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Analysis of the Share of Corporate Property Tax in the Structure of Tax Revenues by Regions and Economic Activities

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ABSTRACT

The subject of the study is the revenues from the corporate property tax in the context of types of economic activity and regions. The purpose of the study is to determine the role of corporate property tax in the structure of tax revenues in terms of economic activity to identify areas for potential growth of revenues from this tax and determine the fiscal and economic consequences of the transition to the cadastral valuation of real estate with the appropriate development of proposals to improve the taxation of real estate. The relevance of the research is due to the fact that the article is devoted to a little researched topic - analysis of property taxation in the Russian Federation in the economic activity context. The main method of research is the calculation of indicators characterizing the structure and dynamics of the corporate property tax and other property taxes, analysis and synthesis of the obtained results and their inter-sectoral comparison. As a result, a comprehensive view of the situation with the tax on the property of organizations in the context of economic activity is presented, which serves as a basis for finding bottlenecks in this part, identifying the factors that hinder the expansion of property taxation and other promising areas for research in this area. The interpretation of the obtained results in terms of the role of corporate property tax and other property taxes at different levels of the budget system should be attributed to the main conclusions. The cross-section allowed us to identify points for the potential growth of tax revenues from the corporate property tax in terms of objects, for which the tax base is the cadastral value. Keywords: property taxation; corporate property tax; structure of tax revenues; sectoral breakdown; types of economic activity; OKVED-2; regional breakdown; budget revenues; consolidated budgets of the RF subjects; local budgets

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INTRODUCTION

Property taxes are not among the taxes showing a substantial share of revenues to budgets of the budgetary system of the Russian Federation. According to the data of the tax reporting in 2021, the entire group of property taxes accounted for 5.19%, of which 3.43% — for corporate property tax (hereinafter - CPT). This value, however, requires two important comments. First, in the last few years this share has decreased significantly, in 2013 the share of property taxes accounted for 8,01%. This is due primarily to the fact that in 8 years (from 2013 to 2021) revenues from property taxes grew from 900 billion rubles to 1.44 trillion rubles, i.e. 1.5 times, while the growth of total tax revenues for the same period was 2.8 times. But even this value is completely incomparable with the share of property taxes in some countries. An important moment is also the question of how burdensome the tax is for taxpayers and whether the share that the tax provides in the structure of tax revenues of budgets of the budgetary system is comparable with the share of this tax in the tax payments structure of the taxpayer.

The second important comment is the fact that the Russian tax system is arranged in such a way that property taxes remain entirely in the regions and form a substantial share of the revenues of regional and local budgets, so it is more correct to consider the share of these taxes not in the overall federal volume of revenues, but to explore their significance for the budgets of regions and areas.

REVIEW OF LITERATURE

Most publications on corporate property tax are devoted to changes in tax legislation in this part and practical recommendations for their implementation. For example, in paper A. V. Lashchenov [1] gives an explanation of the changes that taxpayers must take into account in 2021. In another paper [2], the author further stipulates that when

calculating local taxes should take into account the changes provided for by the normative acts of the constituent entities of the Russian Federation and local authorities (results of cadastral assessment, tax rates, benefits), information about which for each municipality can be obtained on the website of the of the Federal Tax Service of Russia. In paper [3] the author gives an overview of the activities to improve the taxation of property implemented and planned for implementation in 2021, and further steps in this direction are analysed.

Some publications address practical issues such as the cancellation of declarations on certain property taxes. For example, in the paper of S.A. Sosnovsky and V.V. Grigoriev [4] examines the cancellation of declarations on transport and land taxes, examines first experience and identifies the first problems associated with this.

Another area of practice discussed is the use of cadastral value for the purposes of property taxation of organizations. For example, in the paper of N. P. Petrukhina and L. P. Podbolotnova [5] reviewed the system of taxation of real estate in the Russian Federation with emphasis on local taxes. Identified problems faced by the taxpayer when paying real estate taxes and ways to solve them. It should be noted that the introduction of cadastral value is one of the most discussed directions for reforming the CPT. So, for example, paper of N.Z. Zotikov [6] is devoted to identifying the role and importance of property taxes in the formation of income of regional and local budgets and the determination of directions of improvement of property taxation. The paper of Yu. A. Lisovtseva [7] also deserves special attention, which analyzed the experience of foreign countries in the property taxation aspect to identify best world practices that have already proved their validity. In paper of D. A. Smirnov [8] describes the stages of reform of the property taxation system in Russia, which took place

over the last 20 years, reveals the main positive and negative aspects introduced in the Tax Code of the Russian Federation chapters devoted to the taxation of property of organizations and individuals. The author conducts a critical analysis of the main elements of the tax and formulates proposals for improvement of the relevant legislation. This analysis may be supplemented by paper I. Yu. Arlashkin [9], which examines the instruments of interbudgetary regulation applied in Russia from the perspective of their possible impact on regional economic growth.

