

### TAX EXPENDITURES

**JANUARY 2020** 

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## Definition of tax expenditures (Exemptions and Reliefs)

In international practice, for tax reliefs and exemptions a broader term, namely - «tax expenditures» is used.

**Tax expenditures** are legal norms, regulations or practices that reduce or defer the payment of taxes to a relatively small group of taxpayers.\*

**Tax expenditures** are also government foregone revenue, due to the existence of tax reliefs and exemptions.\*\*

### **Types of Tax expenditures:**

- exceptions in taxable base;
- the non-taxable part of the base (for example, non-taxable minimum);
- reduced rates;
- tax holidays;
- special economic zones;
- tax credits;
- deferred tax payment;
- reduction in tax liabilities, etc.



<sup>\*</sup> OECD (2010). Tax expenditures in OECD countries, OECD publishing with reference to Anderson, B. (2008)

<sup>\*\*</sup> Schick A., Performance Budgeting and Accrual Budgeting: Decision Rules or Analytic Tools, 2007



# Tax expenditures – government foregone revenue - above 2 billion euro, ~1/4 of total tax revenue

### Estimated amount of tax expenditures in 2017 - 2019

		2017			2018		2019		
Тах	Min euro	% no TR*	% of GDP	Min euro	% no TR*	% of GDP	Min euro	% no TR*	% of GDP
Personal Income Tax	875.2	52%	3.3%	827.7	47.9%	2.9%	866.6	44.9%	2.8%
Corporate Income Tax	267.1	62.7%	1.0%	6.4	2.1%	0.02%	17.6	39.4%	0.06%
Micro – enterprise Tax	147.1	179.1%	0.6%	112.4	124.9%	0.4%	84.7	104.1%	0.3%
Real Estate Tax	16.0	7.0%	0.06%	18.2	8.2%	0.06%	19.2	8.5%	0.06%
Value Added Tax	837.3	38.3%	3.1%	884.6	36.0%	3.0%	899.3	34.0%	3.0%
Excise Duty	169.9	18.7%	0.6%	186.3	18.1%	0.6%	178.8	16.8%	0.6%
Natural Resources Tax	203.5	794.2%	0.8%	211.2	700.8%	0.7%	241.5	793.2%	0.8%
Vehicle Operation Tax	10.5	11.6%	0.04%	11.8	12.6%	0.04%	13.2	13.8%	0.04%
Company Car Tax	4.3	19.6%	0.02%	4.8	22.4%	0.02%	5.2	24.5%	0.02%
Electricity Tax	2.6	56.5%	0.01%	2.3	45.4%	0.01%	2.3	45.0%	0.01%
TOTAL	2,533.5	29.8%	9.5%	2,265.7	24.7%	7.8%	2,328.5	24.1%	7.6%

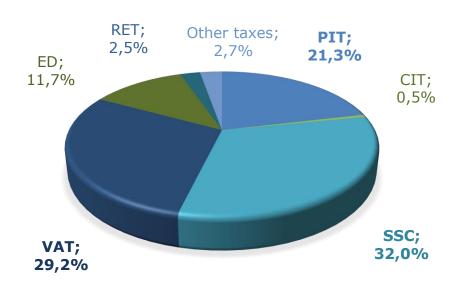
<sup>\* %</sup> of analyzed tax revenue, column TOTAL - % of total analyzed tax revenue

