

行政院及所屬各機關出國報告

出國類別：出席國際會議

參加 OECD 影子經濟關注小組  
工作小組會議報告

服務機關：財政部綜合規劃司

姓名職稱：科長 蔡茵蘋

派赴國家：澳洲

出國期間：107 年 11 月 4 日~11 月 11 日

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## 摘要

經濟合作暨發展組織(Organization for Economic Co-operation and Development; OECD)為一國際性組織，自 1960 年 12 月於法國巴黎成立，迄今會員國已增至 36 個，其成立之宗旨為藉由透過各國政府相互合作，致力於世界民主及市場經濟，以期達成永續經濟成長、促進就業、提高生活品質、維護財政穩定、協助其他國家經濟發展，及世界貿易成長等目標。

OECD 影子經濟關注小組(Shadow Economy Community of Interest, COI)為挪威贊助成立，由澳洲、紐西蘭及英國等國組成之諮詢小組，專注研究影子經濟相關議題。本次會議由澳洲稅務局(Australian Taxation Office, ATO)主辦，邀請各國派員參加，研討內容包括：分享影子經濟快速變化區域之情報、估算影子經濟之規模並衡量其對政策之影響、各式估算影子經濟衡量方式之利弊、處理影子經濟多面向與相互關聯性，及如何協助稅捐機關對抗影子經濟議題。

本次會議整體議程之規劃，除有助於各國代表瞭解 OECD 影子經濟關注小組現行階段性成果，經由各參與國家之分享，也能看出各國因應影子經濟採行之對應政策，及各國近年打擊影子經濟之主要方向，對於我國未來建置、分析、規劃防制影子經濟之制度建置實有助益，建議未來應強化跨機關合作，加強稽徵欠稅工作、推廣線上支付降低現金使用率及加強租稅宣導提升民眾租稅道德感。OECD 影子經濟關注小組之調查結果預定 2019 年 9 月提出初稿，2019 年 10 月繳交最終成果報告，其後續之結論報告值得關注追蹤，以掌握最新國際租稅趨勢。



## 壹、緣起及目的

經濟合作暨發展組織(Organization for Economic Co-operation and Development; OECD)為一國際性組織，自 1960 年 12 月於法國巴黎成立，迄今會員國已增至 36 個，其成立之宗旨為藉由透過各國政府相互合作，致力於世界民主及市場經濟，以期達成永續經濟成長、促進就業、提高生活品質、維護財政穩定、協助其他國家經濟發展，及世界貿易成長等目標。

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本次會議由澳洲稅務局(Australian Taxation Office, ATO)主辦，工作小組會議並邀請各國派員參加，研討內容包括：分享影子經濟快速變化區域之情報、估算影子經濟之規模並衡量其對政策之影響、各式估算影子經濟衡量方式之利弊、處理影子經濟多面向與相互關聯性，及如何協助稅捐機關對抗影子經濟議題。影子經濟議題為我國近年稅務行政面臨挑戰之一，派員參加可掌握當前國際對影子經濟之衡量、對應策略與相關稅務行政等發展趨勢及與其他與會國家代表經驗交流，作為未來賦稅政策研議參考。

## 貳、會議議程與出席國家

### 一、會議議程

OECD 影子經濟關注小組(COI)本次工作小組會議指派 OECD 專家成立群組，分為 3 個子群組，由各子群組主席領導各小組討論。

本次會議由澳洲稅務局(ATO)辦理，由該局影子經濟任務小組(Black Economy Task Force)組長擔任主持人，會議以 3 項子議題分組討論，分別為(一)整體政府方針、(二)測度影子經濟之規模及(三)資訊及知識之分享。會議先由專家群就 3 項子議題就現行進度及預期至 2019 年 3 月預期成果進行分享，並由各與會者自行擇選參加分組討論。次日，由與會者分享各國對影子經濟 3 項子議題之推展及實務經驗，最終日則復由子議題群組專家整理討論成果。會議議程如下：

日期	主題	主持／主講人
11 月 7 日 (週三) 09:00-10:00	報到、開幕、研討會議程介紹	Egil Martinsen(澳洲) Deborah Jenkins(澳洲) Line Wilberg(挪威) John Clingan(澳洲)
10:00-11:00	ATO 歡迎致詞	Michael Andrew, AO (澳洲稅務委員會及地下經濟任務小組主席)
11:30-12:30	專家群致詞-影子經濟之目前進展及預期至 2019 年 3 月之研究成果 1. 整體政府方針 2. 測度影子經濟之規模 3. 資訊及知識之分享	子議題專家群
13:30-14:00	亞太地區就影子經濟問題之處理	David Tansey(亞洲開發銀行專家)
14:00-14:20	行為洞察-以犯罪行為及犯罪成因理論-專業推動者就機會、能力及合理化之影響	Bruce Paynter(ATO)



日期	主題	主持／主講人
14:30-16:30	分組討論： <b>1. 整體政府方針：</b> 如何有效協助稅捐機關對抗影子經濟？ <b>2. 測度影子經濟之規模：</b> 測度影子經濟規模為何重要？為何需要測度及如何測度？直接法與間接法及其優缺點、如何使用第三方資料及新型態 IT 工具以測度影子經濟之活動。 <b>3. 資訊及知識之分享：</b> 個案研究—如何就已確定開立虛假發票及詐欺行為之惡劣營運商轉以線上平臺(該平臺可使用 PayPal 或加密貨幣支付月費，且所有數據均儲存在雲端)，對此行為貴國需要掌握何種資料？如何蒐集？如何在國內、外分享資料及情資？如何從其他國家獲取資訊？對於封閉群組使用何種策略？	Conny Svensson(瑞典) Pia Bergman(瑞典) Thomas Lange(挪威) Richard Owen(紐西蘭) Maurice Manno(澳洲) Elinor Kasapidis(澳洲)
16:30-17:15	Q & A、終場致詞	
11月8日(週四) 09:00-11:30	<b>測度影子經濟之規模</b> 1. 比利時對中小企業之企業所得稅缺口之估計 2. 匈牙利打擊租稅規避之有效工具	Adriaan Luyten Balazs Kertesz
13:00-14:00	<b>整體政府方針</b> 1. 馬來西亞政府如何與其他國家合作以減低影子經濟 2. 挪威觀點：挪威稅務局對抗非法勞工犯罪案例 3. 不公平競爭-瑞典	Mohd Shahfizan Md Salleh Marianne Gansmo Line Wilberg Pia Bergman Skatteverket
15:00-16:00	<b>資訊及知識之分享</b> 1. 瑞典暱名/現金者之資料蒐集之經驗 2. 丹麥建構能力-知識分享之重要性 3. 國際情報共享-澳洲租稅犯罪之預防	Conny Svensson Skatteverket Morten Bohm Skattestyrelsen Bruce Paynter
16:10-17:00 18:00-21:30	<b>整體政府方針</b> 新加坡經驗分享 參訪活動	Lawrence Eng
11月9日(週五) 09:30-12:30	分組討論 終場致詞、COI 未來發展	Jeremy Hirschhorn Line Wilberg

## 二、我國代表及會議出席國家

本次會議奉派由財政部綜合規劃司綦科長茵蘋參加，另有澳洲、比利時、加拿大、丹麥、匈牙利、日本、馬來西亞、紐西蘭、挪威、菲律賓、波蘭、新加坡、南非、瑞典及英國等 16 國共 40 位人員與會。

## 三、本次會議目標

影子經濟（又稱地下經濟）是經濟社會長久存在問題，過去 10 年各國稅捐機關已在不同領域努力對抗並強化識別進而取得部分成果，2012 年 OECD 之稅務組織論壇(Forum on Tax Administration, FTA) 發布「降低影子經濟對租稅之非依從機率」，就一定程度廣泛討論影子經濟活動。然而，因應工作方式和商業模式之改變，影子經濟近年亦隨之不斷變化與調整，特別是電子經濟之發展、更廣泛社會化及全球化，導致新型態影子經濟模式出現或在現有規模或範圍上更為擴大。因而可能產生新的社會問題，並可能廣泛地破壞租稅依從性，特別是許多國家也注意到勞動市場犯罪及跨境詐欺增加、影子經濟技術日益複雜化以及透過共享經濟的快速成增長而帶來對稅基的潛在威脅。

2016 年 5 月在北京舉辦第 10 屆 OECD FTA 會議即就各國稅捐機關如何因應影子經濟之新發展訂定研修法規之時程，並發表「對付逃漏稅之科技工具報告(Technology Tools to Tackle Tax evasion and Tax Fraud report(OECD, 2017a))」、2017 年發表「對抗影子經濟的曙光：機會與挑戰(Shining Light on the Shadow Economy: Opportunities and Threats)」報告，由一連串報告之發布可得知 OECD 期望能提供各會員國有關影子經濟近期發展之變化及案例，進而推薦各國稅捐機關採行之策略，使得各國得於影子經濟發展前掌握機先。

本次工作會議目的，即希望藉由邀請 COI 之成員國與非會員國資深財經官員之參與，就各國對抗影子經濟之成效分享經驗、完成報

告，藉由各國對影子經濟之成效及評估交換意見，並就影子經濟小組之成果展開階段性討論，提供初步成果，如期於 2019 年 10 月繳交最終成果報告。

### 叁、會議討論議題

有別於地上經濟，影子經濟又稱為灰色經濟或地下經濟，Schneider(1986)對影子經濟的詮釋為：「在所有經濟行為中，凡可貢獻附加價值且包含於國民會計制度之國民所得中，卻未於國家相關統計機構紀錄者，稱為影子經濟」。而 Smith(1994)定義則是「凡所有生產及服務等經濟行為，無論合法或非法，只要逃避官方國內生產毛額之統計，即稱影子經濟」。

本次研討會議排定 3 項子議題：整體政府方針、測度影子經濟之規模、資訊及知識之分享，由各組指導專家就各議題設定進度進行廣泛性討論，各國參與代表進行意見交換及提問。希望本次會議藉由充分分享各國實施經驗，使得與會代表在各項議題均能有所收穫。

子議題 1—整體政府方針：研究整體政府多方處理影子經濟和相互關聯因素的方法，有助於 OECD 內部如何最佳促使整體政府能力建構全領域發揮作用。

子議題 2—測度影子經濟之規模：測度影子經濟規模為何重要？為何需要測度及如何測度？直接法與間接法及其優缺點、如何使用第三方資料及新型態 IT 工具以測度影子經濟活動。

子議題 3—資訊及知識之分享：討論如何在影子經濟快速變化領域加強情報共享，特別是在跨境情況下。在考慮快速預警機制時，與情報共享協作國際聯合工作團隊(Joint International Taskforce on Shared Intelligence and Collaboration, JITSIC)、稅務犯罪及其他犯罪問題特別工作組(TFTC)密切合作非常重要。

本報告謹就重要之專家報告及各子議題之國家經驗分享報告略述如下：

## <<專家分享>>

### 一、國際情報共享－澳洲租稅犯罪之預防

情報共享在租稅領域之作用為何？情報可以定義為產品、過程甚或一種能力。情報不僅是資料或資訊，而係由更多細節所組成。情報是由資料蒐集、過濾分析而成，然而，隨著資料數量的增加及越趨複雜，各國可能需要共享的是數據集資料而非情報。

澳洲 ATO 是全球稅務聯合執法成員之一，與英國、美國、荷蘭和加拿大稅務機關成立 J5。J5 致力於透過加強執法合作，打擊國際及跨國稅務犯罪和洗錢活動。該小組共同致力收集訊息，分享情報並開展聯合行動，重點是離岸稅務犯罪、網絡犯罪和加密貨幣詐欺的參與者。

藉由跨國技術合作情報分享，更進一步加入科技加密技術與金融科技，ATO 同時確定分享相關情報的替代管道與國際機構資訊。例如，自 2018 年 4 月 ATO 開始與金融犯罪調查網絡(Financial Criminal Investigation Network, FCINet<sup>1</sup>)合作，允許國際合作機構於正式請求資訊交換前，於共同平臺確認該資訊之存在。FCINet 平臺由荷蘭稅務局和英國稅務局領導，為基於技術資訊共享計畫，十餘年來亦應用於歐盟。

未來，諸如與 JITSIC 合作而對巴拿馬(Panama)文件及天堂(Paradise)文件等聯合調查強化共享協作分析數據，進而產生「聯合」操作情報之迫切需要。澳洲現有之協定和資訊交換機制甚有助益，但或僅適合於個案層面分享情報，且「可預測之相關性」部分仍需測試及修正，目前雖可運用相關技術分析和智能共享，但澳洲稅務局內部流程尚未具備即時回饋之能力。

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<sup>1</sup> Review into the Australian Taxation Office's Fraud Control Management-A report prepared at the request of the Senate Economics References Committee,p188, Inspector-General of Taxation, Australian Government, June 2018.

