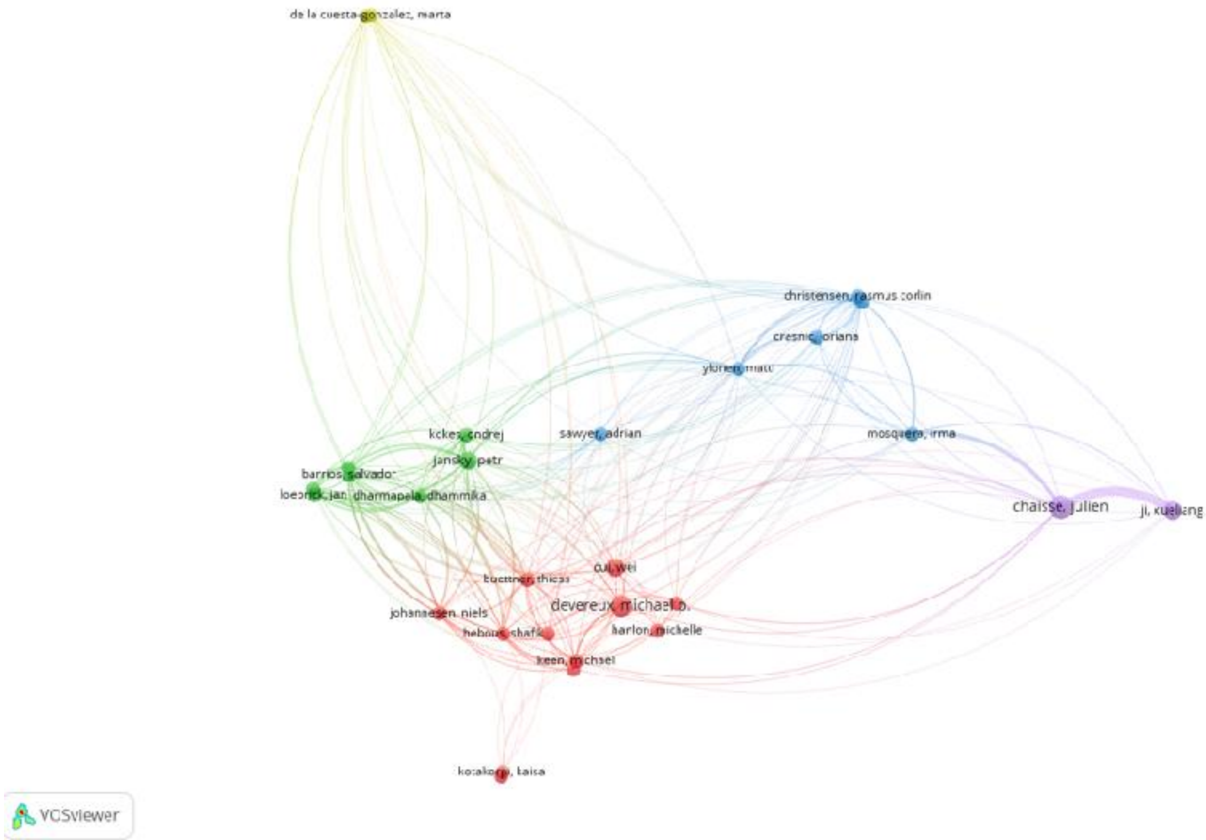

Figure 5. Bibliographic Coupling by Author

Source: Authors' own research results based on the WoS database and VOSviewer.

Bibliographic Coupling by Paper focuses on individual publications that share common references. Papers with a high degree of bibliographic coupling are likely to address related topics, even if they were published in different journals or time periods. This approach is particularly useful for tracking the evolution of a research topic, as it highlights how different studies build upon the same foundational literature.

The findings highlight three major papers that contribute significantly to the academic discourse on international taxation and BEPS (Figure 6): (Dharmapala, 2014) 's paper synthesizes key insights into the consequences of BEPS strategies employed by MNCs, serving as a cornerstone for understanding BEPS mechanisms and policy responses; (Devereux, 2023)'s paper examines the OECD's global minimum tax initiative under Pillar Two, analyzing tax competition dynamics and assessing the effectiveness of a global minimum tax in curbing harmful practices; (Kasper et al., 2015)'s paper explores the behavioral aspects of taxation, analyzing how media coverage of tax policies shapes public perception and compliance. Unlike the other two papers, which focus on corporate taxation and BEPS, this study offers a psychological and societal perspective, highlighting the impact of information dissemination on taxpayer behavior.

