



## Chaire en fiscalité et en finances publiques

# Bulletin de veille

12 avril 2016

## CANADA

### FONDATION CANADIENNE DE FISCALITÉ (FCF)

N. Clavet et al, « [Reforming Old Age Security: Effects and Alternatives](#) », *Revue fiscale Canadienne*, vol. 63, no. 2, 2015.

Des réformes à la *Sécurité de la vieillesse* comme alternatives à la hausse de l'âge de la retraite à 67 ans

Dans le budget de 2012, le gouvernement fédéral a annoncé son intention de hausser l'âge d'admissibilité à la Sécurité de la vieillesse et au supplément de revenu garanti de 65 à 67 ans. La hausse sera instaurée graduellement à compter de 2023. Lorsque la politique sera entièrement mise en œuvre en 2030, elle accroîtra les revenus nets du gouvernement fédéral de 7,1 milliards \$ par année, mais réduira les revenus nets provinciaux de 638 millions \$ (en dollars constants de 2014). En supposant qu'il n'y a aucun changement dans les comportements liés à la main-d'œuvre et à l'épargne, le fait de reporter la date d'admissibilité fera passer de 6 à 17 pour cent le nombre de particuliers âgés de 65 et 66 ans faisant partie du groupe à faibles revenus (pour 100 000 aînés à faibles revenus de plus dans cette catégorie d'âge), et sera le plus néfaste pour les aînés à faibles revenus et les femmes. Des ré-

formes différentes à la Sécurité de la vieillesse pourraient permettre de réaliser des gains nets pour les finances publiques sans avoir de telles incidences négatives sur le taux de faibles revenus parmi les aînés.

### FONDATION CANADIENNE DE FISCALITÉ (FCF)

W, Mayo, « [Resource Rent Taxation—Experiences from Australia](#) », *Revue fiscale Canadienne*, vol. 63, no. 2, 2015.

Remplacer les redevances minières par un impôt sur les bénéfices : des propositions de l'Australie

La propriété collective des ressources minérales de l'Australie et les redevances traditionnelles fondées sur la valeur ou le volume imposées par les gouvernements régionaux dans le système fédéral de l'Australie ont entraîné des propositions de remplacement de ces redevances traditionnelles par un mode de perception bien conçu fondé sur les bénéfices. Un tel remplacement permettrait une meilleure attribution des fonds d'investissement dans le secteur des ressources minérales de l'Australie, y compris de l'investissement dans des opérations marginales qui seraient peu lucratives en vertu des redevances traditionnelles, et la pleine récupération économique des minerais. Un gouvernement aus-

tralien récent a proposé un impôt sur les excédents de trésorerie de conception audacieuse incorporant la compensation retardée de la totalité des pertes (supprimant le risque, inhérent aux impôts traditionnels sur le loyer des ressources, de perdre la valeur des déductions des dépenses), ainsi que des dispositions annulant l'effet des redevances traditionnelles des gouvernements régionaux. Dans ce cas, cette conception audacieuse n'a pas été mise en œuvre et une idée connexe est que la compensation de la totalité des pertes, considérée par certains comme une caractéristique de conception cruciale pour l'obtention des résultats escomptés est un gaspillage de fonds publics pour d'autres. Le remplacement des redevances traditionnelles exigera un modèle fiscal solide en plus de consultations méticuleuses et judicieuses.



## ÉTATS-UNIS

### BROOKINGS INSTITUTE

W. Gale, M. Kearney et P. Orszag, « [Would a Significant Increase in the Top Income Tax Rate Substantially Alter Income Inequality?](#) », 28 septembre 2015, 3 p.

Augmenter le taux marginal maximum d'imposition à 50 % ne réduirait pas les inégalités

The high level of income inequality in the United States is at the forefront of policy attention. This paper focuses on one potential policy response: an increase in the top personal income tax rate. We conduct a simulation analysis using the Tax Policy Center (TPC) microsimulation model to determine how much of a reduction in income inequality would be achieved from increasing the top individual tax rate to as much as 50 percent. We calculate the resulting change in income inequality assuming an explicit redistribution of all new revenue to households in the bottom 20 percent of the income distribution. The resulting effects on overall income inequality are exceedingly modest. That such a sizable increase in top income tax rates leads to such a limited reduction in income inequality speaks to the limitations of this particular approach to addressing the broader challenge. To be sure, our results do

not speak to the general desirability of a more progressive tax-and-transfer schedule, just to the fact that even a significant tax increase on high-income households and corresponding transfer to low-income households has a small effect on overall inequality.

