



## Chaire en fiscalité et en finances publiques

# Bulletin de veille

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## QUÉBEC/CANADA

### COMMISSION DE L'ÉCOFISCALITÉ DU CANADA

Commission de l'Écofiscalité du Canada,  
« [Les choses au clair: comment la tarification du carbone aide le Canada à lutter contre les changements climatiques](#) »,  
4 avril 2018, 36 p.

Nos représentants politiques doivent mieux communiquer les bienfaits des taxes sur le carbone et mettre en place des mesures de plus en plus sévères, car elles sont efficaces dans la lutte contre les gaz à effet de serre.

Nous, les Canadiens, avons fait beaucoup de chemin. Nous disposons maintenant d'exemples concrets et fonctionnels de taxes sur le carbone et de systèmes de plafonnement et d'échange qui font baisser nos émissions de GES tout en permettant de maintenir des économies fortes.

Ce rapport couvre tous les aspects importants de la question. Qu'est-ce qu'on veut dire, quand on dit que la tarification du carbone « fonctionne »? Où est-ce que la tarification du carbone a déjà fonctionné? Pourquoi est-ce qu'elle fonctionne? Qui est en faveur de la tarification du carbone? Comment s'y prend-on pour établir un prix carbone? Nous

apportons des réponses claires à ces questions dans un langage dépourvu (presque entièrement) de termes spécialisés.

### FONDATION CANADIENNE DE FIS- CALITÉ

O. Okafor, D. Mains et al., « [How Did the CRA Expect the Adoption of IFRS To Affect Corporate Tax Compliance and Avoidance?](#) », *Revue fiscale canadienne*, volume 66, n° 1, p 1-23.

L'ARC craignait que l'adoption du système IFRS n'allourdisse sa charge de travail et encourage les planifications fiscales agressives.

From 2008 to 2011, the Canada Revenue Agency (cra) developed a series of bulletins distributed to its internal auditors, alerting them to the fact that the adoption of international financial reporting standards (ifrs) may affect corporate tax reporting. In this study, we review 10 cra ifrs internal bulletins and one internal memorandum from the office of the director general. We discuss the accounting issues addressed in each bulletin, the tax risks and taxpayer actions identified by the cra that could lead to corporate tax avoidance, and finally the cra's prescriptions for detecting or deterring corporate tax avoidance. We found that the cra did have concerns that the adoption of ifrs in

2011 and prior years, coupled with the discontinuation of Canadian generally accepted accounting principles (gaap), could lead to various accounting issues, including increased risk that inappropriate tax adjustments would be made for certain enumerated items. This article presents preliminary evidence that accounting standards may affect corporate tax compliance and avoidance. The cra's concerns are plausible since the starting point for the computation of taxable income is accounting net income. Many firms may engage in tax-avoidance behaviour when they adopt an accounting standard that lends itself to aggressive reporting. The interaction effects of the uncertainty created by the change in gaap and the tax authority's heightened concern about corporate tax avoidance could be an important area for future study.

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## FONDATION CANADIENNE DE FISCALITÉ

R. Campbell et B. Sprague, « [L'harmonisation des stratégies fiscales et de la philanthropie](#) », *Revue fiscale canadienne*, volume 66, n° 1, p 185-214.

Différentes planifications permettent la réduction des impôts et l'atteinte d'objectifs philanthropiques.

Cet article traite des techniques de planification fiscale efficaces dans le domaine de la philanthropie et des diverses options pour harmoniser les objectifs philanthropiques d'un particulier et les économies fiscales connexes. Au moment de la rédaction de cet article, le gouvernement fédéral canadien n'avait pas encore publié la version définitive des propositions de réforme fiscale relatives aux sociétés privées qui avaient été annoncées le 18 juillet 2017; par conséquent, les auteurs du présent article ne se prononcent pas sur l'effet que ces propositions pourraient avoir sur les dons de bienfaisance.

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## FONDATION CANADIENNE DE FISCALITÉ

B. Carr et N. McIsaac, « [Musings on Agnico-Eagle and Univar](#) *Revue fiscale canadienne*, volume 66, n° 1, p 215-250.

La Cour d'appel fédérale, dans son analyse de la RGAÉ, a, pour la première fois, pris en compte la notion qu'une opération autre aurait pu permettre d'arriver au même résultat.

