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Policy brief 2016/02

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15th February 2016

# Latest update of tax revenues (February 2016)

Comparison with previous forecast for 2015 - 2019 (from October 2015)

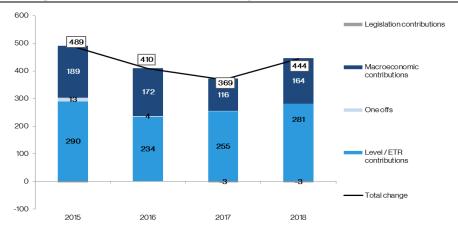
#### Martina Alexová

In comparison with the previous forecast, we expect higher accrued tax¹ revenues for 2015, by EUR 489 mil. (0.6 % GDP). Higher effectiveness in VAT, CIT and SSC collections was the main contributors to the revision for 2015. The revision has increased tax revenues by about EUR 410 mil. (0.5 % GDP) for 2016, EUR 369 mil. (0.4% GDP) for 2017 and EUR 444 mil. (0.5 % GDP) for 2018 compared to the October forecast (sets the baseline for general government budget for 2016 - 2019²).

Higher tax revenues on the entire horizon

Better macroeconomic fundamentals (labour market and government investments) together with higher effectiveness in tax collection further **increase expected general government (GG) tax revenues for 2015 by EUR 489 mil**. In particular, higher effectiveness in SSC, VAT and CIT collections accounts for more than half of increase. The rest is due to improved labour market conditions. The updated tax forecast will improve the final government deficit for 2014 by EUR 72 mil (0,1% GDP)<sup>3</sup> and decrease the deficit (ceteris paribus) for 2015 by 0.5% GDP, to bring it closer to its targeted level – 2.49% GDP. The current update of tax revenues is based on the latest macroeconomic forecast<sup>4</sup> and outturn information on tax collections.

Figure 1: Change of GG tax revenue forecast compared to October 2015<sup>5</sup> (EUR million)



\*ETR = Effective Tax Rate simplified measure of effectiveness of tax collection

Source: IFP

<sup>&</sup>lt;sup>1</sup> Including social security contributions (SSC) – sum of social insurance contributions (SIC) and health insurance contributions (HIC)

<sup>&</sup>lt;sup>2</sup> The final budget figure for 2016 included additional cash reserve from improved tax collection efficiency of EUR 300 mil. (VAT: EUR 250 mil., excises on mineral oil: EUR 50 mil.), which was incorporated in the parliament. The impact of the decreased VAT rate for selected products was also not previously taken into account in the budget. Taking these facts into account, estimated revenues for 2016 are higher by EUR 65.8 mil., for 2017 by EUR 69.0 mil. and for 2018 by EUR 72.4 mil.

<sup>&</sup>lt;sup>3</sup> Compared to Eurostat's October notification. Taking into account CIT outturns and a one-off adjustment in Special levy also influenced this update.

<sup>&</sup>lt;sup>4</sup> The updated (February 2016) macroeconomic policy brief is published at IFP website

<sup>&</sup>lt;sup>5</sup> The methodology for calculation of contributions can be found in forecast evaluation methodology manual (only in Slovak)

Positive economic situation drives tax revenues

The revised macroeconomic forecast increased tax revenues by EUR 189 mil. (0.2% GDP) for 2015 and by EUR 172 mil. (0.2% GDP) for 2016. The main macroeconomic indicators with positive influences on forecast tax revenues are ongoing improvement on the labour market and higher government investments from drawing down of euro funds. Higher profitability<sup>6</sup> of companies further increased tax revenues in 2015. Developments in better wages and employment (Figure 2) as well as investments in the car manufacturing sector<sup>7</sup> will produce higher tax revenues in 2016-2019. The positive effect of these investments is expected to materialize when actual production begins (Box 1).

