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CHAIRE DE RECHERCHE EN FISCALITÉ ET EN FINANCES PUBLIQUES

Alain Charlet, Luc Godbout, « Les taxes à la consommation : enjeux, perceptions et perspectives », *Revue de droit fiscal*, no 18-19, 5 mai 2011, 3 pages.

http://www.usherbrooke.ca/chaire-fiscalite/fileadmin/sites/chaire-fiscalite/documents/Taxes_a_la_consommation/synthese-taxes-consommation.pdf

Synthèse de la journée de réflexion sur les taxes à la consommation tenue le 18 mars 2011.

● Le 18 mars dernier, la Chaire de recherche en fiscalité et en finances publiques de l'Université de Sherbrooke et l'Association des économistes québécois (ASDEQ-Montréal) ont organisé, sous l'égide du professeur Luc Godbout, une conférence qui avait pour objet de réfléchir à l'avenir des taxes sur la consommation, et ce notamment dans le contexte particulier du Québec. La conférence a été ouverte par le ministre délégué aux Finances du Québec, Monsieur Alain Paquet.

REVUE DE PLANIFICATION FISCALE ET FINANCIÈRE

Jean-Pierre Vidal, « Pourquoi se préoccuper d'éthique en fiscalité? » (2011), vol. 31, no 2 *Revue de planification fiscale et financière* 193-224, 32 pages.

http://www.apff.org/site/DOCUMENTS/pdf/revue_31-2.pdf

Réflexion sur diverses questions relatives à l'éthique dans le comportement des contribuables.

● L'éthique en fiscalité est la dernière barrière qu'un contribuable peut se donner pour contrôler l'envie qu'il pourrait avoir d'échapper à son impôt. La question est alors de savoir pourquoi un contribuable pourrait-il vouloir se donner cette barrière. Pourquoi pourrait-il vouloir se préoccuper d'éthique en fiscalité? C'est à cette question que ce texte répond en examinant quatre questions qui pourraient laisser croire qu'il est inutile de se préoccuper d'éthique en fiscalité. Premièrement, est-ce qu'il n'y a pas une limite à donner au gouvernement tout ce qu'il demande? Deuxièmement, est-il bien raisonnable de croire que l'éthique peut faire une telle différence dans les comportements? Troisièmement, n'est-ce pas exagérément pessimiste que de croire que les contribuables pourraient tant vouloir échapper à leur impôt? Quatrièmement, faut-il vraiment croire que le non-paiement d'un seul impôt, ici et là, est si grave? La réponse apportée ci-dessous à chacune de ces questions constitue une raison supplémentaire de se préoccuper d'éthique en fiscalité.

KPMG

KPMG, *Transfer Pricing Topics for High-Tech Companies*, 14 mars 2011, 36 pages.

<http://www.kpmg.com/Ca/en/IssuesAndInsights/ArticlesPublications/Documents/Transfer%20Pricing%20Topics%20of%20High%20Tech%20Companies.pdf>

Les règles sur les prix de transfert à travers le monde et la façon dont elles ont été modifiées en raison de la crise économique.

- Les membres du Service mondial des prix de transfert de KPMG examinent les différentes règles concernant les prix de transfert en vigueur dans le monde et de la façon dont elles ont été touchées par la conjoncture économique, de même que des pratiques commerciales transfrontalières. Les dépenses du gouvernement pour stimuler la croissance économique et pour fournir davantage de services sociaux, tels que des prestations d'assurance-emploi, ont été accompagnées d'une diminution des impôts perçus, ce qui a généré d'importants déficits. Comme il fallait s'y attendre, de nombreux gouvernements s'efforcent d'augmenter les revenus qu'ils tirent des multinationales en faisant valoir que tout bénéfice qu'elles dégagent de leurs activités doit être rattaché à leur pays. Comme le démontre la publication, les différends en matière de vérification fiscale (particulièrement en ce qui concerne les prix de transfert) se sont intensifiés de façon abrupte en 2010, et il est probable que cette tendance se maintienne en 2011 et par la suite. Même si les marchés mondiaux se portent mieux, les résultats des dernières années difficiles pourraient donner lieu à des différends pendant plusieurs années à venir.

INSTITUT DE RECHERCHE EN POLITIQUES PUBLIQUES

Thomas J. Courchene et John R. Allan, "Missing the Bigger Picture: a Response to McLure's View of the Carbon-Added Tax", *Policy Options*, février 2011, 3 pages.

<http://www.irpp.org/po/archive/feb11/courchene.pdf>

Pour une taxe sur les « émissions carboniques ajoutées » : suite du débat.

- Les auteurs répondent ici à la critique que Charles E. McLure a faite cet automne de leur article paru dans *Options politiques* en mars 2008, dans lequel ils préconisaient une taxe sur les émissions carboniques ajoutées pour combattre les émissions de gaz à effet de serre. Tom Courchene et John Allan reconnaissent qu'il serait difficile de mesurer l'empreinte de carbone pour déterminer une taxe du genre, y compris par la méthode de calcul en amont de McLure, mais font valoir que des progrès ont été accomplis sur ce plan et que leur rythme s'accélénera à mesure qu'un plus grand nombre de pays se plieront à l'impératif de réduction des émissions. Ils réaffirment aussi l'utilité de la taxe sur le carbone en tant qu'« analogue conceptuel » du modèle de concurrence parfaite utilisé de manière si fructueuse en théorie économique. Ils soutiennent enfin que l'OMC/GATT devra accepter les ajustements à la frontière nécessaires à l'établissement de règles du jeu équitables, au risque de perdre toute pertinence dans un monde de plus en plus préoccupé par le réchauffement planétaire.