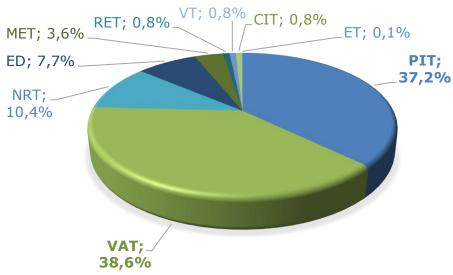


### Main tax expenditures - VAT and PIT

#### Distribution of tax revenues\* in 2019

### Distribution of tax expenditure amount in 2019





**SSC -** Compulsory State Social Security Contributions

**VAT -** Value Added Tax

**PIT -** Personal Income Tax

**CIT -** Corporate Income Tax

**ED -** Excise Duty

**RET -** Real Estate Tax

**NRT - Natural Resources Tax** 

**MET -** Micro-enterprise Tax

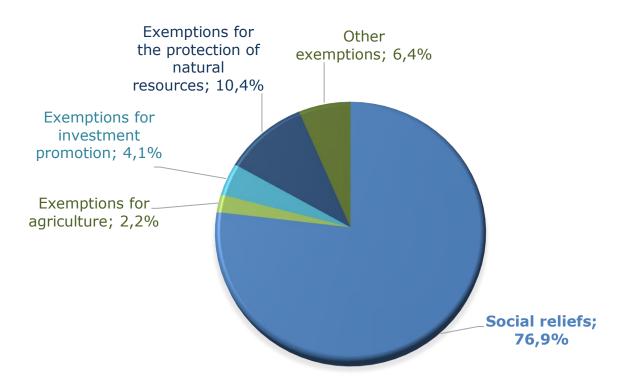
VT - Vehicle Taxes

**ET -** Electricity Tax



## **Highest amount of expenditures – social reliefs for inhabitants**

### Tax expenditures by amount and purpose in 2019, per cent





# PERSONAL INCOME TAX (PIT)





## PIT expenditures ~0.9 billion euro, slightly less than half of PIT revenue

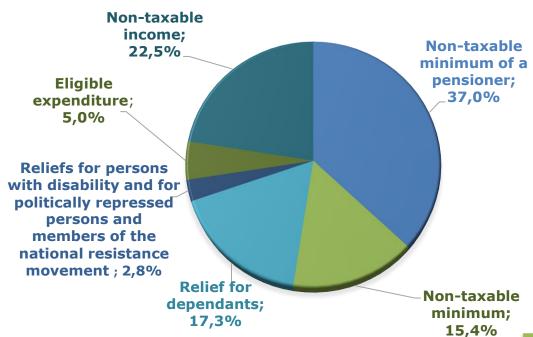
Estimated amount of PIT expenditures in 2017 - 2019, mln euro

Tax relief	2017	2018	2019
Non-taxable minimum, including:	450.4	438.5	454.5
1. Non-taxable minimum	118.0	136.1	133.8
2. Non-taxable minimum of a pensioner	332.4	302.3	320.8
Tax reliefs, including:	151.9	152.4	174.0
1. Relief for dependents	129.2	129.5	149.7
2. Relief for persons who have been recognized as persons with disability	20.0	20.4	21.8
3. Relief for politically repressed persons and members of the national resistance movement	2.8	2.5	2.4
Eligible expenses for:	56.1	48.7	43.5
1. Education and health services	13.7		
2. Medical and health services in full amount	13.8	28.2	25.2
3. Donations and gifts	0.6		
4. Contributions to private pension funds and payments of insurance premiums	28.1	20.5	18.2
Non-taxable income*, for example:	216.7	188.2	194.7
1. Exemption for income from agricultural production and rural tourism activities	4.3	3.3	3.5
<ol><li>Income obtained as a result of reduction or repayment of loan (credit) liabilities</li></ol>	25.0	19.5	19.9
3. Benefits and reimbursements paid by the State Social Insurance Agency	127.4	120.9	128.2
TOTAL (except non-taxable income)	658.5	639.6	672.0
TOTAL	875.2	827.7	866.6
Per cent of PIT revenue  Non-taxable income, according to law "On Personal Income Tax", Section 9	51.7%	47.9%	44.9%



## PIT expenditures – substantial social support

### PIT expenditures by amount in 2019, per cent



Non-taxable minimum of a pensioner, euro per month					
2018	250				
2019	270				
2020	300				
2021	330				

	Relief for dependents, euro per month
2018	200
2019	230
2020	250
2021	250

	Max. differentiated non- taxable minimum, euro per month
2018	200
2019	230
2020	250
2021	250



### VALUE ADDED TAX (VAT)





## VAT expenditures ~0.9 billion euro, ~1/3 of VAT revenue

### Estimated amount of VAT expenditures in 2017 - 2019, mln euro

	Goods and services	2017	2018	2019
Redu	Reduced VAT rate apllied to:		105,7	109,5
1.	Medication supplies	31,8	33,5	34,1
2.	Supplies of medical devices	3,3	3,6	4,0
3.	Supplies of specialised products intended for infants <sup>1</sup>	1,1	1,1	1,03
4.	Inland transport services of passengers and their luggage	11,2	22,3	23,6
5.	Supplies of educational and original literature editions	1,5	1,6	1,6
6.	Supplies of newspapers, magazines, bulletins and other periodicals	3,3	3,2	3,0
7.	Accommodation services in tourist accommodation sites	10,8	12,4	14,1
8.	Supplies of thermal energy for domestic needs	16,6	17,3	16,9
9.	Wood and firewood supplies to inhabitants <sup>1</sup>	4,8	4,8	4,7
10.	Supplies of fresh fruits, berries and vegetables	-	5,9	6,5
Non-taxable supplies <sup>2</sup>		752,9	778,9	789,9
TOT	TOTAL		884,6	899,4
Per	cent of VAT revenue	38,3%	36,0%	34,0%