### HOOVER INSTITUTION

C. Hoxby et G. Bulman, « [The Effects of the Tax Deduction for Postsecondary Tuition: Implications for Structuring Tax-Based Aid](#) », septembre 2015, 54 p.

La déduction pour frais de scolarité n'a pas d'effet sur la fréquentation scolaire

The federal tax deduction for tuition potentially increases investments in postsecondary education at minimal administrative cost. We assess whether it actually does this using regression discontinuity methods on the income cutoffs that govern eligibility for the deduction. Although many eligible households take nearly the maximum deduction allowed, we find no evidence that it affects attending college (at all), attending full-versus part-time, attending four-versus two-year college, the resources experienced in college, the amount paid for college, or student loans. Our analysis suggests that the deduction's inefficacy may be due to issues of salience, timing, and the method of receipt. We argue that the deduction might increase collegegoing if it were modified in simple ways that would not increase costs but would make it more likely to relax liquidity constraints and be perceived as a price change (which they is) as opposed to an income change. We outline how such modifications could be tested. This study has independent applied econometrics interest because households who would be just above a cut-off manage their incomes so that they fall slightly below it. This income management generates bias due to reverse causality, and we explore how to choose "doughnut-holes" that avoid bias without undue loss of statistical power.

## INSTITUTE ON TAXATION AND ECONOMIC POLICY (ITEP)

ITEP, « [State Tax Codes As Poverty Fighting Tools](#) », 17 septembre 2015, 34 p.

### La fiscalité des États américains comme outil de lutte à la pauvreté

State and local tax systems typically make things harder for families living in poverty. A 2015 ITEP report, *Who Pays? A Distributional Analysis of the Tax Systems in All 50 States*, found that the poorest twenty percent of Americans paid on average 10.9 percent of their incomes in state and local taxes. Middle-income taxpayers didn't fare much better, paying an average of 9.4 percent of their incomes toward those taxes. But when it comes to the wealthiest one percent, ITEP found they paid an average of just 5.4 percent of their incomes in state and local taxes. In fact, regressive state tax structures can push families deeper into poverty. State lawmakers have a responsibility to ensure that their state's tax code does not exacerbate this crisis and should consider using the low-income tax credits outlined in this paper as a means of mitigating poverty in their states. Re-fundable tax credits are effective and time-tested anti-poverty solutions that would also provide additional income to help families pay for food, housing, transportation and other necessities. The reforms discussed in this paper are among the most cost-effective anti-poverty strategies available to state lawmakers.

## TAX FOUNDATION

S. Drenkard et J. Henchman, « [Sales Tax Holidays: Politically Expedient but poor Tax Policy 2015](#) », 17 août 2015, 17 p.

### L'impact des congés fiscaux sur la croissance économique est faible

18 states, primarily in the southeastern U.S., will hold a sales tax holiday in 2015, down from a peak of 19 states in 2010. Sales tax holidays do not promote economic growth or significantly increase consumer purchases; the evidence shows that they simply shift the timing of purchases. Some retailers raise prices during the holiday,

reducing consumer savings. Sales tax holidays create complexities for tax code compliance, efficient labor allocation, and inventory management. However, free advertising for what is effectively a paltry 4 to 7 percent sale leads many larger businesses to lobby for the holidays. Most sales tax holidays involve politicians picking products and industries to favor with exemptions, arbitrarily discriminating between products and across time, and distorting consumer decisions. While sales taxes are somewhat regressive, this does not make sales tax holidays an effective tool for providing relief to low-income individuals. In order to give a small amount of tax savings to those with lower incomes, holidays give a large amount of savings to higher income groups as well. Political gimmicks like sales tax holidays distract policymakers and taxpayers from genuine, permanent tax relief. If a state must offer a "holiday" from its tax system, it is a sign that the state's tax system is uncompetitive. If policymakers want to save money for consumers, then they should cut the sales tax rate year-round.