FRASER INSTITUTE

Niels Veldhuis, Jason Clemens, and Milagros Palacios, *Budget Blueprint: How Lessons from Canada's 1995 Budget Can Be Applied Today*, Studies in Budget and Tax Policy, 17 février 2011, 25 pages.

<http://www.fraserinstitute.org/uploadedFiles/fraser-ca/Content/research-news/research/publications/BudgetBlueprint.pdf>

Le gouvernement devrait s'inspirer des coupures faites par les Libéraux dans les années 1990 afin d'éliminer le déficit.

- Canada's federal government has laid out a plan to eliminate its deficit over the next five years. Unfortunately, the current federal plan is based on assumptions of strong revenue growth (based on a strong economic recovery), restrained spending growth, and limited increases in interest rates. Rather than relying on these questionable assumptions about the future, the federal government should have looked at its own experience in the mid-1990s when Canada led the world in solving its deficit and debt problems. In 1995, the federal Liberal Party undertook deliberate and difficult steps—cutting nominal spending and public-sector employment—and were able to solve the deficit and debt problems of the country effectively. They avoided the mistakes of the preceding decade and a half and took real action. In a short time, their approach brought balanced budgets, declining debt, and decreasing interest costs. This study is intended to educate readers about the state of the current fiscal problems of the federal government, the parallels with the failures of the 1980s and early 1990s, how governments solved the problems in the mid-1990s, and how we can again solve today's problem using those lessons.
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C.D. HOWE INSTITUTE

Alexandre Laurin et William B.P. Robson, *A Faster Track to Fiscal Balance: The 2011 Shadow Budget*, Commentary no. 320, février 2011, 20 pages.

http://www.cdhowe.org/pdf/commentary_320.pdf

Cinq pistes de solutions pour retrouver l'équilibre budgétaire le plus rapidement possible.

- This 2011 Shadow Budget presents a program to eliminate the federal deficit a year ahead of the track in the federal government's October Update of Economic and Fiscal Projections. We show how Ottawa can return to budget surpluses in four years through more ambitious spending restraint. This accelerated track to budget surplus will position the federal government to launch new tax and spending initiatives around mid-decade, while protecting Canadians from possible debtmarket disruptions arising from sovereign-debt concerns, and putting federal debt back on a downward track before the pressure of population aging on government finances intensifies. We present a five-point plan for return to fiscal balance. (1) Seeing Budget 2010 Measures Through: The 2010 federal budget outlined a series of measures projected to save \$17.6 billion over five years. The government must deliver on these commitments, and conclusively halt stimulus transfers on their already extended deadline of October 31, 2011. (2) Restraining Federal Public Service Compensation Costs: The number of federal public servants, excluding military and RCMP uniformed personnel, jumped 35 percent from 1999 to 2009, while Canada's population grew some 11 percent – some 24 percentage points slower. Cutting employment 2 percent per year for the next four years combined with better control of compensation costs can deliver more than half the improvement needed to achieve a surplus by 2014/15. (3) Tackling the Cost of Ottawa's Employee Pension Plans: In the longer term, the solution to the federal government's pension challenge must include reductions in benefits, particularly those that encourage early retirement. Nearer term, contributions should rise to fund the plans better, and the employee share of those contributions should rise. (4) Trimming Transfers to Crown Corporations: As a spur to greater efficiencies in consolidated Crown corporations, along the lines of what private-sector enterprises have achieved in recent years, their aggregate subsidies should fall 10 percent from their currently planned level. (5) Review of Tax Preferences: The federal tax system contains a myriad of exemptions, deductions, rebates, deferrals or credits to achieve various economic and social objectives. We propose reducing or eliminating preferences for activities, such as home buying, purchasing health insurance through employers, traveling by public transit, or fitness, that people would largely do anyway. Besides protecting Canadians from adverse consequences of chronic federal borrowing, this accelerated track to surplus sets the stage for further economic and fiscal gains, such as prolonging eligibility for tax-deferred saving, a phase-out of trade barriers and cartels in agricultural goods, tax relief for travelers and international investors, and better tax treatment of related businesses.
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Alexandre Laurin, Finn Poschmann et William B.P. Robson, *When Striking an Awkward Balance Means Striking Out: Budget 2011*, E-brief, 23 mars 2011, 4 pages.

http://www.cdhowe.org/pdf/ebrief_112.pdf

Critique du budget fédéral 2011 : trop de dépenses fiscales, retour à l'équilibre budgétaire trop retardé.

● This text is an analysis of the 2011 Federal Budget. According to the authors, the many minor, targeted spending initiatives and tax credits proposed in the 2011 federal budget delay a badly needed return to budget balance. Notwithstanding their appeal to the targeted beneficiaries, few of the proposed initiatives are sound from a tax and expenditure policy perspective. Keeping the budget balance near its previously scheduled path would be a respectable achievement for minority government in a time of economic uncertainty and appeals for spending. However, Ottawa should reinforce that framework with a revamp of tax and spending programs, taking fuller account of the net social benefits of each revenue source and program.

Bev Dahlby et Ergete Ferede, *What Does it Cost Society to Raise a Dollar of Tax Revenue?*, Commentary no. 324, mars 2011, 20 pages.

http://www.cdhowe.org/pdf/Commentary_324.pdf

Analyse du coût marginal des hausses de taux d'imposition dans les provinces.