Many authors note the important role of property taxes for regional and local budgets. For example, the paper of A.V. Makarova and E.P. Ogorodnikova [10] is devoted to the problems of the formation of local budgets, including the impact of property taxes, as well as the structure and dynamics of incomes to local budgets, and the proportion of property tax in the local budget of the Russian Federation were studied. And, for example, in the article F. S. Aguzarova [11] emphasizes the urgent need to increase the importance of property taxes. The paper of S. A. Kurbanov and R. V. Batashev [12] analyzes factors that have a significant impact on income tax on property of organizations and individuals in regional and local budgets, and identifies alternative ways to increase them. In the paper Kh. M. Musaeva et al. [13], the authors argue that property taxes do not play a substantial role in the formation of the income base of territorial budgets.

The need to increase the importance of property taxes in the income structure of the consolidated budget of the regions is also noted in the paper of V.N. Konovalov [14], where the author rightly proposes increasing the value of regional and local taxes by adjusting their individual components to the financial situation of the payers. The idea of insufficient impact of property taxes on the volume of budget

revenues is also developed in the paper of E.V. Minaeva et al. [15], where the authors performed a comparative analysis of tax revenues of individuals and legal entities to the consolidated budget of the Russian Federation. According to the results of the study, taxes paid by individuals are one of the leading places alongside taxes such as corporate income tax and VAT. Also, we note the paper of L.G. Baranova and V.S. Fedorova [16], which is devoted to the impact of changes in property taxation on the economic processes of the macro- and micro-level.

In conclusion, we will note a few more deserving of attention papers devoted to various aspects of property taxation in Russia. An interesting investigation by B. I. Alekhin [17] does to evaluate the notion that increasing regional tax autonomy, as indicated by the proportion of property taxes to regional budgetary expenditures, improves regional budget balances. Separately, we would like to mention the paper of I.V. Boboshko [18] about the sectoral reduction of income from property tax. The paper discusses issues of mobilization of revenues of regional budgets at the expense of property tax of organizations. As we continue our discussion of the sectoral breakdown, we will mention the work of E. N. Timchenko and A. I. Pogorletsky [19], which is focused on determining how digitalization and the probability of a change in property taxation are related. On the other hand, in the paper of N. I. Malis and L. P. Grundel [20] noted that the difficult economic situation in Russia, associated with both the coronavirus pandemic and the fall in world energy prices, has extremely negatively affected the state of the income base of budgets of all levels. The paper of O.A. Sinenko and A. Yu. Domnikov [21] is dedicated to the study of fiscal mechanisms of regulation of property taxation in the territories with special economic status.

DATA AND METHODOLOGY

For the characterization of the property tax situation use groups of indicators that include sectoral characteristics of revenue from CPT. For economic activity (hereinafter — EA) in the context of regions were estimated four indicators:

• CPT tax burden as ratio of revenues from EA on CPT in the region to regional tax base under CPT:

$$t_b = \frac{T_{ij}}{B_i}, \tag{1}$$

where t_b — tax burden; T_{ij} — revenue from EA on CPT in the i-region; B_i — regional tax base under CPT;

• share of revenues from EA on CPT in the region to total tax revenues from EA in the region:

$$t_t = \frac{T_{ij}}{T_{t,t}},\tag{2}$$

where t_t — share; T_{ij} — revenue from EA on CPT in the i-region; T_{IJ} — revenues from EA in the i-region;

• share of revenues from EA on CPT in the region to EA's CPT revenues in all regions:

$$t_j = \frac{T_{ij}}{T_J},\tag{3}$$

where t_j — share; T_{ij} — revenue from EA on CPT in the i-region; T_j — revenues from EA on CPT in all regions;

 share of revenues from EA on CPT in the region to revenues from EA in all EAs in region:

$$t_i = \frac{T_{ij}}{T_I},\tag{4}$$

where t_i — share; T_{ij} — revenue from EA on CPT in the i-region; T_I — revenues from EA in all EAs in region.