JITSIC 為稅務管理部門提供便捷資訊交流和協作機制，同時確保所有資訊交換都符合雙邊或多邊租稅協定或稅務資訊交換協議之規定。JITSIC 成員資格須積極致力於共享資訊與情報。

## 二、測度影子經濟之規模

影子經濟係社會長久以來存在的問題，通常包括基於下列理由而故意隱瞞政府當局所有基於市場合法生產之商品及服務：1.規避所得稅、增值稅或其他稅款；2.規避社會安全捐；3.規避法定勞動市場標準(如最低工資、最高工時、安全標準等)；4.規避遵守某些行政程序(例如填寫統計調查表或其他行政表格)。

測度時需要瞭解：哪些經濟部門具較高逃漏稅風險？逃漏稅之風險如何演變？針對逃漏稅和影子活動之緩解政策是否產生影響？

測度影子經濟之方法概分為二：

- (一)直接法：1.國民所得統計量測量—差異法；2.調查技術法；3.對公司管理階層之調查；4.對家庭消費與收入間差距之估計法。
- (二)間接法：1.國民支出與收入統計間之差異；2.官方勞動力與實際勞動力之差異；3.供電法(Electricity approach)；4.交易法(Transaction approach)；5.貨幣需求法(Currency demand approach, CDA)；6.多重指標、多重原因(Multiple Indicators, Multiple Causes, MIMIC)法。

測度地下經濟至少會遇到的主要挑戰為：如何衡量多重因素之現象？如何區分納稅義務人在納稅義務之故意過失或無心之過？

方法論設定應考量因素：(一)基於風險之審計導致數據虛假陳述：隨機審核之樣本、兩階段 Heckman 檢定；(二)效果測量中之歸因誤差：多項緩解政策、何者可實際運作？建立衡量基礎之困難；(三)

稅捐機關是否擁有充分的主動和反應工具？

OECD 工作小組的目的即希望藉此彰顯衡量影子經濟之重要性、重新審視測量挑戰、克服挑戰的建議、各國比較方法及其各自利弊、關於「最佳做法」之跨國調查，最終得到具有新見解和建議的前瞻性報告。

### 三、亞太地區就影子經濟問題之處理－亞洲開發銀行(ADB)

亞洲開發銀行(Asian Development Bank, ADB)為亞洲地區之多邊性國際開發援助機構，致力於協助開發中會員國增進經濟及社會之發展，推動亞太地區之經濟及社會成長。因應影子經濟議題，ADB 發表「亞太地區數位科技如何提升租稅收入<sup>2</sup>」及「亞太地區稅務行政比較分析」研究報告。

研究結果發現，稅捐徵管對亞太地區國家為複雜且重要問題，有效之租稅制度值得國家投注精力並將其作為經濟和社會發展之目標。根據 ADB 最新調查數據，2015 年亞太地區 28 個經濟體之平均租稅負擔率為 17.5%，僅略高於 OECD 國家租稅負擔率 34% 之半數。近三分之一亞洲國家之租稅負擔率低於 15%，此為政府在沒有其他收入來源下可持續發展所需之最低門檻。

研究顯示，許多民眾及企業主通常不熟悉租稅專業用語，故稅捐機關應透過使納稅人更容易理解之系統減少納稅人負擔。而透過使用電子申請及電子支付等電子服務建立現代化租稅系統，是提高納稅依從度有效方法之一。例如於網站提供綜合資訊、網路申報工具、計算方式、綜合性之納稅帳戶、提供納稅人網路申請功能、電子發票系統、第三方數據取得及電子郵件之簡單功能，均可大幅提升申報依從性。

值得注意者，許多亞太經濟體逐漸在數位時代於稅捐稽徵取得進

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<sup>2</sup> <http://blogs.adb.org/blog/how-digital-technology-can-raise-tax-revenue-asia-pacific>

展。個人和企業納稅人之識別和登記系統，對稅捐機關管理納稅人至關重要，系統之記錄與更新及分配獨特之識別號碼，可以有效地進行所有後續之管理流程。例如在印度、哈薩克、馬來西亞、蒙古、尼泊爾、新加坡和我國於使用電子繳納稅務報表均有相當大進展。

完全電子化可使管理成本顯著降低，且可更快速地更新納稅人資訊。至於稅款繳納方面，使用現代化電子支付系統可以為納稅人、稅捐機關、政府及金融部門帶來巨大利益，中國大陸、印尼、蒙古和越南之稅捐機關實施強制性電子支付制度。

印尼最近實施新電子支付計劃「Mini ATM」，由印尼稅務總局(DGT)研發，納稅流程始於納稅人可從多元管道（包括通過 DGT 網站、網路銀行、APP 應用程式及簡訊）獲取電子繳款書代碼，納稅人使用繳稅代碼配合使用 Mini ATM 相應之納稅程序，只需刷卡即可繳納稅款，有效便利及擴大繳稅方式。

稅務管理是 ADB 知識共享之關鍵領域，過去 4 年 ADB 已將稅務管理列為知識共享之重要領域。近期出版第 3 版「亞太地區稅務行政比較分析」涵蓋亞太地區 28 個經濟體，分析重點在於該地區國家稅務管理。該報告並對稅捐機關之框架、組織結構、流程及績效進行分析，同時對比各項發展及進展。ADB 另對索羅門群島及亞塞拜然提供防止影子經濟之協助，並提供作為案例分享。

## << 整體政府方針 >>

### 四、新加坡經驗分享

新加坡內地稅局(IRAS)依據「對抗影子經濟的曙光：機會與挑戰(Shining Light on the Shadow Economy: Opportunities and Threats)」報告，界定影子經濟之定義為「經濟活動無論合法或非法，凡法律要求應向稅捐機關全數申報而未申報，因而未納稅之部分」。IRAS 依租稅依從度將納稅人分為 4 階段：自願遵從、未認知(不知道)、疏忽及錯



誤，依前開定義，影子經濟可能發生之階段為疏忽及錯誤。

新加坡影子經濟未依從比率較低，分析其原因為：(一)過去 1 年欠稅徵收(包括罰款)占租稅收入之比例約為 1%，估算近 3 年約在 0.9%至 1.2%間(僅所得稅及商品及服務稅(Good and Service Tax, GST))、(二)依據過去 3 項對納稅人調查結果，對於納稅依從之認同度高達約 97%、(三)GST 之稅收缺口低，估算 2003 年至 2013 年間約為 GST 稅收之 2.7%、(四)降低申報錯誤、簡化查核程序，2009 年之欠稅徵收數額為 GST 實際稅收之 1.6%至 5.7%。

IRAS 採用查核及調查方式強化對納稅人之管理，按每個行業或專業範圍，根據諸如納稅人之資產與收入報告間之差異等指標，選擇較高風險性案例進行查核，而為確保查核範圍具充分涵蓋性，每年都會選擇不同族群納稅人進行依從稽查。

非依從者之定義及檢測區分為一般性風險及特定風險，以進階分析方法識別一般性風險，另輔以分析模型以辨別、選列可能不合常規之案件(預測模型、社會網絡分析、異常檢測等)供進一步查核。特定風險則以大數據資料探勘、內部轉介、外部(政府其他部門)轉介、其他稅捐機關、其他公務部門人員及公開資訊獲取資料。

新加坡政府預計於 2021 年至 2025 年期間將 GST 稅率從 7%上調至 9%，隨著影子經濟之可能性增加，提高 GST 退稅詐欺或旋轉木馬詐欺之複雜程度，IRAS 透過 GST 體系提高查核頻率及攻擊之複雜性；另強化調查權力以解決 GST 退稅詐欺問題，如與其他打擊犯罪部門分享情資、提供無須逮捕令之逮捕權力，甚而提供使用武力進入屋內及搜索人身之權限。

GST 退稅詐欺是一種新興趨勢，政府必須遏制風險，有必要採取多方及協作方法，結合各部門合作及相關法規，有效打擊 GST 退稅詐欺。

## 五、挪威觀點：挪威稅務局對抗非法勞工犯罪案例

挪威屬高所得、高福利國家，因此僱用非法勞工現象很多，常見於建築、造船、運輸、清潔、漁業和食品飲料等行業，且非法勞工常易結合經濟犯罪、逃漏稅、暴力犯罪、販毒和黑社會。故挪威由稅務機關發動並組成全政府策略以期解決非法勞工犯罪問題。

挪威稅務局以確保公眾活動之經濟基礎平等為使命，期望納稅人和訊息提供者遵循租稅法規、稅務局確保使用者得到優質訊息及社會大眾得以信賴稅務管理當局。訂定 2015-2018 年達成目標，為降低勞工犯罪，過程目標為以風險圖象中所有利益相關者為對象、與其他政府機構、僱員和雇主組織、貿易與產業及其他國家密切合作、改善系統註冊及個資品質，最終建置勞工犯罪知識庫，使用此一知識庫作為政策優先性之基礎。

「整體政府」實際執行方式為設計全新方法以解決問題，結合勞動監察部門、挪威勞工及福利管理局、稅捐機關及警察等 11 部門，於 2014 年成立「共同打擊非法勞工犯罪(ARBEIDSLIVET)」聯合組織。該組織開始之運作充滿挑戰，且社會預期聯合組織應以單一機關方式處理問題。設立共同願景對於實現整體政府方針至關重要，故該組織進一步於 2015 年及 2017 年訂定策略及行動計畫。該組織之使命為：優先處理非法勞工相關之犯罪、加強彼此合作、發展、改進及分享與非法勞工相關犯罪之知識、建立正式的務實合作、利用不同機構之作法及工具之各種可能性、爭取額外預算。

協作工作之經驗和結果，使得機關得以藉由預防性檢查察覺更多犯罪，並獲取更多證據。得以藉由常識及情報越來越容易認清犯罪環境、利益相關者、不同現象和作案手法。無論在聯合中心或個別機構均能藉由合作優先打擊犯罪，並得以最佳效益與技巧擇選關鍵性罪犯。打擊非法勞工策略須結合多個政府部門機關之合作，並屬長期性工作，以意志力、耐心及系統性思維持續改進。

## 六、不公平競爭—瑞典經驗分享

瑞典於 2017 年 12 月 18 日成立聯合部門，該部門由環境部、勞工服務部、經濟犯罪署、瑞典社會安全署、性別平等部、移民部門、警察部門及稅務署共同組成。

該聯合部門之任務在為整體政府制定有效及適當(權宜)方法，以打擊詐欺、違規及非法勞工犯罪，分為 5 部分：(一)規劃分析該聯合部門如何挹注貢獻；(二)在中央及地方建立聯繫領域、工作方法和程序，以便於全國實踐良好運作；(三)在當前法規具保密基礎之框架下，提供並支持該聯合部門資訊交換之機會；(四)制定評估標準，以便於政府整體範圍進行控制，並確定在何種情況下哪些部門應以何種方式參與；(五)確保上開方法已納入該聯合部門活動，以便於 2020 年後，政府整體機構合作得以發揮良好作用。

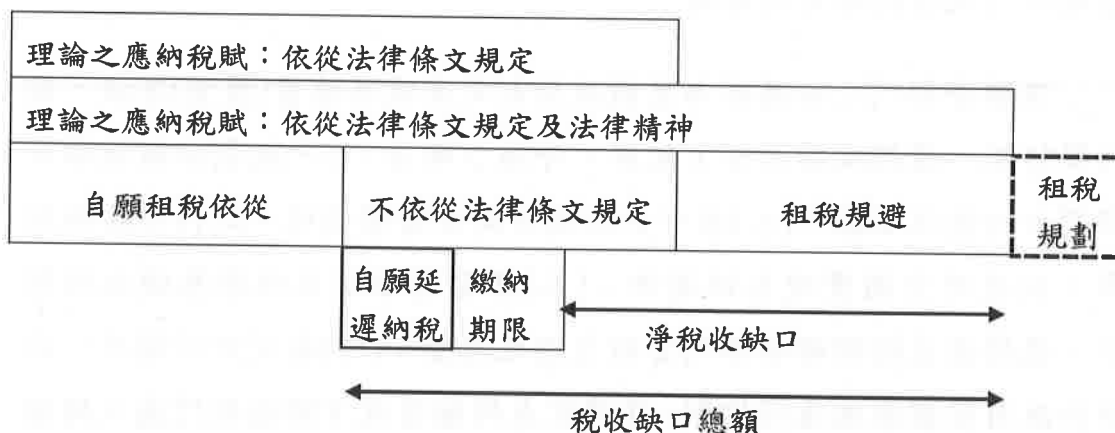
該聯合部門之外溢效果為：建立共同立場與藍圖、確立共通性優先事項及聯合任務。但遭遇下列挑戰：在無正式犯罪嫌疑下，特別是在合作初期，易發生保密問題；各部門間之文化衝突；行動、管理及過程中須充分溝通；調查方向或協作方式應於合作支援前溝通完成；不同部門對資源排序之優先有不同考量。

瑞典自 2019 年將開始整體政府部門之全面運作，從工程、美容院、車庫及餐廳 4 個行業開始施行。

## <<測度影子經濟之規模>>

### 七、比利時對中小企業之企業所得稅缺口之估計

#### (一)何謂稅收缺口？



#### (二)稅收缺口之衡量方法

可分為：1.由上而下法(Top down)係依據比較稅基基礎下租稅收入與國民所得帳(NA)資料間之差距，特點是相對而言較為容易，但可能存在 NA 計算本即以租稅收入為基礎、NA 與稅捐機關使用之稅基不一、租稅期間或非曆年制等問題。2.由下而上法(Bottom up)由稅務審核結果推算至全國人口之合理性，採用隨機審核程序或非隨機審核程序，而以校正樣本偏差為之。

比利時並採黑克曼兩階段估計法(Heckman two-step estimation)達到盡量以隨機抽樣方式有效分析資料，解決實證研究中遇到樣本選擇偏誤和自我選擇(self-selection)機制問題。但可能產生無論在觀察到或未觀察到特點中，所選樣本與一般定義人口有所不同，未來應嘗試將觀察到及未觀察到之差異列入考慮，透過聯合構建模型將結果之變量及樣本選擇過程列為決定因素。

估算結果發現，比利時中小企業之企業所得稅稅收缺口於 2015

年為 15.36%(約 9 億 4,100 萬歐元<sup>3</sup>)、2016 年為 15.38%(約 10 億 5,500 萬歐元)。而選擇中小企業之企業所得稅估算稅收缺口之優點在於資料來源廣泛，且大多數經過查核故資料可信度高，分析重點可著重於租稅規避；而缺點則是僅占所得稅一小部分、無法區別造成稅收缺口之原因是稅收增加或稅基加大。

目前遭遇之挑戰在於無法精確掌握資料之品質及來源，由於詐欺及查核程序具高度複雜和不可預測性，以及建構模型之假設。未來將著重於改進強化使用模型之驗證性、維護現有模型並改善基本線性模型。

## 八、匈牙利打擊租稅規避之有效工具

匈牙利自 2011 年起訂定打擊租稅規避及影子經濟之藍圖，致力於維持預算赤字目標，並採行透過擴大稅基和強化經濟以抑制規避稅賦之行為、降低行政成本增強競爭力，建立有效租稅制度，促進經濟增長。主要措施分為下列四項：

- (一)組織改造:2011 年 1 月 1 日起，將前匈牙利稅務管理局(APEH)和匈牙利海關總署(VPOP)合併為單一行政機關－國家稅務及海關總署(NTCA)。自 2016 年起，並以全功能整合模式重組 NTCA，簡化為二層級組織，減少部門數及高階領導人與管理人。NTCA 主要目標設定為：確保國家和歐盟預算之預算收入、減少逃漏稅和詐欺造成之損失、維持公平經商環境、保持企業被查核之可能性，以促進租稅依從及自我評估、透過消除市場詐欺行為者降低公平交易經濟參與者之競爭劣勢。

NTCA 改變查核方法，由提供服務及提升效率二大面向加以

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<sup>3</sup>2016 年比利時 CIT 總稅收為 145 億 1,200 萬歐元，資料來源：TAX SURVEY(2018), Federal Public service Finance。

改進，目標在現行稅務依從水準下採行預防及行動措施。其中於 2017 年實施支持性查核程序，根據風險分析，稅捐機關啟動支持程序以防止發生。稅捐機關於資料庫獲取訊息及從第三方收集有義務提供之其他訊息進行風險分析。在確定檢測到的風險後，NTCA 可以啟動支持程序以協助自願遵守者(如通知納稅人、要求自行改正、要求個人聯繫)或採取措施以解除稅務風險(如撤銷稅籍編號、通知刑事部門)，如有需要即開始查核。自 2017 年以來已有許多成功案例如 Airbnb。