● The marginal cost of public funds measures the welfare loss a society incurs in raising an additional dollar of tax revenue. Tax increases distort economic decisions and erode tax bases because of tax avoidance and tax evasion by taxpayers. This Commentary uses econometric estimates of the effects of higher provincial tax rates on the provinces' corporate income tax, personal income tax, and sales tax bases to calculate the marginal cost of public funds (MCF) for these taxes. The results indicate that the cost of increasing provincial tax revenues through a corporate tax rate increase is very high, and in some provinces, corporate tax rate reductions in 2006 would have increased the present value of the provincial government's total tax revenues. The results also suggest that significant welfare gains would accrue from reducing provincial corporate income tax rates. As well, increasing provincial corporate and personal income tax rates can cause significant reductions in federal tax revenues because the federal and provincial governments levy taxes on the same tax bases. Finally, Canada's system of the equalization grants might reduce the perceived MCF of recipient provinces.

Pierre Fortin, *Garder Le Cap : le défi de l'équilibre budgétaire du Québec*, Commentaire no 325, mars 2011, 24 pages.

http://www.cdhowe.org/pdf/Commentary_325_fr.pdf

Québec doit absolument mettre en œuvre son Plan de retour à l'équilibre budgétaire tel que prévu.

● En 2009, après dix années d'équilibre budgétaire, le gouvernement du Québec s'est soudainement trouvé devant la perspective d'un déficit structurel insoutenable qui, en l'absence de mesures correctrices, atteindrait 12 milliards \$ en 2013 et 27 milliards \$ en 2019. Ce déséquilibre est apparu en dépit d'une performance économique du Québec relativement bonne dans la conjoncture récente et au cours des deux dernières décennies. L'auteur tient plutôt pour responsables de la détérioration le vieillissement démographique, les allègements fiscaux antérieurs à 2009, l'accélération des investissements en infrastructures, la croissance des dépenses de programmes, le ralentissement prévu des transferts fédéraux, et la remontée attendue des taux d'intérêt sur la dette. Le gouvernement du Québec a réagi à la situation en annonçant un Plan destiné à rétablir l'équilibre budgétaire en 2013-2014. L'auteur juge que les augmentations de taxes et de tarifs (4,3 milliards \$), les compressions de dépenses (5,7 milliards \$) et les autres mesures (2,2 milliards \$) qui composent ce plan peuvent, techniquement, rétablir la viabilité des finances provinciales. Aussi, ces mesures correspondent autant que cela est possible à la volonté populaire d'éliminer les déficits et de réduire la taille de l'État, et sont conçues de façon à minimiser l'impact sur le fardeau fiscal et la croissance économique. Réaliser les compressions de dépenses sera cependant difficile au plan politique comme au plan administratif. L'auteur conclut en souhaitant que le gouvernement maintienne ses intentions et garde le cap sur l'équilibre budgétaire pour 2013-2014, qu'il lance de toute urgence un grand chantier de réforme en profondeur des façons de faire en santé, et qu'il concentre ses interventions dans les domaines de l'éducation, de l'accès aux marchés extérieurs, de la concurrence, de la fiscalité et des infrastructures publiques de façon à favoriser la croissance de la productivité de l'économie.

CANADIAN CENTRE FOR POLICY ALTERNATIVES

Marc Lee, *Fair and Effective Carbon Pricing: Lessons from BC*, 23 février 2011, 33 pages.
[http://www.policyalternatives.ca/sites/default/files/uploads/publications/BC%20Office/2011/02/CCPA-BC Fair Effective Carbon FULL 2.pdf](http://www.policyalternatives.ca/sites/default/files/uploads/publications/BC%20Office/2011/02/CCPA-BC%20Fair%20Effective%20Carbon%20FULL%202.pdf)

Comment rendre la tarification des émissions de carbone plus efficace et plus équitable.

- Carbon pricing refers to policy measures that make it more expensive to burn fossil fuels or purchase goods and services that emit greenhouse gas emissions in their production. This includes carbon taxes that directly put a price on emissions as well as cap-and-trade programs that set a cap on emissions and allow the price to be determined by the trading of emission permits. In tandem with regulations, standards and public investments, carbon pricing can create incentives to reduce environmentally harmful activities and induce shifts to cleaner technologies. Carbon pricing can also deliver to governments the revenues needed for aggressive climate action. BC has started down this path with its Climate Action Plan. The province's carbon tax, its mandate for "carbon neutral" government, and its commitment to the Western Climate Initiative regional cap-and-trade system represent important first steps in carbon pricing. Because BC has among the highest levels of poverty and inequality in Canada, a pressing concern is the potential for unfair impacts of carbon pricing on the poorest - those who have done the least to cause the problem. People with low incomes have smaller carbon footprints. Higher prices for home heating and transportation (and other carbon-intensive goods and services) hit the budgets of lower-income people harder than those with higher incomes. To avert this regressive outcome, revenues must be used to compensate low- to middle-income households, and invest in complementary climate actions (e.g. expanding public transit networks). This report considers lessons learned to date from the BC experience, and the next steps required for an effective and equitable carbon pricing strategy. BC's carbon pricing, while it is a positive first step, has serious flaws: 1) The carbon tax is too low to significantly reduce emissions; 2) Tax cuts and credits have reduced government revenues by more than what the carbon tax brings in, making the tax "revenue negative"; 3) This drain on the public sector is worsened by requirements that the public sector pay an additional tax (or "offset") for emissions, leading to reduced public services; and 4) Even after tax cuts and credits are figured in, the carbon tax has a disproportionate impact on low-income British Columbians, and most benefits the highest-income households that are also the biggest emitters.