Thus, in addition to estimating the tax burden of the CPT in the breakdown of the EA in the regions, the study identified the contribution of the CPT to the total tax revenue of the region in the breakdown of the EA, the region's contribution to the CPT for all regions for each EA and the contribution of each EA to the CPT for each region and for the federal level. Analysis of indicators conducted in the dynamics from 2017 to 2020. Source for calculations was data based on statistical forms of reporting FTS 1-NOM.

RESULTS

In Russia, 11.4% of all revenue of the consolidated budgets of the regions of the Russian Federation belongs to property taxes, with 7.6% or two thirds belonging to CPT. If we calculate an average proportion of all regions, this proportion will be even slightly higher — 8.9%. Minimum shares (less than 4%) are shown by the Murmansk and Omsk regions, as well as the city of Sevastopol. In Yamalo-Nenets AD, Khanty-Mansiyskc AD and Nenets AD, the Jewish Autonomous Region and the Republic of Komi, on the contrary, more than 20% of all revenues of the consolidated budgets of the regions of the Russian Federation belong to CPT.

When it discusses dynamics, it should be highlighted that the CPT share has a positive dynamic in only 11 regions. These are the Kaliningrad, Sakhalin, Astrakhan and Magadan regions, the Jewish Autonomous Region, the city of Sevastopol, the Republic of Sakha (Yakutia), Altai, Crimea, Kalmykia and North Ossetia-Alania. Vologda region and the Republic of Ingushetia demonstrate the maximum decrease of shares, as well as the regions noted by us, showing the maximum shares, Yamalo-Nenets, Khanty-Mansiysk and Nenets AD.

Table 1 presents the share of CPT revenues in the consolidated budgets of regions of the Russian Federation in terms of EA. EA is presented in accordance with the All-Russian

Table 1
Revenue from Corporate Property Tax by Economic Activities, % of Revenues of Consolidated Budgets of the Subjects of the Russian Federation

Activity	2017	2018	2019	2020	2021
А	0.131	0.158	0.133	0.119	0.118
В	1.237	1.401	1.282	1.343	1.156
С	1.166	1.212	0.884	0.807	0.759
D	1.079	1.138	0.969	0.979	0.790
Е	0.110	0.105	0.104	0.104	0.098
F	0.194	0.189	0.171	0.134	0.107
G	1.827	1.710	1.495	1.522	1.137
Н	1.322	1.455	1.235	1.290	1.088
I	0.065	0.065	0.061	0.054	0.059
J	0.194	0.180	0.081	0.054	0.042
К	0.360	0.319	0.237	0.260	0.213
L	1.061	1.044	1.029	1.038	0.968
М	0.340	0.327	0.288	0.303	0.240
N	0.074	0.075	0.035	0.035	0.031
0	0.234	0.213	0.200	0.213	0.161
Р	0.388	0.407	0.397	0.409	0.349
Q	0.213	0.228	0.201	0.194	0.168
R	0.114	0.139	0.142	0.137	0.121
Others	0.360	0.114	0.131	0.035	0.033
Total	10.470	10.480	9.074	9.030	7.637

Source: Authors' calculations based on the data of statistical reporting forms No. 1-NM and No. 1-NOM. URL: https://www.nalog.gov.ru/rn77/related_activities/statistics_and_analytics/forms/ (accessed on 02.07.2023).

Classification of Economic Activities in force since 2017 (the so-called OKVED-2).

Wholesale and retail trade (as well as repair of motor vehicles and motorcycles) make the most of the contribution to CPT's proceeds. It should also be noted that this EA in the region does not have a low load, as in other EAs. The significant contribution of CPT to revenue can also be mentioned in the mining and transportation and storage sectors. Moreover, in terms of the share of EA in revenue the value of transportation and

storage indicators are comparable with the indicators of mining. It should be noted that the maximum values of the contribution of this EA to CPT revenue have border regions. Real estate operations and electricity, gas, steam and air conditioning also make a significant contribution.

