

TAX INCENTIVES

in the Global South



A business and civil society briefing

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Context and introduction

The purpose of this briefing is to reflect a growing convergence between businesses and tax advocacy groups, on the use of tax incentives in the Global South. It follows a roundtable discussion of the UK Tax Dialogue – a forum for action and discussion between corporates and civil society groups – in which a strong degree of consensus was reached.

The basis of the roundtable was the discussion paper ‘Getting to Good: Towards Responsible Corporate Tax Behaviour’, which argues, amongst other thematic areas of the fair and responsible tax agenda, that tax-responsible companies should approach tax incentives by:

- **Seeking equal treatment under a country’s tax regime and avoiding the use of company-specific incentives;**
- **Being transparent about the incentives that they use; and**
- **Regularly monitoring and evaluating their use of incentives to ensure that they are delivering their intended outcomes at the intended costs.**

Whilst challenging companies to demonstrate responsible behaviours, the paper also accepts that incentives can – when deployed in a particular way – have a positive role to play. It therefore does not suggest that tax incentives or reliefs offered by governments are universally negative, or that companies should voluntarily refrain from claiming tax reliefs.

Against that backdrop, a positive discussion was had between around fifteen large companies and the Tax Dialogue’s founding civil society groups – ActionAid UK, Christian Aid and Oxfam. It became clear that whilst certain tax issues remain contested, there was a strong degree of consensus about tax incentives.

It was agreed that this common ground should be communicated to policymakers and other stakeholders, and this briefing is the product of that agreement. It has been developed jointly by the Confederation of British Industry (CBI) – the leading business organisation in the UK – and by ActionAid UK, Christian Aid and Oxfam. It first sets out a civil society perspective on tax incentives, which is largely concerned with the negative impacts that poorly designed incentives have on revenue collection in the Global South. It then provides a business perspective, which focuses on the need for a level playing field which can be maintained through well-designed incentives that promote genuinely positive outcomes such as decent jobs and growth. Finally, it provides some joint reflections from all parties – the CBI and the three civil society organisations.

We hope that it demonstrates that whilst taxation can be highly contested, there is scope to find a common way forward. We also hope that it will be considered by a range of stakeholders – businesses, tax advocacy organisations and, primarily, policymakers in the Global South – and that it might form the basis of better policymaking in the future.

The civil society perspective

ActionAid UK, Christian Aid and Oxfam are international development organisations, working around the world to respond to crises, tackle poverty, and challenge injustices. Over several years we have focused on the issue of tax because – put plainly – many developing countries simply do not raise sufficient revenue to fund even the most basic services, like healthcare and education. If we are to achieve the ambitious Sustainable Development Goals (SDGs), then considerable new sources of finance need to be found, and this includes domestic tax revenue.

Much of our work has focused specifically on corporate taxes. There are a number of reasons for this, not least that in some of the poorest countries in the world, it is neither practicable nor morally acceptable for the burden of tax to fall on the poorest. Furthermore, evidence shows that the scale of corporate tax avoidance is considerable – whilst estimates and projections vary, the IMF suggests that it could cost developing countries some \$200 billion annually.¹ Some other estimates find a slightly higher figure² and a greater proportion of losses for developing countries. Additionally, and crucially, developing countries tend to rely disproportionately on corporate income taxes as a source of revenue: whilst wealthier economies raise on average 8% of tax revenues from corporate income, the figure in developing countries is 16%.³ Therefore, corporate taxes (and corporate tax avoidance) are of much greater importance in the poorest parts of the world.