In the recent cases of Agnico-Eagle and Univar, the Federal Court of Appeal faced novel issues and made a number of significant comments that will influence the jurisprudence in the future. In Agnico-Eagle, the court had to address the consequences to a corporation of the conversion of debentures denominated in a foreign currency into shares of the corporation. The court had never previously been asked to consider such an issue. The court's comments are relevant to the treatment of foreign exchange gains and losses and the computation of paid-up capital. In Univar, the court had to consider whether the general anti-avoidance rule (gaar) applied to a reorganization designed to permit a Canadian corporation to pay out to its foreign parent surplus that existed at the time of the acquisition of control and was in excess of paid-up capital. In holding that gaar did not apply, the court considered whether there could be an abuse when the corporation could have achieved the same result in another manner. This was the first time that a Canadian court had explicitly stated this principle. In this article, the authors (who participated in the hearing of each of the appeals) outline their views on the nuances of the cases.

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## INSTITUT DES FINANCES PUBLIQUES ET DE LA DÉMOCRATIE (IFPD)

R. Bartlett et K. Page, « [Ending Homelessness](#) », 29 mars 2018, 17 p.

Le gouvernement doit réviser son programme d'accès à la propriété pour que les moins biens nantis puissent en bénéficier davantage et ainsi réduire le nombre de sans-abris.

Symposium participants agreed that Canada benefits from a culture of fighting for what is right rather than what is popular. This puts the nation at a great advantage with regard to adaptability and for taking holistic approaches to the issue of ending homelessness. There is a bravery inherently

required to end homelessness: the general consensus of the symposium was that Canada could set an international example, if it gets ending homelessness right.

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## INSTITUT DU QUÉBEC

M.-C. Bernard, J.-G. Côté, M. Homsy et S. Scarfone, « [Le gouvernement québécois ouvre les vannes grâce à une bonne performance économique et à la réserve de stabilisation](#) », 27 mars 2018, 9 p.

Il faudra donc assurer la pérennité du Fonds des générations et le maintien d'une réserve de stabilisation suffisante car le Québec, comme le Canada dans son ensemble, a moins de leviers solides pour affronter les prochaines crises économiques qui arrivent rarement lorsqu'on s'y attend.

L'économie québécoise a eu le vent dans les voiles, mais cet élan s'essouffle et le gouvernement prévoit des revenus qui augmenteront plus modestement. L'équilibre budgétaire se maintiendra, notamment, grâce à l'utilisation de la réserve de stabilisation, après le versement des revenus consacrés au Fonds des générations. Pour l'année financière qui vient de s'achever, le gouvernement du Québec a dégagé un excédent de 850 M\$ qui fait suite aux excédents de 2,2 G\$ en 2015-2016 et 2,4 G\$ en 2016-2017.

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## INSTITUT FRASER

S. Lafleur et B. Eisen, « [Why Is Alberta's Deficit Still So Big?](#) », 27 mars 2018, 11 p.

Les choix de dépenses du gouvernement albertain au cours des trois dernières années sont une cause importante de la persistance de déficits dans la province.

Why Is Alberta's Deficit Still So Big? finds that the province's \$8.8 billion deficit this year is not primarily due to low oil prices, but is largely a product of the Notley government's spending decisions. In fact, if the current government had adhered to the spending plan it inherited from its predecessor laid out in the 2015 budget, the deficit

today would be approximately \$3 billion—less than half of the deficit actually posted in the recent provincial budget.

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## THE SCHOOL OF PUBLIC POLICY (UNIVERSITY OF CALGARY)

B. Dahlby, « [The Path to Balance or the Road to Ruin?](#) », Fiscal Policy Trends, Mars 2018, 3 p.

Le scénario "prudent" du gouvernement albertain démontre à quel point la route vers l'équilibre est fragile.

The NDP government's plan to balance the provincial budget by 2023-24 is based on drastically cutting capital spending and on optimistic revenue projections.

In order to show that these are the key elements of the "Path to balance", we need to know how interest payments on debt, total operating expenditures, and the cash deficits will evolve under the government's plan, but these key fiscal variables are not reported in the budget documents.

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## THE SCHOOL OF PUBLIC POLICY (UNIVERSITY OF CALGARY)

J. Lester et J. Warda, « [An International Comparison of Tax Assistance for R&D: 2017 Update and Extension to Patent Boxes](#) », SPP Research Paper, Volume 11:13, Avril 2018, 36 p.

Le taux de subvention pour la R&D exécutée par les grandes entreprises au Canada apparaît inférieur au niveau qui permettrait de maximiser l'avantage social net.

Business investment in research and development (R&D) is widely recognized as providing benefits to the broader economy that exceed the benefits to the firms that perform the R&D. As a result of this externality or spillover, most governments provide support for R&D in order to encourage more of it. In 2017, 29 of the 35 members of the Organisation for Economic Co-operation and Develop-

ment (OECD) provided tax incentives for spending on R&D. That's up slightly since 2014, when we last prepared an international comparison of tax assistance for R&D. On the other hand, average support levels edged down from 2014 to 2017.