The paper analysed the set of indicators described in the previous section, formula (1)–(4). For the indicators indicated, an analysis of correlation according to economic activities was carried out, on the basis of

Table 2
Correlation Coefficients of Indicators Characterizing the Tax Burden on Corporate Property Tax
by Economic Activities

Activity	Tax burden / Share of activity	Tax burden / Share of tax	Tax burden / Share of region	Share of activity / Share of tax	Share of activity / Share of region	Share of tax / Share of region
А	0.99	0.17	0.71	0.18	0.70	0.11
В	0.98	0.01	0.56	0.02	0.56	-0.04
С	0.98	0.02	0.52	0.01	0.52	-0.02
D	0.94	0.45	0.18	0.41	0.16	0.01
E	0.99	0.43	0.85	0.42	0.88	0.25
F	0.88	0.46	0.11	0.59	0.12	0.04
G	0.97	0.86	0.60	0.85	0.59	0.62
Н	0.98	0.52	0.21	0.53	0.22	0.32
I	0.94	-0.00	0.46	0.00	0.37	-0.01
J	0.92	0.53	0.09	0.52	0.13	-0.16
К	0.98	0.65	0.36	0.58	0.42	-0.03
L	0.96	0.09	0.62	0.08	0.68	0.04
М	0.98	-0.05	0.19	-0.07	0.21	0.02
N	0.88	0.42	0.30	0.28	0.16	0.19
0	0.96	0.73	0.31	0.72	0.31	0.52
Р	0.94	0.72	0.03	0.67	0.03	0.19
Q	0.91	0.72	-0.01	0.68	-0.01	0.17
R	0.96	0.78	0.17	0.75	0.18	0.17
Others	0.99	0.62	0.55	0.64	0.59	0.17

Source: Authors' calculations based on the data of statistical reporting forms No. 1-NM and No. 1-NOM. URL: https://www.nalog.gov.ru/rn77/related_activities/statistics_and_analytics/forms/ (accessed on 02.07.2023).

Comparison
of Correlation Coefficients of Tax Burden
and Share of Economic Activities

Activity Profit tax Property Tax 0.9908 0.9473 В 0.9841 0.4574 C 0.9816 0.8680 D 0.9369 0.9093 Ε 0.9869 0.7839 F 0.8829 0.6206 G 0.9704 0.1540 Н 0.9780 0.8252 Ι 0.9404 0.4795 J 0.9174 0.9257 Κ 0.9787 0.2791 L 0.9623 0.8008 Μ 0.9833 0.5268 Ν 0.8816 0.9708 0 0.9568 0.9952 0.9362 0.9196 0 0.9140 0.7985 0.9585 0.9142 0.9905 0.8041 Others

Source: Authors' calculations based on the data of statistical reporting forms No. 1-NM and No. 1-NOM. URL: https://www.nalog.gov.ru/rn77/related_activities/statistics_and_analytics/forms/ (accessed on 02.07.2023).

which the correlation matrix presented in *Table 2* is constructed.

Table 2 shows that the maximum correlation values are observed for the pair of tax burden indicators and the share of EA. For all EAs, the correlation factor is greater than 0.9. The slightly smaller size of the coefficient (although still indicating a close correlation of indicators) is demonstrated by construction and administrative activities. The tax burden is closely linked to the share of CPT in revenue in trade, public administration, education, health and cultural, sports, leisure and entertainment activities. With the region's share in revenue, the tax burden demonstrates a close link between agriculture and water supply, water disposal, collection, waste disposal, pollution elimination activities. Due to the close link between the tax burden and the share of the EA, the latter also demonstrates a close link (although slightly less strong) within the same EAs with the CPT share of revenue and the region's share, respectively. The share of CPT in revenue and the share of the region as a whole do not show close links. Against this background, a relatively greater linkage can also be mentioned in trade and public administration.

It will also be interesting to determine whether the strong association between the tax burden and the share of EA is specific to the CPT or whether it applies to other taxes as well. Statistical tax reporting allows for such analysis on only one tax — corporate profit tax. *Table 3* shows a comparison of the correlation factors for the tax burden and the share of EA in corporate profit tax and CPT.

Table 3 data also shows high correlation for corporate profit tax too. However, if for CPT this was typical for all industries in general, there are exceptions for corporate profit tax. Let's first discuss about the trade and financial sectors. For these industries, the tax burden correlation coefficients and the proportion of EA are low and

prevent us from inferring a connection between the data. Scientific and technical correlation coefficients for the fields of mining, construction, hotels and catering, as well as professional fields, indicate that there is an average strength connection, but they are significantly lower than the values reported by CPT. For processing, water supply, transportation and storage, real estate operations and health and social services, the rates are high and indicate a close correlation, but significantly lower than the CPT data. Accordingly, only 7 of the 18 industries have the same high correlation rates as the CPT, suggesting that the close relationship between the tax burden and the share of EA is a special characteristic of CPT.