The way developing countries tax companies is paramount, and tax incentives are an important piece of the puzzle. As organisations concerned with poverty alleviation and economic development, we recognise the role the private sector can play in creating decent and green jobs, investing and fostering inclusive growth, and believe that, when part of a clear and transparent economic development plan, tax incentives can enable fair and sustainable outcomes. For example, incentives could be designed to reduce pay gaps between women and men; offered when companies hire more women; used to incentivise care arrangements such as childcare in the workplace; or given to employers providing educational grants, canteens or flexible working. Using tax incentives to achieve gender equality has been endorsed by the High Level Panel on Women's Economic Empowerment.⁴

In the Global South particularly, inefficiency of tax incentives is all too common, with a multitude of incentives often granted across different government departments, with the resultant administration and monitoring costs outweighing any positive impact on revenue from raised investment. Through our work around the world, we also know that incentives can have a range of negative effects, and we often see incentives leading to more inequality and exploitation, as seen in the case of underpaid women workers in Special Economic Zones (SEZs) without basic social protection.⁵ These include incentives failing to realize their stated or implied objective due to misuse or abuse (what the Tax Platform terms 'ineffective' use including profit-based, time-bound, geographically confined and full tax incentives);⁶ or incentives failing to realise their objective without disproportionate social costs, including foregone revenue for the government (what the Tax Platform terms 'inefficient' use).

As recognised by the IMF and the Inter-American Development Bank⁷ amongst others, incentives can – in the worst cases – be entirely redundant,⁸ granted to companies that would have made an investment regardless. Low tax rates themselves are rated lower (7th) than other factors for FDI decisions.⁹ At a time when the UN estimates¹⁰ that financing the SDGs will require as much as \$11.5 trillion annually, developing countries simply cannot afford to grant tax incentives that do nothing to raise investment, but cost in lost revenue. ActionAid research shows that in just three West African countries – Nigeria, Ghana and Senegal – some \$5.8 billion of revenue is foregone annually, whilst 46% of firms in Ghana, Nigeria and Côte d'Ivoire are beneficiaries of tax holidays.¹¹ Not all of these incentives are necessarily inappropriate, but the numbers involved demonstrate both the prevalence of incentives, and the scale of revenue foregone.

Tax incentives can also have an adverse impact on inequality, including gender inequality. As highlighted by ActionAid UK,¹² tax and women's rights are intertwined, and when tax revenues are foregone unnecessarily, it is women who suffer disproportionately.¹³ When public services such as health and education are deprived of proper funding, women and girls bear a bigger burden. Quantifying this relationship is rife with difficulty, but to illustrate the problem, research suggests that

through the granting of tax breaks of questionable economic value, governments are forfeiting many times the amount of spending targeted at women's rights and empowerment.¹⁴

For this reason, we believe that incentives should only ever be granted following effective and transparent mechanisms for evaluating costs (environmental, fiscal, exacerbation of inequalities including gender inequality) and benefits. Governments are responsible for tax incentives; and should ensure that any granted are specific and limited in scope and time (targeted incentives are more likely to be efficient and effective), recorded in national budget expenditure, monitored and evaluated against their stated objectives, and withdrawn or revised accordingly. They should also ensure that the incentive is likely to be efficient – mainly be cost-based (rather than profit-based), and not given in full – resulting in net social gains, including being public revenue positive. The analysis should also take account of the impact on poor people and vulnerable groups, with the findings available for public scrutiny.

Incentivising Little: Burundi's inefficient use of tax incentives

By any measure, Burundi is one of the poorest countries in the world. It ranks 180th out of 186 countries in terms of the Human Development Index,¹⁵ whilst nearly 64.9% of the population live below the poverty line. To make matters worse, in both 2015 and 2016 Burundi's gross domestic product contracted.

Given entrenched, widespread poverty and a shocking lack of basic public services, Burundi cannot afford to make inefficient use of tax incentives. Yet in an IMF survey of tax incentive redundancy, some 77% of investors in Burundi responded that the incentive they received was redundant.¹⁶ Put another way, at least 77% of tax incentives were wholly unnecessary, thus depriving the country of much needed revenue.