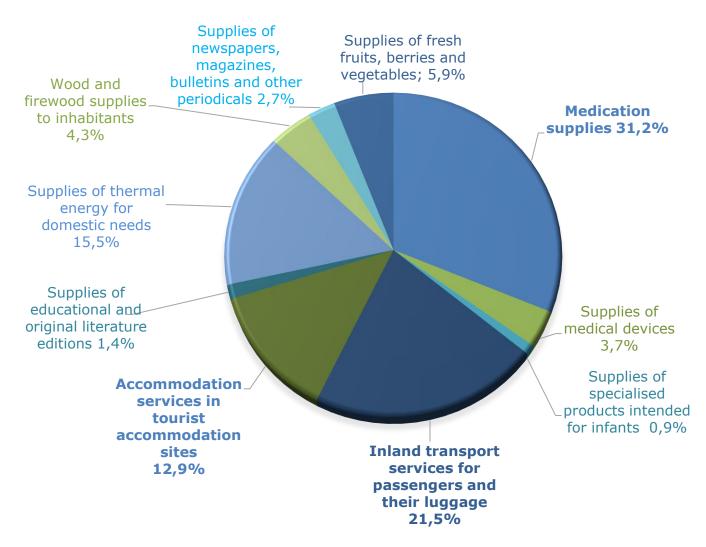
<sup>1</sup> Data available for 2017, for 2018 and 2019 an indicative assessment was calculated

Non-taxable supplies, according to Value Added Tax Law, Section 52 and non-taxable supplies of investment gold, according to Section 139. Approximate calculation, as VAT return data provides information on all transactions, including multiple supplies of the same product, not just those released for final consumption.



### VAT reduces rates (5% and 12%)socially sensetive issue

Goods and services subject to reduced VAT rates by the amount in 2019





# CORPORATE INCOME TAX (CIT)





From 2018 a new tax model is introduced – the payment of CIT is deferred until the profit is distributed or otherwise directed to expenditure which does not ensure the further development of the company

The new CIT model itself is a relieved tax regime, so most of the tax expenditures that existed until 2018 were not maintained.

#### **Retained expenditures:**

- relief for donations to Public Benefit Organizations (in order to increase the intensity of donations, **between 2020 and 2022**, companies that donate to public benefit organizations will be able to reduce the CIT to be paid for dividends calculated in the accounting year by **85%** of the amount donated, while at the same time not exceeding **30%** of the calculated CIT amount for the calculated dividends);
- relief for income from the share alienation;
- relief for subsidies to taxpayers who carry out agricultural activities;
- relief for shipping industry for shipments to domestic companies.

### The transitional rules include the following expenditures, which have been taken over for a specified period from the Law on Corporate Income Tax:

- transfer of losses of the previous years 5-year transitional period;
- tax relief for losses incurred by a state capital company, the shares of which may not be alienated, which performs functions delegated by the state not related to economic activity;
- tax relief for the supported investment projects approved by the Cabinet by 31 December 2017;
- tax relief for investments in Free ports or Special Economic Zones investments made by 31 December 2035 or the estimated wage costs made by 31 December 2024 (effective from 2020).



## The CIT expenditure amount in 2019 has increased by 175.9 per cent compared to 2018

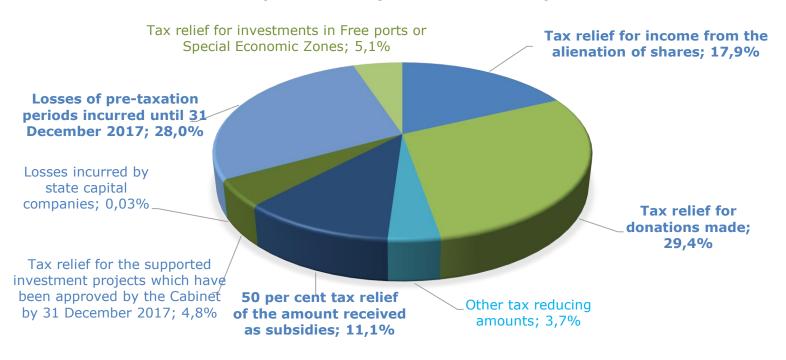
### **Estimated amount of CIT expenditures in 2018 - 2019,** mln euro