## ÉTATS-UNIS

### CENTER FOR AMERICAN PROGRESS

A. McGrew, L. Scott et M. Madowitz, « [The State of the U.S. Labor Market: Pre-March 2018 Jobs Release](#) », 5 avril 2018, 12 p.

Les travailleurs handicapés peinent encore sur le marché du travail. Conserver un faible taux d'intérêt et leur apporter une aide supplémentaire sont des actions nécessaires à l'optimisation du marché du travail.

Overall unemployment is low, and the employment rate is growing—but these top-line statistics mask underlying disparities across demographic groups. One group whose labor market challenges are often obscured by overall figures is workers with disabilities—a group that is often left out of the conversation when it comes to labor market policy. As shown in Figure 1, while the unemployment rate for prime-aged workers with disabilities is at its lowest since 2009, it is still a whopping 10.8 percent—well above the peak nondisabled unemployment rate in the aftermath of the Great Recession. These numbers are an important reminder that the Fed must allow the labor market to tighten further in order to close the gap between the economic outcomes of workers who have been doing well, such as white nondisabled workers, and less-advantaged workers. Indeed, economists and policymakers should be evaluating the health of the labor market based on how the most disadvantaged members of the population are doing—not solely on the overall numbers—when the BLS releases its monthly employment numbers.

### CENTER ON BUDGET AND POLICY PRIORITIES (CBPP)

M. Leachman, « [State Tax Cuts: A Key Factor in AZ, OK Teacher Pay Crises](#) », 26 mars 2018, 3 p.

Certains États américains doivent cesser de se concentrer sur les baisses d'impôt et améliorer les services au niveau de l'éducation.

Media coverage of possible teacher strikes in Arizona and Oklahoma, following one in West Virginia, has often overlooked an important contributing factor in those states: excessive state tax cuts that have shrunk state revenues and thereby made it harder for states to devote adequate resources to education. Reductions in state education funding largely due to tax cuts have limited pay and other resources for teachers. And both Arizona and Oklahoma have supermajority requirements to raise revenue, which tend to lock in tax cuts once they've been enacted and make it difficult for these states to address shortfalls in education funding.

### CONGRESSIONAL BUDGET OFFICE (CBO)

A. Lerner, « [Final Sequestration Report for Fiscal Year 2018](#) », 2 avril 2018, 4 p.

Le CBO estime qu'il ne sera pas nécessaire pour le gouvernement américain de procéder à une annulation des ressources budgétaires pour l'année 2018.

In general, after a session of Congress ends, CBO is required to issue a report that provides estimates of the limits (often called caps) on discretionary budget authority that are in effect for each fiscal year through 2021. CBO also must report whether, according to its estimates, enacted legislation for the current fiscal year has exceeded those caps. If so, a sequestration (that is, a cancellation of budgetary resources) would be required. Normally, CBO's final sequestration report would



be issued 10 days after the end of a session of Congress. However, because the appropriations for fiscal year 2018 were not final at the end of the first session of the 115th Congress on December 29, 2017, the deadline was extended until 10 days after the Consolidated Appropriations Act, 2018 (Public Law 115-141), was signed into law on March 23, 2018.

In CBO's estimation, a sequestration will not be required for 2018. However, the authority to determine whether a sequestration is required and, if so, exactly how to make the necessary cuts in budget authority, rests with the Administration's Office of Management and Budget (OMB). Those determinations are based on OMB's own estimates of federal spending.

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## HERITAGE FOUNDATION

A. Michel, « [Tax Reform 2.0: Priorities After the Tax Cuts and Jobs Act of 2017](#) », 22 mars 2018, 10 p.

La plupart des changements de la réforme fiscale américaine ne sont effectifs que jusqu'à 2025. Le Congrès doit agir afin de leur procurer une nature permanente.

Following the most sweeping update to the U.S. tax code in more than 30 years, Americans are no longer suffering under its most burdensome features. The Tax Cuts and Jobs Act of 2017 (TCJA) simplified tax paying for many Americans, lowered taxes on individuals and businesses, and updated the business tax code so that American corporations and the people they employ can again be globally competitive. In 2025 most of the individual, and some of the business, tax cuts revert to pre-reform levels. The deadline gives Congress an opportunity to revisit the tax code, make much of it permanent, allow a few provisions to expire, and address many remaining issues not included in the 2017 tax law. Pennsylvania's treatment of investment has become increasingly hostile even as federal treatment has improved. Unless legislators reverse this recent executive action, the Commonwealth will find itself poorly positioned to take advantage of new domestic investment occasioned by federal tax reform, and increasingly uncompetitive in comparison to its peers.

