JETIR.ORG ISSN: 2349-5162 | ESTD Year : 2014 | Monthly Issue
JOURNAL OF EMERGING TECHNOLOGIES AND INNOVATIVE RESEARCH (JETIR)
An International Scholarly Open Access, Peer-reviewed, Refereed Journal

Comparative Taxation

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ABSTRACT

This research paper compares India's tax system with those of other developing economies. Taxation is crucial for economic growth, revenue generation, and income distribution. The study focuses on key aspects such as direct and indirect taxes, tax rates, tax-to-GDP ratios, and tax administration efficiency. By examining the tax structures of India, Brazil, China,
South Africa, and Mexico, the paper highlights strengths, weaknesses, and potential improvements in India's taxation system. Additionally, it discusses international best practices that India can adopt to enhance its fiscal policy and revenue efficiency.

KEYWORDS: Tax Structure, Developing Economies, Tax-to-GDP Ratio, Direct and Indirect Taxes, Tax Administration Efficiency

INTRODUCTION

Taxation serves as the primary source of revenue for governments worldwide, funding
public services such as healthcare, education, and infrastructure. Different countries adopt various taxation models based on economic structures, political ideologies, and social
welfare considerations. This paper explores the comparative aspects of taxation, shedding light on direct and indirect taxes, tax compliance, and international taxation policies.

1. INDIA'S TAX STRUCTURE

Taxation systems are broadly classified into direct and indirect taxes.

- **Direct Taxes:**

These include income tax, corporate tax, and wealth tax, levied directly on individuals and organizations.

- **Indirect Taxes:**

These include Value Added Tax (VAT), Goods and Services Tax (GST), and excise duties, imposed on goods and services rather than on income or wealth.

2. REVIEW OF LITERATURE

- Bird and Zolt (2011) emphasized the need to broaden the tax base to enhance revenue collection.
- Tanzi and Zee (2000) discussed the significance of digitalization for efficient tax administration.
- Piketty and Saez (2013) supported progressive taxation to reduce income inequality.
- Tanzi (2011) analyzed China's successful tax administration as a model for developing nations.

3. Comparative Analysis of Tax Systems

A. Progressive vs. Regressive Taxation

I. **Progressive Taxation:** This system imposes higher tax rates on higher income brackets, ensuring wealth redistribution and social equity. Countries like the United States, Canada, and Germany employ progressive taxation to reduce economic disparity.

II. **Regressive Taxation:** A uniform tax rate applied to all taxpayers regardless of income, disproportionately affecting lower-income groups. Examples include sales taxes and excise duties in several developing nations.

B. Corporate Taxation

I. **United States:** Implements a corporate tax rate of 21% (as of 2023), with additional state-level taxes.

II. **United Kingdom:** Corporate tax rate varies, with a main rate of 25% in 2023.

III. **India:** Corporate tax rate for domestic companies is 22% for those not availing incentives and 15% for new manufacturing companies.

IV. **China:** Levies a standard corporate tax rate of 25%, with preferential rates for certain industries and regions.

C. Individual Income Taxation

I. **United States:** Uses a progressive tax system with tax brackets ranging from 10% to 37%.

II. **United Kingdom:** Income tax rates are categorized into basic (20%), higher (40%), and additional (45%) tax brackets.

III. **India:** Implements a dual tax regime, offering both an old system with exemptions and a new simplified structure with lower rates but no deductions.

IV. **Sweden:** One of the highest-taxed countries, with rates exceeding 50% for high- income earners, funding comprehensive welfare programs.

Value Added Tax (VAT) and Goods & Services Tax (GST) VAT/GST is a key indirect tax applied across various jurisdictions:

- **European Union:** Standard VAT rates range between 17-27%, with reduced rates for essential goods.
- **India:** Implemented GST in 2017, unifying multiple indirect taxes into a single framework with slabs of 5%, 12%, 18%, and 28%.
- **Canada:** Uses a combination of GST (5%) and provincial sales taxes, varying by province.
- **Australia:** Levies a standard GST rate of 10%.