	Tax reliefs	2018	2019
Stati	utory tax reliefs, including:	5.3	11.0
1.	Tax relief for donations	0.2	5.2
2.	Tax relief for income from the alienation of shares	3.0	3.2
3.	Tax relief of 50% of the amount received in the form of subsidies as State aid for agriculture or EU support for agriculture and rural development	1.4	1.9
4.	Other tax reducing amounts	0.7	0.7
Tax	reliefs with transitional period, including:	1.1	6.7
1.	Tax relief for the possibility to cover losses of the taxation period and the previous period (with five years transitional period)	0.4	4.9
2.	Tax relief for losses incurred by state capital companies, the shares of which may not be alienated, which performs functions delegated by the state not related to economic activity	0.02	0.01
3.	Tax relief for the supported investment projects which have been approved by the Cabinet by 31 December 2017	0.7	0.8
4.	Tax relief for investments in Free ports or Special Economic Zones	0.0	0.9
TOTAL		6.4	17.6
Per co	ent of CIT revenue	2.1%	39.4%



# Main CIT expenditures in 2019 – tax relief for donations and the possibility to cover losses of pre-taxation periods

#### CIT expenditures by amount in 2019, per cent







## CIT expenditures by sectors - most used in wholesale, retail and manufacturing





### NATURAL RESOURCE TAX (NRT)





## NRT expenditures 0.24 billion euro, which is almost 8 times more than total NRT revenue

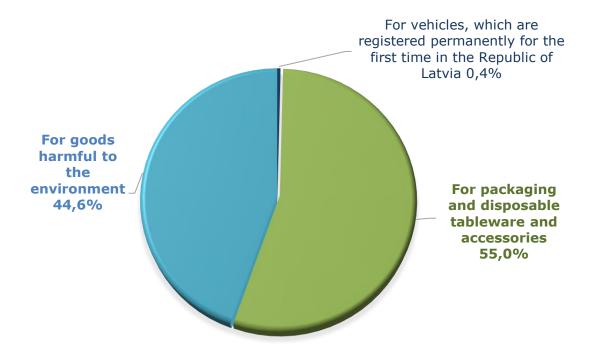
### Estimated amount of NRT expenditures 2017 - 2019, mln euro

	Tax exemptions and reliefs	2017	2018	2019
	exemption for vehicles which are registered permanently for the time in the republic of Latvia	0.8	0.9	1.0
	exemption for packaging and disposable tableware and ssories, including:	132.7	133.7	132.8
1.	Of glass source materials	26.6	27.6	28.9
2.	Of plastic (polymer) source materials	45.6	47.2	46.7
3.	Of metal source materials	13.6	13.5	12.9
4.	Of wood, paper and cardboard or other natural fibre and bioplastic source materials	32.4	32.9	33.8
5.	Plastic carrier bags	12.1	10.0	8.3
6.	Of oxy-degradable plastic and polystyrene source materials	2.4	2.5	2.3
Tax e	xemption for goods harmful to the environment, including	70.0	76.6	107.8
1.	Lubricating oils	2.8	3.1	3.1
2.	Electric batteries, lead	3.4	3.3	3.3
3.	Galvanic elements and galvanic pile	3.7	4.4	4.4
4.	Other electrical batteries	2.4	3.2	3.2
5.	All types of tyres	7.8	10.2	10.2
6.	Electrical and electronic equipment, including	49.7	52.5	83.6
	6.1. Temperature exchange equipment	_,		12.6
	6.2. Screens, monitors, and equipment containing screens having a surface greater than 100 cm2	equipment	nd electronic classification	10.3
	6.3. Light bulbs	<ul> <li>and tax rates have been changed since 1st July</li> </ul>		2.7
	6.4. Large equipment (at least one external dimension exceeds 50 cm) 6.5. Small equipment (no external dimension greater than 50 cm)		ing them in 6	38.9
			instead of ous 11	15.8
	6.6. Small information technology and telecommunication equipment	F. 67	3.3	
TOTA		203.5	211.2	241.5
Per ce	ent of NRT revenue	794.2%	700.8%	793.2%



# The purpose of NRT reliefs is to achieve active involvement of producers and traders and responsibility for ensuring waste management\*

#### NRT expenditures by amount in 2019, per cent



The taxpayer shall not pay the NRT for packaging and disposable tableware and accessories, as well as environmentally harmful goods, if the taxpayer ensures compliance with the recovery norms, has established a system for the management of these accessories and goods, submitted financial security to the MEPRD subordinate institution and concluded agreement on the application of the management system.