The relative efficiency and effectiveness of a given tax incentive can vary over time. This is highlighted by the INESC¹⁷ – Christian Aid's partner in Brazil – which found that Brazilian mining companies (and other exporting industries) continue to use tax incentives first introduced in 1996, some twenty years on. Under the 'Kandir Law', all products and services for export are exempted from value added tax that would normally be excised at state level, thus depriving local authorities of significant income. While this may have made sense twenty years ago when exports were low and the national currency was overvalued, it does not make sense at a time when Brazil is a major exporter of natural resources. The results of a cost-benefit analysis conducted today would be very different indeed from the same cost-benefit analysis conducted two decades ago, including possible company behavioural changes over time, yet the incentive remains. This highlights the need for the application of cost-benefit analyses on a regular basis, to ensure that an incentive will continue to support its stated goal over time.

We also believe that regardless of efficiency or effectiveness, **there are certain types of incentives that are never appropriate.** An example of this might be a discretionary incentive that is granted to a specific company, instead of being made available on a level playing field. Some prospective investors may argue that this sort of company-specific incentive might be essential to the viability of a given investment, but if this is the case, then there is no reason why the incentive shouldn't be made available to all prospective investors on a level playing field. Company-specific incentives risk distorting the market, potentially stifling healthy competition whilst encouraging monopolistic practices.

Leaking Revenue: Nigeria and lost tax revenue from the oil and gas sector¹⁸

In 1990 the Nigerian Government passed a law which, according to ActionAid research, ended up costing some US\$3.3 billion in foregone tax revenue.

The massive tax break came in three parts stretching from 1999 to 2012. First there was a regular five year tax holiday, granted to most investors in Nigeria at the time, and which ActionAid does not count as having resulted in foregone revenue. However there then followed a second tax break: an extension for a further five years, and granted exceptionally for one particular deal in the oil and gas sector. Finally, the Government deemed that tax allowances that would theoretically have been used during the tax holiday should be rolled over, thus exempting the companies in question from tax for a further two years. The five year extension meant US\$2 billion of revenue was lost, and the rolled over allowances cost a further US\$1.3 billion.

To put that number into perspective, US \$3.3 billion is the equivalent of twice the Nigerian healthcare budget for 2015. Other benefits will have arisen from the investment, but the scale of tax revenue loss is deeply concerning.

Finally, **any incentives granted without requisite political scrutiny and oversight are never appropriate.** On occasion, we have identified instances of governments allocating tax incentives without debate and scrutiny from the legislature. This has led to the widespread perception that so-called 'sweetheart deals' have been agreed between ministers and companies, which are deeply corrosive to public trust and democratic accountability. Therefore, any incentive granted without parliamentary oversight, and which is not grounded in legislation, is not appropriate in our view.

We do not reject the use of tax incentives outright: when applied effectively and efficiently, and when resulting in outcomes that benefit the poorest, we support them. But much too often incentives are

badly targeted, poorly managed and granted without sufficient consideration, particularly in the Global South. Specific, tailored tax incentives are significantly different to blanket tax holidays. In too many cases, incentives do not (and were never likely to) achieve their stated goal. So long as poverty persists, and basic public services are deprived of funding, this cannot continue.

As organisations concerned with poverty alleviation and economic development, it is incumbent on us to highlight this concerning trend, and to work to find better solutions. In our joint paper entitled 'Getting to Good: Towards Responsible Corporate Tax Behaviour',¹⁹ we identify a number of example behaviours that companies can adopt to demonstrate a responsible approach to tax incentives. Some are immediately achievable; others are more challenging and aspirational for the medium term.

These include:

“A corporate group commits not to request or use company-specific tax incentives”

“A corporate group publishes all tax incentives, reliefs and rulings it currently uses in any jurisdiction where it operates – ranging from investment certificates granting tax holidays, to company-specific tax rulings – and the impact of each on the company’s tax charge”

“A corporate group audits its use of tax incentives and reliefs on a regular basis to ensure that it has delivered the required investment, employment or other input, even where such inputs are not audited by the tax authority or finance ministry”

We also work directly with companies to advocate for more responsible tax practices, including on the subject of incentives.

This joint briefing, meanwhile, is intended as a modest contribution to the debate on tax incentives, serving to highlight an emerging convergence between civil society organisations and the business community. We hope that its message will be heard by policymakers around the world: that tax incentives are not always efficient or effective; that potential investors are often looking for something different from the investment environment; and that incentives will not be a panacea for countries seeking sustainable and equitable growth.

