

Foreign Experience in Taxation in the System of Financial Support for Small Business Development

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Abstract: The article deals with the foreign experience of small businesses taxation. The simplified taxation system features in foreign countries are investigated. The main directions of tax pressure reduction in order to support small enterprises in different countries are determined.

Keywords: taxation of small business, simplified taxation system, foreign experience of small business taxation

The development of small business is one of the most important areas for solving economic and social problems. Small business, as a special sector of the market economy, makes a significant contribution to the formation of a competitive environment, quickly adapting to external conditions and having the additional ability to modify the final product, following demand.

As you know, small business occupies a special place in the economy, as it solves the problem of employment, allows you to quickly reconfigure production and thereby quickly respond to market needs, promotes competition. At the present stage of development, small business is called upon to become not only an element of the structural restructuring of the economy, taking into account the peculiarities of the development of regions, but also to increase the revenues of local budgets.

The main financial instrument that regulates the relationship between small businesses and the state remains taxation, which can solve two problems, namely, to provide the budgets of different levels with the financial resources necessary to solve the most important economic and social problems; at the same time to promote the increase in the production of goods and services, the growth of employment of the population, in particular, through the development of small business.

The need to improve special tax regimes for small businesses, as well as the removal of the most acute contradictions and the coordination of the interests of the state and small businesses determine the relevance of studying foreign experience in taxing small businesses.

At the same time, studies of the possibilities of using foreign experience in taxing small businesses in the realities of Ukrainian modernity are rather narrow, so there is a need for a comprehensive study of this issue.

The study found that in order to reduce tax pressure on income taxes in order to support small businesses, countries take various measures: the use of a presumptive tax, the possibility of maintaining cash accounting for taxable income, as well as other simplified accounting procedures and reporting (table 1).

Table 1. Simplified tax systems for small businesses in foreign countries

A country	Taxpayers	Tax Liability Calculation
Austria	Small businesses: annual income less than 220,000 euros	Taxable income is calculated as 88% of the amount of annual receipts; the normal tax rate applies.
	Agriculture and forestry: self-employed individuals with assets below €130,000 (in 2015)	Taxable income is calculated as income for the year (including VAT) minus part of the annual expenses (70-80%), which depends on the type of activity, the size of the land, location, and how (or where) the products are sold. Taxable income for smaller (or less profitable) businesses is calculated based on the assessed value of the land
Brazil	Annual income up to BRL 3,600,000	Taxable income is equal to annual income, the tax rate increases with income and differs for different types of activity (trade, industry or services).
	Micro enterprises: Individuals with an annual income of less than BRL 60,000 with 1 minimum wage employee	Monthly payment of a fixed amount of tax (depending on the type of activity - commerce or industry; services; commerce and services). Exempted from paying federal taxes, local taxes are paid.
	Annual income up to 78 million BRL	Taxable income is equal to annual income; the tax rate is different for different types of activities
	Small businesses owned by natural persons without employees and with an income of up to CZK 5 million during one of the last three tax periods	Taxable income is set by the tax authorities.
	Seafaring enterprises	Taxable income depends on the tonnage of the vessel; the rate increases with tonnage.
Czech	Micro-enterprises, non-payers of VAT with annual income up to: 1A 82,000 euros (trade); 1B EUR 32,900 (services)	1A Taxable income equals 29% of annual income; the normal tax rate applies; 1B Taxable income equals 50% of annual income; the normal tax rate applies.
Denmark	Individuals with annual income last year up to 150,000 euros	The amount of tax established by the tax authorities.
	Micro-enterprises: small enterprises in the service sector with up to 5 employees.	The tax is calculated on the basis of a tax card, where the tax liability depends on the type of activity and its volume, the number of employees, the number of residents in the locality where the enterprise is located.

Let us consider in more detail each of the instruments of preferential taxation of small businesses. According to the presumptive taxation scheme, enterprises that fall into the category of small enterprises according to the relevant criteria are exempt from income tax. Income tax is being replaced by a presumptive tax that provides for a taxable base other than profit, such as annual income (receipt). Since the presumptive tax usually uses an adjusted base for which ordinary tax rates are used, in some cases the tax rates on the tax depend on the type of economic activity (for example, in Brazil and France).

Taxpayer requirements are usually determined by annual income thresholds, in some countries the maximum number of employees is also taken into account (for example, in Brazil, the Czech Republic, Poland and Slovenia). It should also be noted that some presumptive tax regimes are voluntary and provide for the possibility of choosing a simplified or general taxation system with the obligatory use of one or another system for a certain number of years (Denmark).

This choice of tax regime helps to reduce tax costs and tax administration costs. Small companies may be exempted from the need to maintain accounting records. Because small businesses are less likely to employ employees for tax purposes, simplified accounting under presumptive taxation provides payers with greater confidence in the accuracy of their tax liability.

In addition to facilitating the filling of budgets from the proceeds of such taxes, the use of presumptive tax accounting schemes facilitates the transition of small enterprises that exceed the thresholds to the regular income tax regime.

The simplest type of presumptive tax is a lump-sum tax paid as a settled amount. In practice, such a tax is applied to businesses that carry out activities with a small turnover (for example, hairdressers, mechanics, fishermen).

The main advantages of the tax are its simplicity, low tax burden and low tax administration costs. At the same time, being a fixed amount, the lump-sum tax can be a big burden for businesses with lower income, and during periods when businesses receive low income or losses, the need to pay tax can lead to problems with the financial support of the enterprise. In this regard, Hungary has two modes of simplified taxation of small businesses.

