



Chaire en fiscalité et en finances publiques

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CANADA

CHAIRE EN FISCALITÉ ET EN FINANCES PUBLIQUES (CFFP)

L. Godbout, S. St-Cerny et A. Genest-Grégoire, « [La mise en place de certaines promesses fiscales fédérales : Quelles sont les principales incidences fiscales et financières?](#) », 1^{er} décembre 2015, 51 p.

Qui sont les gagnants et les perdants des promesses fiscales fédérales?

Maintenant que l'élection fédérale est chose du passé, il est permis d'anticiper la réalisation de certaines promesses, soient la modification du barème d'impôts fédéral et la création de l'Allocation canadienne aux enfants. Ainsi, dans le cahier de recherche *La mise en place de certaines promesses fiscales fédérales : quelles sont les principales incidences fiscales et financières au Québec?* les auteurs Luc Godbout, Suzie St-Cerny et Antoine Genest-Grégoire mesurent les incidences fiscales et financières de ces promesses au Québec. Plus précisément, ils veulent faire ressortir les situations gagnantes et perdantes à l'aide de cas type de familles québécoises. De plus, ils commentent les incidences de la mise en œuvre de ces promesses sur la progressivité de l'imposition, l'incitation au travail, la distribution des revenus, la compétitivité du

régime fiscal du Québec et de l'Ontario, le soutien financier global offert aux familles avec enfants et les recettes du gouvernement du Québec.

CHAIRE EN FISCALITÉ ET EN FINANCES PUBLIQUES (CFFP)

L. Godbout, T. Gagné-Dubé et Suzie St-Cerny, « [Bilan de la fiscalité au Québec – Édition 2016](#) », 29 janvier 2016, 48 p.

Survol des principaux indicateurs en matière de fiscalité au Québec

Dans *Bilan de la fiscalité au Québec – édition 2016*, Luc Godbout, Tommy Gagné-Dubé et Suzie St-Cerny regroupent une série d'indicateurs importants en fiscalité qui, bien que souvent étudiés isolément, sont rarement traités dans un même document. Il en résulte un portrait de la situation de la fiscalité québécoise regroupant les données les plus récentes présentées en une trentaine de graphiques et tableaux brièvement expliqués.

CHAIRE EN FISCALITÉ ET EN FINANCES PUBLIQUES (CFFP)

F. Delorme, « [Viabilité et Vulnérabilité des finances publiques du Québec à moyen terme : Une proposition de cadre d'évaluation](#) », 29 janvier 2016, 37 p.

Un cadre d'évaluation pour répondre aux questions concernant la viabilité des finances publiques du Québec

Au cours des derniers mois, la question de la viabilité des dettes publiques a été au cœur des débats entourant les mesures d'austérité. Le niveau de la dette publique est-il trop élevé? Sa trajectoire est-elle préoccupante? Faut-il l'abaisser? Si oui, à quel rythme et à quel moment? Faut-il attendre une période de croissance économique vigoureuse ou, au contraire, faut-il réduire l'endettement public coûte que coûte, quelle que soit la conjoncture économique? Voilà une série de questions à la base de ce cahier de recherche Viabilité et vulnérabilité des finances publiques du Québec à moyen terme : Une proposition d'un cadre d'analyse et une évaluation, réalisé par François Delorme. Celui-ci tente de jeter un éclairage sur toutes ces questions dans le contexte québécois. Nous nous intéressons principalement au moyen terme, soit un horizon de cinq ans environ, car l'objectif fondamental de la méthodologie présentée est de pouvoir évaluer de façon périodique si les finances publiques sont sur une trajectoire soutenable dans le cadre d'un mandat normal d'un gouvernement.

FONDATION CANADIENNE DE FISCALITÉ (FCF)

V. Chandler, « [The Public Transit Tax Credit – Ridership and Distributional Impact](#) », Revue fiscale canadienne, vol. 63, no. 4, 2015. (Veuillez noter qu'il faut s'abonner aux publications de la Revue fiscale canadienne pour consulter ce document)

Crédit d'impôt pour le transport en commun : bon sur le plan politique, moins bon en pratique

Cet article traite du crédit d'impôt non remboursable pour le transport en commun qui a été adopté dans le but de promouvoir l'utilisation du transport en commun. L'auteur fait un survol de la littérature empirique qui examine l'effet du crédit d'impôt et conclut qu'il n'y a aucune preuve que le crédit a eu l'effet désiré sur l'achalandage. Puisqu'un crédit de taxe non seulement crée des incitatifs, mais transfère également le revenu aux ménages, l'auteur évalue aussi l'incidence distributive du crédit d'impôt. Il a constaté que le crédit a été beaucoup plus utilisé par les contribuables dans les ménages fortunés que par ceux dans les ménages à faible revenu, contribuant ainsi à l'inégalité du revenu. L'auteur croit toutefois que la valeur politique accordée au crédit d'impôt pourrait empêcher qu'il ne soit aboli, même si son inefficacité peut être prouvée.

