## Production vs Revenue Efficiency With Limited Tax Capacity Theory and Evidence From Pakistan

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November 2013

# Production Efficiency

- Production Efficiency Theorem (Diamond & Mirrlees 1971): Any second-best optimal tax system maintains production efficiency
- Key policy implications:
  - Permits taxes on consumption, wages and profits
  - Precludes taxes on inputs, turnover and trade
- The theorem has been influential in the policy advice given to developing countries

Production Efficiency vs Revenue Efficiency

- Production Efficiency Theorem assumes perfect tax enforcement
   This is violated everywhere, but especially in developing countries
- Tax evasion introduces a trade-off between production and revenue efficiency in tax design
- In the context of firm taxation in Pakistan, our contribution is:
  - Simple model on the optimal production-revenue efficiency trade-off
  - Quasi-experimental evidence on the evasion elasticity w.r.t taxes
  - Link model & evidence to quantify optimal policy

# Novel Quasi-Experimental Approach

- Minimum Tax Scheme: firms are taxed on either profits or turnover (lower tax rate on turnover) depending on which tax liability is larger
  - This production inefficient policy is motivated by tax compliance
- Non-standard kink where both the tax rate and the tax base jump
  - Kink changes real and evasion incentives differentially
  - ▶ Novel method for estimating tax evasion based on a bunching approach
- ► Wide applicability of our approach since such schemes are ubiquitous

## Contributions to Previous Literature

- Public Finance & Development: Kleven & Waseem (2013), Pomeranz (2013), Kumler et al. (2013)
- Optimal taxation with enforcement problems: Emran and Stiglitz (2005), Gordon & Li (2009), Kleven et al. (2009)
- Estimating tax evasion: Andreoni et al. (1998), Slemrod (2007), Kleven et al. (2011)
- Corporate taxation: Hassett & Hubbard (2002), Auerbach et al. (2010), Devereux et al. (2013)
- **Bunching methodology:** Saez (2010), Chetty et al. (2011)

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- Empirical Methodology

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### **Empirical Results**

Bunching Evidence Estimating Evasion

### **Policy Implications**

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## Firm Behavior: Real vs Evasion Responses

- ▶ Real output y, real cost c(y), declared cost  $\hat{c}$ , penalty  $g(\hat{c} c(y))$
- Tax liability  $T = \tau [y \mu \hat{c}]$
- Maximization of after-tax profits

$$c'(y) = 1 - \omega$$
$$g'(\hat{c} - c(y)) = \tau \mu$$

- Production wedge  $\omega = \tau \frac{1-\mu}{1-\tau\mu}$ :
  - $\omega = 0$  for a profit tax  $\mu = 1$  [production efficiency]
  - $\omega = \tau$  for a turnover tax  $\mu = 0$  [production inefficiency]

# Proposition [Production Inefficiency]

With perfect enforcement, the optimal tax base is pure profits  $(\mu = 1)$ 

With **imperfect enforcement**, the optimal tax base is in between pure profits and turnover  $(0 < \mu < 1)$  and depends on the evasion-output elasticity ratio



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## Minimum Tax Scheme

• Combination of profit tax ( $\mu = 1$ ) and turnover tax ( $\mu = 0$ ):

$$T = \max\left\{\tau_{\pi}\left(y-c\right); \tau_{y}y\right\}.$$

Firms switch between the two taxes depending on profit rate p:

$$au_{\pi}(y-c) = au_{y}y \quad \Leftrightarrow \quad p \equiv rac{y-c}{y} = rac{ au_{y}}{ au_{\pi}}$$

 Kink: tax base and marginal tax rate change discontinuously, but tax liability is continuous

# Bunching at the Minimum Tax Kink



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# Bunching at the Minimum Tax Kink



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# Bunching at the Minimum Tax Kink



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# Minimum Tax Kink Ideal for Eliciting Evasion

#### Real output response:

- $\blacktriangleright$  Firms choose real output based on  $1-\omega$
- At the kink, production wedge  $\omega$  changes from 0 to  $\tau_y$  ( $\approx$  0)  $\Rightarrow$  almost no variation and therefore small real response