## TAX FOUNDATION

K. Pomerleau, « [2015 International Tax Competitiveness Index](#) », 28 septembre 2015, 47 p.

### Index 2015 de la compétitivité des systèmes fiscaux

Taxes are a crucial component of a country's international competitiveness. In today's globalized economy, the structure of a country's tax code is an important factor for businesses when they decide where to invest, how much to invest, and which types of operations to locate in which countries. No longer can a country levy high taxes on business investment and activity without adversely affecting its economic performance. In recent years, many countries have recognized this fact and have moved to reform their tax codes to be more competitive. However, others have failed to do so and are falling behind the global movement.

## TAX POLICY CENTER

J. Nunns et J. Rohaly, « [Why Individual Income Tax Revenues Grow Faster Than GDP](#) », 1er septembre 2015, 15 p.

### Les lois fiscales actuelles tiennent-elles compte de l'inflation?

Using the latest long-term budget projections from the Congressional Budget Office, we project that individual income tax revenues under current law will increase as a share of GDP from a little over 9.5 percent in 2025 to a little less than 13.3 percent in 2090, an increase of over 3.7 percentage points. This paper describes the factors that explain this differential in growth rates and provides estimates from the Tax Policy Center's new long-run microsimulation model of the relative importance of each of these factors over the 2025-2090 period. We find that 80 percent of the increase in revenues as a share of GDP occurs because current law does not adjust some individual income tax parameters for inflation and none of the parameters for changes in real income.

## TAX POLICY CENTER

J. Rosenberg, « [The Distributional Burden of Federal Excise Taxes](#) », 2 septembre 2015, 23 p.

### Qui supporte réellement les taxes d'accise?

The federal tax system imposes a number of excise taxes on goods and services such as gasoline, alcohol, tobacco, air travel, and health care. In fiscal year 2014, the federal government raised \$93.4 billion or 0.5 percent of GDP from excise taxes, accounting for about 3 percent of total federal revenue. This report provides a brief summary of federal excise taxes and presents the methodology the Tax Policy Center uses to estimate the incidence of excise taxes in our distributional tables.



## INTERNATIONAL

GRANT THORNTON INTERNATIONAL

F. Lagerberg, « [BEPS : Business call For Clarity](#) », 5 août 2015. 1 p.

### Les chefs d'entreprise demandent plus de clarté en matière de planification fiscale internationale

Three quarters of business leaders would pay more taxes in exchange for greater clarity from authorities on what is acceptable, according to the Grant Thornton International Business Report (IBR), a global survey of 2,580 businesses in 35 economies. And while few expect a global agreement any time soon, the majority would like to see their governments take unilateral action to help achieve this aim. International tax standards clearly need to be stripped down and rebuilt for the world we live in today. The existing legislation is creaking at the seams in an increasingly interconnected, digital world in which the definition of a 'border' is looking archaic. The research is showing that businesses are asking for more help to enable them to navigate the new challenges of a digital economy.

## INSTITUTE FOR FISCAL STUDIES (IFS)

H. Miller et T. Pope, « [Corporate Tax Changes Under the UK Coalition Government 2010-2015](#) », 15 septembre 2015, 20 p. (Veuillez noter que l'accès à cette publication nécessite un abonnement)

### Le gouvernement Britannique a-t-il atteint son objectif d'avoir le régime d'imposition des entreprises le plus compétitif du G20?

Corporation tax was one of the most active policy areas under the coalition government in power in the UK from 2010 to 2015. In attempting to fulfil an aim to create 'the most competitive corporate tax regime in the G20', the government reduced the main rate by 8 percentage points, introduced a Patent Box and reformed the taxation of foreign income. The government also made changes to the tax base – notably, reducing the generosity of capital allowances for plant and machinery and temporarily increasing the generosity of the annual investment allowance – and took steps to

reduce avoidance opportunities. This paper reviews the policy changes and sets out where they leave the UK corporate tax system.