FRASER INSTITUTE

P. Ebrahimi et F. Vaillancourt, « [The Effect of Corporate Income and Payroll Taxes on the Wages of Canadian Workers](#) », 19 janvier 2016, 80 p.

Quelles sont les incidences des impôts sur les bénéfices des sociétés et des taxes sur la masse salariales sur les travailleurs Canadiens?

A long held misperception in public policy debates is about who ultimately bears the burden of business taxes. The tax incidence is determined by the group that ultimately bears the burden of the tax, which can be different from the entity responsible for collecting and remitting the revenue to government. When it comes to corporate taxes, some simply—and wrongly—assume that corporations pay them in an economic sense, leading to inaccurate claims about the desirability of raising such taxes. And, when it comes to payroll taxes, those levied on employers are assumed—again, incorrectly—to be paid by employers. The corporate income tax (CIT) is ultimately “paid” for by individuals either as: workers through lower wages; consumers through higher prices; and/or corporate owners (shareholders) through lower profits and returns of investment. While the objective of groups pushing for a higher CIT may be to increase the tax burden on owners of capital, taxes shifted to consumers or workers are clearly not paid by

“corporations”, even in the loosest meaning of the term. With respect to payroll taxes, an increase in the total cost of labour is not always and easily absorbed by employers, meaning increased payroll taxes can result in a reduction in compensation (either wages or fringe benefits, or a combination of both). Thus, studying the incidence of corporate income and payroll taxes is important for an informed public-policy debate

INSTITUT C.D. HOWE

A. Laurin, « [Shifting the Federal Tax Burden to the One-Percenters: A losing proposition](#) », 3 décembre 2015, 13 p.

L'augmentation du taux d'imposition marginal maximum pourrait coûter jusqu'à 4 milliards de dollars

Ottawa's plan to shift the tax burden more to the very top income earners could cost federal and provincial governments \$4 billion in lost tax revenue, according to a new C.D. Howe Institute report. In “Shifting the Federal Tax Burden on the One-Percenters: A Losing Proposition,” author Alexandre Laurin assesses the all-in costs of the plan, taking into account the experience of other jurisdictions and the findings in economic literature. As presented in the Liberal platform, the changes would be more or less revenue neutral: the new top rate is supposed to bring in as much as the decreased middle-income rate is supposed to forego (Liberal Party of Canada 2015). A more probable scenario, however, is that the response of high-income taxpayers to changes in rates will likely be much greater than anticipated. And the middle-income bracket rate reduction will likely cost more than anticipated as well.

The result of the federal tax changes could be national tax receipts falling short of commitments for both levels of government by more than \$4 billion, meaning higher taxes elsewhere, unplanned spending cuts, or larger increases in government debt

STATISTIQUE CANADA

D. Messacar, « [Do Workplace Pensions Crowd Out Other Retirement Savings?](#)

[Evidence from Canadian Tax Records](#) », 21 décembre 2015, 35 p.

La cohabitation des régimes de retraite publics et privés : quel est l'effet sur l'épargne?

This paper investigates whether registered pension plans (RPPs) help households prepare financially for retirement or simply substitute for other forms of private saving. This issue is addressed using a panel of 1.8 million Canadian households, from 1991 to 2010, which appear in the Longitudinal Administrative Databank. The analysis controls for correlations in savings across accounts due to unobserved tastes for saving by exploiting the fact that employer contribution rates increase discontinuously on earnings above the average industrial wage, a unique feature of occupational pensions in Canada, the effect being estimated in a Regression Kink Design. The results show that: (1) the Canada Pension Plan or Québec Pension Plan contribution rate significantly affects employers' generosity of RPP provisions; and, (2) RPPs partially crowd out contributions into registered retirement savings plans—by approximately \$0.50 per \$1.00. The latter finding means that some substitution is occurring between the two plans but that there may still be a role for employer-assisted saving, since one-half of the automatic change in pension wealth passes through into greater total savings. In addition, the crowding-out response is much smaller for workers with weaker histories of saving in retirement accounts. Employer sponsorship and other forms of automatic saving may, therefore, matter a great deal in helping more vulnerable groups save for their retirement.



ÉTATS-UNIS

BROOKINGS INSTITUTE

D. Marron et A. Morris, « [How should governments use revenue from corrective taxes?](#) », 29 janvier 2016, 22 p.

Quatre façons d'utiliser les revenus des taxes dites correctives

Corrective taxes can encourage healthier, safer, and less polluting behavior. But how should governments use their revenue?