(二)重建租稅體系：減少對勞動之稅賦，增加對消費、交易及負外部性之稅課。個人所得稅(PIT)採比例稅率為 15%、調降企業所得稅(CIT)稅率為 9%、一般增值稅(VAT)稅率為 27%。2011 年實施家庭免稅額，並於 2013 年實施就業保護行動計畫以鼓勵弱勢族群就業，並為中小企業施行特殊稅制。

(三)創新工具以對抗租稅規避：採用創新工具如線上收銀機、電子交易控制系統(Electronic Road Trade Controll System, EKAER)、納稅人分類系統，並自 2018 年 7 月 1 日起施行電子發票制度，有效減輕行政負擔，強化經濟，提高目標風險分析(選案)之有效性。2018 年 7 月 1 日之後若發票開立者在匈牙利註冊增值稅、向國內營業人開立發票及發票上加值稅額達 10 萬匈牙利幣(約 320 歐元)者，即應採用電子發票。未來將由 NTCA 提供免費線上開立發票軟體，希望鼓勵小型及微型企業由手寫發票改為電子發票。

(四)降低行政負擔及強化與納稅人之夥伴關係：減少官僚主義、盡可能簡化制度、善加利用 IT、廣泛使用電子文件。

匈牙利政府衡量政策變化之影響，係以 NTCA 績效管理系統、整體估計租稅收入之影響、稅收缺口分析及政策工具之成本與效益分

析。其中行政效能績效指標以租稅收入、行政服務、客戶服務及运营管理衡量。估算 NTCA 各項對抗影子經濟措施產生之租稅收入影響，2018 年約占 GDP 之 0.89%、2017 年為 0.81%，相較於實施前之 0.59% 至 0.79%，有小幅成長。

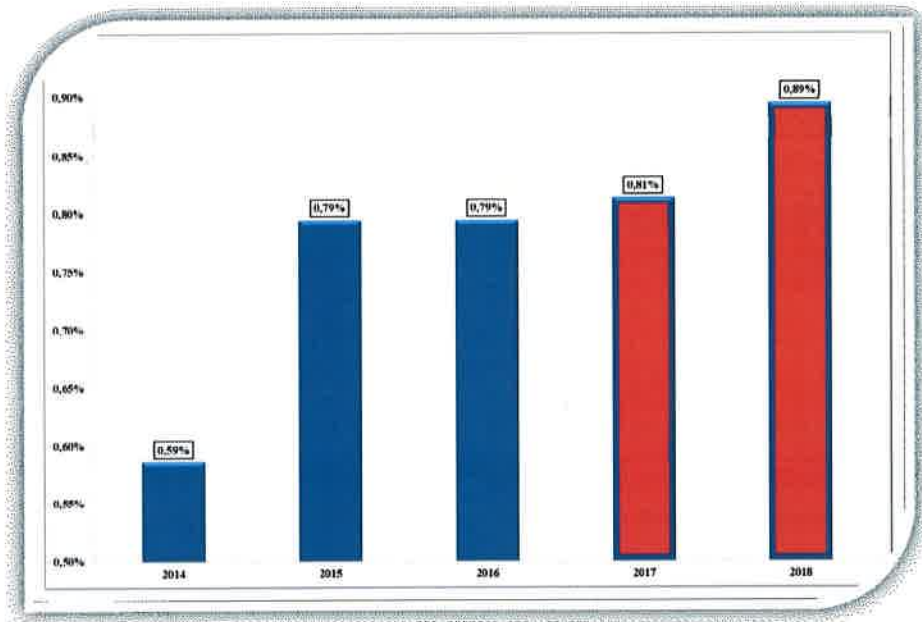


圖 1 NTCA 各項對抗影子經濟措施之收入效果 (%GDP)

若採由上而下方法，以歐盟增值稅稅收缺口指標(增值稅稅收缺口占增值稅總稅收(VTTL)之百分比)估算歐盟 28 個會員國增值稅之稅收缺口，匈牙利自 2012 年至 2016 年增值稅缺口持續呈現下降趨勢，降幅約 9%，達 2016 年之 13.3%(詳圖 2)。<sup>4</sup>

<sup>4</sup> 資料來源：歐盟 CASE 稅務總局和關稅聯合組織(2018)，Study and Reports on the VAT Gap in the EU-28 Member States: 2018 Final Report。

VAT Gap as a percent of the VTTL in EU-28 Member States, 2016 and 2015

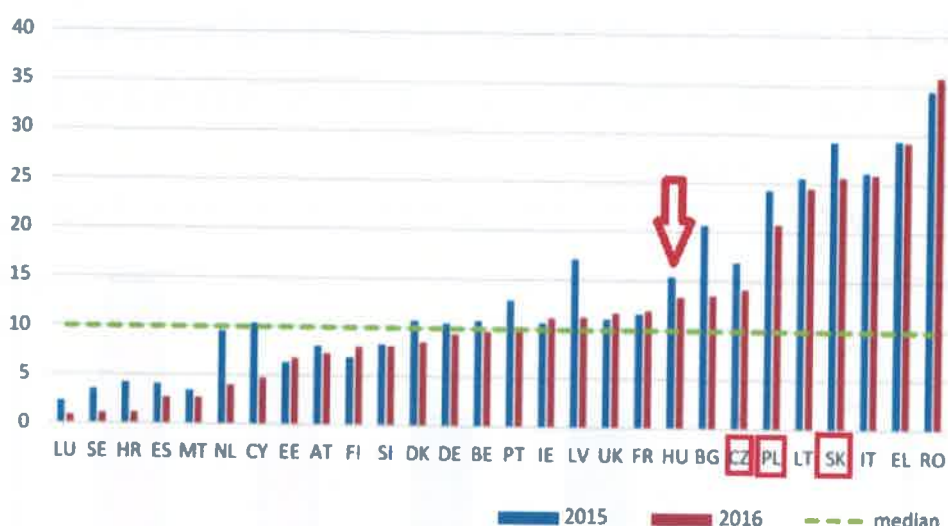


圖 2 2015 年及 2016 年歐盟 28 會員國加值稅之稅收缺口占總稅負比率

若採由下而上衡量方法估算稅收缺口，匈牙利自 2017 年就加值稅與企業所得稅(CIT)由財政部與 NTCA 執行聯合查核計畫，以稅務查核資料為基礎，使用風險基礎選案及隨機查核資料，並由稅務查核紀錄中獲取各項訊息，以防止誤判。其主要目標在於辨別稅收缺口與增進租稅依從策略與租稅政策。

### << 資訊及知識之分享 >>

## 九、稅收缺口與影子經濟－澳洲經驗分享

### (一)簡介稅收缺口與 ATO 工作計畫

稅收缺口係指 ATO 估計實際所收的租稅收入與若每個納稅人完全依從稅法所應納稅額間之差異。在某種程度上，所有國家都存有稅收缺口。重點在於稅收缺口是估計值、是衡量無法查得之資料，影子經濟包含故意違規及犯罪不守法因素，而稅收缺口不等於影子經濟，但影子經濟包含稅收缺口。稅收缺口之衡量有助 ATO 瞭解租稅體系之績效與完整性，包括自願參與的程度及租稅依從之重大變化。

估算稅收缺口對任何國家都具有挑戰性，實際上，稅收缺口是衡



量不可見的東西—納稅人不會主動告知其依從程度—無論是因為誤差、自行選擇、或因採取不同於 ATO 法律觀點之租稅立場。

稅收缺口計畫之整體觀點，主要依據 3 項原則：1. 可靠性：要使結果值得信賴，結果必須透明、簡潔，對評估和批評持開放態度。2. 可信賴：當須解釋估算結果之差距及討論更廣泛問題和影響時，結果須為可信賴。3. 有意義：有效的溝通意味著利益相關者可用以作為策略並為計畫提供訊息，以完整瞭解狀況。

稅收缺口之研究程式概分為：1. 交易為基準之稅收缺口—由交易供應鏈中較後端之實體(通常由消費者負擔成本)所收與支付之租稅差異，如 GST 或燃料消費稅。2. 所得為基準之稅收缺口—所得稅(個人和企業)基於應稅所得之租稅差距。3. 行政缺口—非稅收缺口，係因該行政機關管理計畫而形成。4. 影子經濟—經常受到影子經濟活動影響之差距。圖 3 顯示澳洲租稅體系和退休金制度背景下整體缺口研究計畫之各項租稅稅收缺口。

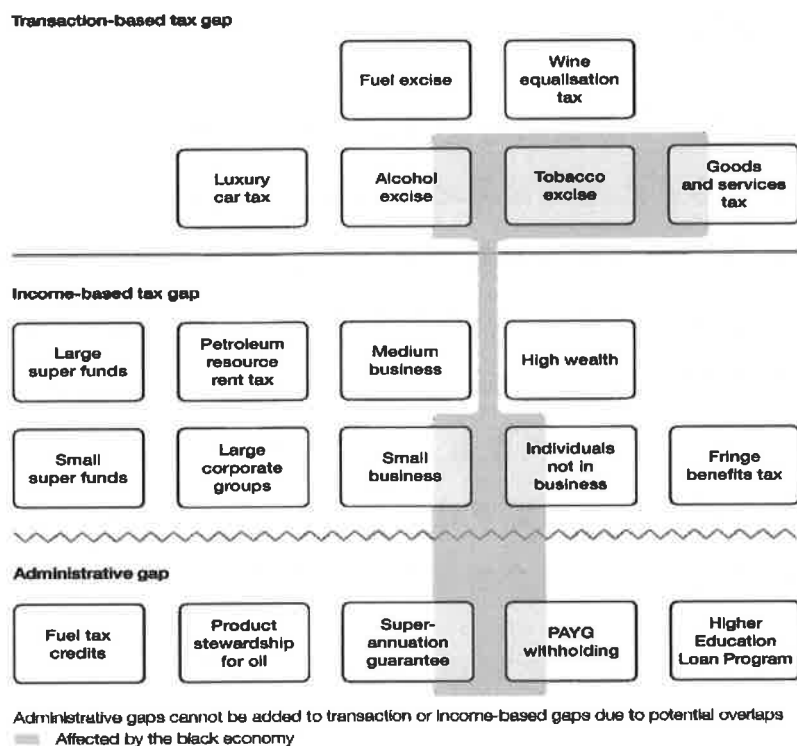


圖 3 澳洲租稅體系和退休金制度整體稅收缺口

## (二)如何衡量稅收缺口

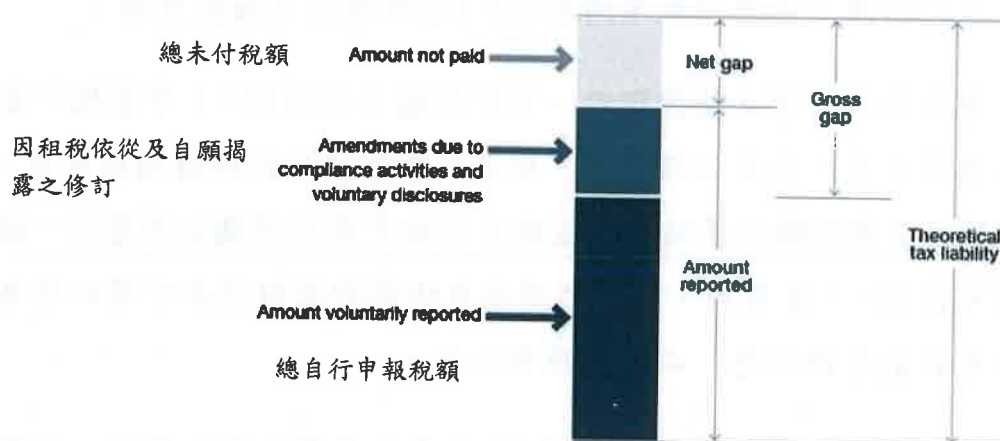


圖 4 稅收缺口架構

總缺口(Gross gap)係指總自行申報稅額(Amount voluntarily reported)與理論上應納稅額(Theoretical tax liability, 若每個納稅義務人完全依從之應納稅額)間之差距;而淨缺口(Net gap)係指總申報稅額(含總自行申報稅額及因租稅依從及自願揭露之修訂)與理論上應納稅額間之差距。在可能情況下,ATO 還會估算從未註冊或從未申報者之稅額,而稅收缺口之估算中不含處罰及利息。

ATO 使用組合方式同時使用由上而下或由下而上方式估算各項缺口,採互補的方式提高估算之準確性及實用性。由上而下法係使用外部提供的彙總數據估計稅基大小,從中估算理論之稅負,通常用於間接稅,目前運用於估算如 GST 或燃料消費稅之稅收缺口。由下而上法包含對數據來源之詳細檢查,例如納稅報表、查核結果(含隨機檢查程序)、風險登記資料或第三方提供數據之資訊,然後推斷整體人口數之不合理程度,以從中估算稅收缺口,通常用於直接稅,目前運用於個人所得稅、大型企業所得稅及菸稅。

## (三)影子經濟對稅收影響之洞察與觀察

影子經濟對稅收之影響<sup>5</sup>以下表簡要表示：

表 2 影子經濟對各稅之影響

單位：澳幣元

稅收缺口	淨缺口	影子經濟對稅收之影響
菸稅	\$5.94 億 2015-16 (5.6%)	\$7.31 億 (總缺口)
GST	\$53 億 2016-17 (7.9%)	\$9.98 億 (1.5% of TTL)
個人所得稅	\$87 億 2014-15 (6.8%)	\$149 萬 (現金薪資)
退休金保證 <sup>6</sup> 缺口	\$28 億 2015-16 (4.9%)	\$7.99 億 (現金薪資)
分期付款(PAYG) <sup>7</sup> 扣繳缺口	\$34 億 2015-16 (1.9%)	\$21.72 億 (現金薪資)

1. 菸稅缺口：2015-16 年度，菸稅淨缺口估計約為澳幣 5.94 億元 (5.6%)，分析顯示海運及空運貨物為非法菸草進入澳洲之最主要管道。
2. GST 缺口：2016-17 年度 GST 淨缺口較往年略微下降至澳幣 53 億元(7.9%)，分析結果係因一般家庭在食品、健康和教育等 GST 免稅商品和服務消費較多所致，本項表現中澳洲在同類型國家排名相對較好。
3. 個人所得稅缺口：2014-15 年度，估計淨稅收缺口為澳幣 87 億元(6.8%)，分析顯示主要因素包括與工作相關費用扣除錯誤之索賠，及未申報(現金)薪資相關之收入漏列所致。
4. 退休金保證缺口：2015-16 年度，估計退休金保證缺口為澳幣 28 億元，相當於估計雇主須支付退休金保證總額澳幣 567.7 億元之 4.9%。
5. PAYG 扣繳缺口：2015-16 年度預計淨現金扣除額估計為澳幣 34 億元(1.9%)，代表雇主大致遵守其預扣義務。澳洲財政部估