Alternative budgétaire pour le gouvernement fédéral 2011, *Repenser, reconstruire et renouveler : un plan de relance post-récession*, 15 mars 2011, 178 pages.

<http://www.policyalternatives.ca/sites/default/files/uploads/publications/National%20Office/2011/03/ABGF%202011.pdf>

Proposition de budget alternatif visant principalement à augmenter l'emploi et à protéger les programmes sociaux.

- L'Alternative budgétaire pour le gouvernement fédéral de cette année, qui s'inspire des meilleures idées d'un vaste échantillon transversal de représentants de la société civile, vise à déterminer la suite des événements pour assurer non seulement que le Canada se sortira de la reprise actuellement fragile de l'économie, mais qu'il ira plus loin et adoptera une façon de faire plus durable. L'ABGF 2011 présente un plan de relance intégré qui vise à : donner de bons emplois aux Canadiens et aux Canadiennes; réduire l'inégalité des revenus qui atteint des sommets records, renforcer la classe moyenne du Canada et améliorer les moyens d'aide aux pauvres et aux personnes les plus vulnérables du Canada; protéger les programmes publics sur lesquels compte l'ensemble de la population canadienne, y compris les soins de santé et les pensions publiques; gérer notre dette au PIB sans sabrer dans des programmes publics vitaux; s'attaquer sérieusement à la réduction des émissions de gaz à effet de serre; lancer une initiative à volets multiples pour accroître la production à valeur ajoutée dans des secteurs clés.

INSTITUT ÉCONOMIQUE DE MONTRÉAL

Youri Chassin, *Le point sur la dette du gouvernement québécois*, mars 2011, 2 pages.
http://www.iedm.org/files/point012011_fr.pdf

Une analyse des composantes d'une dette québécoise toujours croissante.

- Le budget 2011-2012 du gouvernement du Québec établit que la dette du secteur public s'élève à 235 milliards de dollars au 31 mars 2011, une augmentation de 13 milliards de dollars depuis l'an dernier. Représentant 74 % du PIB, cette dette est d'autant plus préoccupante dans le contexte du vieillissement de la population et des déficits actuels. Lors des deux dernières années, l'IEDM a publié un Point sur la dette du gouvernement québécois qui expliquait les différents concepts de dette et comparait l'endettement public des provinces. Poursuivant la tradition, ce Point présente la situation de la dette publique du Québec. Il dresse aussi un portrait sommaire d'une de ses composantes, sans doute la moins connue et la plus mal comprise : le passif au titre des régimes de retraite des employés du secteur public.

ÉTATS-UNIS

CONGRESSIONAL BUDGET OFFICE

Congressional Budget Office, *Reducing the Deficit: Spending and Revenue Options*, 10 mars 2011, 256 pages.
<http://www.cbo.gov/ftpdocs/120xx/doc12085/03-10-ReducingTheDeficit.pdf>

Analyse de diverses mesures fiscales visant la réduction du déficit : impacts sur le budget fédéral et sur les groupes bénéficiant de ces mesures.

- The Congressional Budget Office (CBO) regularly issues a compendium of budget options to help inform federal lawmakers about the implications of possible policy choices. This volume presents more than 100 options for altering federal spending and revenues. The report begins with an introductory chapter that describes the current budgetary picture and the uses and limitations of this volume. Chapters 2 and 3 present options that would reduce mandatory and discretionary spending, respectively. Chapter 4 contains options that would increase revenues from various kinds of taxes and fees. The options discussed in this report stem from a variety of sources, including legislative proposals, various Administrations' budget proposals, Congressional staff, other government entities, and private groups. The report also puts forward that different types of spending cuts and tax increases would impose direct costs on different people and businesses; those policy changes could also affect the size of the economy.

Congressional Budget Office, *Alternative Approaches to Funding Highways*, 23 mars 2011, 38 pages.
<http://www.cbo.gov/ftpdocs/121xx/doc12101/03-23-HighwayFunding.pdf>

Les sources possibles pour le financement des autoroutes : taxes sur l'essence ou tarification en fonction de la distance parcourue.

- The federal government collects revenues from taxes paid by highway users, mostly from those levied on gasoline and diesel fuel, and credits them to the Highway Trust Fund. Those revenues and others are subsequently used for federal spending on highways and transit and for some other purposes. In fiscal year 2010, the trust fund's revenues totaled about \$35 billion. Some policymakers and transportation analysts have expressed interest in developing new sources of funding, for two main reasons. One is that, over fiscal years 2008 to 2010, federal spending on highways exceeded the revenues available in the trust fund, and the government supplemented the fund with about \$30 billion from the Treasury's general revenues. As scheduled increases in federal standards for average vehicle fuel efficiency take effect, dedicated revenues may fall further below spending. The other main reason is that the current taxes do not give highway users an incentive to consider all of the costs their use of roads imposes on others; as a consequence, road use exceeds the efficient amount, and the quality of service that users receive from the highway network is lower than it would be

otherwise. This Congressional Budget Office (CBO) study, prepared at the request of the Chairman of the Senate Budget Committee, analyzes the effects of alternative approaches to funding highways. In particular, it compares the effects of current fuel taxes and of possible new taxes on the number of miles highway users drive. Some costs of highway use, such as those associated with emissions of greenhouse gases and the nation's dependence on foreign oil, are directly related to fuel consumption. But the larger share of costs—for pavement damage, congestion, accidents, and noise—is more directly tied to the number of miles traveled. Therefore, having users pay the actual cost of their highway use would involve imposing a combination of fuel taxes and per-mile charges. Although such an approach would lead to more efficient use of highways, it would distribute the burden of highway funding somewhat differently than would fuel taxes alone.