Options abound to cut other taxes, boost spending, or reduce borrowing. We organize those uses into four categories: 1) offsetting new burdens created by the tax, 2) furthering the goal of the tax, 3) compensating people who bear costs from the taxed activity, or 4) funding unrelated public priorities.

We illustrate them with examples including greenhouse gas emissions, unhealthy foods and drinks, financial transactions, tobacco, gasoline, and other products and activities. We discuss the pros and cons of competing revenue uses and describe tradeoffs across their social benefits and political appeal.

INSTITUTE ON TAXATION AND ECONOMIC POLICY (ITEP)

ITEP, « [Delaware: An Onshore Tax Heaven](#) », 10 décembre 2015, 10 p.

Le Delaware est un paradis fiscal à même les États-Unis

A loophole in Delaware's tax code is responsible for the loss of billions of dollars in revenue in other U.S. states, and its lack of incorporation transparency makes it a magnet for people looking to create anonymous shell companies, which individuals and corporations can use to evade an inestimable amount in federal and foreign taxes. The Internal Revenue Service estimated a total tax gap of about \$450 billion with \$376 billion of it due to filers underreporting income in 2006 (the most recent tax year for which this data is available).¹ While it is impossible to know how much of this underreported income is hidden in Delaware shell companies, the First State's ability to attract the formation of anonymous companies suggests that it could rival the amount of income hidden in more well-known offshore tax havens.

TAX POLICY CENTER

D. Marron, M. Gearing et J. Iselin, « [Should We Tax Unhealthy Foods and Drinks?](#) », 14 décembre 2015, 37 p.

Les effets d'une taxe sur la malbouffe aux États-Unis

What we eat and drink can cause obesity, diabetes, hypertension, and other conditions. In response, many governments have enacted or are considering taxes on unhealthy food and drinks. This report evaluates the rationale behind such taxes; reviews evidence on their effects; analyzes different ways of structuring them; draws lessons from taxes on tobacco, alcohol, and carbon emissions; and offers a framework for assessing their benefits and costs. Taxing can influence what people eat and drink, but it is not a silver bullet. Governments must balance potential health gains against taxes' limits and costs.

TAX POLICY CENTER

L. Burman et al, « [Financial Transaction Taxes](#) », 20 janvier 2016, 13 p.

L'idée d'une « Taxe Tobin » est toujours vivante

The massive financial market failures that led to the Great Recession have prompted renewed calls for a financial transaction tax (FTT) to discourage excessive risk taking and recoup the costs of the crisis. A well-designed FTT could raise up to about 0.4 percent of GDP (\$75 billion in 2017) in the United States and would be quite progressive. We discuss design options and the effects of an FTT on various aspects of financial sector behavior and its ambiguous effects on economic efficiency.



INTERNATIONAL

SOCIAL SCIENCE RESEARCH NETWORK

M. Wilde, « [Tax Jurisdiction in a Digitalizing Economy; Why 'Online Profits' are so Hard to Pin Down](#) », 1er décembre 2015, 10 p.

Les règles fiscales actuelles ne sont pas adaptées à l'économie numérique

Although we live in an age in which everything and everyone is 'online connected', countries' profit taxation systems are still based on an economic reality of around a century ago. And that creates tension. The problems this tension causes are particularly evident in the case of profits generated by internet-related activities. The fact that these 'online profits' are difficult to tax is becoming increasingly critical, given the rising share of the economy now accounted for by digital activities. Although the time may not yet be ripe for fundamental reform, we perhaps ought in any event to start thinking about the direction in which our corporation tax systems should be moving. Suggestions in international tax literature, as well as from the OECD and EU, point in the direction of attributing the taxable base to the market jurisdiction; in other words, of imposing corporation tax on, or also on, the basis of the destination principle. There is certainly something to be said for these suggestions. The world is changing. And perhaps it is now time for our tax systems to change along with it.

SOCIAL SCIENCE RESEARCH NETWORK

K. Kanagaretnam et al., « [Relation between Auditor Quality and Corporate Tax Aggressiveness: Implications of Cross-Country Institutional Differences](#) », 15 décembre 2015, 59 p.

Y a-t-il un lien entre la qualité des auditeurs et l'agressivité des impôts des sociétés?

Using an international sample of firms from 31 countries, we study the relation between auditor quality and corporate tax aggressiveness. Using an indicator variable for tax aggressiveness when the firm's corporate tax avoidance measure is within the top quintile of each country-industry combination, we find strong evidence that auditor quality is negatively associated with the likelihood of tax aggressiveness, even after controlling for other institutional determinants such as home-country tax system characteristics. We also find that the negative relation between auditor quality and the likelihood of tax aggressiveness is more pronounced in countries where investor protection is stronger, auditor litigation risk is

higher, the audit environment is better, and capital market pressure is higher.