<sup>5</sup><https://www.ato.gov.au/about-ato/research-and-statistics/in-detail/tax-gap/australian-tax-gaps-overview/>

<sup>6</sup>退休金保證(Superannuation Guarantee)澳洲政府規定無論企業規模大小，雇主都必須提供約當普通平均薪資之 9.5%。2014 年 7 月 1 日起提撥率為 9.5%，自 2021 年 7 月提撥率調升為 10%。

<sup>7</sup>分期付款(Pay as you go, PAYG)是一種定期支付預期年度所得稅負之系統，僅適用於超過一定金額業務或投資收入以上者。

算，在未干預情況下雇主支付 95% 之扣繳稅款。

在分析現金給付薪資和缺口之影響時，澳洲財政部提供澳洲統計局(Australian Bureau of Statistics, ABS)於估計員工薪資數據加乘因子(1.2%)以推計影子經濟中未支付之退休金保證，由此可說明以現金給付薪資或員工分類錯誤係造成影子經濟之原因。該項加乘因子已考慮可比較國家之工資水準，並就原有數據進行分析，特別專注於影子經濟下交叉分析雇主與依從活動之關聯性。2014-15 年度缺口對稅收之影響為：退休金保證未支付數達澳幣 7.68 億元、PAYG 扣繳達澳幣 21 億元未繳付、個人經營業務未繳納澳幣 14 億元所得稅。

分析非法香菸影響時，採由下而上法分別估算各種供應管道對租稅之影響，由於在澳洲種植所有菸草均屬非法，故亦可能發生香菸在不繳交菸稅情況下進入消費市場。統計發現：進口形成之缺口達澳幣 4.41 億元、非法自行種植(Domestic chop chop<sup>8</sup>)達澳幣 1.18 億元、倉儲流出達澳幣 1.72 億元。

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<sup>8</sup> Chop-chop (tobacco), Australian English for home-grown tobacco, 澳洲俗稱自行在家種植之菸草。

## 肆、心得與建議

### 一、心得

我國學界雖時有對影子經濟規模之研究，惟官方並未正式統計。2018年1月IMF出版工作報告「世界各國影子經濟研析:過去20年我們學到什麼?(Shadow Economies Around the World: What Did We Learn Over the Last 20 Years?)」，就影子經濟最新發展及新式估算方法廣泛研究。結果發現1991年至2015年，全球158個國家的影子經濟平均規模為國內生產總值31.9%，最高者為辛巴威(60.6%)、玻利維亞(62.3%)；最低者為奧地利(8.9%)及瑞士(7.2%)。依據該報告，估算我國影子經濟之平均值為32.5%、最高為1991年38.43%、最低為2014年32.5%。

國內研究部分，戴韻珊、孫佳宏(2003)研究結果發現臺灣自1962年至2002年間影子經濟規模從27%至5.6%，呈現逐年下降趨勢；何志欽等(2014)估計1961年至2012年臺灣地下經濟規模為56.7%至28.1%；李怡庭、湯茹茵(2014)研究顯示1996年至2012年間，臺灣地下經濟占GDP比例介於14%至25%之間。未來或可運用國際估算經驗，由較易掌握資料來源之稅目（如加值稅或貨物稅）著手，採試行以各種模型加以估算，俟有長期研究結果復觀察其趨勢，建立系統性研究方法做為長期研究依據；或可成立工作小組深入探討，蒐集各方資料，據以改善租稅政策及稅收缺口，未來並可推估對國家整體稅收之影響，並逐年修正，以臻完善。

ATO本次主辦之OECD影子經濟關注小組工作研討會，提供各國稅捐機關工作者與各界專家（如租稅犯罪、加密貨幣領域）就租稅政策經驗交流與學習之機會。尤以OECD為成員國提供平臺，供各國比較政策經驗與交換共同問題，有助於影子經濟活動之解決做法。在國際合作層面，各國在查核技術、情報共享、數據研析方面取得長足進步，透過合作藉由打擊租稅犯罪實現全球性對抗影子經濟之成果

顯而易見。

## 二、建議

本次會議中，我國代表多次與其他國家稅捐機關資深官員交換經驗與心得，過程中發現，在對抗影子經濟之各項作為無論在租稅制度、防制作為或電子化工具之應用，我國與先進國家相較毫不遜色。參與國際研討會，獲取最新國際租稅潮流得到寶貴經驗，謹提出下列建議供政府未來打擊影子經濟之參考：

### （一）強化跨機關合作，加強稽徵欠稅工作

為期公平課稅，維護優良納稅風氣，財政部訂頒「稅捐稽徵機關清理欠稅作業要點」，責令各稅捐稽徵機關照案執行。參考瑞典、挪威經驗，建議未來財政部相關機關（賦稅署、關務署、各地區國稅局等）持續與法務機關合作，就重大案件結合內政、警政、檢察機關等，透過資料蒐集、查證、聯合舉辦查核實務課程、適時召開相關會議及定期通報等方式密切合作，提升執行案件徵起績效。

### （二）推廣線上支付降低現金使用率

我國具備良好工業與資通訊產業基礎，順應各國發展邁向智慧國家「無現金社會」日益成熟。現行財政部推動「台灣 Pay」行動支付，係將國內 QR Code 規格標準化，強化安控機制並與國際接軌，未來仍應持續改善應用場域不足、技術整合障礙等難題。建議未來「台灣 Pay」應持續擴大支付項目及應用型態，舉辦各項宣傳及行銷活動，促進行動支付高普及率，共同對抗影子經濟利用現金支付非法支出之漏洞。

### （三）加強租稅宣導提升民眾租稅道德感

稅課收入乃確保國家施政建設及社會福利之重要來源，建立相關規範提升納稅人納稅觀念及納稅依從度，有助各項目標之達成。建議

未來持續加強稅捐稽徵機關同仁專業訓練，俾審核案件引用法令正確，減少徵納雙方爭議。同時加強對民眾之政策宣導及租稅教育工作，提升民眾租稅道德感，強化合法打擊非法，有效對抗影子經濟活動。

### 三、結語

隨著全球化與科技進步，影子經濟之手法及範圍愈趨明確，各國政府除希冀租稅提供基本財政功能，在現今租稅競合之國際情勢，無不希望政府在有限資源下達到最佳課稅效果，故而租稅制度之設計及稅捐稽徵之方法及推廣亦顯格外重要。

本次會議整體議程規劃，除有助於各國代表瞭解 OECD 影子經濟關注小組現行階段性成果外，經由各參與國家之分享，也能看出各國因應影子經濟採行之對應政策，及各國近年打擊影子經濟之主要方向，對於我國未來建置、分析、規劃防制影子經濟及跨部門合作之制度建置實有助益。OECD 影子經濟關注小組之調查結果預定 2019 年 9 月提出初稿，2019 年 10 月繳交最終成果報告，其後續之結論報告值得關注追蹤。

本部每年均派員參與 OECD 所舉辦之各項租稅研討會議，藉由與指導專家及各國代表意見交流，不僅能瞭解各國租稅制度之最新發展，更能將我國實務經驗與各國代表分享切磋，未來仍應積極參與，與該組織保持良好互動，以掌握最新國際租稅趨勢。





August 2018

Dear Colleagues,

Having asked for letters from the sponsors of Communities of Interest and Enduring Programmes, I am in the rather odd position of responding to myself as sponsor of the Shadow Economy COI.

I will therefore confine myself to a few observations in the light of the development of the wider work programme and synergies to be drawn as well as thanking those tax administrations which have volunteered to be in the Advisory Group and assist us with developing the work programme and activities. As the letter on the planned activities of the COI sets out, in addition to the sharing of knowledge and emerging risks – including through effective use of the OECD O.N.E site - more targeted work will be carried out by three small expert groups. One will be on how we can enhance the sharing of intelligence in the fast-changing area of the shadow economy, particular in cross border situations. Here it will of course be very important to work closely with JITSIC colleagues and the Single Points of Contact as well as the Task Force on Tax Crimes and other Crimes (TFTC) as we think about quick alert mechanisms.

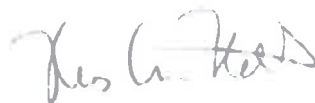
The second group will look at measurement. While this is always difficult, it is important to make the best attempt we can to measure the impact of policies. Here I hope that we can also leverage the expertise of the Analytics COI as well as the Behavioural Insights COI. I am hopeful that this work may lead to a short note on the different approaches that can be taken to measurement and their pros and cons. This also might be an area where we will want to reach out to academia in due course.

The third group will look at whole of government approaches for tackling the multifaceted and interlinked elements of the shadow economy. This will benefit, I hope, from the separate work being undertaken within the OECD on recommendations for how to best make whole of government approaches work in the area of capacity building.

I am also keen that our work on the shadow economy is promulgated more widely outside of the FTA and that it also benefits from inputs from developing countries where this can make up a significant proportion of economic activity. It will be important here to consider how we can best join-up with the various regional tax organisations. Here, as elsewhere, the Knowledge Sharing Platform will be an important tool.

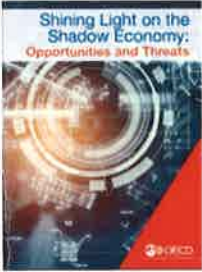
Finally, I am very glad to report that there will be a physical meeting of the COI in Australia this November (7-9 November). Please may I offer my sincere thanks to the ATO for their kind offer to host and to help prepare the event. A lot of FTA meetings take place in Europe – not surprising given that the OECD is based in Paris. But it is good from time to time that those of us who are in, or close to Europe, take the jet lag upon ourselves and relieve others of that burden.

Your sincerely,



Hans Christian





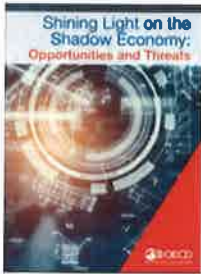
## Community of Interest Shadow Economy



### AGENDA: Shadow Economy COI Workshop 7 – 9 November 2018, Sydney, Australia

#### Wednesday 7<sup>th</sup>:

09:00-09:30	Registration
09:30-10:00	<p>Welcome and opening remarks (Australia and Norway)</p> <ul style="list-style-type: none"> <li>• <b>NTA:</b> International Director, Director General's Office - International Unit, Egil Martinsen</li> <li>• <b>ATO</b> Deputy Commissioner, Small Business, Deborah Jenkins</li> <li>• <b>NTA:</b> Head of section, Methodology section, Line Wilberg</li> <li>• <b>Facilitator of the workshop:</b> John Clingan</li> </ul>
10:00-11:00	Key note speaker – Michael Andrew, AO, Australia Black Economy Task Force
11:00-11:30	Icebreaker Activity, with refreshments
11:30-12:30	<p>Presentation of the Expert Groups - ongoing work and expected output in March 2019</p> <ul style="list-style-type: none"> <li>✚ Whole of government approach, Sweden – Conny Svensson and Pia Bergman</li> <li>✚ Measuring Effects, Norway and New Zealand – Thomas Lange and Richard Owen</li> <li>✚ Sharing Intelligence/Information, Australia – Maurice Manno and Elinor Kasapidis</li> </ul>
12:30-13:30	Lunch
13:30-14:00	✚ <i>"Tackling the Shadow Economy in the Asia-Pacific region"</i> David Tansey, Asian Development Bank
14:00-14:20	✚ Behavioural Insight – Criminal behaviours and theories of crime causation - the professional enablers impact on capability, opportunities and reinforcing rationalisation, Bruce Paynter Australian Tax Office



# Community of Interest Shadow Economy



14:30-16:30	<p>Group discussions - refreshments during the group session</p> <p>✦ Measuring effect: how to measure/know if we have an impact on the criminal behaviour?</p> <p>Group discussions lead and summarized by Richard Owen and Thomas Lange (chairs):</p> <ul style="list-style-type: none"> <li>○ Why is measurement of the shadow economy important?</li> <li>○ Why measure vs. how to measure?</li> <li>○ Do the mitigation policies against evasion and shadow activities have an impact?</li> <li>○ Direct and indirect approaches to measurement, their pros and cons</li> <li>○ Country specific approaches and methods and their respective pros and cons</li> <li>○ What are we aiming to achieve by the end of this work? Content and output.</li> <li>○ Impact assessments of policies and policy changes</li> <li>○ The use of third party data, and how new IT-tools and automation may facilitate measurement of shadow activities</li> </ul>
	<p>✦ Sharing Intelligence: what to be highlighted regarding methods to identify?</p> <p><u>Norwegian Case Study to be workshopped:</u> Your country has identified that a known egregious operator, who you have previously identified as providing false invoicing and committing fraud has now moved on to a different business model. The egregious operator has established an online platform for the sharing of employees. However, to access this private platform you must register and pay a monthly fee, the registration could be aliases and the monthly fee can be paid using a variety of different methods including PayPal, cryptocurrency or via other unregulated payment platforms, offshore, such as WeChatPay. All data is stored in the Cloud.</p> <ul style="list-style-type: none"> <li>○ What Intelligence would your country need to understand this behaviour?</li> <li>○ How would you collect this intelligence?</li> <li>○ How would you share this information intelligence, including internationally?</li> <li>○ How would you gain information from other countries?</li> <li>○ What treatment approach would you put in place to address the behaviours in the Closed Community?</li> </ul>
	<p>✦ Whole of government approach - how may this approach assist the tax administration to combat Shadow Economy? Group discussions.</p>
16:30-17:00	Open discussion, Q & A - all the delegates
17:00-17:15	Closing remarks