The first KIVA tax regime based on the company's cash flow and replacing income tax, social contributions and vocational training contributions. The tax rate is 16% of the taxable base - the taxpayer's income. The rate increases with the increase in personnel costs. The tax regime can be used by entities with no more than 25 employees and an annual income of no more than HUF 500 million.

The problematic aspects of the application of this regime are to create conditions for promoting rapidly developing labour-intensive enterprises, as well as ensuring neutrality between the payment of wages and the tax obligations of the employer. The second regime of taxation (KATA) consists in the payment of a one-time tax by self-employed persons. Under the terms of this taxation regime, entrepreneurs registered as small taxpayers pay a monthly payment of HUF 50,000 (or HUF 75,000 if the entrepreneur opted for a higher level of social protection). This one-time payment is applied when receiving income up to HUF 6 million, if the income exceeds this amount, then a tax of 40% of the excess amount is paid.

Payment of this tax exempts from paying corporate income tax, personal income tax, social contributions, health care contributions, pension contributions, as well as contributions to employment and vocational training. At the same time, it does not exempt from paying VAT. The KATA taxation regime was created to counteract shadow business, as well as to simplify accounting for micro-enterprises.

Italy has a presumptive tax that replaces income tax, regional and municipal surcharges and regional taxes on production. Payers of this tax are exempt from paying VAT, but they cannot deduct incoming VAT payments. Tax payers can only be individual entrepreneurs with a certain annual income limit (table 2).

Table 2. Income Thresholds and Rates of Return for Simplified Tax Calculation in Italy

Sphere of economic activity	Income limit, euro	National rate of return (profitability)
Food industry	35 000	0,4
Wholesale and retail trade	40 000	0,4

Foreign food trade	30 000	0,4
international trade	20 000	0,54
Construction and real estate	15 000	0,86
Resellers	15 000	0,62
Restaurant and hotel business	40 000	0,4
Professional activity	15 000	0,78
Other	20 000	0,67

The tax on payment is calculated as 15% of the taxable base, which is established by applying the rate of return (profitability) to the gross income of the enterprise. For example, a company operating in the retail trade with an income of 40,000 euros per year should pay 2,400 euros in tax: 40,000 euros * 40% * 15% = 2,400 euros.

Another relatively simple type of presumptive tax is a tax based on indicators of enterprise size other than circulation or profits. Such indicators can be the total number of employees, the value of assets, electricity consumption, etc. The base of this tax is generally more difficult to falsify than the turnover or profit figure.

The negative feature of the tax is that payers will try to limit the financing of those costs that relate to indicators, for example, if the tax base is related to the number of employees, the risk that enterprises will try to limit the number of employees, if the tax amount depends on the area of real estate, then, respectively, investments in fixed assets are minimized.

The indicator tax is often used in relation to enterprises engaged in specific types of business activities. For example, in Denmark, such a tax is applied to shipping companies, where the indicator on which the amount of tax depends is the carrying capacity of the vessel.

In India, such a tax is imposed on the transport business, where the tax liability is defined as a specific amount for a certain volume of goods transported. In addition, tax payment indicators may be related to doing business in specific geographic areas.

For example, in Poland, the tax on microenterprises, in addition to a number of other indicators, also depends on the number of inhabitants in the city where the enterprise is located. In Austria, among the indicators that determine the amount of tax, the fact that the activity is carried out in the Alps region is taken into account. The most common type of presumptive tax is the circulation tax. Unlike one-time and indicative taxes, the circulation tax depends directly on the scale of the enterprise, which is measured by the size of its circulation.

The flat tax rate is a reasonably effective tax rate for businesses with income below a certain threshold. Thus, the circulation tax provides for a greater tax burden for low-performing enterprises, and also prevents the allocation of capital in those areas of economic activity where the profitability threshold is lower than the average. The circulation tax scheme is often applied to specific sectors of economic activity.

An interesting example is Chile, where the tax liability of small iron miners depends on the price of copper (if the latter mines copper, gold or silver). Conclusions. Summing up the foreign experience in building a taxation system for small businesses, it can be argued that in most countries of the world there are mechanisms for preferential taxation of small businesses.

It is difficult to assess their effectiveness, because in each case the taxation system is only an element of a comprehensive mechanism for financial support for small businesses. Not all options for applying preferential taxation can be used in Ukraine.

At the same time, in our opinion, some of the measures should be given special attention in the process of reforming the simplified taxation system in the future. First, the experience of Italy in the differentiation of rates by type of activity deserves attention.

The approach used in Italy, in our opinion, allows us to take into account the level of profitability of activities in a particular industry, as well as the priority of financial support for certain types of economic activities of small businesses.

Since the single tax base in Ukraine is the turnover of an enterprise, enterprises with a high level of profitability have the opportunity to take advantage of preferential taxation much more widely, while for high-cost enterprises with a low level of profitability, the advantage of a single tax is a simplified accounting and reporting procedure, and not at all receiving additional resources for development in connection with the payment of a smaller amount of tax.

Given this, we believe that the use of Italy's experience can be especially valuable in today's conditions. Secondly, the experience of Poland in taxing micro-enterprises deserves attention, where the tax is calculated depending on the type of activity and its volume, the number of employees, the number of inhabitants in the locality where the enterprise is located. Accounting for a larger list of parameters that determine the amount of the tax liability makes it possible to achieve the maximum level of tax fairness, including individual entrepreneurs.

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