Douglas W. Elmendorf, *CBO's Analysis of the Major Health Care Legislation Enacted in March 2010*, 30 mars 2011, 35 pages.

<http://www.cbo.gov/ftpdocs/121xx/doc12119/03-30-HealthCareLegislation.pdf>

Effets de la législation visant la réforme du système de santé.

- CBO and the staff of the Joint Committee on Taxation (JCT) have provided the Congress with extensive analyses of the legislation both before and after its enactment in March 2010. My statement summarizes the major results of those analyses—in particular, the projected effects of those laws on the federal budget (over the first 10 years and the subsequent decade), health insurance coverage, Medicare, premiums for health insurance, and labor markets. Among other things, PPACA and the Reconciliation Act will do the following: establish a mandate for nearly all legal residents of the United States to obtain health insurance; create insurance exchanges through which certain individuals and families will receive federal subsidies to substantially reduce the cost of purchasing health insurance coverage; significantly expand eligibility for Medicaid; permanently reduce the growth of Medicare's payment rates for most services (relative to the growth rates projected to occur under prior law); impose an excise tax on health insurance plans with relatively high premiums; impose certain taxes on individuals and families with relatively high income; and make various other changes to the federal tax code, Medicare, Medicaid, and other programs.

U.S. DEPARTMENT OF THE TREASURY

Office of Tax Policy, *Investing in US Competitiveness: The Benefits of Enhancing the Research and Experimentation (R&E) Tax Credit*, 25 mars 2011, 12 pages.

<http://www.treasury.gov/resource-center/tax-policy/Documents/Research%20and%20Experimentation%20report%20FINAL.PDF>

Le gouvernement américain veut rendre le crédit d'impôt de RS&DE permanent, en plus de l'élargir et de le simplifier, pour stimuler la recherche et l'innovation.

- The Research & Experimentation (R&E) tax credit encourages innovation and provides a powerful incentive for businesses to continue to invest in research projects. Investments in research and experimentation produce technological advancements that drive productivity growth and improvements in U.S. living standards. Businesses may underinvest in research, however, because they may not be able to capture the full benefit of their spending. The R&E tax credit is designed to address this underinvestment and to increase the total amount of research activity undertaken in the United States. The credit has been extended on a temporary basis 14 times since its creation in 1981, often retroactively, and is currently scheduled to expire on December 31, 2011. When the credit lapses, the incentive effect is blunted because uncertainty about whether the credit will be available in the future makes it difficult for taxpayers to factor the credit into decisions to invest in research projects that will not be completed prior to the credit's expiration. That is why the President proposed making the R&E credit permanent in his Fiscal Year (FY) 2010 and 2011 budgets and extended the current credit through 2011 as part of the bipartisan tax agreement in December 2010. Two years ago, the President set an ambitious goal of achieving a level of research and development that is the highest share of the economy since the space race of the 1960s – 3 percent of GDP – a commitment he re-emphasized in his State of the Union address in 2011. The R&E tax credit is a vital component of achieving this goal and helping us out-innovate our competition. This is why, in addition to making it permanent, the President proposed on September 8, 2010 to expand and simplify the credit, making it easier and more attractive for businesses to claim this credit for their research investments. This proposal was

subsequently included in the President's FY 2012 Budget and should be part of the reform of our corporate tax system currently under consideration.

TAX POLICY CENTER

John L. Palmer et Rudolph G. Penner, *Committees Tackle the Deficit*, février 2011, 7 pages.

<http://taxpolicycenter.org/UploadedPDF/412298-Committees-tackle-the-Deficit.pdf>

Les politiciens s'entendent sur l'urgence et la nécessité de réformes en profondeur du système fiscal et du système de santé.

- The United States faces a dire budget problem, largely the result of the aging of the population and soaring health costs. The president's National Commission on Fiscal Responsibility and Reform and the Bipartisan Policy Center's Debt Reduction Task Force both agree that Social Security, Medicare, and Medicaid reforms are necessary, although health costs are the far greater problem. They also recommend restructuring the personal and corporate tax systems. These commissions' efforts show that reasonable policy packages can get bipartisan support even in an intensely partisan era.

INSTITUTE ON TAXATION AND ECONOMIC POLICY (ITEP)

The ITEP Guide to Fair State and Local Taxes, mars 2011, 80 pages.

<http://www.itepnet.org/pdf/guide.pdf>

Diverses mesures pour augmenter les revenus des états de la manière la plus équitable possible.

- This Guide offers citizens, activists, journalists, and policymakers a detailed primer on state and local tax policy. It takes a hard look at why state taxes have underperformed in the recent economic downturn, and recommends strategies for reforming these taxes to make them better able to fund needed public investments in the future. The report includes separate chapters discussing each of the major revenue sources on which state and local governments rely, including income, sales, property and corporate taxes. A common theme in analysis of each of these taxes is that unwarranted (and frequently unintentional) loopholes in the tax law make these taxes less fair and less sustainable than they should be. The Guide identifies and analyses some of those loopholes: tax breaks for capital gains and retirement income, state's sales tax exempts of some service, corporate tax-avoidance and "tax caps" on property taxes. The report also recommends a variety of procedural tax reforms that would make it much easier for state policymakers to identify and evaluate these harmful tax giveaways in the future. These reforms include regularly publishing detailed "tax expenditure reports," which list the cost and rationale for every tax break currently weighing down state tax codes, and "tax incidence analysis" to help measure the tax fairness impact of proposed tax changes.