4. RESEARCH DESIGN

A comparative case study approach is used to examine India's tax system alongside those of other developing economies, focusing on key taxation indicators and efficiency metrics.

5. DATA SOURCES Data is collected from:

a. Government reports and official tax policies

b. International organizations such as the IMF, World Bank, and OECD

c. Academic research papers and online databases

nternational Taxation and Double Taxation Avoidance Multinational corporations: face complex tax implications due to cross-border transactions. To address double taxation, countries enter into Double Taxation Avoidance Agreements (DTAAs).

- **OECD's BEPS Initiative:** Aims to prevent tax base erosion and profit shifting by multinational companies.
- **Tax Havens:** Countries like the Cayman Islands and Bermuda offer low or zero tax rates, attracting global corporations seeking tax benefits.
- **Digital Taxation:** Nations are introducing digital service taxes to capture revenue from multinational tech giants operating without a physical presence.

Tax Compliance and Evasion: Tax compliance varies across countries based on enforcement mechanisms and taxpayer attitudes.

- **United States:** Implements stringent IRS audits and penalties for evasion.
- **India:** Introduced measures like the Goods and Services Tax Network (GSTN) to enhance compliance.
- **Sweden:** High voluntary compliance due to strong public trust in the government.

6. TAX SYSTEMS IN OTHER DEVELOPING ECONOMIES

This section provides an in-depth analysis of the tax structures in Brazil, China, South Africa, and Mexico, focusing on their tax policies, revenue generation mechanisms, and administrative efficiency.

7. TAX-TO-GDP RATIOS, TAX RATES, AND ADMINISTRATION

A. Tax-to-GDP Ratio:

India: 17-18% (lower than many peers, indicating scope for improvement) Brazil: 33% (high due to significant social security contributions)

China: 16-17% (similar to India but with better revenue collection mechanisms) South Africa: 28% (broad tax base with strong compliance)

Mexico: 18% (comparable to India, though with better direct tax enforcement)

B. Tax Rates:

India: Progressive income tax (5%-30%), corporate tax ~30%

Brazil: Higher marginal rates (~27.5% income tax, ~34% corporate tax) China: Lower personal tax (~3%), corporate tax ~25%

South Africa: High top marginal rate (~40%) for income tax

Mexico: Corporate tax ~28%, personal tax follows a progressive model

C. Tax Administration Efficiency:

India: Digital improvements (e-filing, GSTN) but challenges in enforcement and compliance Brazil: Complex bureaucratic procedures leading to inefficiencies China: Highly efficient due to digital infrastructure and strict enforcement South Africa: Moderate efficiency but affected by corruption and administrative delays Mexico: Persistent inefficiencies in tax collection and enforcement

8. OBSERVATIONS

- India's tax-to-GDP ratio is lower than its peers, highlighting the need for better tax compliance and enforcement.
- China's digital tax administration model is highly efficient and can serve as a benchmark for India.
- India relies heavily on indirect taxes, which can disproportionately burden lower- income groups, necessitating stronger direct tax collection mechanisms.

9. POLICY RECOMMENDATIONS

A. Broaden the Tax Base:

- Reduce tax exemptions and loopholes.
- Encourage business formalization and compliance.

B. Improve Tax Administration:

- Expand digital tax infrastructure for smoother compliance.
- Simplify tax laws to reduce bureaucratic hurdles.
- Strengthen enforcement mechanisms to curb tax evasion.

C. Optimize Tax Rates:

- Conduct periodic reviews of tax policies.
- Balance investment incentives with progressive taxation.

D. Learn from Other Countries:

- Implement China's digital tax collection strategies.
- Adopt Brazil's higher tax-to-GDP model with necessary modifications.
- Engage with international tax experts to refine fiscal policies.

10. CONCLUSION

India's tax structure has undergone significant reforms with the introduction of GST, yet challenges such as a low tax-to-GDP ratio, administrative inefficiencies, and reliance on indirect taxation persist. By adopting global best practices, broadening the tax base, and leveraging digital technology, India can enhance its taxation system, leading to higher revenue generation and economic growth.

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