### BOX 1: Preliminary impact of Jaguar Land Rover (JLR) investment on tax revenues

The JLR investment plan significantly influences the growth of the economy and employment from 2016. During the investment stage (until 2017) there will be a positive impact particularly in the construction sector. From 2018, when the car manufacturing is expected to start and up to 2019 when full operations are expected in JLR, the main impact will be on a car manufacturing sector. The cumulative expected impact of JLR investment by the end of 2019 is EUR 220 mil. (0.3% GDP).

Higher tax revenues (0.3% GDP) are also expected in the years after 2019. Tax revenues will be influenced by wages and employment growth and consequently by higher consumption by employees as well as by higher profits being made by JLR and its suppliers.

The extension of the suppliers' network and secondary impact on domestic demand are incorporated in estimated impact of the JLR investment on tax revenues. The estimation is based on macroeconomic fundamentals approved by Macroeconomic Committee (with the exception of 2020). The estimate does not assume that any tax reliefs will be paid to JLR or its suppliers.

Estimated impact of the JLR investment on tax revenues for years 2016-2019 (EUR mil.)

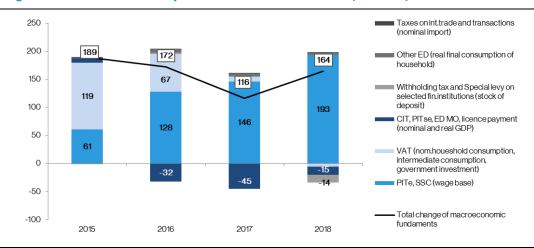
	2016	2017	2018	2019			
Taxes on labour (PITde, SSC)	6.6	18.6	56.5	107.6			
Taxes on capital (CIT, PITse, Withholding Tax)	5.4	13.3	24.5	56.2			
Taxes on consumption (VAT, Excise Duties)	3.6	13.7	29.0	56.6			
Total	15.6	45.6	110.0	220.4			
Note: preliminary estimated impact for 2020 - EUR 265 mil.			So	Source: IFP			

Table 1: Update of main macro indicators, February 2016 vs. September 2015													
	gro	wth in %	(Februa	change compared to September (in pp)									
	2015	2016	2017	2018	2019	2015	2016	2017	2018				
GDP, real	3.6	3.2	3.6	4.1	4.6	0.4	0.1	0.0	0.5				
GDP, nominal	3.2	3.3	5.3	6.3	6.9	0.2	-0.8	-0.2	0.6				
Final household consumption,													
real	2.3	3.2	2.6	2.7	2.9	0.2	0.4	-0.1	-0.1				
Final household consumption,													
nominal	2.1	3.3	4.3	4.8	5.2	0.0	-0.3	-0.2	0.0				
Adjusted base for VAT	5.0	0.9	3.5	4.3	5.7	2.3	-1.0	-1.1	-0.3				
Wage base	5.0	4.7	5.4	5.9	6.1	0.6	0.6	0.1	0.3				
Stock of deposit	6.9	6.7	5.0	5.6	5.1	1.3	2.2	-0.4	0.7				

<sup>&</sup>lt;sup>6</sup> The cumulative annual growth of profitability in 3rd quarter 2015 is 16.7%

<sup>&</sup>lt;sup>7</sup> The construction of JLR factory, a new facility for VW and production of a new model of PSA

Figure 2: Macroeconomic impact on tax revenue forecast<sup>8</sup> (EUR mil.)