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## HERITAGE FOUNDATION

A. Michel, N. Michel et J. Ligon, « [To Reduce Corporate Welfare, Kill the Low-Income Housing Tax Credit](#) », 28 mars 2018, 4 p.

Le crédit habitation pour gens à faibles revenus est inefficace et bénéficie surtout aux banques.

Every year, the federal government redistributes hundreds of billions of tax dollars to various housing programs, and provides billions in housing subsidies through various tax breaks. One of the more wasteful of such subsidies is the low-income housing tax credit (LIHTC), a form of corporate welfare created by the Tax Reform Act of 1986. The Consolidated Appropriations Act of 2018 expands the LIHTC, thus ensuring that large developers and investors will continue to benefit at the expense of all other taxpayers, including those the credit is intended to help. Policymakers should limit the federal government's involvement in the U.S. housing market, including ending the inefficient and poorly targeted LIHTC.

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## TAX FOUNDATION

J. Bishop-Henchman et J. Hill, « [New York, New Jersey, and Connecticut v. the United States: A Preview of the SALT Limit Constitutional Challenge](#) », 3 avril 2018, 6 p.

La contestation constitutionnelle du plafond de "State and Local Tax" (SALT) Deduction entrepris par le gouverneur de New York a peu de chance d'aboutir. Les États de New York et du Connecticut devront modifier leur système d'imposition s'ils désirent rester compétitifs.

Under rational basis review, New York and other states would have to show that there is no legitimate purpose for the law, or that it has a legitimate purpose but does not rationally advance it. The government can argue that the purpose of the SALT deduction cap provision is to raise revenue to help pay for other TCJA provisions, or that it

sought to eliminate a tax deduction primarily used by high-income taxpayers. Other legitimate rationales that the federal government could cite for enacting the law could include increasing take-home income for taxpayers, increasing economic growth or economic competitiveness, and distributional progressivity. Even if these purposes were not the stated motivation for enacting the provision by those who voted for it, under rational basis review the government only needs to demonstrate that legitimate rationales for the provision exist. Raising revenues is a legitimate purpose for government action, and the enactment of this provision is rationally related to it. Therefore, it is unlikely that this argument would succeed on the merits.

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## TAX POLICY CENTER

F. Sammartino, P. Stallworth et al., « [The Effect of The TCJA Individual Income Tax Provisions Across Income Groups and Across the States](#) », 28 mars 2018, 23 p.

L'abolition de la limite de la déduction SALT diminuera la disparité entre les contribuables des différents États quant aux réductions d'impôt résultant de la Tax Cut and Jobs Act.

The Tax Cut and Jobs Act (TCJA) will reduce individual income taxes on average for all income groups and in all states. Unlike prior Tax Policy Center reports, this analysis focuses on the distribution of the individual income tax changes, and does not include changes in the corporate income tax, excise taxes, or estate and gift taxes. It also extends the analysis to include the distribution of the individual income tax changes across the states. We estimate that in 2018, the TCJA will cut individual income taxes for 65 percent of households overall, but raise taxes for about 6 percent of households. Only 27 percent of households in the lowest income-quintile will receive a tax cut (or an increase in their tax refund), with most having no material change in their taxes. The individual income tax cuts as a percentage of after-tax income will be largest for high-income households, particularly those in the 95th to 99th percentile of the income distribution. We estimate that between 60 and 76 percent of taxpayers in every state will receive a tax cut. The individual income tax cut will average about 1.8 percent of after-tax

income across all states, exceed 2.1 percent of after-tax income in seven states, and fall below 1.5 percent of after-tax income in California, New York, and Oregon.

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## URBAN INSTITUTE

F. Sammartino, P. Stallworth et D. Weiner, « [The effect of the TCJA individual income tax provisions across income groups and across the states](#) », 28 mars 2018, 23 p.

Dans les États où le niveau de taxation local est plus élevé, les réductions d'impôt fédéral aux particuliers seront plus petites.

The Tax Cut and Jobs Act (TCJA) will reduce individual income taxes on average for all income groups and in all states. Unlike prior Tax Policy Center reports, this analysis focuses on the distribution of the individual income tax changes, and does not include changes in the corporate income tax, excise taxes, or estate and gift taxes. It also extends the analysis to include the distribution of the individual income tax changes across the states. We estimate that in 2018, the TCJA will cut individual income taxes for 65 percent of households overall, but raise taxes for about 6 percent of households. Only 27 percent of households in the lowest income-quintile will receive a tax cut (or an increase in their tax refund), with most having no material change in their taxes. The individual income tax cuts as a percentage of after-tax income will be largest for high-income households, particularly those in the 95th to 99th percentile of the income distribution. We estimate that between 60 and 76 percent of taxpayers in every state will receive a tax cut. The individual income tax cut will average about 1.8 percent of after-tax income across all states, exceed 2.1 percent of after-tax income in seven states, and fall below 1.5 percent of after-tax income in California, New York, and Oregon.