---

---

## INSTITUTE FOR FISCAL STUDIES (IFS)

P. Levell, B. Roantree et J. Shaw, « [Redistribution From a Lifetime Perspective](#) », 22 septembre 2015, 92 p.

### L'effet redistributif des systèmes fiscaux sur un cycle de vie

Most analysis of the effects of the tax and benefit system is based on snapshot information about single cross-section of people. Such an approach gives only a partial picture because it cannot account for the fact that circumstances change over life. This paper investigates how our impression of redistribution undertaken by the tax and benefit system changes when viewed from a lifetime perspective. To do so, we simulate lifecycle data designed to be representative of the experiences of the baby-boom cohort, born 1945–54. We examine the properties of the current tax and benefit system as well as historical and hypothetical reforms from both a lifetime and a snapshot perspective. We find that much of what the tax and benefit system achieves is effectively to redistribute across periods of life and, as a result, it is much less effective at reducing lifetime inequality than inequality at a snapshot.

---

---

## ORGANISATION DE COOPÉRATION ET DE DÉVELOPPEMENT ÉCONOMIQUES (OCDE)

C. Klein et R. Price, « [Improving Public Sector Efficiency for More Inclusive Growth in Latvia](#) », 1er août 2015. 31 p.

### Une réforme fiscale en Lettonie afin de mieux redistribuer la richesse

This working paper explores avenues to improve public sector efficiency in Latvia, a catching-up and ageing economy where spending needs are large. Ensuring that spending allocated to core services (e.g. education, healthcare) is adequate to achieve convergence of policy outcomes to

OECD upper standards is challenging. Efficiency gains in the tax system could bring additional revenues. The tax base should be expanded by reducing informality, strengthening tax administration and increasing property and environmentally related taxes, which are low by international standards. To reduce unemployment and income inequality, the tax-benefit system should also be revised as it is now relatively regressive and the tax wedge on low-income earners is high. Enhancing analytical, monitoring and assessment capacities should help to rein in wasteful expenditure and improve the prioritisation of spending. The reform of human resource management, public procurement, and state-local relations is also needed to deliver higher-quality and more cost-efficient public services

---

---

## ORGANISATION DE COOPÉRATION ET DE DÉVELOPPEMENT ÉCONOMIQUES (OCDE)

R. Jones et K. Fukawa, « [Achieving Fiscal Consolidation while Promoting Social Cohesion in Japan](#) », 2 septembre 2015, 41 p.

### Le système d'imposition du Japon sous pression en raison du vieillissement de la population

Avec une dette publique brute de 226 % du PIB, le Japon se trouve dans une situation budgétaire sans précédent, qui met en péril son économie. Le Japon a besoin d'un programme d'assainissement budgétaire précis et crédible, prévoyant des mesures spécifiques d'accroissement des recettes et de maîtrise des dépenses, afin de renouer avec la viabilité budgétaire. La principale préoccupation au chapitre des dépenses tient aux pressions sur les dépenses sociales sur fond de vieillissement démographique rapide. Il est donc prioritaire d'engager des réformes pour contenir ces dépenses. L'effort d'assainissement des finances publiques devra cependant porter en grande partie sur les recettes, essentiellement sous la forme d'une hausse du taux de la taxe sur la consommation allant au-delà de son relèvement à 10 %, qui est maintenant prévu pour 2017. L'assainissement budgétaire devrait s'accompagner de mesures destinées à promouvoir la cohésion sociale en s'appuyant sur le système de prélèvements et de prestations et en mettant fin au dua-

lisme du marché du travail. Il est notamment prioritaire de mettre en place un crédit d'impôt sur les revenus du travail pour aider les travailleurs pauvres.

---

---

## SOCIAL SCIENCE RESEARCH NETWORK

J. Oh et C. Tausanovitch, « [Quantifying Legislative Uncertainty: A Case Study in Tax Policy](#) », 9 août 2015, 62 p.

Un modèle économique qui permet de mesurer la prévisibilité des réformes fiscales

This Article offers an empirical model for quantifying that uncertainty, and it develops this argument in the context of federal income tax rates. Specifically, we estimate a model of legislator preferences on tax rates and show that the political process can be well understood in terms of the preferences of key legislators. This argument has several implications for policymaking and the analysis of legislative uncertainty more generally. First, quantifying legislative uncertainty offers insight into the behavioral effects of the law. How people respond to the law depends on their perception of the law's future trajectory. Second, our analysis allows us to explore the stability of major legislative reform. Our methodology allows us to demonstrate that reforms are sometimes predictably unstable. Such reforms can have the perverse result of increasing future legislative uncertainty.