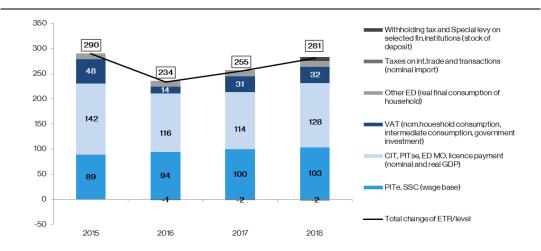


Source: IFP

Ongoing improvement of tax collection

**Further improvement in tax collections**<sup>9</sup> **increases expected tax revenues in 2015 by EUR 290 mil. (0.4 % GDP, Figure 3).** Higher collections of SSC and personal income tax from dependent activity (PIT) are behind this increase. Based on the growth of both SSC and PIT in the current year we revised our expected yield for the whole forecasted horizon. Based on the continuing growth in effectiveness of mineral oil tax collection (since 2012) we assumed the stable ETR across the whole forecast period. Profitability growth was significantly higher than forecast for CIT in the macro base<sup>10</sup> which resulted in further increase of CIT revenue. In part, higher VAT collection was due to increased drawing down of euro funds at the end of 2015. For the following years we expect stable drawing down of euro funds at the 2014 level (with the exception of transportation activity). VAT revenues are adjusted for this "increased euro funds" effect across the whole forecast period. Due to this adjustment, higher VAT tax collections are expected in 2016-2019.

Figure 3: Impact of ETR on the tax revenue forecast (EUR mil.)



Source: IFP

<sup>8</sup> Taxes are categorized according to the degree of influence of the macroeconomic aggregate on the each tax. ED = excise duty, PITse = PIT business activity, PITe = PIT dependent activity, ED MO = excise duty on mineral oil, SSC = social security contributions

<sup>&</sup>lt;sup>9</sup> The effectiveness of tax collection is measured by effective tax rate ( "ETR")

<sup>&</sup>lt;sup>10</sup> GDP – employees' compensations provides a good proxy for companies' profitability

#### No legislative changes with an impact on tax revenues have been adopted.

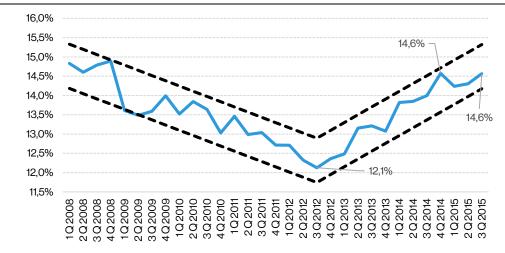
Continuing positive development in CIT

For CIT we are experiencing ongoing positive growth since February 2014. Based on the final settlement the accrued CIT revenue for 2014 is EUR 2 047 mil. which is EUR 27 mil. higher than we expected in October 2015. CIT revenues are also increased in 2015 as a result of higher profitability growth. Based on recorded profitability in the third quarter we expect profits of Slovak companies to increase by 7.9% in 2015. This is twice as much as we expected in October. Investment incentives delivered through tax reliefs complicate the CIT forecast (Box 2).

Higher VAT revenues as a result of massive investments of GG

Higher economic activity connected with the drawing down of euro funds in the third quarter significantly raised VAT revenues. The VAT effective tax rate (ETR) reached a 6-year high. We **increased accrued VAT revenues by EUR 180 mil. (0.23% GDP) in 2015.** For following years we adjusted VAT revenues to take into account increased tax collection in 2015 (due to increased utilization of euro funds in 2015). Several legislative changes coming into effect in 2016, mainly the reduced rate for selected groceries, create a negative risk on VAT revenue forecast. Against this, the introduction of a reverse charge in construction (with effect from 2016) may bring additional VAT revenues.

Figure 4: VAT effective tax rate (%)<sup>14</sup>



Source: IFP

Wages and employment growth

Surprisingly high growth of **SSC continued in first three quarters of 2015.** Based on the available data the growth of SSC was much higher than the growth in the wage base in the last quarter of 2015 as well. At the moment we do not have complete data to analyse this discrepancy<sup>15</sup>. For following years, in accordance with economic theory, we expect approximately equal growth in contributions and the wage base.

<sup>&</sup>lt;sup>11</sup> Revenues are adjusted for adopted legislative changes which influence benchmarked years (eg. decrease of CIT rate from 23% to 22%, introduction of minimum CIT)

<sup>&</sup>lt;sup>12</sup> Cumulative annual growth of 16.7%, after adjustment for one off adjustments not subject to CIT the growth is only "10.0%"

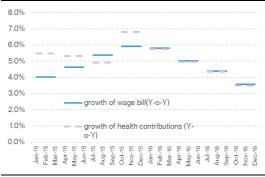
<sup>13</sup> The reverse charge transfers tax liability to purchaser. The aim is to avoid tax frauds at all stages of the supply chain, except for retail