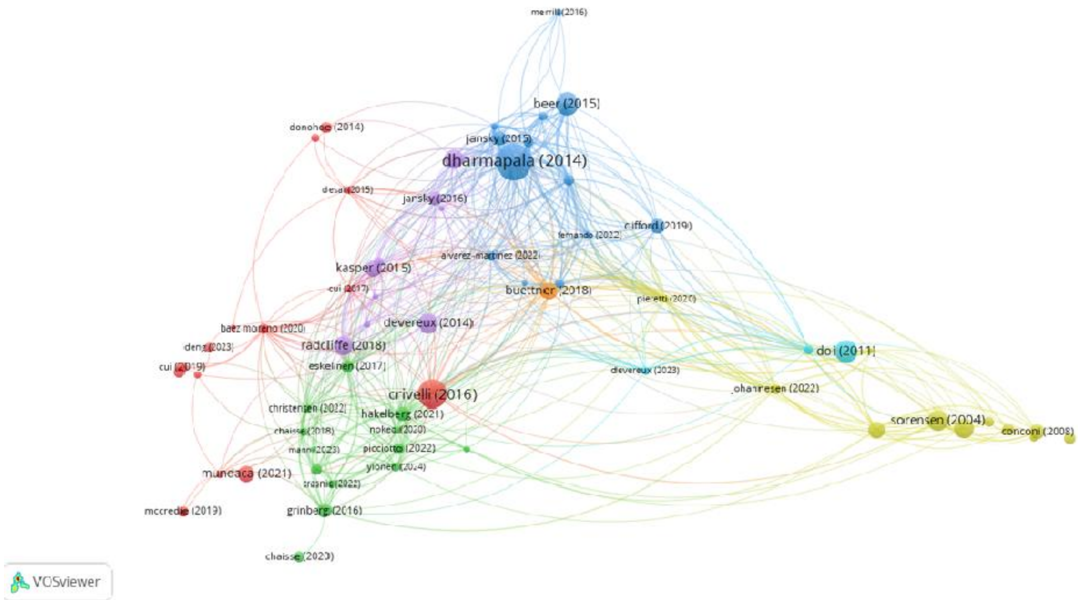

Figure 6. Bibliographic Coupling by Paper
Source: Authors' own research results based on the WoS database and VOSviewer.

5. Discussion

Evolution and Emerging Themes in BEPS Research: Between 2013 and 2018, research efforts intensified, with scholars focusing on the effectiveness of BEPS actions, their impact on MNCs, and the responses of different jurisdictions. Key themes during this period were identified as the examination of transfer pricing regulations, the introduction of country-by-country reporting, and the role of tax treaties in the prevention of double taxation (Capatina-Verdes, 2022), (Mijoč et al., 2024).

Post-2018, the literature expanded further to assess the real-world implications of BEPS reforms, including empirical analyses of corporate tax planning strategies, compliance costs, and enforcement challenges. Researchers also explored the political and economic dimensions of BEPS, such as the influence of lobbying on tax policy, the role of tax havens, and disparities in implementation across developed and developing countries.

More recently, the debate has shifted towards the OECD’s Pillar One and Pillar Two proposals, introduced in response to the limitations of the original BEPS framework. Studies have examined the global minimum tax and the effectiveness of international tax cooperation in a rapidly changing economic landscape (Noonan & Plekhanova, 2023), (Dharmapala, 2014). In particular, future research could focus on evaluating the impact of Pillar 1 on global economies and exploring the perspectives and influences on EU countries, where studies remain limited, with only up to 20 publications on the topic in WoS to date.

Research on BEPS spans multiple disciplines by research categories, with the highest concentration in Economics (72 papers), followed by Law (31) and Multidisciplinary Sciences (26). This disparity underscores the dual nature of BEPS, requiring both legal compliance and economic impact assessment. The variation in research focus highlights the need for an integrated approach combining legal enforcement with economic analysis to comprehensively address BEPS challenges globally.