The sectoral characteristics of CPT revenue by region will be examined next. However, in some areas, a specific EA makes a larger contribution to the CPT revenues of all EAs. And it may not just be particular values from specific regions. For example, in the spheres of public administration and military security, as well as social security, in almost half of the regions the tax burden is greater than the overall federal value. EA demonstrates greater uniformity of burden indicators across regions compared to EA's contribution to revenue.

For most EAs, however, the situation is characterized by the fact that regions with the highest CPT tax burden have a higher burden than the respective EA's share of CPT revenue. A typical example is the education sector, where the share of EA in revenue in the leading regions is marked in the same order, and the burden differs more substantially. However, this is not typical for all EAs. Thus, in financial and insurance activities there is the opposite situation, when the share of EA in revenue in the regions showing maximum indicators in this parameter, vary considerably, and the burden differs less significantly. In the spheres of public administration, military security and social welfare, the burden is also more uniform than the contribution of EA to revenue.

It should be noted that the highest tax burden is shown by the regions that have demonstrated a higher share of EA in revenue CPT. There are also exceptions, for example, in the field of supply of electricity, gas, steam and air conditioning, the city of Sevastopol demonstrates the importance of the contribution of EA to CPT revenue in 2020 at the level of 75%, providing a significant gap in this indicator from the values of other regions, while in tax burden the region occupies only eighth position. Or, for example, in the sphere of activities of hotels and catering companies the share of EA was greater in the Republic of Crimea, the tax burden is higher in Krasnodar region. An interesting exception is the fact that in the field of real estate transactions, the Republic of Altai demonstrates a burden of less than the overall federal value, while the share of EA in revenue in the region is higher than the general federal value. At the same time, in the Samara region, the same EA has the opposite situation — the share of revenues is lower than the overall federal, and the burden — is higher.

It should be noted that there are situations where maximum indicators are presented by regions that do not have top values either in terms of the level of tax burden or the contribution of EA to CPT revenues when measuring the percentage of CPT in the structure of tax revenues.

For example, the largest share of CPT in the sphere of public administration and military security, as well as social welfare have companies in Belgorod region, which did not show the highest values either in the contribution of EA to CPT revenue or in the level of tax burden on this tax. Another example of this situation is the leadership of the regions of the North Caucasus Federal District in terms of the value of the indicator in the sphere of activity of hotels and catering companies. We will also note the Krasnodar

region and the Republic of Tatarstan, which have a significant contribution to the revenue of CPT companies working in agriculture, while not showing a high level of tax burden, which indicates the relatively larger tax base for this tax in agricultural these regions.

The opposite situation is typical, for example, for the extraction of minerals. The relatively low share of CPT in the structure of EA tax revenues is due to the fact that this EA is the source of one of the most productive taxes — mineral extraction tax, which accounts for a substantial share of EA tax revenue. The same is due to the actual absence of mining regions among those with a high share of CPT in the structure of tax revenues.

The city of Moscow makes the maximum contribution to the CPT's achievements on the data of all EAs. In some EAs, Moscow has a significant gap from the values of other regions, and more than half of all CPT revenues in these EA are in that region. The capital region demonstrates the maximum contribution in virtually all EAs, except for agriculture, forestry, hunting, fishing, fisheries (Belgorod region has the greatest contribution), mining (Khanty-Mansiysk AD), processing industries (Republic of Tatarstan), water supply, water disposal, waste collection and disposal, pollution elimination activities (St. Petersburg) and wholesale and retail trade, as well as repair

of motor vehicles and motorcycles (Yamalo-Nenets AD). It is important to note that Moscow may not have either the maximum values of the EA contribution or a high level of tax burden. For example, in the construction sector, the Moscow accounts for 34.16% of all CPT revenues. While the region demonstrates relatively large indicators and EA share in revenue and tax burden, and CPT share in the structure of EA tax revenues, these figures have not been leading anywhere, especially with such a significant gap. This may indicate that both the tax base and the amount of revenue from other taxes in the EA in that region exceeds the other regions with the same margin as its share of revenues.

CONCLUSION

The analysis made it possible to obtain information about the factually unexplored direction of property taxation — its sectoral breakdown. The calculation of the tax burden, the share of EA revenues on CPT in the region to the total tax revenues from EA in the area, to the revenues by EA on CPT in all regions, and to CPT revenues in all EAs of the region allowed for a thorough examination of the CPT situation across industries, which serves as a basis for identifying gaps in this section, identifying factors which prevent to the expansion of property taxation, and other potential research directions.

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A.A. Popov — collection of statistical data, tabular and graphical presentation of the results.

S.D. Shatalov — statement of the problem, development of the concept of the article.

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