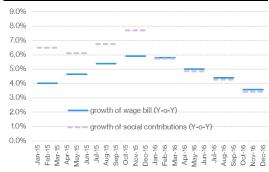
The VAT effective tax rate is calculated as VAT revenues divided by the sum of final consumption by households, intermediate consumption by general government and gross fixed capital formation by general government. VAT revenues are based on VAT tax returns and are adjusted for legislative changes and other factors

<sup>&</sup>lt;sup>15</sup> Only 40% of the growth of contributions and PIT in 2015 is explained by macro fundamentals, the rest seems to be due to higher effectiveness in tax collection

Figure 5: Annual growth of health contributions and wage base (1-3Q real)







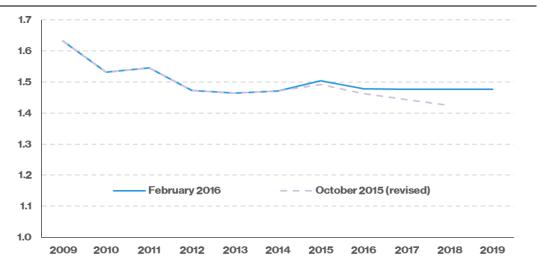
Source: IFP

Source: IFP

Stabilization of mineral oil revenues

Tax revenues from mineral oil are higher by EUR 13 mil. (0.02% GDP) than we expected in the October 2015 forecast. Improved tax collection efficiency is accountable for two thirds of this increase. Based on the stable ETR development during 2012-2014 (confirmed by growth in 2015) we assumed a stable ETR in future years (Figure 7). Forecast growth of other excise duties is in line with the latest forecast.

Figure 7: Excise duty on mineral oil, ETR development (%)



Source: IFP

# BOX 2: Tax reliefs from 2006 to 2015

Foreign literature<sup>16</sup> shows significant inverse correlation not only between FDI and the headline CIT rate but also between FDI and effective tax rate (which takes into account reliefs and subsidies). Therefore, governments make an extra effort to attract FDI through investment incentives.

These subsidies can be direct or they can take a form of a tax relief. The tax relief would decrease the tax liability of a company. From the public finance perspective, a tax relief is more attractive than a direct subsidy because a tax relief can be utilized only when a company earns a profit (which depends on the production or service

<sup>&</sup>lt;sup>16</sup> De Mooij a Ederveen (2003) show that a 1 p.p. increase of statutory rate decreases FDI by 3.3% (and vice versa)

supplied by a company, which generates various direct and indirect effects). In practice, companies usually do not fully utilize available tax reliefs (in comparison to direct subsidies). Tax returns data shows that companies **utilize on average 27% of approved tax reliefs**. In other words companies are able to spend every euro from direct subsidies, but, use only 27 cents of every Euro of available tax reliefs. **Already approved tax reliefs create a high uncertainty for CIT forecast.** 

## Approved and utilized tax reliefs 2006 to 2015 (EUR mil.)

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved tax reliefs	207	79	33	31	10	33	121	47	88	26
Utilized tax reliefs*	140	139	55	30	31	26	39	42	47	NA
	1. year	2. year	3. year	4. year	5. year	6. year	7. year	8. year	9. year	10. year
Average utilization**	0,8%	4,1%	4,0%	6,1%	4,1%	1,6%	1,6%	1,7%	1,0%	2,6%

<sup>\*</sup> relief utilized in each particular year (approved a maximum 10 years previously). Various utilization possibilities, usually not in the first years after approval, the possibility to utilize relief for 10 years.

More information about approved investment subsidies, their utilization and structure are published at web IFP (in Slovak).

Based on these facts IFP prepared its own model for the evaluation of the investment proposals. Based on criteria such as cost effectiveness, decrease of regional differences and innovative potential, the model creates ratings that enable us to evaluate the added value of proposed investment for Slovakia. The model will be further updated and modified.