SOCIAL SCIENCE RESEARCH NETWORK

F. Streif, [Tax Competition in Europe – Europe in Competition with Other World Regions?](#) », 4 janvier 2016, 36 p.

La concurrence fiscale entraîne des baisses des impôts corporatifs en Europe

Corporate tax levels have fallen substantially in Europe during the last decades. A broad literature has identified tax competition as one reason for this decline in corporate tax levels. However, none of these studies explicitly asks the question whether tax competition within regions is different from tax competition across regions, e.g. due to global regionalism of foreign direct investments. This is a crucial question to answer in order to discuss the desirability of tax harmonization in a distinct region, for example, within the European Union. Therefore, the study aims to give hints on the question whether the decline in corporate tax levels in Europe is mainly driven by tax competition between EU member states or by pressure from other world regions. The results of this study, which makes use of tax reaction functions, indicate that there is evidence for tax competition within Europe, whereas there is no robust evidence that European countries compete with countries from other world regions

SOCIAL SCIENCE RESEARCH NETWORK

C. Hwang, « [The New Corporate Migration: Tax Diversion Through Inversion](#) », 6 janvier 2016, 51 p.

Le retour en force d'une pratique fiscale controversée : l'inversion fiscale

In a corporate inversion, a U.S.-incorporated taxpayer renounces its status as a U.S. corporation and becomes incorporated, for tax purposes, in a tax-friendly foreign jurisdiction. The recent surge in inversions is not a new phenomenon, and constitutes the fourth generation of these

transactions. Inversions are hugely controversial: critics complain of their effects on the federal deficit, government officials accuse inverters of being unpatriotic, and proposals abound for staunching these transactions.

To this point, however, the debate has failed to focus on the negative collateral consequences of inversions. These transactions warp tax policy by favoring larger corporations and corporations in certain industries. Inversions can also distort corporate decision-making by, for example, causing corporations to incorporate in jurisdictions where managers and shareholders are less familiar with local law and with local social, economic, and political factors. These distortionary impacts provide further cause for concern over inversion transactions, and should play a more central role in the ongoing policy debate.

SOCIAL SCIENCE RESEARCH NETWORK

B. Genser et R. Holzmann, « [The Taxation of Internationally Portable Pensions: Fiscal Issues and Policy Options](#) », 18 janvier 2016, 26 p.

La taxation des pensions transférables au niveau international : problèmes et pistes de solutions

Pension policy reforms across the world in recent decades are a reaction to the changing demographic and socioeconomic environment. While pension scheme redesign has received much attention, the tax treatment of contributions, returns, and benefits of retirement savings remains mostly unattended and the taxation of internationally portable pensions is terra incognita for economists. This paper focuses on the huge differences in old-age pension taxation within and across OECD countries and highlights fiscal equity and efficiency issues that emerge in a world of internationally mobile workers and pensioners. It highlights that pension taxation differs widely not only across countries but also across pension pillars within a country, creating savings and mobility distortions and fiscal equity problems at individual and country level. The paper offers explanations for this heterogeneity and proposes a switch from deferred taxation towards front-loaded taxation of retirement sa-

vings to meet the demographic challenges of a globalized world. Three policy options presented differ in the way taxes are paid, but all of them are claimed superior to single-country measures taken to uphold deferred pension taxation or to rely on renegotiations of bilateral double taxation treaties.

SOCIAL SCIENCE RESEARCH NETWORK

E. Zelinsky, « [Defining Residence for Income Tax Purposes: Domicile as Gap-Filler, Citizenship as Proxy and Gap-Filler](#) », 22 janvier 2016, 29 p.

L'importance de la notion de domicile dans le système de taxation américain

The states' income tax systems are important repositories of experience which confirm the administrative benefits of citizenship-based taxation. Domicile today plays an important role in state tax systems as a gap-filler when more objective statutory residence laws fail to assign any state of residence to the taxpayer. Citizenship is an administrable proxy for domicile and serves a similar gap-filling role in the federal taxation of individuals whose income and activities straddle across national boundaries.

The states' difficulties enforcing domicile-based taxation highlight the administrative benefits of citizenship-based taxation. As long as residence is understood for tax purposes in terms of domicile, citizenship is an efficient proxy for such domicile. The states' experience defining residence supports the United States' citizenship-based approach to federal income taxation. Under the Internal Revenue Code, citizenship serves as an administrable proxy for domicile and fulfills the same gap-filling function played by domicile under the states' income taxes.

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/>

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