The business perspective (CBI)

The CBI is the UK's leading business organisation, speaking for some 190,000 businesses that together employ around a third of the UK's private sector workforce. We represent businesses of all sizes from all sectors, many of which have an interest in developing countries due to the nature of their operations or the markets they serve. We have drawn on this expertise from around our membership to provide the business perspective on tax incentives in developing countries.

The CBI's view focuses primarily on tax as a key tool in helping poorer nations out of poverty. Tax is a driver for foreign direct investment (FDI),²⁰ which supports the growth and prosperity of nations. While low tax rates are an important factor, they are not the only priority for businesses on taxation. The infrastructure underpinning the tax system is just as important. Stability, predictability and level playing fields are some of the tax factors that will impact businesses' decisions.

Therefore, when it comes to tax incentives, the business community has more in common with civil society than might initially be expected. The three principles set out in the briefing above hold true for businesses too:

1. Incentives should only ever be granted following a robust and comprehensive cost benefit analysis;
2. There are certain types of incentives that are never appropriate; and
3. Any incentives granted without requisite political scrutiny and oversight are never appropriate.

Securing private sector inward investment in developing countries can deliver significant economic benefits to the local economy and help to achieve a shared aim of creating more prosperous societies worldwide. Economics identifies the core benefits of FDI to the host economy as including job creation (particularly higher skilled, higher paid jobs), transfer of technology, stronger managerial and operational business practices, increased access to foreign markets and access to international finance.²¹ Evidence from the World Bank indicates that FDI has become the largest source of external

finance for many developing countries, with over 40% of global FDI flows going to developing countries.²²

Expansion by multinational corporations (MNCs) to developing countries is one example of FDI and is driven by various factors that depend on the business strategies of the respective MNC. The World Bank suggests motivations generally include lowering production costs, strong domestic growth prospects, access to local markets and/or regions, and the ability to tap into a country's natural resources and raw materials.²³

Considering its potential economic benefits, promoting FDI is often on a developing country government's agenda. As a result, attracting inward investment can be competitive, emphasising the importance in ensuring policy delivers a supportive environment for foreign investors. However, policy makers must consider this within the context of the public interest to ensure incentives are in line with national economic policy.

Findings from the World Bank Global Investment Competitiveness (GIC) survey²⁴ suggest factors such as political stability and security, and a business-friendly legal and regulatory environment are at the top of an investor's list when choosing where to invest, with 86% of those surveyed stating the legal and regulatory environment as important. Other important factors include macroeconomic stability, the pool of skilled labour, infrastructure and low tax rates. Therefore, whilst a country's tax environment is likely to be a consideration in an investor's location decision, well-developed regulatory and legal frameworks are relatively more important to most businesses.

Tax features such as tax incentives can play an enabling role to help attract investment into a developing country by helping to reduce the cost of doing business. To encourage genuinely new investment, it is important that the choice of tax incentive and its design are appropriate. Otherwise, the incentives may only benefit those businesses that would have invested anyway, without the tax incentive. For instance, recent analysis by the Copenhagen Business School concluded that tax holidays are not an effective tool for developing countries to achieve sustainable development and are more likely to undermine than facilitate growth.²⁵

The CBI's starting point on tax is our Statement of Tax Principles,²⁶ which sets out our governing thoughts on responsible tax management in the UK. These principles state that “tax planning should be aligned with the businesses’ commercial and economic activity, in a way that does not lead to an abusive result”. While businesses should be able to respond to tax incentives, we are clear that the law should be interpreted in line with the original intentions of the policy. In relation to tax incentives this should mean they deliver the policy intentions they were designed to.

Whilst these principles were drafted from a UK perspective, they hold true for the way in which businesses should approach tax incentives on a global basis. The Business and Industry Advisory Committee (BIAC)²⁷ to the OECD has similarly set out principles for best practice in using tax incentives in developing countries.