Taxes as % of GDP

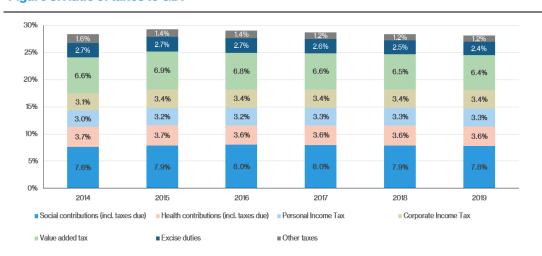
**Tax revenues account for almost one/third of GDP in 2015** (29.3%) which is 1 p.p. more than in 2014 (Figure 8). In 2016-2019 we expect a slight decline in their share of GDP, due to higher GDP growth compared to the corresponding macro bases.

Major direct taxes from labour and capital and VAT grew faster than other taxes in 2015. Improvement in the labour market in 2015 was reflected in GDP growth, which in turn raised both SSC and PIT revenues. Ongoing improved administration effectiveness and especially massive government investment in 2015 significantly increased VAT collection. Unexpected growth in companies' profitability materialized in higher CIT revenues. For the forecast horizon we expect stable direct taxes relative to GDP, due to comparable GDP and wage base growth. Indirect taxes are slightly declining due to higher GDP growth relative to consumption.

Source: IFP, MH SR

<sup>\*\*</sup> Average utilization since 2004 according to the lifespan of reliefs, cumulative total - 27,6%.

Figure 8: Ratio of taxes to GDP



Source: IFP

The Ministry of Finance (MoF) prepares and publishes forecasts of tax and social contribution revenues in accordance with the constitutional Fiscal Responsibility Act. The forecast of tax and social contributions revenue was discussed at the meeting of **The Tax Revenue Forecast Committee on 11th February 2016.** The forecast was evaluated as **realistic** by every member of the Committee (NBS, KRRZ, Infostat, SISP, Tatrabanka, UnicreditBank and ČSOB<sup>17</sup>).

More about tax forecast, including materials and relevant documents can be found on the IFP website in the section "Economic forecasts ⇒ tax forecast."

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NBS=National Bank of Slovakia, KRRZ=Council for Budget Responsibility and Infostat are public organizations. SISP, Tatrabanka, UnicreditBank and ČSOB are private banks.