### MICRO - ENTERPRISE TAX (MET)





# Theoretically, the amount of foregone tax revenue is 84.7 mln euro, which is 104.1% of total MET revenue in 2019

#### MET regime - theoretically lost tax revenue 2017 - 2019\*, mln euro

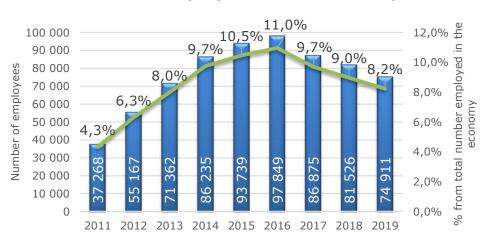
MET regime	2017	2018	2019
Total impact of MET, including:	147.1	112.4	84.7
MET impact on SSIMC	97.9	83.1	65.5
MET impact on PIT	49.2	29.4	19.2
Per cent of MET revenue	179.1%	124.9%	104.1%

<sup>\*</sup> Theoretical assessment of the Ministry of Finance of how much the state loses in the form of taxes, allowing the application of the MET regime, assuming that the existing MET payers would have paid PIT and SSIMC as in a general regime

#### **MET rates 2010 - 2018**

<b>Turnover,</b> euro per year	From 1 September 2010 to 31 December 2016	2017	From 1 January, 2018
Up to 7 000		12%	
Up to 40 000 (until 1 January 2018 – from 7 000 to 100 000)	9%	15%	15%

### **Number of employees in micro-enterprises**





### **EXCISE DUTY (ED)**





## ED expenditures ~179 mln euro, which is almost 17% of total ED revenue in 2019

### Estimated amount of ED expenditures in 2017 - 2019, mln euro

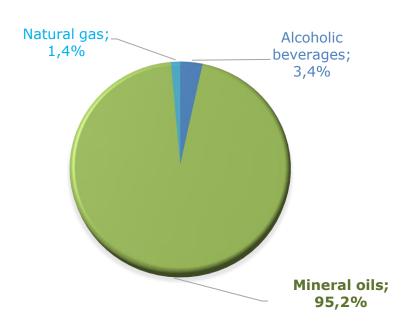
Tax exemptions and reliefs	2017	2018	2019
ED reduced rates, including:	57.4	60.9	65.3
1. Alcoholic beverages (for small brewery beer realization)	1.1	1.6	2.2
2. Mineral oils (for labelled mineral oils used as fuel and for agricultural purposes, as well as biofuels)	55.2	58.2	62.2
<ol> <li>Natural Gas (for use as a fuel in industrial production and processing of agricultural raw materials)</li> </ol>	1.1	1.1	0.9
Exemptions, including:	112.5	125.3	113.5
1. Alcoholic beverages (mainly denatured alcohol)	59.4	58.4	44.3
2. Tobacco Products	3.0	3.3	3.0
<ol> <li>Mineral oils (supplied and used in aircrafts which are not used for private recreation and entertainment)</li> </ol>	48.9	62.2	64.6
4. Natural Gas (which is used for – purposes other than as fuel; in two ways (both as a fuel and for purposes other than use as fuel); mineralogical processes; the heating of covered areas of agricultural land (greenhouses) and the heating of industrial poultry houses (barns) and incubators)		1.3	1.5
5. Non-alcoholic beverages and coffee	0.1	0.1	0.1
TOTAL	169.9	186.3	178.8
Per cent of ED revenue	18.7%	18.1%	16.8%