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## URBAN INSTITUTE

V. Williamson, « [Reconsidering americans' overestimates of government waste and foreign aid](#) », 30 mars 2018, 4 p.

Les répondants du sondage croient que, pour chaque dollar d'impôt perçu, 52 cents sont gaspillés par le gouvernement.

Widespread and profound public misinformation about government presents a serious challenge to democratic accountability. This paper demonstrates that two of the most common examples of public misperception may be systematically overestimated; public misperceptions of “foreign aid” spending and “government waste” are in substantial part explained by differences of elite and popular terminology. Failure to take into account what members of the public mean by waste and foreign aid has led researchers, journalists and public officials to misunderstand meaningful public critiques of U.S. policy.



## INTERNATIONAL

### COMMISSION EUROPÉENNE

Commission européenne, « [Rapport de la Commission au Conseil et au Parlement européen sur les effets des articles 199 bis et 199 ter de la directive 2006/112/CE du Conseil sur la lutte contre la fraude](#) », 8 mars 2018, 15 p.

La mesure d'autoliquidation semble être un outil efficace pour lutter contre la fraude à la TVA et pour restaurer une concurrence équitable sur le marché.

L'article 199 bis, paragraphe 1, de la directive 2006/112/CE (ci-après la « directive TVA ») permet aux États membres de prévoir que le redevable de la TVA sur les livraisons de biens et prestations de services énumérées audit article est l'assujetti destinataire des livraisons et prestations concernées (mécanisme dit « d'autoliquidation »). Ce mécanisme est limité dans le temps et peut être appliqué jusqu'au 31 décembre 2018. Conformément à l'article 199 bis, paragraphe 3, de la directive TVA, les États membres appliquant le mécanisme doivent transmettre un rapport à la Commission au plus tard le 30 juin 2017 sur la base des critères établis à l'article 199 bis, paragraphe 2, point c).

Ensuite, avant le 1er janvier 2018, la Commission doit présenter un rapport d'évaluation générale des effets du mécanisme prévu à l'article 199 bis, paragraphe 1, de la directive TVA sur la lutte contre la fraude.

L'article 199 ter, paragraphe 1, de la directive TVA permet aux États membres de désigner le destinataire en tant que redevable de la TVA due sur certaines livraisons de biens et prestations de services en recourant à la mesure du mécanisme de réaction rapide (ci-après le « MRR ») visant à lutter contre la fraude fiscale soudaine et massive susceptible d'entraîner des pertes financières considérables et irréparables. Cette mesure est applicable jusqu'au 31 décembre 2018.

Conformément à l'article 2 de la directive 2013/42/UE modifiant la directive TVA, la Commission doit soumettre, avant le 1er janvier 2018, un rapport d'évaluation générale sur l'impact de la mesure du MRR.

Par conséquent, le présent rapport met l'accent sur les effets des mesures prévues à l'article 199 bis de la directive TVA sur la lutte contre la fraude ainsi que sur l'impact du mécanisme prévu à l'article 199 ter de la directive TVA.

### FONDS MONÉTAIRE INTERNATIONAL (FMI)

R. Beetsma, X. Debrun, X. Fang et al., « [Independent Fiscal Councils: Recent Trends and Performance](#) », 23 mars 2018, 28 p.

La présence d'un conseiller fiscal peut favoriser des prévisions budgétaires plus précises.

Countries increasingly rely on independent fiscal councils to constrain policymakers' discretion and curb the bias towards excessive deficits and procyclical policies. Since fiscal councils are often recent and heterogeneous across countries, assessing their impact is challenging. Using the latest (2016) vintage of the IMF Fiscal Council Dataset, we focus on two tasks expected to strengthen fiscal performance: the preparation or assessment of forecasts, and the monitoring of compliance with fiscal rules. Tentative econometric evidence suggests that the presence of a fiscal council is associated

with more accurate and less optimistic fiscal forecasts, as well as greater compliance with fiscal rules.

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## FONDS MONÉTAIRE INTERNATIONAL (FMI)

M. Ghazanchyan, A. Klemm et Y. Zhou, « [Tax Incentives in Cambodia](#) », 29 mars 2018, 22 p.

Certains incitatifs fiscaux actuels corrigent des problèmes du système fiscal; pour plus d'efficacité, il faudrait améliorer le système directement.