CENTER ON BUDGET AND POLICY PRIORITIES

Chuck Marr et Brian Highsmith, *Six Tests for Corporate Tax Reform: Reform Should Help Shrink Long-Term Deficits, Reduce Biases and Preferences in the Tax Code, and Discourage Tax Sheltering*, 28 février 2011, 10 pages.

<http://www.cbpp.org/files/2-28-11tax.pdf>

Des balises pour une réforme de l'impôt des sociétés.

- In light of the nation's significant economic and budgetary challenges, this report proposes and explains six tests that are an essential measuring stick for a corporate tax code reform. According to the authors, a well-designed corporate tax reform proposal should contribute to long-term deficit reduction; reduce the tax code's bias towards debt financing; reduce the tax code's bias toward overseas investments; improve economic efficiency by reducing special preferences;

provide more neutral treatment of corporate and non-corporate businesses; and take specific steps to discourage tax sheltering.



INSTITUTE FOR FISCAL STUDIES

Stuart Adam et James Browne, *Redistribution, Work Incentives and Thirty Years of UK Tax and Benefit Reform*, 9 décembre 2010, 70 pages.

<http://www.ifs.org.uk/wps/wp1024.pdf>

Comment le système fiscal maintient le délicat équilibre entre la redistribution des revenus et l'incitation au travail.

- Governments wishing to reduce inequality by redistributing money from the rich to the poor face the dilemma that in doing so (by increasing tax rates and means-tested benefits, for example) they reduce the incentive for individuals to increase their incomes. Policy-makers have tried to balance these objectives in different ways and, partly as a result of this, the tax and benefit system today is very different from the one that existed thirty years ago. In this paper we look at how the tax and benefit system redistributed income and affected incentives to work in 2009-10, and at the effect of tax and benefit reforms between 1978-79 and 2009-10 on the level of inequality and work incentives.

Mike Brewer, James Browne et Wenchao Jin, *Universal Credit: A Preliminary Analysis*, 12 janvier 2011, 69 pages.

<http://www.ifs.org.uk/bns/bn116.pdf>

Les impacts d'un nouveau crédit d'impôt unifié qui remplacera tous les crédits pour adultes reliés au niveau de revenus.

- The government plans to redesign entirely the system of means-tested benefits and tax credits for working-age adults by replacing them all with a single benefit, known as Universal Credit, to be administered by the Department for Work and Pensions. This Briefing Note analyses Universal Credit as set out in the government's White Paper, *Universal Credit: Welfare that Works*. A Welfare Reform Bill is due to be published later in January 2011, and this should contain more details of how Universal Credit will operate.

Kevin Denny, *The Effect of Abolishing University Tuition Costs: Evidence From Ireland*, 24 mars 2011, 27 pages.

<http://www.ifs.org.uk/wps/wp1105.pdf>

L'abolition des frais de scolarité universitaires n'augmente pas l'accessibilité pour les étudiants provenant de classes inférieures de revenus.

- University tuition fees for undergraduates were abolished in Ireland in 1996. This paper examines the effect of this reform on the socio-economic gradient to determine whether the reform was successful in achieving its objective of promoting educational equality that is improving the chances of low socio-economic status (SES) students progressing to university. It finds that the reform clearly did not have that effect. It is also shown that the university/SES gradient can be explained by differential performance at second level. Students from white collar backgrounds do significantly better in their final second level exams than the children of blue-collar workers. The results are very similar to recent findings for the UK. The results show that the effect of SES on school performance is generally stronger for those at the lower end of the conditional distribution of academic attainment.



ORGANISATION DE COOPÉRATION ET DE DÉVELOPPEMENT ÉCONOMIQUES (OCDE)

Pierre Beynet, Andrés Fuentes, Robert Gillingham et Robert Hagemann, *Restoring Fiscal Sustainability in Spain*, 18 mars 2011, 47 pages.

[http://www.oecd.org/officialdocuments/displaydocumentpdf/?cote=ECO/WKP\(2011\)19&doclanguage=en](http://www.oecd.org/officialdocuments/displaydocumentpdf/?cote=ECO/WKP(2011)19&doclanguage=en)

Les mesures draconiennes adoptées par l'Espagne pour assainir ses finances publiques.

- Le gouvernement espagnol a introduit des mesures d'assainissement budgétaire ambitieuses qui devraient produire une amélioration importante des efforts budgétaires discrétionnaires. Dans le cas où les objectifs budgétaires ne seraient pas atteints, les autorités devront se tenir prêtes, comme annoncé, à prendre des mesures supplémentaires, qui pourraient consister à assujettir davantage de produits et de services au taux ordinaire de la taxe sur la valeur ajoutée. Ces mesures pourraient aussi servir à financer la réduction d'une partie des cotisations patronales de sécurité sociale. Une fois la consolidation budgétaire suffisamment avancée, une nouvelle réforme du système fiscal devra être envisagée en vue de mettre davantage l'accent sur les impôts qui favorisent la croissance. L'Espagne se trouve aussi confrontée à une augmentation spectaculaire des dépenses publiques liées au vieillissement, due pour l'essentiel aux retraites. Le plan de réforme des retraites va dans le bon sens mais des réformes plus poussées du système de retraite seront nécessaires pour contenir l'accroissement des dépenses. Il conviendrait de revoir les règles relatives aux soldes budgétaires des différents niveaux d'administration afin d'inciter les autorités régionales à dégager des excédents budgétaires plus importants lorsque l'activité économique est supérieure au potentiel.