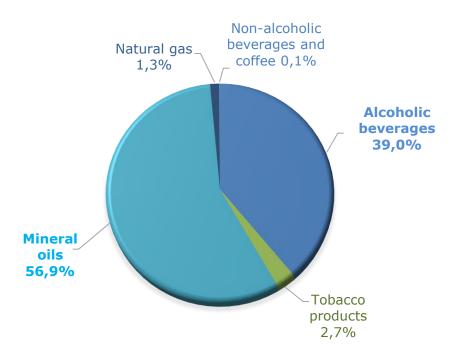
# Highest ED expenditure amount of reduced rates – 96% mineral oils (agriculture, fuels and biofuels), of exemptions ~51% for mineral oils (mainly for use in aircraft for commercial purposes)

#### **ED** expenditure by amount in 2019, per cent

Distribution of the amount of products subject to the reduced ED rates



#### Distribution of the amount of ED exemptions





### REAL ESTATE TAX (RET)





Republic of Latvia

# RET expenditures ~19 mln euro, which is not significant comparing to other tax expenditures (8.5% of RET revenue), but their amount tends to grow

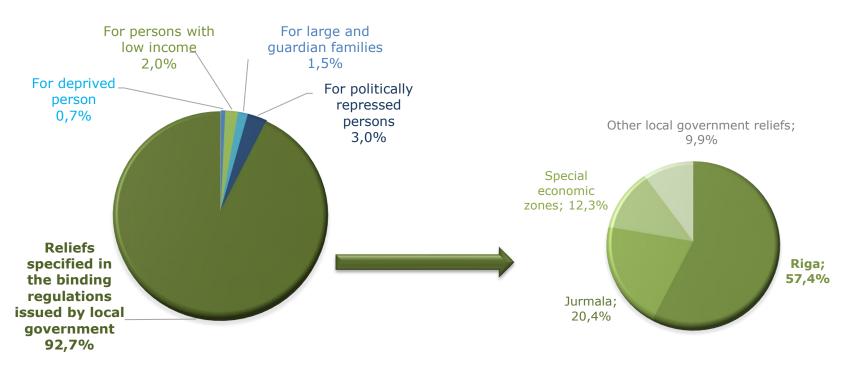
Estimated amount of RET expenditures 2017 - 2019, mln euro

Tax exemptions and reliefs	2017	2018	2019
The Law on Immovable property tax provides the following reliefs, including	1.9	2.0	1.4
1. For deprived persons	0.2	0.1	0.1
2. For persons with low income		0.4	0.4
3. For large families (with 3 or more children) and guardian families	0.7	0.9	0.3
4. For politically repressed persons	0.6	0.6	0.6
Reliefs specified in the binding regulations issued by local governments, including:	14.1	16.2	17.8
In Riga, including:	7.5	9.3	10.2
1. Reliefs for families with children	3.2	3.1	3.3
2. For buildings recognized as a State protected cultural monument and for buildings located in the State metropolitan monument area	1.0	1.1	2.3
3. For persons with disability and pensioners		1.2	1.2
4. For residential houses owned by a municipal capital company		0.5	0.6
5. Relief for persons who have taken over the management of a residential house from the municipality		1.6	2.0
In Jurmala, including:	3.3	3.6	3.6
<ol> <li>For properties, if a natural person has declared a place of residence in Jurmala</li> </ol>		3.4	3.2
For special economic zones	2.2	2.0	2.2
TOTAL		18.2	19.2
Per cent of total RET revenue	7.0%	8.2%	8.5%



## RET reliefs - dominated by reliefs granted by local governments (~93%)

#### **RET expenditures by amount in 2019,** per cent



<sup>\*</sup> More than half (57.4 per cents) of the total amount of reliefs specified in the binding regulations of local governments is made up of tax reliefs granted by the **Riga** City Council (in 2019 - 10.2 million euro). Special mention should be made of the additional tax reliefs granted by the Riga City Council to families with children. Namely, in addition to the reliefs already provided by law for large families (50 per cents of the calculated RET for persons with three or more children under the age of 18, but not more than 500 euro), the Riga City Council has set additional reliefs in its binding regulations: **90 per cent** for three or more children, **70 per cent** for two children and **50 per cent** for one child.

The RET relief granted in **Jurmala** for land properties, if a natural person has declared his / her basic residence in the administrative territory of Jurmala, accounted for 16.6 per cent of the total amount of reliefs and 87.9 per cent of the total amount of reliefs in Jurmala.