#### Evasion response:

- Firms choose evasion based on  $au\mu$
- At the kink,  $au\mu$  changes from  $au_{\pi}~(\gg 0)$  to 0
  - $\Rightarrow$  large variation and therefore large evasion response
- Bunching *B* identifies (mostly) evasion:

$$B \propto rac{ au_y^2}{ au_\pi} arepsilon_y - rac{\Delta\left(\hat{c} - c
ight)}{y}$$

## Robustness

## Distortionary profit tax

• If  $\omega > 0$  under profit tax, then turnover tax may improve real incentives

 $\Rightarrow$  firms move away from the kink and create a hole

#### Distortionary turnover tax

- $\blacktriangleright$  Small  $\tau_y$  may create big distortions via cascading and extensive margin
  - $\Rightarrow$  GE effects and extensive responses do not affect bunching

#### Output evasion

• If firms can underreport output, the turnover tax reduces output evasion (due to  $\tau_y < \tau_{\pi}$ ) in addition to cost evasion

 $\Rightarrow$  bunching identifies differential evasion from output and costs

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## Data

- Administrative data from FBR Pakistan
- All corporate tax returns from 2006-2010 (about 15,000 returns per year)
- ▶ New electronic data collection system in place for this time period
- In each year, about half of the firms are turnover taxpayers and half of them are profit tax payers

## Variation in Minimum Tax Kink

• Variation in profit tax rate  $\tau_{\pi}$  across firms:

 High rate of 35%, low rate of 20% [depends on incorporation date, turnover, assets, #employees]

#### • Variation in turnover tax rate $\tau_y$ over time:

- 2006-07: tax rate of 0.5%
- 2008: turnover tax scheme withdrawn
- 2009: tax rate of 0.5%
- 2010: tax rate of 1%

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Heterogeneity

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**Policy Implications** 

Optimal Tax Base (Given  $\tau$  and  $\varepsilon_{\gamma}$ )

$$rac{ au}{1- au} imes rac{\partial \omega}{\partial au} \left( \mu 
ight) \simeq -rac{\Delta \left( \hat{c} - c 
ight)}{\hat{\Pi}} \left( \mu 
ight) imes rac{1}{arepsilon_y}$$



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Optimal Tax Base (Varying  $\tau$  and  $\varepsilon_y$ )



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# Conclusion

- Production inefficient policies like turnover taxes may be optimal under imperfect enforcement
- Novel quasi-experimental approach using minimum tax schemes for estimating evasion responses to switches between profit taxes and turnover taxes
- Large evasion responses to such switches in Pakistan, which justify deviations from a production efficient profit tax
- Returns to improved tax enforcement are high: up to 2/3 of profit tax revenues are lost due to underreporting by corporations

# Counterfactual Estimation

► Estimate counterfactual density following Chetty et al (2011):

$$d_j = \sum_{l=0}^q \beta_l(z_j)^l + \sum_{k=z_L}^{z_U} \gamma_k \cdot \mathbf{1}[z_j = k] + v_j.$$

Estimate excess mass:

$$b = \frac{\sum_{k=z_L}^{z_U} \hat{\gamma}_k}{\sum_{k=z_L}^{z_U} \hat{d}_k / N_k}$$

• Excess mass indicates the profit rate change  $\Delta p$  for marginal buncher.



# Bunching Heterogeneity by Evasion Proxies

Theory predicts more evasion among firms that are

- **small** in number of employees (Kleven et al. 2009):
  - Collusive evasion is more sustainable in a small group
  - Proxy for firm size: salary payments, turnover
- less dependent on financial intermediation (Gordon & Li 2009)
  - Access to formal credit creates a paper trail
  - Proxy for credit needs: interest payments (scaled by turnover)
- ▶ selling to final consumers (e.g. Pomeranz 2013)
  - Paper trail is lacking for transactions with final consumers
  - Compare "retailers" and "non-retailers"

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