Cambodia, like its regional peers, offers a number of tax incentives to investors. This paper reviews these incentives to assess their costs and benefits, including their likely effectiveness in attracting capital and in supporting the diversification strategy. It finds that an important incentive, the tax holiday, differs materially from practice elsewhere in offering a deferral rather than exempting from tax and may not be very effective. Moreover, other features of the tax system, such as the high withholding rate on dividends, imply relatively high effective tax rates for foreign investors. The paper discusses potential reforms that weigh revenue and other costs of tax incentives against the need for a competitive tax system, including a shift from tax holidays toward investment allowances.

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## INSTITUTE FOR FISCAL STUDIES (IFS)

T. Harris, D. Phillips et al., « [Redistribution via VAT and cash transfers: an assessment in four low and middle income countries](#) », 23 mars 2018, 18 p.

Les traitements préférentiels de la TVA diminuent la pauvreté, mais ils ne permettent pas de rediriger suffisamment de ressources vers les familles à faible revenu.

As in high-income countries, reduced rates of VAT and VAT exemptions (“preferential VAT rates”) are a common feature of indirect tax systems in

LMICs. Many of the goods and services that are granted preferential rates – such as foodstuffs and kerosene – seem likely to receive such treatment on the grounds that they provide a means for the government to indirectly target poorer households, for whom such expenditures may take up a large proportion of their total budget. We use microsimulation methods to estimate the impact of preferential VAT rates in four LMIC countries, considering their effect on revenues, poverty, inequality, and across the consumption distribution. We consider whether other policy tools might be better suited for the pursuit of distributional objectives by estimating the impact of existing cash transfer schemes and a hypothetical scenario where the revenue raised from broadening the VAT base is used to fund a Universal Basic Income (UBI) in each country. We find that although preferential VAT rates reduce poverty, they are not well targeted towards poor households overall. Existing cash transfer schemes are better targeted but would not provide a suitable means of compensation for a broader VAT base given issues related to coverage and targeting mechanisms. Despite being completely untargeted, a UBI funded by the revenue gains from a broader VAT base would create large net gains for poor households and reduce inequality and most measures of extreme poverty in each of the countries studied – even if only 75% of the additional VAT revenue was disbursed as UBI payments.

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## INSTITUTE FOR FISCAL STUDIES (IFS)

L. Abramovsky, Y. Abrha Beyene et al., « [Are corporate tax incentives for investment fit for purpose? Revisiting economic principles and evidence from low- and middle-income countries](#) », 26 mars 2018, 53 p.

L'Éthiopie et le Ghana devraient privilégier des incitatifs basés sur les coûts ou les profits plutôt que sur les bénéfices et diminuer la variation du traitement préférentiel entre les secteurs prioritaires et les zones géographiques pour favoriser la neutralité et réduire les dépenses de conformité et d'administration.



Corporate income tax is an important source of revenue for many low- and middle-income countries. At the same time, many such countries lose much needed revenues by providing corporate tax (and non-tax) incentives in the hope of attracting mobile business investments, incentivising specific geographic areas and industrial sectors, or addressing market failures. Many countries thus face a difficult trade-off between raising vital revenues and maintaining an attractive corporate tax environment in a world of increasingly footloose capital and international tax competition that can lead to a race to the bottom.

Against this background, there is scarce evidence about the cost and benefits of tax incentives in developing countries, which hinders evidence-based policy-making. This paper, written collaboratively by IFS researchers and policy-makers from Ethiopia and Ghana, has multiple and interlinked objectives: (i) to provide an overview of tax incentives and best practices for their design grounded in economic principles, and assess how these apply to the case studies of Ethiopia and Ghana; and (ii) to understand more broadly the causal impacts of tax incentives on economic outcomes in developing countries by reviewing the relevant methodologies to conduct rigorous quantitative analysis and the existing empirical literature. Finally, we discuss the policy implications and avenues for research given the existing literature on the causal impact of tax incentives.

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## INSTITUTE FOR FISCAL STUDIES (IFS)

J. Cribb, A. Norris Keiller et al., « [Five years of recovery in living standards: middle incomes rise by more than for higher or lower income households](#) », 22 mars 2018, 10 p.

La diminution du taux d'emploi, la réduction des prestations pour les travailleurs et le ralentissement de la croissance du salaire moyen risquent de surtout toucher les ménages avec des enfants et par conséquent d'augmenter la pauvreté de ces derniers.

The latest official data on household incomes, covering the year 2016–17, has been published today by the Department for Work and Pensions.