## Community of Interest Shadow Economy



### AGENDA: Shadow Economy COI Workshop 7 – 9 November 2018, Sydney, Australia

#### Thursday 8<sup>th</sup>:

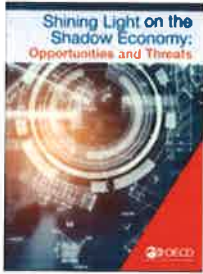
08:30-09:00	Refreshments
09:00-11:30	<b>Measuring Effects</b> ↓ "An estimate of the Belgian CIT gap for SME's", Adriaan Luyten, Belgian Ministry of Finance ↓ TBA: Prospective contributions from either Norway, NZ or Australia,.
11:30-12:00	Open discussion, Q & A - all delegates
12:00-13:00	Lunch
13:00-14:00	<b>Whole of government approach</b> ↓ "How Malaysia co-operate with other government agencies to reduce the shadow economy", Mohd Shahfizan Md Salleh – Inland revenue board of Malaysia ↓ "What is needed to have success with whole of government approach? – example from Norway" Marianne Gansmo/Line Wilberg – Norway ↓ "Unfair competition" – Pia Bergman, Skatteverket, Sweden
14:00-14:30	Open discussion, Q & A - all the delegates
14:30-15:00	Refreshments
15:00-15:20	<b>Sharing Intelligence</b> ↓ "Collecting information – experiences with unannounced visits – cash registers" – Conny Svensson, Skatteverket, Sweden
15:20-15:40	↓ "Building capacity - The importance of Sharing Intelligence" – Morten Bøhm, Skattestyrelsen Denmark
15:40-16:00	↓ "Sharing Intelligence Internationally – A Tax Crime Perspective" Bruce Paynter, Australian Tax Office
16:00-16:10	<b>Short Leg-stretch</b>
16:10-16:30	↓ "Singapore's main shadow economy issue", Lawrence Eng, Inland Revenue Authority of Singapore
16:30-16:45	↓ "Russia's experience on implementation and operation of analytical systems: ○ Automatic Control System "VAT-II" ○ Automatic Control System "Online Cash Registers" ○ FTS mobile application for the registration of self employed individuals Daniil Egorov, Federal Tax Service of Russia
16:45- 17:00	Closing remarks
18:00 – 21:30	Wild Life Dinner Experience at the Sydney Zoo (ref. map/directions)

臨時取消



## Community of Interest Shadow Economy





## Community of Interest Shadow Economy

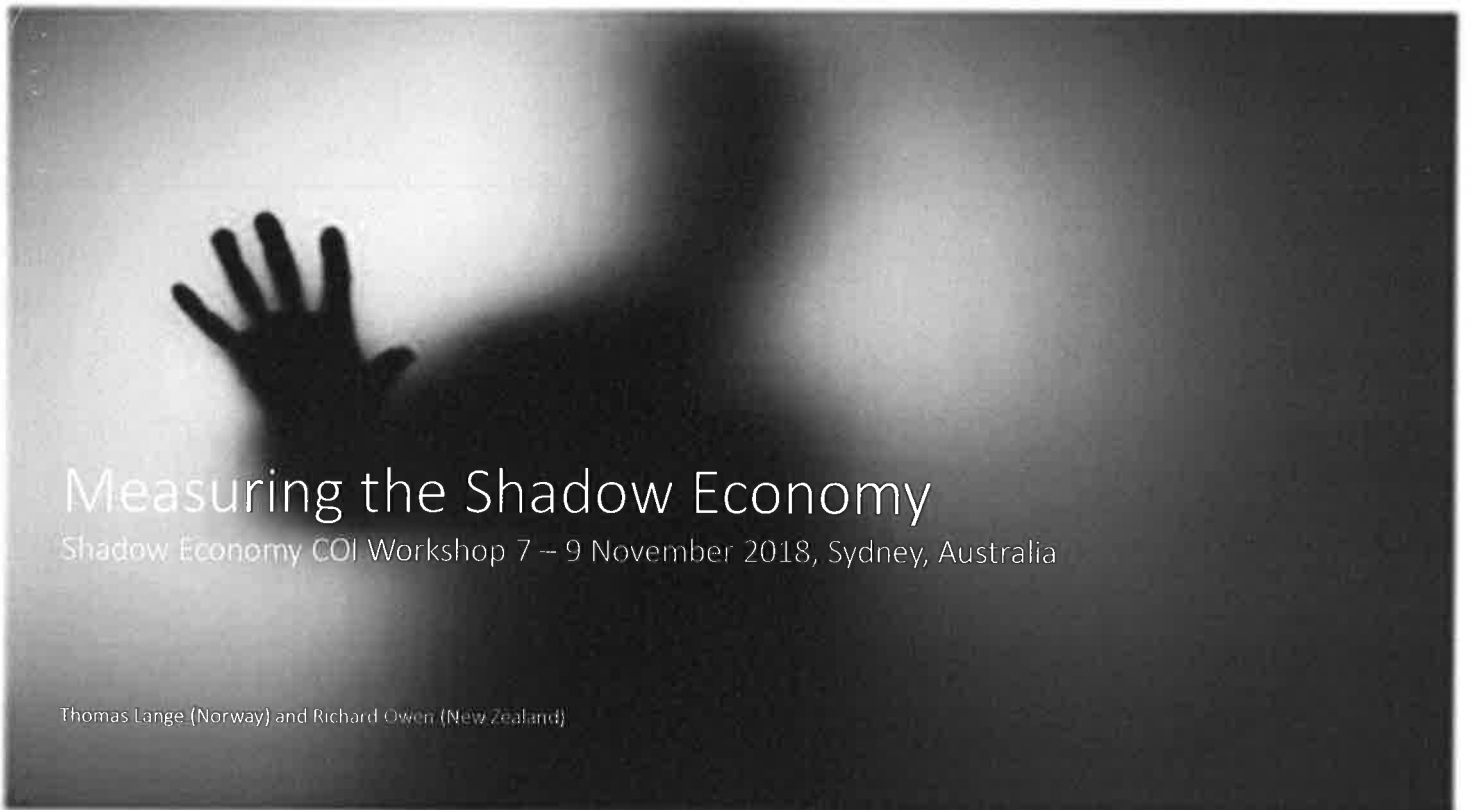


### Friday 9<sup>th</sup>:

09:00-09:30	Refreshments
09:30-12:30	Expert group discussions - based on the presentations and information from workshop - working and discussing the products/outcome from the groups - also how to use the ONE page further.
12:30-13:00	Closing remarks & Next steps for the COI <b>ATO</b> Second Commissioner Jeremy Hirschhorn <b>NTA</b> Head of section Line Wilberg
13:00-14:00	Lunch







# Measuring the Shadow Economy

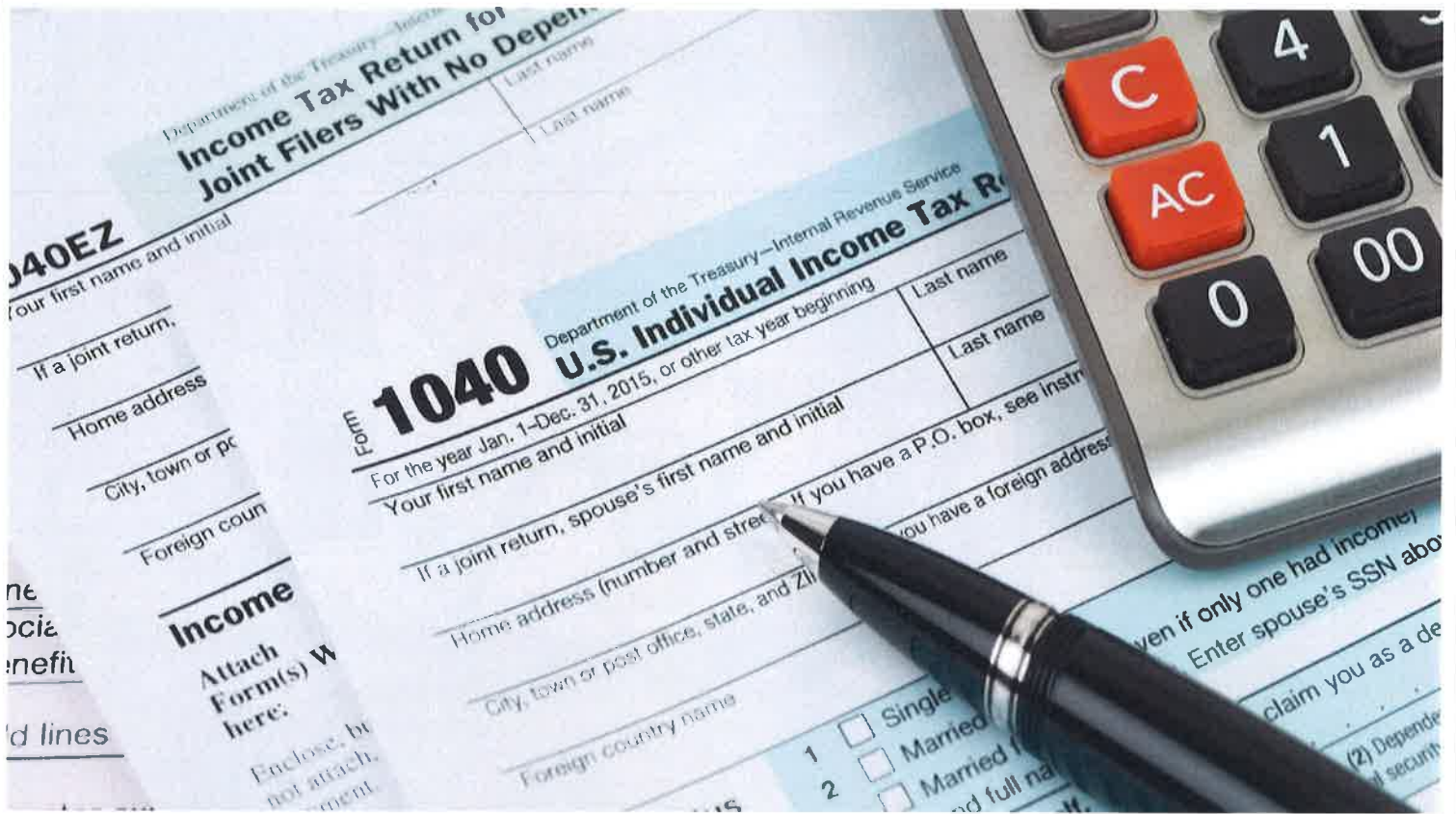
Shadow Economy COI Workshop 7 – 9 November 2018, Sydney, Australia

Thomas Lange (Norway) and Richard Owen (New Zealand)

No government can announce a tax system and then rely on taxpayers' sense of duty to remit what is owed.

Joel Slemrod 2007















The shadow economy reflects legal economic and productive activities.



- The shadow economy includes all market-based legal production of goods and services that are deliberately concealed from public authorities for any of the following reasons:
  - to avoid payment of income, value added or other taxes,
  - to avoid payment of social security contributions,
  - to avoid having to meet certain legal labor market standards, such as minimum wages, maximum working hours, safety standards, etc., and,
  - to avoid complying with certain administrative procedures, such as completing statistical questionnaires or other administrative forms.



## Why Measure vs. How to Measure?

What we need to know:

- Which segments of the economy have a high risk of evasion?
- How does this risk evolve?
- Whether the mitigation policies against evasion and shadow activities have an impact?



## How to measure the Shadow economy?

- Direct approaches:
  - Measurement by the System of National Accounts Statistics – Discrepancy method;
  - Survey technique approach;
  - The use of surveys of company managers; and;
  - The estimation of the consumption-income-gap of households.

### QUESTIONNAIRE

Very often	<input type="checkbox"/>
Often	<input type="checkbox"/>
Sometimes	<input type="checkbox"/>
Rarely	<input checked="" type="checkbox"/>
	<input type="checkbox"/>





## How to measure the Shadow economy?

- Indirect approaches:

- Discrepancy between national expenditure and income statistics
- Discrepancy between official and actual labor force
- Electricity approach
- Transaction approach
- Currency demand approach (CDA)
- Multiple Indicators, Multiple Causes (MIMIC) approach

A photograph of a piece of paper with handwritten mathematical calculations. The calculations show the steps to find the probability of a standard normal variable Z falling between -0.32 and 1.20. The steps are:  $P\left(\frac{18.4 - 20}{5} < Z < \dots\right)$ ,  $= P(-0.32 < Z < 1.20)$ ,  $= P(Z < 1.20) - P(Z \leq \dots)$ , and finally  $= 0.8849 - 0.3745$ , resulting in  $0.5104$ .

(At least) two major challenges

How to measure a multifactorial phenomenon?

How to distinguish the willful understatement of tax liability from the inadvertent?

故意逃税

非故意的

## Methodological Considerations

- Misrepresentation in data resulting from risk based audits
  - Sample of randomized audits
  - Two-stage Heckman correction
- Attributional errors in effect measurement
  - Multiple mitigation policies
  - Which one(s) is actually working?
  - Difficulties establishing a baseline
- Do tax administrations possess adequate proactive and reactive instruments?

## What we are aiming to achieve by the end of this work?

- Why is measurement of the shadow economy important?
- A renewed light on the measurement challenges
- Proposals for overcoming these
- Country comparison of approaches and methods and their respective pros and cons
- Cross country survey on “best practices”
- Final product:
  - A forward looking report with new insights and recommendations

## Timeframe

- Final report by end October 2019
- Survey development: December 2018-February 2019
- Survey released: End of February
- Reach consensus on report headings: March
- Survey deadline: End of March
- Analysis of Survey responses: April
- First draft: End June
- Final draft: End September





## Whole of government approach – from Norwegian point of view

– Example from Norwegian Tax Administration's program against work-related crime

- the need for strategic and overall approach



**The Tax Administration's mission in society is to:**

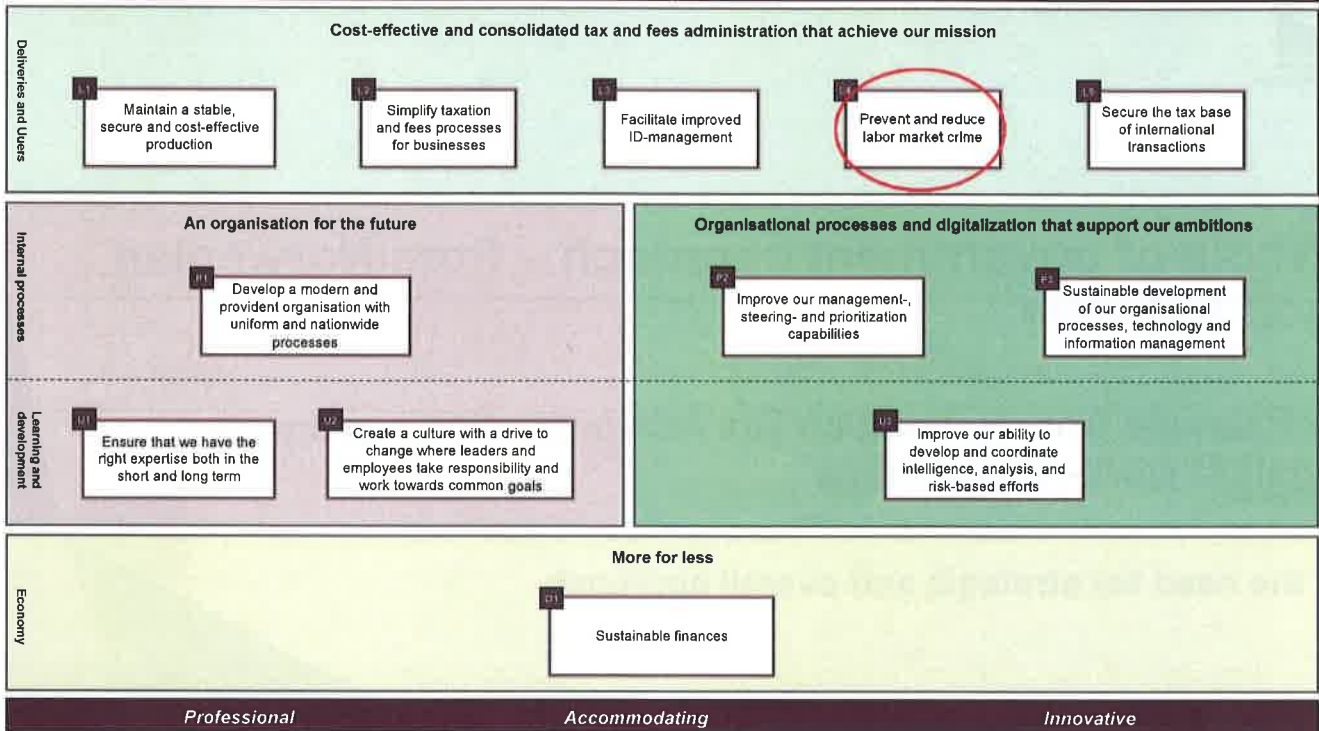
**- secure a financial basis for public activities**