OCDE, *Tackling Aggressive Tax Planning Through Improved Transparency and Disclosure: Report on Disclosure Initiatives*, février 2011, 22 pages.

<http://www.oecd.org/dataoecd/7/29/47020506.pdf>

Revue des stratégies adoptées par les pays membres de l'OCDE pour lutter contre les planifications fiscales agressives.

- Aggressive tax planning is a major risk to the revenue base of many countries. Countries have developed a number of strategies to deal with aggressive tax planning. This report, approved by all OECD members, covers a range of approaches from mandatory disclosure rules to forms of co-operative compliance. The report provides a toolkit for those concerned with aggressive tax planning and recommends a careful review of the different approaches to inform both tax policy and compliance.

OCDE, *Tax Administration in OECD and Selected Non-OECD Countries: Comparative Information Series (2010)*, 3 mars 2011, 291 pages.

<http://www.oecd.org/dataoecd/2/37/47228941.pdf>

Étude sur les performances des administrations fiscales dans 49 pays.

- This report is a comprehensive survey of tax administration arrangements, practices and performance across 49 countries. This fourth edition describes institutional setups, elements of the legislative and administrative framework, aspects of strategic management and human resources management, resourcing, key areas of operational performance, the use of technology, organisational arrangements and reforms for tax administration across the all the countries covered by the series.

INTERNATIONAL TAX DIALOGUE

Inter-American Center of Tax Administrations, *Tax Thematic Series: Tax Evasion*, 28 mars 2011, 93 pages.
http://www.ciat.org/images/documents/biblioteca/Serie/tema_series7.pdf

Série d'études sur l'évasion fiscale : méthodes de mesure et stratégies visant à la contrôler.

- In an effort to provide an ever better and highly qualified tax information service to its member countries, the Inter-American Center of Tax Administrations hereby presents the seventh issue of the CIAT Tax Thematic Series. The purpose of this series is to disseminate relevant information on specific taxation issues to support the research and study work carried out by the tax administrations of the CIAT member countries. The bibliographical material of this seventh issue is devoted to "Tax Evasion". The material gathered includes studies and papers prepared by technical officials for presentation either at the general assemblies or technical conferences, essays, research scholarships and articles published in the tax administration review, among others. To speed up the search and recovery of information a general table of contents and index is presented for each paper. The documents that are part of this issue are available in the CIAT Virtual Library and web page: www.ciat.org. Through this new documentary contribution CIAT, hopes to disseminate the bibliographical material existing in the Jorge Eduardo Corradine Library, for the benefit of the tax administrations.

SOCIAL SCIENCE RESEARCH NETWORK

Daniel Jacob Hemel, "Should Tax Rates Decline with Age?", *Yale Law Journal*, Vol. 120, p. 102, 30 mars 2011, 14 pages.

http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1791006

Mode d'imposition alternatif : la diminution des taux d'imposition en fonction de l'âge.

- For nearly a century, economists have recognized that it is "advantageous to...tax most the source of supply which is least elastic." But although the "inverse elasticity rule" is now a basic tenet of public economics, it rarely yields practicable prescriptions for tax policy. For example, the inverse elasticity rule would suggest that marginal tax rates should decrease as income increases, as taxes are more likely to disincentivize labor for high-income individuals than for low- and moderate-income individuals. However, such a policy may not be politically feasible - or normatively desirable - on account of its regressive implications. Still, there is one segment of the workforce whose labor supply is highly price-elastic and whose relative tax rates might be lowered without triggering the political concerns and distributive qualms mentioned above: older workers. By one estimate, the price elasticity of labor supply - the percentage increase in hours worked for every one percent increase in after-tax income - is approximately three times as high for sixty-year-olds as it is for forty-year-olds. Other estimates indicate an even more dramatic increase in labor supply elasticity over age. Thus, the deadweight loss per dollar raised from income taxation is much larger for taxes imposed on older Americans than for taxes imposed on prime-age workers. Congress could raise the same amount of revenue while generating less deadweight loss if it increased rates on prime-age workers and lowered rates on older ones. This Comment evaluates age-adjusted tax rates from the perspectives of economic efficiency, distributive equity, and political feasibility. It presents the first sustained case from a law-and-economics perspective for reducing income tax rates on individuals as they enter old age. It also explains how age-sensitive tax rates can be consistent with distributive equity objectives. Finally, it shows the importance of reconciling optimal taxation theory with political reality and constitutional law. Until now, tax theorists have largely derived optimal tax rules without reference to political and constitutional constraints. By incorporating political considerations into the optimal tax calculus, economists and tax law scholars can generate policy prescriptions that not only are efficient in theory but also stand a chance at implementation.

Richard Thompson Ainsworth, *VAT Fraud as a Policy Stimulus - Is the US Watching? VAT Withholding, RTvat, and the Mittler Model*, 26 février 2011, 17 pages.

http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1769145

Mesures afin de contrer les fraudes en matière de taxes de vente : le cas de la TVA européenne.