“Business may utilise tax incentives that are transparent, publicly published and endorsed by the host nation legislation. Business should refrain from claiming or accepting exemptions not contemplated in the statutory, regulatory, or administrative framework related to taxation, financial incentives, or other issues.”

Source: BIAC Statement of Tax Best Practice for Engaging with Tax Authorities in Developing Countries

In drafting this briefing, business and civil society agree that tax incentives can be useful tools for governments to attract much needed inward investment. However, designing effective tax incentives is not always straightforward, and there is no simple blueprint for the design of good incentives – what might work in one country may not bring about the desired effects in another. For that reason, a series of broad, underlying principles should help to guide the role of tax incentives.

Tax incentives can work well when they are used to address markets that are operating sub-optimally. Markets do not always work perfectly and in some instances, leaving a market to its own devices could result in a suboptimal outcome. As with the regulatory role the government plays in protecting consumers, government also has a role to play in supporting economic activity that realises wider benefits to society and to the economy.

Offering tax incentives could help to create or to grow activity that may not have otherwise occurred.

A high-risk project is generally characterised by large sunk costs that result in economic losses in the short term. Even though such a project is expected to be profitable in the long term, the associated risk can limit the pool of investors. Furthermore, it is often the case that these types of projects will provide wider economic gains through the creation of a new industry or product. This is an example of a market operating sub-optimally, where government intervention could helpfully support this investment. Providing investors with tax incentives at the early stages of a high-risk project could help to make a project economically viable and, over time, as the project starts to make returns, the tax incentives can be removed.

It is important that tax incentives are designed appropriately to address market failures to support business growth. Poorly designed and poorly governed tax incentives can actually have adverse effects on business by creating uncertainty in the tax system. In addition, the design of tax incentives should seek to minimise distortions, promote economic growth and ensure the sustainability of public finances over the long term. Targeting specific sectors or types of businesses could create competitive distortions.

By their very nature tax incentives will result in foregone tax revenue in the short-term. However, over the long-term the benefits from a well-designed tax incentive should outweigh the short-term cost. This longer-term benefit will be felt in a number of ways, including employment, economic output, local regeneration and ultimately increased future tax revenues. To focus only on the immediate cost of an incentive is to ignore the dynamic impact tax incentives have on an economy and why they are introduced in the first place.

Businesses want to get to a position where tax incentives work effectively for everyone offering value for money and providing business certainty. We believe the effectiveness of a tax incentive is driven by the policy-making process. This is true in any jurisdiction, and the principles we advocate below are ones the business community would seek with the UK government just as much as with a country in the Global South.

By bringing together the civil society and business perspectives above we can clearly see areas of common ground emerging. This common ground will be relevant to businesses and – primarily – the policymakers responsible for the design of effective and efficient tax incentives. We believe that the following joint reflections would helpfully underlie the use of tax incentives, and promote a better, fairer tax system that both attracts inward investment, whilst promoting stronger revenue collection by governments in the Global South.

1. Incentives must be consistent with national economic policy

For tax incentives to be effective at delivering the desired economic and social outcomes they must support the economic and development strategies of the country. Governments that offer concessions often see tax as one of their best bargaining chips to secure commitments for investment, but without a clear link to an economic strategy and development plans – including the SDGs – it is unlikely that the incentive will be as effective as it could be. For example, a government seeking to increase employment and stimulate the creation of better jobs may wish to use tax incentives as a means of attracting investment to catalyse job creation. However, whilst some tax incentives catalyse investment that leads to new jobs, this is not always the case. Therefore, it is important that tax policy is strongly aligned with wider economic plans.

2. Incentives must be underpinned by a transparent and clear legal process with democratic oversight and political scrutiny

Well-designed incentives, which are administered in a way that ensures they meet their original policy intentions, are important to a well-functioning tax system which supports investment and economic growth. To bring more confidence to the use of tax incentives in developing countries it is incumbent on government and business to be transparent about their existence and take-up. Greater oversight and scrutiny of public finances also helps to

enhance the accountability of policymakers and their use of public sector resources. It also reduces opportunities for corruption.