1. Taxpayers and information providers comply with tax and VAT regulations
2. The Tax Administration ensures users access to high-quality register data and information
3. The society trusts the Tax Administration



Strategy Period 2018 - 2021



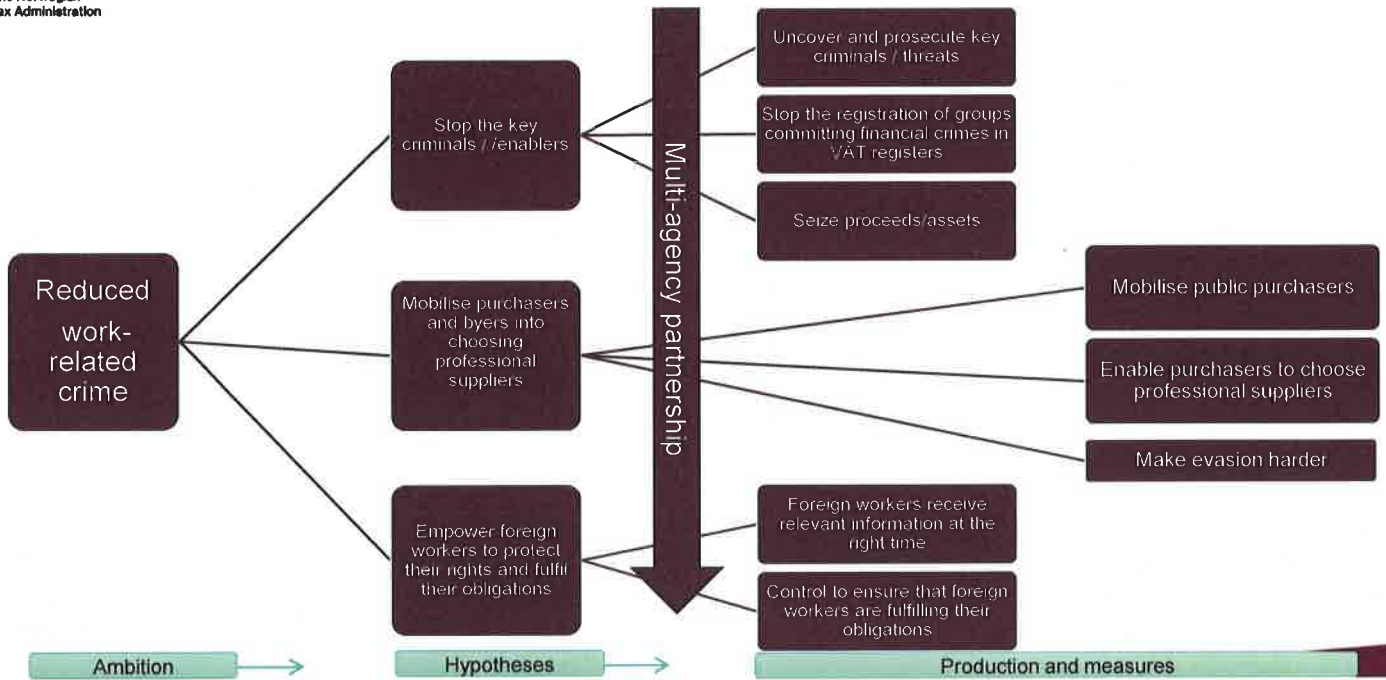
# Ambitions 2015-2018



Goals	Ambition
Delivery goal	<ul style="list-style-type: none"> <li>reduced work-related crime</li> </ul>
Process goals	<ul style="list-style-type: none"> <li>targeted efforts on all stakeholders in the risk picture</li> <li>Work closely with other government agencies, employees' and employers' organisations and trade and industry, as well as other countries</li> <li>Improved both registry and ID quality</li> </ul>
Development goals	<ul style="list-style-type: none"> <li>Building up a knowledge of work-related crime and using this knowledge as a basis for prioritizing</li> <li>Necessary building of capacity and expertise for the task</li> </ul>



# working methodology



## “Whole of government” approach – To act as one - a «new» way to handle the problem



Arbeidstilsynet



Skatteetaten



POLITIET

Labor Inspection – Norwegian Labor and Welfare Administration – Tax Authority - Police

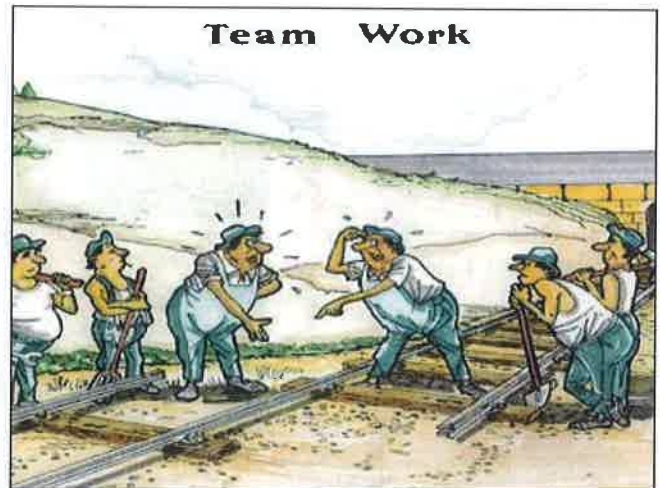
SAMMEN MOT **KRIMINALITET** I  
**ARBEIDSLIVET**





## Cooperation can be both challenging and developing

What does it take to act as one?



The society expects us to deal with problems as a whole



## A joint vision is crucial to achieve a “whole of government approach”



Joint vision

Levels and roles that need to have a joint vision:

Government

Employers associations and trade unions

Business life

Agencies

Media



2014 – an important year towards a “whole of government approach” in Norway





## However, a joint vision is not enough

### 2015 & 2017 Strategy Actionplan



#### Directive to the agencies:

- Work-related crime should be given high priority
- Strengthen cooperation with each other
- Develop, improve and share knowledge about work-related crime
- Establish a formalise practical cooperation
- Use the broad possibilities of the different agencies' means and tools
- Get extra budget funding's

The most important effect of the strategy is that it sets the direction for all agencies' efforts and priorities within work-related crime



The Norwegian  
Tax Administration

## Important initiatives were made in the strategy and action plan



### Reality check

- Different definitions and understanding of the problem – different cultures
- Limited knowledge about each others instruments / tools and regulations
- Lack of common intelligence based methods
- Limited opportunities for information sharing
- Unbalanced resource input
- Different governance models and KPI' s



### Focus on opportunities

Establish joint centres

Establish national centres for intelligence and analysis

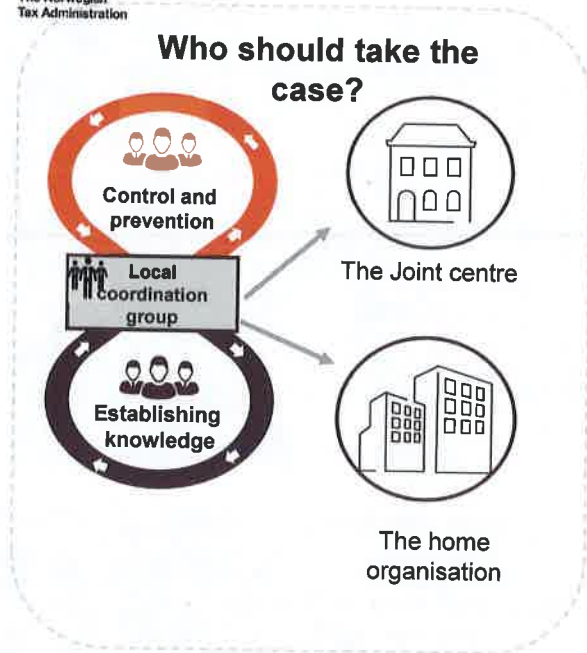
Develop supervisor of confidentiality regulations

Identify needs for regulatory development

Develop technical cooperation solution



# Task focus: Joint centre for combating work-related crime



## Clarification of expectations

The centres should focus on:

- **Outward-looking** activity using instruments and sanctions that have a rapid impact on stakeholders
- **Added value** of the case being closed through a multi-agency partnership

## Underpin added value

- Joint knowledge acquisition
- Cases where joint presence offers:
  - 📈 More efficient work processes
  - 👥 Reduced duplication
  - 🏡 Socio-economic gains



The Norwegian



Arbeidstilsynet



Skatteetaten



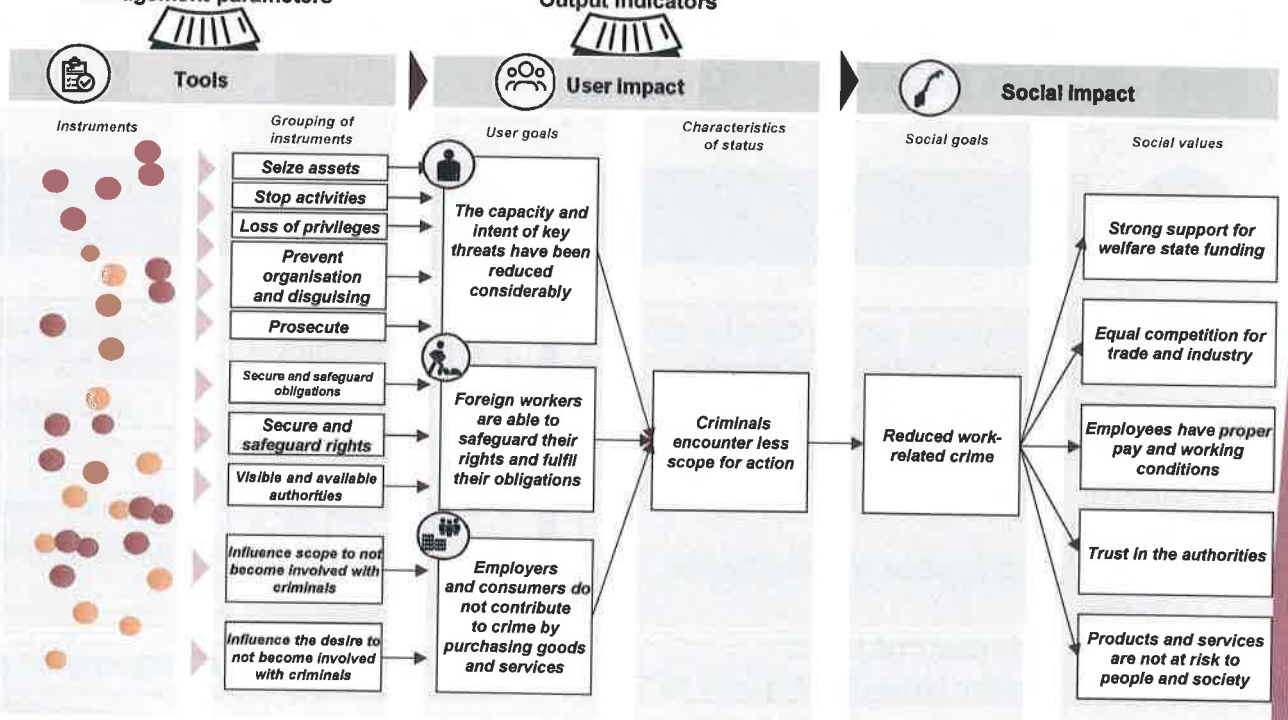
NAV



POLITIET

### Management parameters

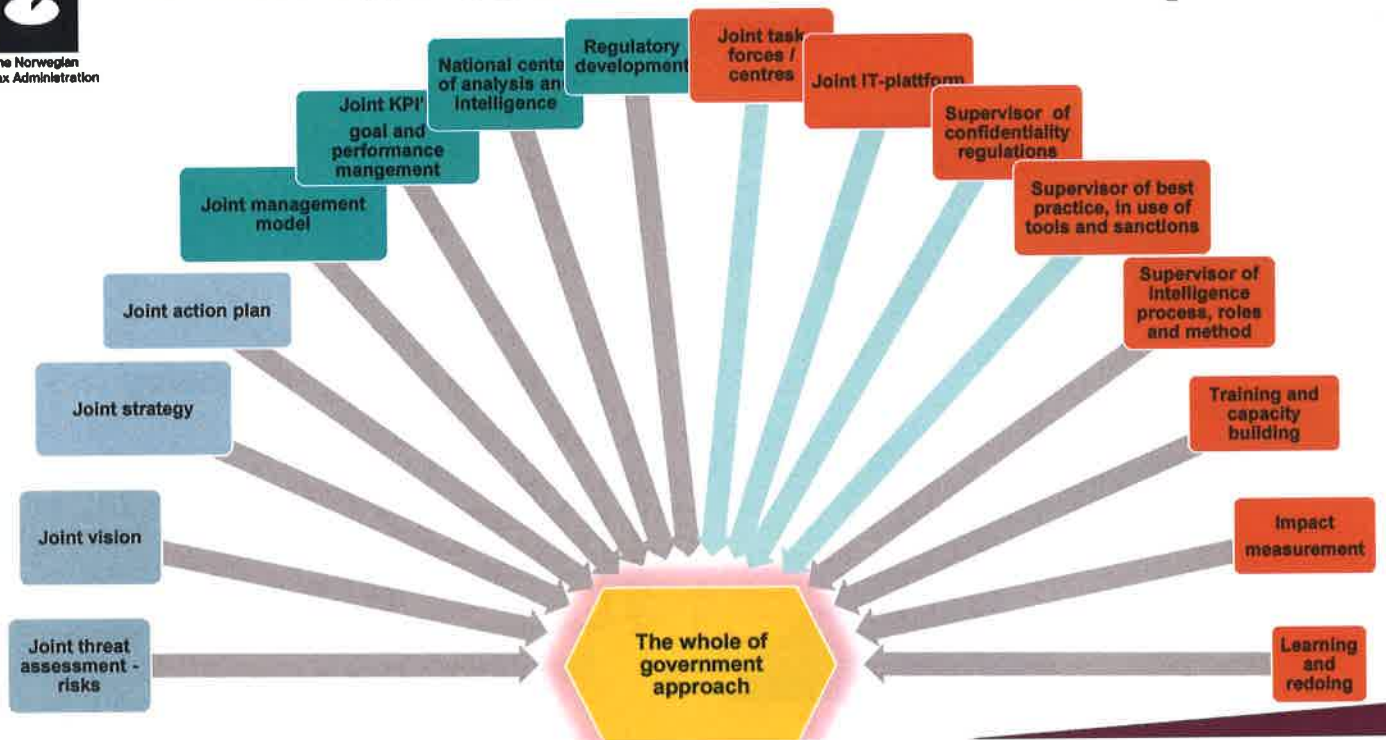
### Output indicators



= symbolises the products/services of the agencies



# Lessons learned – useful steps



## Experiences and results from the collaborative work

- We see more ongoing crime,
  - get earlier detection, which gives us more access to evidence
- Increasingly we get a common perception of reality,
  - and common knowledge and intelligence regarding:
    - The criminal environments
    - The stakeholders
    - Different phenomenon and modi operandi
- More commitment and higher priority to combat the crime
  - both in joint centres and in each agency
- Better skills to choose key criminals
  - and use the best and most cost-efficient tools