- The EU VAT, like most mature tax regimes, is resistant to change. Fraudsters are testing this resilience today, and this may not be such a bad thing for policy-makers. Significant challenges produce significant reforms proposals. If the US is seriously considering a VAT it would do well to observe this dynamic, avoid the known pitfalls, and work to advance the policy debate before it inherits a problem. The most serious EU VAT frauds include missing trader intra-community fraud (MTIC), its extra-community companion in tradable services (MTEC), and sales suppression (the fraud of manipulating cash register records with Zappers and phantomware). Fraud does seem to bring out the best efforts in reform proposals. This paper highlights three examples of this fraud/reform dynamic. The examples are drawn from the payment side, and can be seen in a continuum. The first example presents the Ecuadorian VAT withholding regime. In EU terms VAT withholding is the reverse charge mechanism, with an added requirement that the withheld VAT must be directly remitted to the treasury. Financial intermediaries are required to split VAT from payments and directly deposit these funds with the Treasury. Secondly, the RTvat is considered. RTvat presents a similar VAT withholding proposal for the EU. However, under the RTvat the third-party withholding application is dramatically expanded to all business-to-business (B2B) payments. But the RTvat goes even further. It applies the same third-party withholding mechanism to: (a) all business-to-consumer (B2C) transactions, and then applies the third-party, intermediary payment principle to (b) VAT refunds. The third example is the Mittler Model. This EU proposal takes the next logical step and eliminates all B2B VAT payments (but retains the B2B paperwork). Simply stated, the Mittler Model replaces the money (the payment of the VAT) with encrypted exemption certificates. Perhaps the US needs to take a good look at the RTvat, or the Mittler Model when it considers a VAT. Just because these proposals for change are meeting resistance in a mature system, like the EU VAT, does not at all mean that they would be inappropriate for the US if it decides to look seriously at a VAT. VAT fraud is a very effective VAT policy stimulus.

Craig Elliffe, *International Tax Avoidance - The Tension between Protecting the Tax Base and Certainty of Law*, 20 mars 2011, 18 pages.

http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1787843

Les RGAÉ de divers pays, classés selon une nouvelle catégorisation : sont-elles subordonnées aux conventions fiscales ou ont-elles préséance sur elles?

- Tax authorities respond to international tax planning by having recourse to domestic general anti-avoidance rules (GAARs) or other judge made anti-avoidance rules. This article is an enquiry into this response of countries to the problem of international tax avoidance. When the OECD's Commentary categorises countries, it divides them into a dichotomy, saying that anti-avoidance rules are applied in either a factual or interpretative way. It is suggested that this is confusing. It would be more helpful to categorise countries on the basis of overriding law; namely, do treaties override the GAAR, or vice versa? By analysing seven jurisdictions on this basis of overriding law, three categories of countries emerge. First, those countries that place most importance on their domestic anti-avoidance provisions overriding the treaty; these countries value most their ability to preserve the tax base and strike down abusive transactions. Secondly, those countries that place more importance on their treaties overriding the domestic GAAR; these countries value most the certainty of law. The last category of countries has hybrid features, so that although the domestic GAAR will normally operate on cross-border transactions and override the treaty, in situations where the treaty conflicts with the GAAR, the treaty will prevail and override the domestic anti-avoidance provisions. The conclusion reached is that this third category of countries that has the best policy approach. This is because this approach encourages certainty of law where two sovereign states have expressly concluded an agreed position in a treaty, supporting public international law, but also permits the use of the domestic GAAR when the use of the treaty is not robustly an intended outcome and the treasury coffers are at risk.

Roberta F. Mann, "How to Love the One You're With: Changing Tax Policy to Fit Cap-and-Trade", *San Diego Journal of Climate and Energy Law*, Vol. 2, p. 145, 24 mars 2011, 36 pages.

http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1792610

Concevoir le traitement fiscal d'un système de plafonnement et d'échanges de droits d'émission de gaz à effet de serre.

● Recognizing that a federal cap-and-trade program will affect the tax system both directly and indirectly, this paper will consider how the direct and indirect tax issues should be resolved. Direct tax issues include how emissions credits should be treated, the tax consequences of the receipt of emission allowances, and the tax consequences of the sale of emission allowances. A cap-and-trade system will affect the tax system in two broad indirect ways: 1) it will alter the effectiveness of energy tax incentives contained in the tax system under current law, and 2) the additional costs imposed by a cap-and-trade program will fall disproportionately on low-income taxpayers. The regressive impact of cap-and-trade could be resolved in a number of ways, which may include changing the tax system. The resolution of tax issues should maintain the environmental effectiveness of the cap-and-trade program without increasing the complexity of the tax system. The ideal solution would mitigate climate change while improving the clarity and transparency of the tax system. This paper will begin with an introduction of climate change issues, including a brief history of international mitigation efforts. The next section will give an overview of cap-and-trade systems and describe how a typical cap-and-trade system would interact with the current federal income tax system. The discussion of the interaction of cap-and-trade with the income tax will include both direct and indirect effects. This section will then compare those effects with the potential impact of a carbon tax. The direct impacts of cap-and-trade on the income tax system occur because the “trade” part of cap-and-trade creates a new financial instrument that needs to be accounted for within the tax system. A carbon tax would not create a new financial instrument. Both a carbon tax and a cap-and-trade system could cause international trade issues that could affect the income tax system. Both a carbon tax and a cap-and-trade system, by placing an additional cost on energy-intensive products, could alter the effectiveness of existing energy tax incentives and place a disproportionate burden on low-income populations.

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