The analysis highlights the leading contributors to BEPS research, with the United States (44 publications) at the forefront, followed by the United Kingdom (19), Germany (16), and China (14). The dominance of these countries reflects the strong correlation between research output and funding availability, as developed nations invest heavily in international taxation studies. This financial support drives the volume and depth of BEPS research, shaping the global tax policy and compliance discourse.

Research Gaps and Future Directions: Despite BEPS's global significance as a central issue in international tax policy, several gaps in the literature remain insufficiently addressed or underexplored. (Sumantri et al., 2024) highlights the lack of a comprehensive framework integrating key factors in tax behavior and suggests that future research could refine analytical models, conduct international comparisons, evaluate policy effectiveness, and examine the socio-economic impact of tax avoidance. Beyond these areas, several other key research directions could help bridge the existing gaps.

Quantitative impact analysis: Although some research has been conducted on BEPS policies, their long-term revenue effects on EU member states have been comprehensively quantified in only a few studies. Further empirical analysis is needed to assess the fiscal impact of tax base erosion across economies, particularly in the context of the Pillar One and Pillar Two reforms (Bird, 2018), (Tracana, 2017).

Digital economy: The taxation of the digital economy remains a contentious issue, with ongoing debates about the effectiveness of digital services taxes. There is limited research on how digital services taxes interact with OECD/G20 initiatives (Brauner & Baez Moreno, 2015), (Muhmad et al., 2024) and their broader implications for international tax competition and economic growth (Moreno & Brauner, 2018), (Avi-Yonah et al., 2022). As digital business models evolve, further investigation is required into innovative taxation solutions and their effects on developed and developing EU economies.

Implications for developing economies: Existing discussions on BEPS and tax policy have mainly focused on developed economies, with the disproportionate impact of tax avoidance on countries in the Global South often overlooked. Difficulties in countering BEPS practices are frequently faced by developing economies, underscoring the importance of analyzing how tax policies are shaped and how they affect revenue collection, economic stability, and investment flows in these regions (Brauner & Baez Moreno, 2015), (Mabel et al., 2024).

Interdisciplinary approaches: Most BEPS research has been confined to economic and legal perspectives. However, the complexity of global tax policy is increasingly recognized, and a multidisciplinary approach is required, in which insights from public policy, political economy, and behavioral economics are integrated to more holistically understand compliance, enforcement, and policy effectiveness (Devereux, 2023), (Klein et al., 2021).

EU tax harmonization and policy coordination: Achieving tax harmonization within the EU is widely regarded as a significant challenge, particularly in balancing national sovereignty with the OECD/G20's global tax initiatives. Greater research attention is required to examine the interplay between EU tax policies and international reforms, with a focus on how differences in tax policy implementation are navigated and consensus on tax coordination is negotiated among member states (Englisch, 2017), (Gangoș, 2024),

Comparative Analyses within the EU: While much attention is given to major economies, there is a lack of comparative studies on how smaller EU nations adapt to global tax reforms. Examining cross-country variations in BEPS policy adoption could offer valuable insights into the effectiveness and limitations of different tax strategies across diverse economic landscapes.

Addressing these research gaps is essential for developing a more comprehensive understanding of BEPS and EU tax policies. Future studies should adopt empirical, interdisciplinary, and comparative approaches to provide deeper insights into how global tax reforms impact economies with varying fiscal structures and policy priorities.

6. Conclusion

This study maps the evolving BEPS research landscape, highlighting key contributors, influential journals, and shifting thematic trends. While significant progress has been made, gaps remain in assessing the long-term revenue impact of BEPS measures, the interaction between digital services taxes and OECD frameworks, and the implications for developing economies. Future research should adopt interdisciplinary approaches and leverage technological advancements like big data and blockchain to enhance tax compliance. Expanding comparative cross-country analyses to assess the effectiveness of tax policies in different jurisdictions, particularly in EU economies, will also be important.

These insights help highlight emerging research directions, interdisciplinary connections, and gaps in the existing literature, ultimately contributing to a more comprehensive understanding of the global discourse on BEPS and its implications for international tax policy.

In terms of limitations, although this study relies on the most relevant databases, WoS and Scopus, its findings cannot be generalized to all articles on this topic. Future research could incorporate additional databases to broaden the scope. To minimize bias and potential errors, this analysis includes only English-language articles. However, future studies could explore non-English literature separately to provide a more comprehensive perspective on BEPS research.