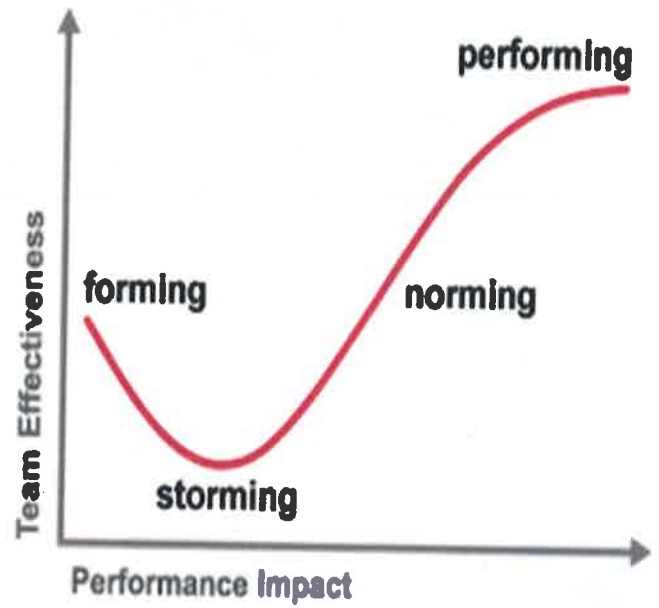
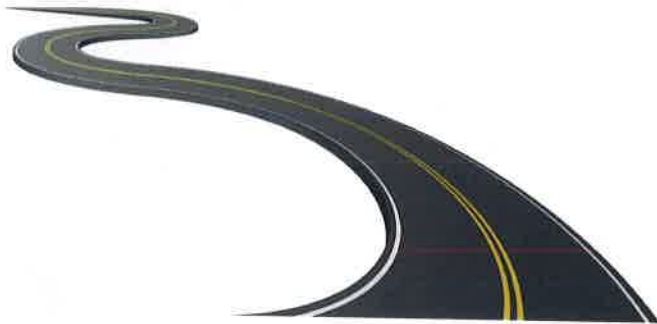




# Combating and receiving compliance - in a multi-agency co-operation requires a long-term perspective

Will and patience

Mind set of continuous improvement..





# How IRBM co-operate with other government agencies in Malaysia to reduce the shadow economy

By  
Mohd Shahfizan Md Salleh  
Director of Special Operations Department  
IRBM

## THE NRRET INITIATIVE

ATTORNEY GENERAL



CENTRAL BANK



**BANK NEGARA MALAYSIA**  
CENTRAL BANK OF MALAYSIA

MALAYSIAN POLICE



MALAYSIAN CUSTOMS



COMPANIES COMMISSION



MACC



IRBM



DOMESTIC TRADE



# NRRET STRUCTURE



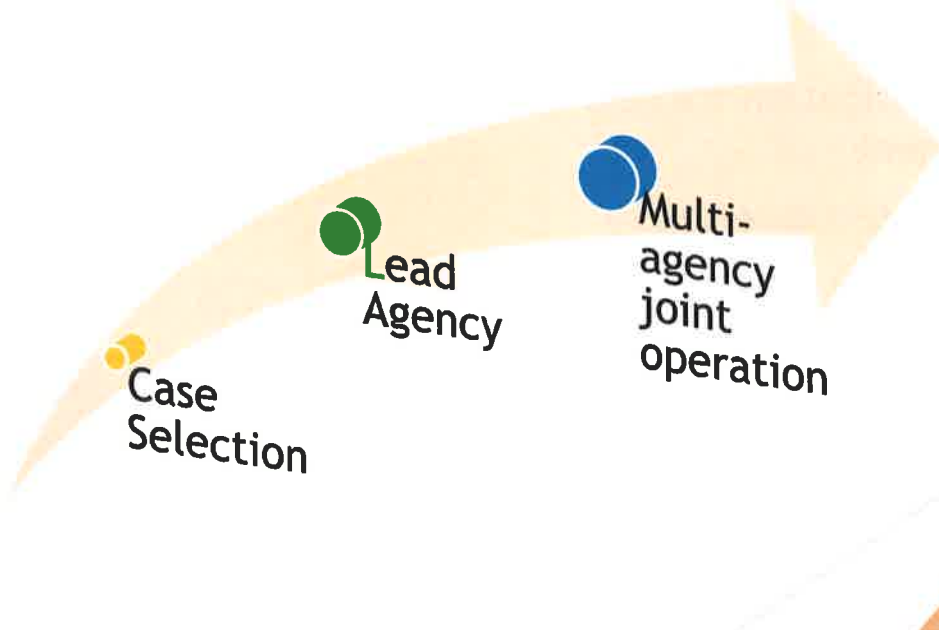
# FOCUS OF NRRET

**To recover revenue from syndicated crime involving:**





# MECHANISM OF NRRET



# CASE EXAMPLE



## IMPACT OF INTER AGENCY TASK FORCE

- ▶ Increase investigation success rate and expedite case settlement
- ▶ Increase in revenue recovery
- ▶ Widen tax base & increase compliance
- ▶ Reduce shadow economy particularly from illegal activities

**THANK**  

---

**YOU**  

---



# Unfair competition - Sweden

Pia Bergman - Sweden

## Authoritye

- Government descion 18 December 2017,
- Authorities:
  - Environment Authority
  - Employment Exchange Service
  - Economic Crime Agency,
  - Swedish Social Insurance Agency
  - Gender Equality Authority
  - Migration Board
  - Swedish Police Office and
  - Tax Agency

# Mission

2018-2020

Develop effective and appropriate/expedient methods for government-wide control in order to combat fraud, violation of rules and combating crime in working life



The government's mission is divided into five parts

- Mapping and analysing how the authorities can contribute in joint controls
- Develop contact areas, working methods and procedures for well-functioning government-wide control at both national and regional levels.
- Provide support to the authorities regarding opportunities and means for information exchange, within the framework of current confidentiality legislation.
- Develop criteria that will assist in assessing when it is appropriate to make government-wide control and, in that case, which authorities should participate and in what way.
- Ensure that the developed methods are integrated into the authorities' activities so that after 2020 the government –wide agency cooperation works well.



## **Value Added / Positive Effects:**

- **Common Position/Pictures**
- **Common Priorities**
- **Joint Mission**



## **Challenges**

- **Big secrecy problems when collaboration, at least initially, should be implemented without formal suspicion of crime**
- **Cultural clashes**
- **Communication during action / management and control of these**
- **Pilot Investigations / collaboration started before method support was completed.**
- **Different priorities on resource by different authorities**



# 2019

- working methods and procedures for well-functioning government-wide control
  - Starting with four industries
    - Construction
    - Beauty salons
    - Garages
    - Restaurants



**NAV**

## **Effective tools against tax evasion in Hungary**

**Community of Interest OECD workshop**

**8th November 2018**

**Balázs Kertész  
Planning and Analysis Department  
Hungarian National Tax and Customs Administration**



## Strategic governmental approach:

Effective  
administration  
NTCA

Restructuring  
the taxation  
system

Innovative  
tools to fight  
tax evasion

Reducing  
administrative  
burden and  
strengthening  
partnership  
with taxpayers

### **A roadmap to fight tax evasion and shadow economy since 2011**

#### **Improve the effectiveness of the collection of taxes**

The government is dedicated to sustaining the budgetary deficit target, and the following tax policy measures have been rendered to this:

- Widening the tax base and whitening the economy by curbing of tax avoidance behavioural patterns,
- Reducing administrative costs influencing competitiveness,
- Creating an effective tax system that facilitates economic growth.



**INCREASING THE EFFECTIVENESS OF THE TAX AUTHORITY**

# Strategic governmental approach:

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with taxpayers

## The first step: creating the integrated tax and customs administration in 2011

Predecessors (Hungarian Tax Administration (APEH) and the Hungarian Customs Administration (VPOP)) were merged into a single administration as of **1st January 2011**: National Tax and Customs Administration (NTCA).

### Government expectations:

- ✓ more effective and economic collection of state revenues
- ✓ more focus on the fight against financial crimes
- ✓ better flow of information in taxation matters
- ✓ single public contact centres for all administrative matters
- ✓ simplification of procedures
- ✓ National competence in all tax- and customs- related matters
- ✓ Independent central budgetary organisation
- ✓ Joint tax, customs and tax crime investigation



### Since 2016: Reorganization of NTCA:

Full functional integration, creating a more simple and transparent structure, NTCA has become a two-level organisation, the number of departments, directorates and top management has been reduced.



**NTCA**

## **Main goals of NTCA**

- ✓ **Ensuring the income for the national and the EU budget**
- ✓ **Reducing the loss from tax evasion and fraud with budgetary donations**
- ✓ **To keep up a fair business environment**
- ✓ **Maintaining the sense of the possibility to be audited in order to promote compliance and self-assessment**
- ✓ **Reducing the competitive disadvantage of the fair-dealing economic actors by removing the fraudulent actors from the market**

**Change of approach: Strengthening partnership  
with taxpayers**

**Stronger customer-friendly service activities**  
**Modern, efficient organisation and tax procedures**  
**Strengthening partnership with taxpayers**



**Flat, more simple organisational system**

**The redesign of the taxation law**



## Flat, more simple organisation

### *Since 2016 – full functional integration*

- Full functional integration, creating a more simple and flat structure,
- NTCA has become a two-level organisation, the number of departments, directorates and top management has been reduced.
- Abolishment of the 7 regional tax directorates general and 7 customs directorates general → establishment of merged 22 county tax and customs directorates (Lower level units are now fully integrated).
- Establishment of separate Directorate of Dispute Resolution.
- Centralization of the management of selection (risk analysis) and certain control tasks.



NTCA

### Service provider

- Supportive procedure
- Supportive checks
- Tax speedcams
- „Good to know” heading (internet)
- Information letters

## Change in the audit approach

### Increase efficiency

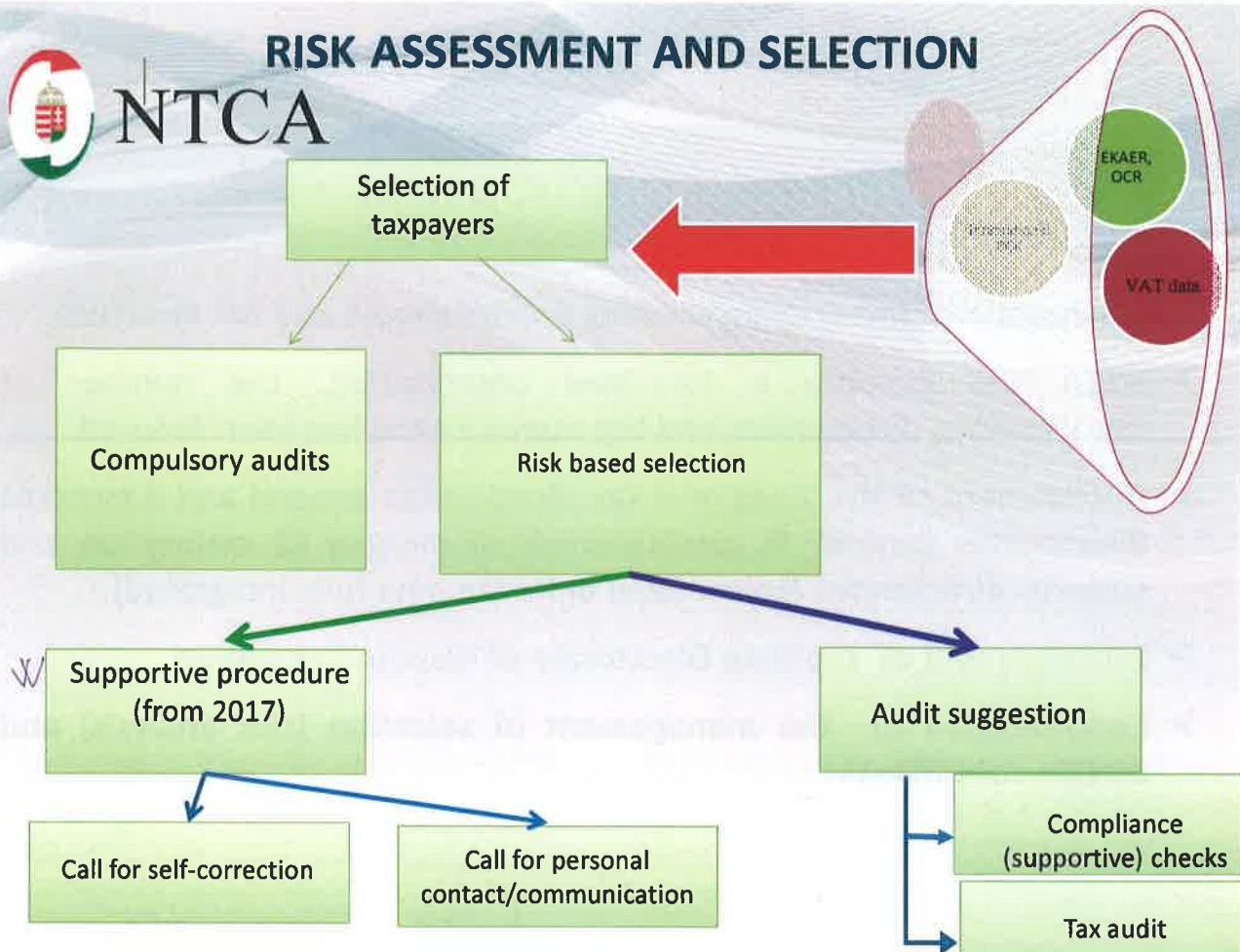
- Reallocation of tax inspection capacity
- New direction in the cooperation among the fields of the NTCA
- E-commerce Committee (gig and share economy models)
- Future – digitalization of the audit activity

**Goal: prevention and to take actions based on the level of compliance**



NTCA

## RISK ASSESSMENT AND SELECTION



### Supporting procedure implemented in 2017

**Based on risk analysis the tax administration can start a supporting procedure to abolish the risk discovered.**

#### The risk analysis is based mainly on:

- Information found in the tax administration's own database or
- Other information collected from third parties obliged to provide information.

