The carried forward losses regime: loophole of acceptable tax avoidance?

**Paper details:**

No introduction, no conclusion. Only Body paragraph. Focusing on "UK" Paragraph 1: Problem on the use of loss for tax purposes, focusing on loss carry-forward rule for corporations' trading loss in the UK. A little bit mentioned to EU law e.g. decision of the European Court of Justice on tax treatment losses (Mark & Spencer case). Have anyone agreed with this regime? Paragraph 2: Do these regimes impact on an income of HM treasury or HM revenue? Are corporations try to avoiding tax by making an artificial trading loss? Paragraph 3: How the government responds to detecting corporate strategies? Is that work in practice? Any loophole in the future? Paragraph 4: Does this regime be the best option for the UK? Is there any improvement in the future? Materials based on OECD, UK Corporate Tax Act 2010, Draft guidance on the reform of Corporation Tax loss relief from HM Treasury and HM Revenue & Customs. Including journal articles on Westlaw.