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Appendix

Appendix 1. The standardization of keywords is explained

Original Keywords	Conceptually similar keywords	Standardized selected keywords
Base Erosion and Profit Shifting	Tax Base Erosion and Profit Relocation; Erosion of the Tax Base and Profit Diversion; Corporate Tax Avoidance Practices; Profit Shifting and Tax Base Reduction; International Tax Base Erosion; Shifting of Taxable Profits; Erosion of Taxable Income; Tax Avoidance Through Profit Shifting	BEPS
Pillar One and Pillar Two	Pillar One (Reallocation of Profits): Profit Reallocation Framework; Redistribution of Taxing Rights; New Nexus Rules for Multinational Taxation; Tax Allocation for the Digital Economy; Cross-Border Profit Reallocation; Market-Based Taxation Model; Allocation of Multinational Tax Revenue Pillar Two (Global Minimum Tax): Global Minimum Tax Framework; Minimum Tax on Multinational Corporations; Base Erosion Prevention through Minimum Taxation; Global Anti-Base Erosion (GloBE) Rules; Minimum Effective Tax Rate System	Pillar One and Pillar Two
Minimum tax rate	Global minimum tax; global tax; minimum tax rate	Minimum tax rate
Global profit shifting	Global profit shifting; Cross-Border Profit Shifting; Global Income Reallocation; Corporate Tax Base Shifting	Global profit shifting
Digital taxation	Digital economy taxation; Digital taxation; Digital Services Tax (DST); Taxation of the Digital Economy	Digital taxation
EU tax policy	EU tax policy; EU Fiscal Policy; EU Tax System; EU Taxation Rules; EU tax harmonization; European Union Tax Framework; European Union Taxation Framework; European Union Fiscal Regulations; Tax Policies of the European Union; European Tax Policy Framework; EU Fiscal Governance; European Taxation Strategy	EU tax policy

Appendix 2. Search protocol

Task	Description	Total Documents WoS	Total Documents Scopus
Sample collection: Identification of keywords aligned with the study's objective	Before conducting the review, the search strings were tested to identify any inconsistencies.		
Sample collection: Type of document	The search was limited only to journal articles, proceedings papers, book chapters, and books.		

Sample collection: Language	Only articles published in English		
Sample collection: Time span	No restrictions		
Sample collection: Subject areas	No restrictions		
Sample collection: Keywords identification	"Base Erosion and Profit Shifting" - "Pillar One and Pillar Two" - "global minimum tax" - "global profit shifting" - "Digital taxation" - "EU tax policy"		
Sample collection: Query Description	1st query: TITLE-ABS-KEY ("Base Erosion and Profit Shifting") OR ("BEPS") AND TITLE-ABS-KEY ("OECD") AND (LIMIT-TO(SRCTYPE, "j" AND "b" AND "bc" AND "pp")) AND (LIMIT-TO (LANGUAGE, "English")) =	53	280
	2nd query: TITLE-ABS-KEY ("Pillar One and Pillar Two ") AND TITLE-ABS-KEY ("OECD") AND (LIMIT-TO(SRCTYPE, "j" AND "b" AND "bc" AND "pp")) AND (LIMIT-TO (LANGUAGE, "English")) =	16	73
	3rd query: TITLE-ABS-KEY ("global minimum tax") OR ("global tax") OR ("minimum tax rate") AND TITLE-ABS-KEY ("OECD") AND (LIMIT-TO(SRCTYPE, "j" AND "b" AND "bc" AND "pp")) AND (LIMIT-TO (LANGUAGE, "English")) =	46	35
	4th query: TITLE-ABS-KEY ("global profit shifting") AND TITLE-ABS-KEY ("OECD") AND (LIMIT-TO(SRCTYPE, "j" AND "b" AND "bc" AND "pp")) AND (LIMIT-TO (LANGUAGE, "English")) =	55	189
	5th query: TITLE-ABS-KEY ("Digital economy taxation") OR TITLE-ABS-KEY ("Digital taxation") AND TITLE-ABS-KEY ("OECD") AND (LIMIT-TO(SRCTYPE, "j" AND "b" AND "bc" AND "pp")) AND (LIMIT-TO (LANGUAGE, "English")) =	14	9
	6th query: TITLE-ABS-KEY ("EU tax policy") OR ("EU tax harmonization") AND TITLE-ABS-KEY ("OECD") AND (LIMIT-TO(SRCTYPE, "j" AND "b" AND "bc" AND "pp")) AND (LIMIT-TO (LANGUAGE, "English")) =	5	6
Sample collection: Exclusion	1st criterion: Search for duplicates and inconsistencies in the row data 2nd criterion: Coherence with the topic of interest	24	9

Source: Author's elaboration.