---

---

## SOCIAL SCIENCE RESEARCH NETWORK

C. Johnson, « [Organizational Capital: The Most Important Unsettling Issue in Tax](#) », 25 août 2015, 12 p.

Un mode d'imposition uniforme pourrait être plus équitable que le système actuel

Organizational Capital argues that a uniform income tax would not do material damage, but that our income tax does serious distortion by reducing pretax returns for different companies by very divergent amounts. If an investment has zero adjusted basis, then tax does not reduce the

pretax rate of return. To reduce pretax rate of return by the statutory tax rate, the adjusted basis of the investment must equal the present market value of the investment (using the internal rate of return as the discount rate). There is also a rule of proration under which a tax basis of half of present value implies that pretax returns are reduced by half of the statutory tax rate. This creates an uneven playing field with relative advantages and punishments unrelated to the merits of the underlying investments.

---

---

## SOCIAL SCIENCE RESEARCH NETWORK

T. Baskaran, « The Revenue and Base Effects of Local Tax Hikes: Evidence from a Quasi-Experiment », 11 septembre 2015, 38 p.

Effets d'une hausse des impôts fonciers et des impôts des entreprises : l'expérience d'une région Allemande sur une période de 15 ans

This paper studies the revenue and base effects of local property and business tax hikes using a natural experiment in the German state of North Rhine-Westphalia (NRW). Due to a reform of the local equalization scheme in 2003, a set of municipalities in NRW increased their local tax rates by one to two percentage points while the remaining municipalities kept their rates constant. Using this variation across municipalities and over time to implement a difference-in-differences design covering the period 1995-2010, I find that property tax hikes have a revenue elasticity of unity and no adverse base effects. Business tax hikes have no discernible base effects but also no statistically significant effect on revenues. Furthermore, the results suggest that the tax hikes have no effect on broader economic outcomes such as local employment, firms' wage bill, and property prices. Overall, increasing local tax rates by one to two percentage points does not seem to affect the local economy adversely

J. Wang, « [Does a More Transparent International Tax Environment Provide the Same Outcomes as Transfer Pricing Would But in a Less Arbitrary Way?](#) », 16 août 2015, 34 p.

La transparence : une piste de solution pour lutter contre les mauvaises pratiques en matière d'impôt?

Effective tax planning involving transfer pricing is made possible due to discrepancies between the tax regimes offered by different countries. The mobility of intangible assets and the significant profits yielded by exploitation of intangibles make tax planning using transfer pricing of intangibles the most controversial and thorny issue in international taxation. The double Irish Dutch sandwich structure is used to illustrate how differences between different tax regimes are exploited, allowing multinationals to minimise their tax bills.

International efforts to tackle revenue losses have been led by the OECD, recently culminating in the base erosion and profit shifting (BEPS) project. However, a historical review of the OECD's work on tackling harmful tax practices reveals the limitations of any of such attempt. Adoption of a tax regime always falls within a state's sovereignty and cannot be interfered with by any other country or organisation. Despite their participation in the BEPS project, many OECD countries and European Union (EU) member states are adopting preferential tax regimes and lower corporate income taxes to attract investment in relation to intangible development and exploitation. Examination of the OECD's campaign against harmful tax practices and the latest developments in the area of information exchange illustrate the difficulty of reaching a consensus on a substantial standard, and the diverse national interests in setting their own tax policies. Nevertheless, improving transparency can be regarded as a compromise to tackle harmful tax practices. Measures to improve transparency have been reinforced by the OECD's Action plan on base erosion and profit shifting (BEPS Action Plan).

The existing preferential regimes for research and development and commercialisation of intangibles force multinational enterprises to consider the tax consequences of their global operation. However, these enterprises are facing a more transparent international tax environment and better-equipped tax authorities, which makes arbitrary tax planning of transfer pricing less possible.

## **Équipe de rédaction**

*Coordination, édition et révision :*  
Tommy Gagné-Dubé.

*Recherche et sélection des articles :*  
Alexandre Ely, Batoul Hassan, Gabrielle  
S. Leblanc, Julie Lemieux, Catherine  
L'Espérance et Jessica Morin-Côté

<http://cftp.recherche.usherbrooke.ca/>

**Pour vous abonner gratuitement  
au Bulletin de veille et aux  
publications de la Chaire :**  
[cftp.adm@USherbrooke.ca](mailto:cftp.adm@USherbrooke.ca)