Table 2: Actual forecast and comparison with G	able 2: Actual forecast and comparison with General Government budget for 2015-2017 and proposal for GG budget for 2016 - 2018 (October forecast) (EUR million, ESA2010)																							
	(	(1) GG budget 2015 - 2017 (2) October forecast (3) Actual forecast (February 2016)					Difference (3) - (1)					rence (3) - (1) Difference (3)			- (2)									
Indicator	2014	2015	2016	2017	2014	2015	2016	2017	2018	2014	2015	2016	2017	2018	2019	2014	2015	201 6	2017	201 4	201 5	201 6	201 7	201 8
Total GG revenues	12 469	12 950	13 459	13 890	12 808	13 414	13 817	14 330	15 018	12 880	13 798	14 064	14 519	15 239	16 133	410	848	605	629	72	384	247	189	221
Tax on income, profit and capital assets	4 560	4 852	5 100	5 382	4 796	5 157	5 399	5 735	6 090	4 819	5 317	5 518	5 828	6 211	6 662	259	466	418	446	23	161	119	94	121
Personal Income Tax	2 269	2 394	2 536	2 685	2 278	2 423	2 555	2 709	2 886	2 280	2 471	2 617	2 776	2 962	3 160	11	77	80	91	2	49	62	67	76
Income from dependent activity	2 132	2 249	2 385	2 527	2 138	2 275	2 406	2 555	2 726	2 138	2 320	2 466	2 620	2 799	2 989	6	71	82	93	0	45	60	65	73
Income from business and other self-employment activity	137	145	152	157	140	148	149	154	160	142	152	150	156	163	171	6	7	-1	-2	2	4	2	2	3
Corporate Income Tax	2 120	2 312	2 407	2 525	2 342	2 575	2 677	2 846	3 007	2 364	2 684	2 726	2 870	3 056	3 291	243	372	319	345	21	109	49	24	48
Withholding tax	171	146	156	173	175	159	167	180	197	175	162	175	182	194	211	4	16	18	9	0	3	8	3	-4
Domestic taxes on goods and services	6 931	7 142	7 393	7 653	7 036	7 318	7 470	7 748	8 043	7 036	7 524	7 587	7 837	8 143	8 549	105	382	194	184	0	206	117	89	99
Value added tax	4 917	5 099	5 314	5 546	5 021	5 236	5 358	5 576	5 835	5 021	5 416	5 440	5 617	5 863	6 200	104	317	126	71	0	180	83	41	28
Excise duties	2 014	2 043	2 079	2 107	2 015	2 082	2 113	2 172	2 208	2 015	2 108	2 147	2 220	2 279	2 349	1	66	68	113	0	26	34	48	71
On mineral oil	1 067	1 080	1 104	1 126	1 077	1 126	1 139	1 165	1 190	1 077	1 139	1 157	1 197	1 246	1 303	10	59	53	70	0	13	17	32	55
On spirits	202	206	210	212	202	205	209	213	217	202	205	210	214	218	222	-1	0	1	2	0	0	1	1	1
On beer	56	57	58	59	55	56	57	58	59	55	57	59	60	61	62	-1	0	0	0	0	1	1	1	1
On wine	4	4	4	5	4	5	4	5	5	4	4	4	4	5	5	0	0	0	0	0	0	0	0	0
On tobacco	643	654	661	662	640	653	665	692	698	640	665	680	707	712	718	-3	11	19	45	0	12	15	15	14
On electricity	17	17	17	18	14	13	13	13	14	14	13	13	14	14	14	-3	-4	-4	-4	0	0	0	0	0
On natural gas	23	24	24	24	22	24	24	24	25	22	23	23	24	25	25	-1	-1	-1	0	0	0	0	0	0
On coal	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Taxes on international trade and transactions	29	30	26	28	32	28	23	25	27	32	29	23	24	26	27	2	-1	-3	-3	0	1	0	-1	-1
Local taxes (incl. Motor vehicle tax until 2015)	652	675	682	702	647	514	516	537	561	647	525	522	538	556	577	-5	-150	-160	-164	0	10	6	1	-4
Other taxes	297	251	258	125	297	396	408	286	298	346	403	414	291	304	318	49	152	156	166	48	7	5	5	6
Social security funds (SSC)	8 547	8 673	9 064	9 491	8 539	8 946	9 179	9 653	10 171	8 539	9 051	9 341	9 834	10 394	11 007	-8	378	277	343	0	105	162	181	223
Social contributions (incl. tax due)	5 767	5 965	6 225	6 489	5 761	6 072	6 324	6 625	6 956	5 761	6 165	6 453	6 767	7 126	7 520	-7	201	228	278	0	93	130	142	170
Health contributions (incl. taxes due)	2 780	2 708	2 839	3 002	2 779	2 874	2 855	3 028	3 215	2 779	2 886	2 888	3 066	3 268	3 487	-2	178	49	65	0	12	32	39	53
Total taxes and SSC revenues	21 017	21 622	22 523	23 381	21 347	22 360	22 995	23 983	25 190	21 419	22 849	23 405	24 353	25 634	27 139	402	1 227	882	971	72	489	410	369	444
Fines and penalties	42	42	42	42	49	35	35	35	35	49	32	32	32	32	32	7	-10	-10	-10	0	-3	-3	-3	-3
Total taxes and SSC revenues incl. fines and penalties	21 059	21 664	22 565	23 423	21 396	22 395	23 030	24 018	25 225	21 468	22 881	23 437	24 385	25 666	27 171	409	1 217	872	961	72	486	407	366	441
% GDP	28.0	27.8	27.5	27.0	28.4	28.9	28.4	28.0	27.8	28.4	29.3	29.1	28.7	28.5	28.2	0.5	1.6	1.1	1.1	0.1	0.6	0.5	0.4	0.5
Central government (S1311)	9 797	10 127	10 488	10 883	10 137	10 563	10 789	11 240	11 739	10 160	10 915	10 927	11 367	11 884	12 561	363	788	439	484	23	352	138	127	145
State finance assets (S1311)	225	179	187	55	225	182	190	60	63	273	186	192	61	64	68	48	7	5	7	48	4	2	2	1
Local government (S1313) - municipalities	1 803	1 950	2 060	2 183	1 798	1 959	2 088	2 229	2 367	1 798	1 982	2 165	2 272	2 418	2 573	-5	32	105	89	0	23	77	43	51
Local government (S1313) - higher territorial units	573	623	654	699	576	634	674	725	774	576	639	704	743	798	855	3	16	50	43	0	5	30	18	24
Radio and TV licence fee (S1311)	71	70	69	69	71	75	75	75	75	71	75	74	74	74	74	1	5	5	5	0	0	0	0	0
Environmental fund (S1311)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
Expenditure on public purpose	51	54	50	54	52	60	56	59	64	52	57	55	58	62	67	2	3	4	4	0	-3	-1	-2	-2
of which persons	22	23	25	27	22	24	26	29	31	22	24	27	29	32	35	0	1	2	2	0	0	0	1	1
of which corporates	29	31	25	26	30	36	30	31	33	30	33	28	28	30	32	1	2	3	2	0	-3	-2	-2	-3