Appendix 3. Most cited publications

Article Title	Authors, Publication year	Journal Title	Publisher	Journal Classification	Affiliations	Total Citations	Authors' keywords	Area of focus
Mandatory binding dispute resolution in the Base Erosion and Profit Shifting (BEPS) two pillar solution	(Noonan & Plekhanova, 2023)	International & Comparative Law Quarterly	Cambridge University Press	Law	University of Auckland	190	Mutual Agreement Procedures; arbitration; dispute settlements; international income taxation; Base Erosion and Profit Shifting; BEPS; Two Pillar Solution; World Trade Organization; investment treaties; investor-State dispute settlements	International taxpayer-initiated dispute resolution has traditionally been underdeveloped, despite growing support. The OECD's Two Pillar Solution to BEPS introduces binding multilateral dispute settlement, marking a shift in the system. However, it focuses primarily on protecting multinationals from double taxation, with limited consideration of recent trade and investment dispute resolution practices
Are global taxes feasible?	(Bird, 2018)	International Tax and Public Finance	Springer	Economics	University of Toronto	173	Global tax; International taxation; Financing international organizations; Supranational taxation; Tax policy	Global tax proposals have struggled due to the lack of a global government. The paper suggests that lessons from international finance and cross-border taxation could guide a more feasible approach, focusing on a gradual, transparent model under national control.
Taxing the digital economy post-BEPS, seriously	(Moreno & Brauner, 2018)	Columbia Journal Of Transnational Law	Columbia Journal Transnational Law Assoc	Economics; Law	University of Florida	169	n.a.	The digital economy challenges traditional tax rules, as foreign firms earn income without a physical presence. Attempts to adjust the system have failed, making fundamental reform inevitable. This article advocates for a withholding tax as a superior solution.
A New Framework for Digital Taxation	(Avi-Yonah et al., 2022)	Harvard International Law Journal	Harvard Law School	Law	University of Michigan	157	n.a.	Pillar One faces major challenges, including political compromises, complexity, and resistance to repealing Digital Services Taxes (DSTs). The article critiques the deal, examines U.S. responses, and proposes alternative solutions, including a U.N. digital tax and a Data Excise Tax.
Outbound Profit Shifting and the Propensity to Engage in Cross-Border Acquisitions	(Tardios & Clegg, 2024)	British Journal of Management	Wiley	Business; Management	Brunel University	134	n.a.	Analyzing 39,951 cross-border acquisitions across 26 countries (1996–2015), the study finds that profit shifting is a key driver of foreign direct investment, particularly in economically attractive or highly unequal markets and in industries with strong vertical or horizontal integration. The findings highlight the role of financial opacity in shaping investment