## VEHICLE OPERATION TAX (VOT) AND COMPANY CAR TAX (CCT)





### The impact of vehicle tax expenditures is relatively insignificant (only 0.06% of GDP) in 2019

### Estimated amount of VOT and CCT expenditures in 2017 - 2019, mln euro

Tax exemptions and reliefs	2017	2018	2019
Vehicles exempted from the VOT <sup>2</sup> :	7.8	8.7	9.6
1. Motorcycles, tricycles and quadricycles	0.03	0.02	0.03
2. Cars (reg. before 2005)	5.0	4.9	5.5
3. Cars (reg. after 2005)	2.1	2.8	2.7
4. Cars (reg. after December 31, 2008)	0.8	0.6	1.3
6. Buses and trucks	0.1	0.1	0.1
VOT reliefs:	2.7	3.1	3.6
<ol> <li>50 per cent for a vehicle the owner, holder or driver of which is an institution subordinate to the Ministry of the Interior, an institution subordinate to the Ministry of Defence or the National Armed Forces, a local government police institution</li> </ol>	0.2	0.2	0.2
<ol><li>75 per cent for a producer of agricultural products, an agricultural service co- operative society and a recognised aquaculture goods vehicle</li></ol>	1.3	1.4	1.6
<ol><li>50 per cent for one vehicle if the owner or holder has a large family (with 3 and more children)</li></ol>	1.3	1.5	1.7
Exemptions from the Payment of the CCT <sup>3</sup>	4.3	4.8	5.2
TOTAL	14.8	16.7	18.3
Per cent of Vehicle taxes revenue	13.1%	14.4%	15.8%

Main exemptions and reliefs for which information is available

Vehicle operation tax exemptions for disabled, diplomatic, consular or international representation vehicles, operational vehicles, vehicles with historic vehicle status, sports vehicles, vehicles for the care of disabled children and electric vehicles, under the Vehicle Operation Tax and Company Car Tax Law, Section 6

Exemptions from company car tax for emergency vehicles, manufacturer demonstration vehicles, rental vehicles with specific conditions, vehicles 29 used exclusively for business purposes, vehicles with historic vehicle status, sports vehicles, under the Vehicle Operating Tax and Company Car Tax Law, Section 14



# ELECTRICITY TAX (ET)





# From 2017 several ET reliefs have been abolished. The impact of ET reliefs is insignificant (only 0.01 per cent of GDP)

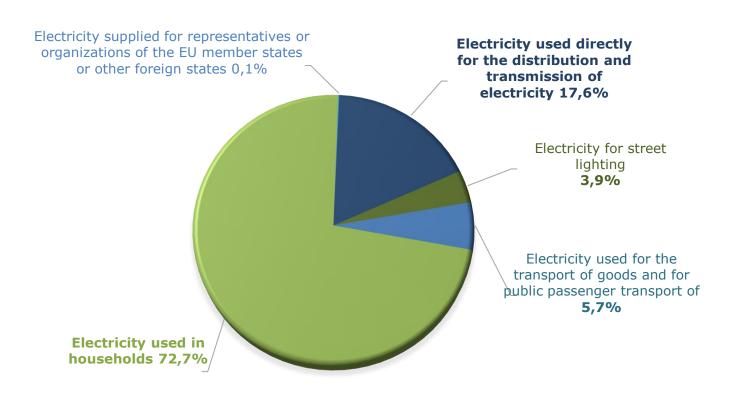
### Estimated amount of ET expenditures in 2017 - 2019, mln euros

Tax exemptions and reliefs	2017	2018	2019
Electricity exempt from tax in accordance with Section 6, Paragraph two and three of the Electricity Tax Law, including:	2.5	2.2	2.3
1. Electricity used for the transport of goods and for public passenger transport	0.1	0.1	0.1
2. Electricity used in households	1.6	1.7	1.6
3. Electricity supplied for representatives or organizations of other European Union Member States or other foreign states	0.004	0.003	0.003
4. Electricity used directly for the distribution and transmission of electricity	0.8	0.8	0.4
Taxable amount of electricity supplied to a person for the provision of street lighting services, which is exempt from tax in accordance with Section 6, Paragraph five of the Electricity Tax Law	0.1	0.1	0.1
TOTAL	2.6	2.3	2.3
Per cent of ET revenue	56.5%	45.4%	45.0%



## ~63% of ET expenditures for household users

**EN expenditures by amount in 2019,** per cent





Ministry of Finance Republic of Latvia