Table 3: Difference between actual forecast and	d October 201	5 forecast -	contribution	s (ESA201	0,EUR mil.)											
	2 015	2016	2017	2018	2015	2016	2017	2018	2015	2016	2017	2018	2015	2016	2017	2018
	Le	evel / ETR co	ntributions		Ma	croeconomic	contribution	S		One of	fs		Le	gislation o	ontribution	ons
Personal Income Tax	36	36	38	36	13	26	29	40	0	0	0	0	0	0	0	0
Corporate Income Tax	106	82	71	75	3	-33	-47	-26	0	0	0	0	0	0	0	0
Withholding tax	7	8	9	17	-1	-1	-2	-17	0	2	0	0	-3	-1	-4	-4
Value added tax	48	14	31	32	119	67	9	-5	13	1	1	1	0	0	0	0
Excise duties	20	23	38	56	6	11	10	15	0	0	0	0	0	0	0	0
On mineral oil	9	12	27	44	4	5	5	11	0	0	0	0	0	0	0	0
On tobacco	11	11	11	11	1	4	4	3	0	0	0	0	0	0	0	0
Other taxes	16	9	3	-5	2	1	1	4	0	0	0	0	0	1	1	1
Tax revenues	233	173	189	211	141	70	1	11	13	4	1	1	-3	0	-3	-3
Social contributions (incl. taxes due)	60	60	63	66	33	70	79	105	0	0	0	0	0	0	0	0
Health contributions (incl. taxes due)	-4	1	2	4	16	32	36	48	0	0	0	0	0	0	0	0
Social security funds	56	61	65	70	48	102	115	153	0	0	0	0	0	0	0	0
Total tax revenues and social security funds	290	234	255	281	189	172	116	164	13	4	1	1	-3	0	-3	-3

Table 4: Major changes in legislation (ESA2010, EUR mil.)				
New adopted legislation changes, included	2015	2016	2017	2018
		0	0	0
TOTAL		0	0	0
Revision of previously incorporated legislation changes, included				
Act no. 595/2003 Coll. on Withholding tax	-3	-1	-4	-4
Financial and nonfinancial benefits for doctors from pharmaceutical companies	-3	-1	-4	-4
Act no. 361/2014 on motor vehicle tax	0	1	1	1
Relief for minivans (should not be included in tax)	0	1	1	1
TOTAL	-3	0	-3	-3
SUM OF NEW AND REVISED LEGISLATION	-3	0	-3	-3
Announced but not approved legislation up to September 2015, not included		2016	2017	2018
TOTAL		0	0	0