This means that we now have five years of data on household incomes since living standards reached their recent post-recession trough in 2011–12. In this briefing note, IFS researchers briefly summarise what the newly released data tell us about how living standards have changed after five years of recovery, how this differs between different groups, and the implications for income inequality and poverty.

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## INSTITUTE FOR PUBLIC POLICY RESEARCH (IPPR)

L. Murphy, C. Snelling et al., « [A poor tax - Council tax in London: Time for reform](#) », 22 mars 2018, 60 p.

Le système fiscal municipal doit être réformé puisque les charges foncières sont inégales d'une région à l'autre, que la capacité de payer des contribuables n'est pas prise en compte et que les autorités locales n'ont pas la flexibilité nécessaire pour générer des revenus supplémentaires.

Council tax is considered by many to be in the 'too difficult to touch' box when it comes to reform. Haunted by memories of the community charge, better known as the poll tax, which is widely perceived to have contributed to the fall of Margaret Thatcher, the majority of national politicians aren't even speak of reform, let alone propose any change, for fear of the political consequences.

But leaving council tax unreformed is becoming ever more unsustainable. Local authorities across the country are increasingly cash strapped as a consequence of government cuts to their core grant funding and limits on their ability to raise funds through council tax and other sources. Moreover, the direction of public policy is towards greater devolution and allowing local politicians, accountable to their local electorates, to have a greater say – not just about what services should be prioritised, but how the funds for them should be raised.

Perhaps most significantly, however, is just how unfair the current system has become. Our research, focused on London, but with wider relevance for the whole system across England,

demonstrates how council tax has become increasingly regressive with regard to property values – the cheaper your property, the more you are likely to pay as a proportion of your property value.

## INSTITUTE FOR PUBLIC POLICY RESEARCH (IPPR)

C. Roberts et M. Lawrence, « [Our Common Wealth : A Citizens' Wealth Fund for the UK](#) », 2 avril 2018, 34 p.

Pour s'assurer que le fonds contribuera à réduire les inégalités, sa création devra reposer sur des paramètres essentiels, soit d'être détenu et géré dans l'intérêt des citoyens, les modalités devront être définies démocratiquement et les actifs seront accumulés autant pour les générations actuelles et futures.

A declining labour share of national income, together with unequal capital ownership, mean wealth inequality in the UK has risen and is set to rise further.

This policy paper sets out why a Citizens' Wealth Fund, a sovereign wealth fund owned by and run in the interests of citizens, would help address this problem by transforming a part of national private and corporate wealth into shared net public wealth. It sets out how such a fund could be capitalised, and proposes that the income generated should be used to provide a 'universal dividend' to all young people. In this way the rising returns to capital, and the opportunities derived from wealth, can be more fairly distributed across society.

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

OCDE, « [Revenue Statistics in Latin America and the Caribbean 2018](#) », 27 mars 2018, 308 p.

En 2016, les recettes fiscales ont diminuées pour la moitié des 25 pays

analysés alors qu'elles avaient augmentées pour 21 de ces pays en 2015.

Revenue Statistics in Latin America and the Caribbean is a joint publication by the OECD Centre for Tax Policy and Administration, the OECD Development Centre, the United Nations Economic Commission for Latin America and the Caribbean (ECLAC), the Inter-American Center of Tax Administrations (CIAT) and the Inter-American Development Bank (IDB). It presents detailed internationally comparable data on tax revenues for 25 Latin American and Caribbean economies two of which are OECD members. Its approach is based on the well-established methodology of the OECD Revenue Statistics database, which is an essential reference source for OECD member countries. Comparisons are also made with the average tax indicators for OECD economies.

The term "taxes" in this publication is confined to compulsory, unrequited payments to general government. As outlined in the Interpretative Guide to Revenue Statistics, taxes are "unrequited" in the sense that benefits provided by government to taxpayers are not normally in proportion to their payments. The OECD methodology classifies a tax according to its base: income, profits and capital gain (classified under heading 1000), payroll (heading 3000), property (heading 4000), goods and services (heading 5000) and other taxes (heading 6000). Compulsory social security contributions paid to general government are treated as taxes and classified under heading 2000. Much greater detail on the tax concept, the classification of taxes and the accrual basis of reporting is set out in the Interpretative Guide in Annex A.

Extending the OECD methodology to Latin America and the Caribbean countries enables comparisons of tax systems on a consistent basis both across this region and with OECD countries. In a few cases this methodology differs from the approach used by ECLAC, CIAT and IDB; these differences are noted in the text and in the tables, either with a footnote or an extra row.

The report provides an overview of the main taxation trends in Latin America and the Caribbean. It examines changes in both the level and the composition of taxation plus the attribution of tax collection by sub-level of government between 1990 and 2016.