								decisions and distinguish outbound profit shifting from tax-haven strategies.
Soft law in international law-making: how soft international taxation law is reshaping international economic governance	(Chaisee & Ji, 2018)	Asian Journal of WTO & International Health Law And Policy	National Taiwan University (NTU) Press	Multidisciplinary sciences; Law	Chinese University of Hong Kong	133	soft law; hard law; international taxation; international trade; international investment; base erosion and profit shifting reform; BEPS; dispute resolution	This article examines BEPS as a key example of modern soft law, shaping international taxation and economic governance. It argues that tax, trade, and investment norms must align, that soft law offers flexibility for legal innovation and that BEPS is driving a major transformation in the global tax system.
Is Sunlight the Best Disinfectant? Reassessing BEPS Action 5's Tax Ruling Transparency.	(Hasson, 2021)	University of Pennsylvania Law Review	University of Pennsylvania Law School	Law	University of Pennsylvania	127	n.a.	The OECD's BEPS Action 5 aims to increase tax ruling transparency but lacks the deterrent effect needed to curb tax-motivated profit shifting. This article argues that transparency alone is insufficient and suggests implementing a disgorgement mechanism, similar to EU state aid enforcement, to enhance its effectiveness.
From tax havens to cryptocurrencies: secrecy-seeking capital in the global economy	(Ylönen et al., 2024)	Review of International Political Economy	Routledge Journals Taylor and Francis Ltd.	Economics; Multidisciplinary sciences	University of Helsinki	122	Estonia; cryptocurrencies; FinTech; tax governance; tax evasion; money laundering	As tax havens face global scrutiny, secrecy-seeking capital is shifting to non-tax-haven countries and FinTech. This study highlights two key practices—organizational ring-fencing and swarming—using Estonia as a case study. It calls for further research on how these strategies exploit regulatory gaps in the evolving global tax landscape.
Global Tax Shelters, the Ethics of Interpretation, and the Need for a Pragmatic Jurisprudence	(Ostas & Hilling, 2016)	American Business Law Journal	Wiley	Business; Law	University of Oklahoma	119	n.a.	This article explores the economic, ethical, and legal challenges of global tax shelters, which have evolved from exploiting U.S. tax codes in the 1990s to complex multinational structures that shift income to low-tax jurisdictions.
Is neoliberalism still spreading? The impact of international cooperation on capital taxation	(Hakelberg & Rixen, 2021)	Review of International Political Economy	Routledge Journals Taylor and Francis Ltd.	Economics; Multidisciplinary science	Free University of Berlin	117	Capital Taxation; Globalization; International Cooperation; Tax Evasion and Avoidance; Automatic Exchange of	Personal capital income taxes have risen while corporate tax rates continue to decline due to differing successes in combating tax evasion and avoidance. Strong international cooperation curbed household tax evasion, but efforts against corporate tax avoidance fell short, allowing firms to continue shifting profits.

				s			Taxpayer Information	
The Devil in the Details: How the Complexity, Costs, and Uncertainty of Treasury Regulations Encourage Corporate Inversion	(Wilson, 2017)	Hastings Law Journal	University of California	Law	University of California	103	n.a.	U.S. corporate tax regulations, particularly the Treasury's punitive approach, may inadvertently encourage firms to relocate and shift profits overseas. Despite international efforts like the OECD's BEPS project, corporate inversion remains attractive due to the high tax and compliance burden in the U.S., beyond just tax rates and worldwide income taxation.

Source: Author's own research based on the WoS database.

Appendix 4. The most frequently used keywords

Cluster	Most frequent keywords	Occurrences (n > 5)	Total link strength
Cluster 1 (red color)	base erosion	8	34
	beps	19	50
	corporate income tax	5	27
	corporate taxation	7	25
	fdi	6	23
	firms	7	24
	international taxation	15	51
	tax	13	24
	tax avoidance	14	47
Cluster 2 (green color)	avoidance	10	23
	havens	9	33
	multinational corporations	6	14
	policy	11	22
	tax evasion	6	15
	tax havens	7	29
	tax policy	7	15
	trade	5	19
	wealth	6	24
Cluster 3 (blue color)	choice	10	27
	competition	12	21
	coordination	9	13
	global minimum tax	5	10
	information	6	9
	model	5	8
	tax competition	15	39
	taxation	28	70
Cluster 4 (yellow color)	f23	5	18
	h26	6	21
	investment	6	18
	multinationals	11	54
	profit shifting	15	71
Cluster 4 (purple color)	base erosion and profit shifting	6	15
	impact	9	25
	income	9	34
	multinational firms	10	36
	transfer pricing	5	14

Source: Author's own research based on the WoS database and VosViewer software.

Appendix 5. Co-citation by authors

Cluster	Author	Citations (n > 25)	Total link strength
Cluster 1 (red color)	Devereux, M.P.	50	285
	European Commission	40	285
	Fuest, C	27	195
	Johannesen, N	33	230
	Keen, M	40	173
	OECD	316	854

Cluster 2 (green color)	Clausing, K.A.	42	373
	Desai, M.A.	36	293
	Dharmapala, D	43	361
	Grubert, H	29	252
	Hines, Jr	27	218
	Huizinga, H	31	249
Cluster 3 (blue color)	Dyreng, S.D.	29	189
	Hanlon, M	28	173

Source: Author's own research based on the WoS database and VosViewer software.