Tax incentives should be clearly defined in legislation, after having gone through the appropriate legislative process. This process is important to businesses, society and taxpayers alike in ensuring fairness. It also adds legitimacy to the development of the incentive design and is therefore less likely to be removed because of political pressure in the future. A lack of such legitimacy could create uncertainty for business and undermine investor confidence.

3. Incentives should only be granted following clear, evidence-based economic, social and environmental impact assessments

Offering incentives should be about achieving the long-term ambitions of a country, to support sustainable and inclusive economic growth. Businesses and civil society want to see tax incentives offered when there is clear economic and social need to build a lasting presence in a country, which will contribute to prosperity long after the initial project or investment.

Impact assessments can help to provide accountability and sufficient evidence that the incentive will deliver a net benefit to the economy by seeking to account for all potential economic, social and environmental impacts. By determining the costs and benefits of an incentive, impact assessments can also help to inform the design of the incentive to ensure the associated costs are minimised.

Projects will vary in length, as will the period in which businesses see returns. Some may not come to fruition for 20 years and in some cases incentives lasting this long might be justified. In this case, impact assessments are important as they can help to identify when sunset clauses are required to ensure companies do not reap excessive value from incentives.

4. Incentives should be subject to ongoing monitoring and evaluation by the government to ensure they continue to serve their original purpose

Maintaining the efficiency and effectiveness of tax incentives requires that they are subject to ongoing, robust monitoring and evaluation. Specific incentives and reliefs should be audited on a regular basis to ensure they are delivering their intended outcomes. More broadly, incentive regimes should be subject to long term evaluation within the context of wider tax strategies, to ensure they remain appropriate and well aligned with broader economic and development plans, and to understand any indirect impacts of the incentive.

This regulatory scrutiny is in the interests of both civil society organisations and businesses. For the former, monitoring and evaluation helps to ensure that incentives are not being granted or maintained unnecessarily, thus depriving countries in the Global South of much needed revenue. For the latter, evidence-based analysis is a tool to demonstrate that incentives used by businesses are contributing to investment, jobs or growth. Furthermore, a clearly defined process of monitoring and evaluation will promote the sort of stable political and economic environment that businesses seek, so they are better able to forecast returns on investment decisions, making them more likely to invest in the future.

5. Incentives should be available on a level playing field to all similar companies

It is never appropriate for governments to introduce tax incentives for specific company needs, so striving for a level playing field is vital. This is because company-specific tax incentives can distort investment patterns and create the potential for corruption.

However, it is important to recognise that it might be part of a country's economic plan to help a particular sector or industry. For example, where an industry is critical to a country's security or citizens' welfare then tax incentives might be appropriate, so long as they are granted on the basis of robust evidence-based analysis. There are also examples where industry focussed incentives can be used to attract the first mover or innovator, to stimulate wider investment and growth in the sector. A good starting point for considering this trade-off is the introduction of State Aid principles, where any advantage provided must be justified against pre-determined rules and where it has been clearly identified as beneficial to the economy.

Endnotes

1. IMF research estimates that developing countries may lose \$200 billion a year to corporate tax avoidance - see p21, Fig 3 <https://www.imf.org/external/pubs/ft/wp/2015/wp15118.pdf>
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19. https://www.actionaid.org.uk/sites/default/files/publications/getting_to_good_towards_responsible_corporate_tax_behaviour.pdf
20. Foreign direct investment is an investment in a business by an investor from another country, where the foreign investor has a controlling interest in the company.
21. The economic literature identified these benefits over thirty years ago and institutions such as the World Bank still postulate these as the key benefits of FDI in developing countries.
22. Global Investment Competitiveness Report 2017/2018: Foreign Investor Perspectives and Policy Implications, World Bank Group
23. Pierre Guislain and Peter Kusek, Investment Climate Department, World Bank Group.
24. This is a survey by the World Bank of 754 executives of multinational corporations that have investments in developing countries.
25. Stausholm, Salla N. 2017. "Rise of Ineffective Incentives: New Empirical Evidence on Tax Holidays in Developing Countries".
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