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

OCDE, « [Forum mondial sur la transparence et l'échange de renseignements à des fins fiscales : France 2018 \(Deuxième cycle\)-Rapport d'examen par les pairs sur la demande d'échange de renseignements](#) », 3 avril 2018, 128 p.

Depuis le rapport de 2011, la France n'a pas beaucoup amélioré son délai de réponse aux demandes de renseignements et devrait travailler en ce sens.

**À noter : Des rapports pour 7 autres pays sont également disponibles.**

Ce rapport analyse la mise en œuvre juridique de la norme ERD par la France, la mise en place du système juridique en pratique ainsi que la pratique d'échange de renseignement sur demande au vu des demandes de renseignements émises pendant la période allant du 1er octobre 2013 au 30 septembre 2016, en application des Termes de référence 2016. Ce rapport conclut que la France continue d'être « Conforme » la norme internationale en matière d'échange de renseignements sur demande. En 2011 le Forum mondial avait déjà procédé à l'évaluation de la France par un examen combiné (mise en œuvre juridique et pratique) en application des Termes de référence 2010. Le rapport de cette dite évaluation (Rapport 2011) avait conclu que la France était conforme à la norme.

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

OCDE, « [Additional Guidance on the Attribution of Profits to a Permanent Establishment under BEPS Action 7](#) », 22 mars 2018, 25 p.

Les principes généraux relatifs à l'attribution des bénéfices à un établissement stable ont été mis en place à partir des commentaires fournis par les

différents intervenants et les États sont en accord avec ceux-ci.

Ce rapport donne des instructions supplémentaires sur l'attribution de bénéfices aux établissements stables résultant des modifications du Rapport sur l'Action 7 du Plan d'action BEPS à l'Article 5 du Modèle de Convention fiscale de l'OCDE. Ces instructions supplémentaires définissent les principes généraux relatifs à l'attribution de bénéfices à des établissements stables résultant de l'Article 5(5), conformément aux articles correspondants de la convention fiscale, et incluent les exemples de l'utilisation d'une structure de commissionnaire pour la vente de produits, d'une structure de vente en ligne de publicité et d'une structure de passation de marchés. Ce rapport contient également des instructions complémentaires relatives aux établissements stables résultant des modifications apportées à l'Article 5(4) et propose un exemple concernant l'attribution de bénéfices à des établissements stables résultant de la règle anti-fragmentation énoncée à l'Article 5(4.1).

## THE AUSTRALIA INSTITUTE

D. Richardson, « [Company Tax Changes and The Big Four Banks](#) », 22 mars 2018, 3 p.

Si le taux d'imposition des sociétés de 25% avait été appliqué en 2017, les quatre plus grandes banques australiennes auraient reçu un avantage fiscal totalisant 2,2 millions de dollars.

Over the ten years to 2026-27 when the total benefit to companies is estimated at \$65 billion, The Australia Institute estimates the big four banks will receive a "gift" of \$9,500 million with Commonwealth Bank alone to receive \$2,800 million.

# OUTILS

## CHAIRE EN FISCALITÉ ET EN FINANCES PUBLIQUES (CFFP)

Collectif, « [Guide des mesures fiscales](#) », Mars 2018, 301 p.

Les principales mesures fiscales du fédéral et du Québec présentées sous forme de 56 fiches descriptives réparties en 12 sections thématiques.

Le Chaire de recherche en fiscalité et en finances publiques présente son Guide des mesures fiscales. Cette nouvelle publication s'inscrit dans le volet pédagogique ayant pour objectif de rendre les sujets touchant la fiscalité et les finances publiques les plus accessibles possible pour tous.

Le Guide présente les principales mesures fiscales visant les particuliers des gouvernements fédéral et du Québec sous forme de fiches descriptives. Cette première mouture présente 56 fiches descriptives réparties en 12 sections thématiques. Il existe une panoplie d'endroits où les contribuables peuvent se renseigner sur les mesures fiscales qui peuvent les toucher, dont bien entendu les sites des agences fiscales gouvernementales. Les fiches du Guide se distinguent en ce que, en plus de décrire les paramètres des mesures et les facteurs d'admissibilité, chaque fiche présente aussi l'objectif, le coût, une illustration de la mesure, une courte section historique ainsi que les sources vers les sites officiels des gouvernements.

Ces fiches visent, entre autres, à aider les contribuables du Québec à remplir leur déclaration de revenus. Ainsi, les paramètres des mesures fiscales sont ceux de l'année d'imposition 2017. La Chaire mettra à jour ces paramètres annuellement. Évidemment, bien que les fiches descriptives renferment des informations sur les mesures, les informations officielles demeurent celles des agences des gouvernements.

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