#### After qualifying the risks detected the tax and customs administration can

- Start a supporting procedure to help the voluntary compliance (inform taxpayers, call for self correction, call for personal contact) or
- Take measures to dissolve tax risk (deregistration of tax number, inform criminal department) or
- Start an audit if needed.

#### Since 01.01. 2017:

- Several succesful supporting procedures (e.g. Airbnb)

# Strategic governmental approach:

Effective  
tax  
administrati  
on  
NTCA

**Restructuring the  
taxation system**

Innovative  
tools to fight  
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partnership  
with taxpayers

## Restructuring the taxation system



**Labour**

**Consumption**

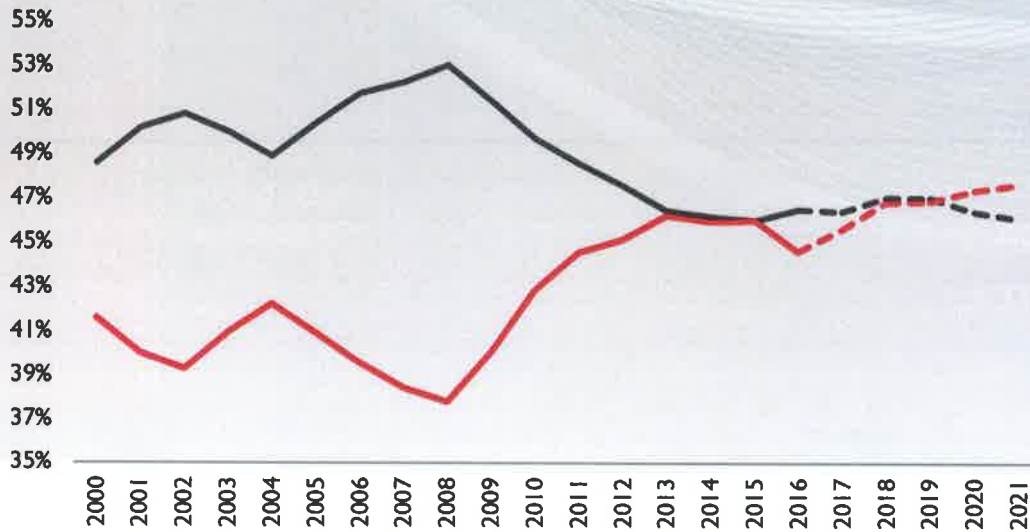


- ✓ Reducing taxes on labour and increasing the taxes on consumption, turnover and negative externalities.
- ✓ Flat rate PIT of 15%, low CIT rate of 9%, general VAT rate 27%
- ✓ Introduction of the family tax allowance in 2011 and introduction of the Job Protection Action Plan that encourages employment of most vulnerable employees in 2013.
- ✓ Introduction of special tax regimes for SME's.



## Restructuring the taxation system

Share of tax revenues:  
**consumption vs. Income and payroll**



Source: MoF

## Strategic governmental approach:

Effective  
tax  
administ  
ration  
NTCA

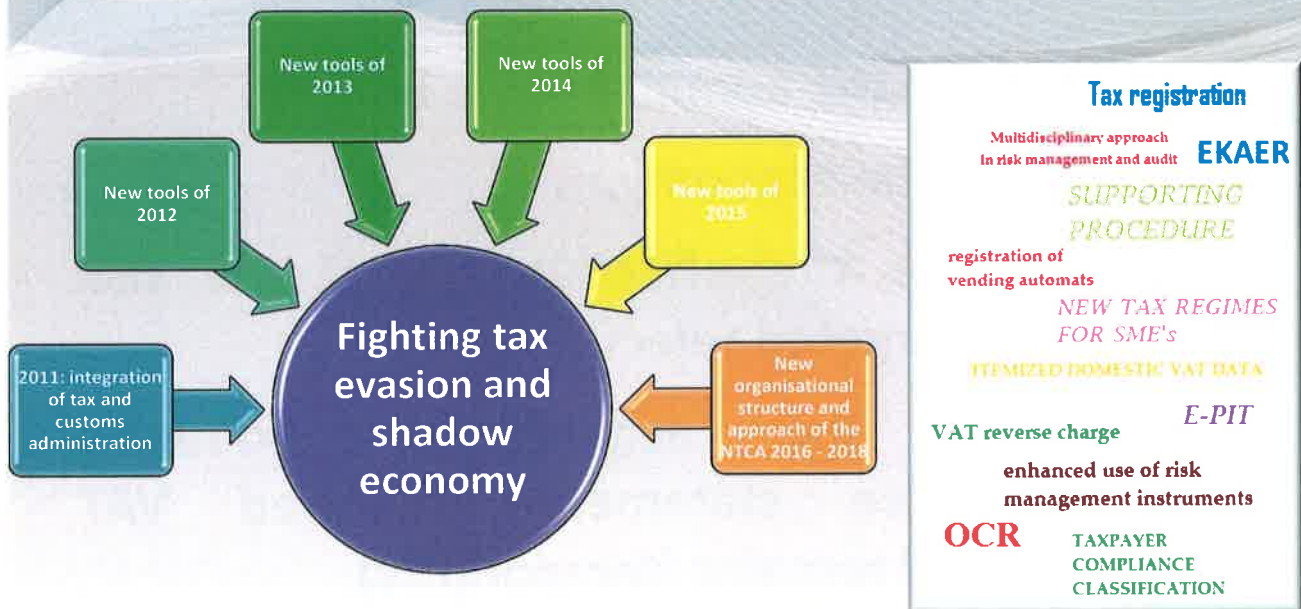
Restructuring  
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taxpayers

**A roadmap to fight tax evasion  
and shadow economy since 2011**

## New innovative tools to fight tax evasion since 2011



## Some examples of implemented measures

- **Online cash registers**
- **Electronic Road Trade Control System (EKAER)**
- **Taxpayer classification system**
- **E-invoice system since 1st of July 2018**
- **New Taxation procedure law from 01.01.2018**
  - ✓ *Supports voluntary compliance;*
  - ✓ *More simple and shorter tax audit procedure;*
  - ✓ *Effective tax dispute resolution system;*
  - ✓ *New risk management tools;*
  - ✓ *Consultancy service for newly registered taxpayers – „mentor“ program.*

## E-invoice system

- ✓ to decrease the administrative burden,
- ✓ to whiten the economy,
- ✓ to increase the effectiveness of the risk analysis (targeted selection),
- ✓ regarding the acquisitions, domestic recapitulative statement (itemized VAT listings) still remains (temporarily).

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## E-invoice system

After the 1<sup>st</sup> of July, 2018 the issuer of the invoice, if

- it is registered for VAT in Hungary,
- it issues invoice to a domestic partner,
- the amount of the VAT on the invoice reaches 100 thousand HUF (about 320 €).

Related to only the invoices which fulfill the criteria.

Optional: the data of every issued invoice will be declared.

**Real time and automatic data providing system** to the NTCA without human interference, machine-to-machine communication (xsd scheme provided by NTCA)



## E-invoice system

- The data of handwritten invoices is obliged to be declared on the online platform within one week (or one day in case of invoices containing at least 500 thousand HUF).
- Goal: to change small and micro business from handwritten invoices to invoicing software.

**To reach the goal: free online invoicing software provided by the NTCA.**

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## Reducing bureaucracy

Discover the possible simplification of the system

Make better use of IT possibilities

Wider use of electronic documents



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## E-PIT reform in 2017

### ✓ NTCA – 2016 e-PIT

- Tax return proposal
- Simplified tax return
- Special tax return made by NTCA

### ✓ Employer

- Tax return is made by the employer

### ✓ Taxpayer

- Tax statement (simplified content)
- Normal PIT return  
PIT return will be made if the NTCA has information on a taxpayer

### Problems were:

- Too many options
- Too difficult form
- Language is too legislative, hard to understand
- Tax benefits are hard to understand
- Error messages of the system are unrecognizable
- Few feedbacks
- No helping hand

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**Strategic governmental approach:**

**Measuring the effects  
of policy changes**

**Measuring the effects  
of policy changes**

- **Performance management system of NTCA**
- **Overall estimated tax revenue impact**
- **Tax gap analysis**
- **Cost/benefit analysis of policy tools**



## Most important factors during the development of the performance management system

- **Examining new and developing management techniques:**  
**BSC, PBSC, EFQM, CAF, Performance prism, IAM, DEA, local practices;**
- **Change of approach: more focus on strategic goals and outcomes instead of measuring the administrative output**
- **Benchmarks instead of quantitative goals**

## The four aspects of the current performance management system

Performance indicators are grouped to **4 administrative aspects:**

**(1) Revenues**

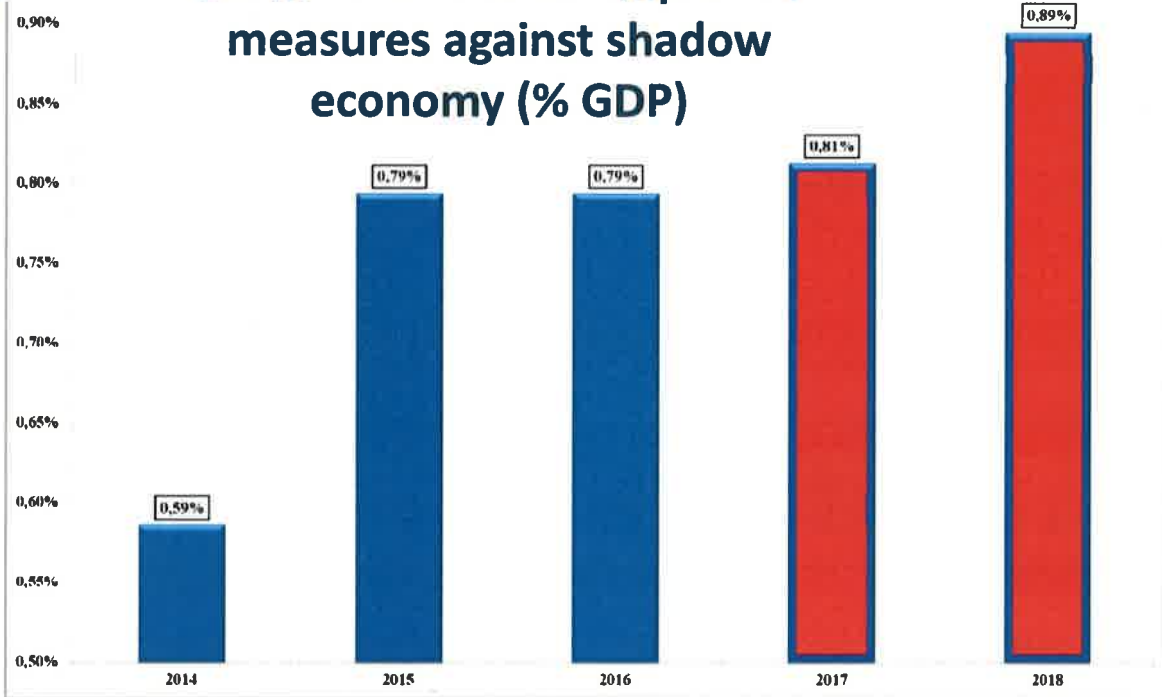
**(2) Administrative service**

**(3) Customer Service**

**(4) Operation & Management**

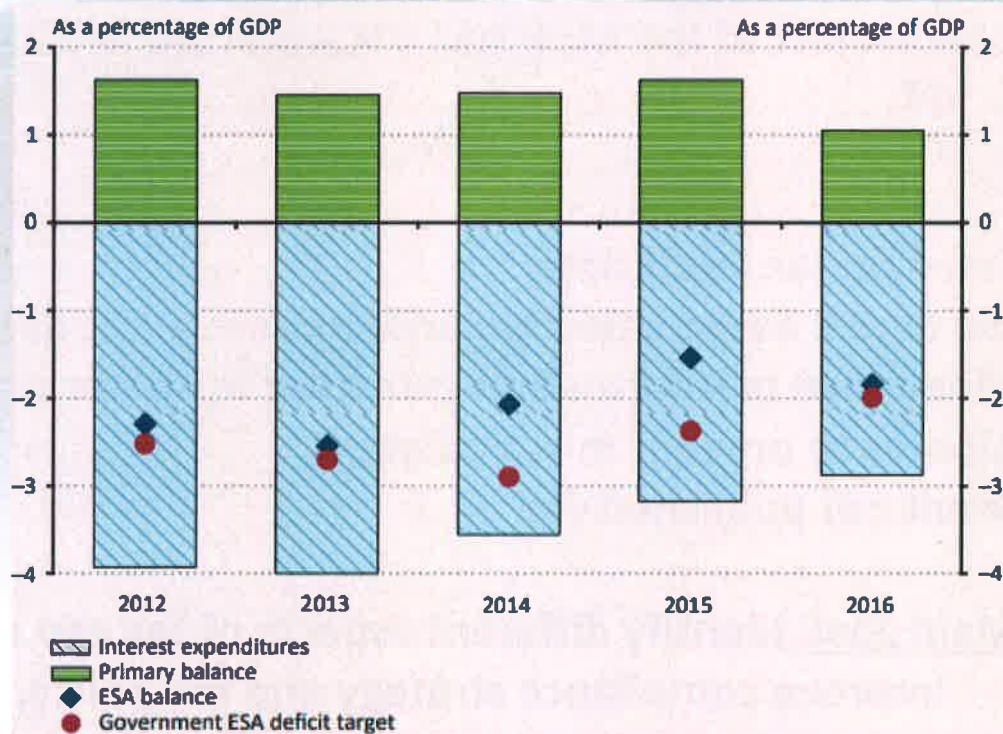


## Estimated revenue impact of measures against shadow economy (% GDP)



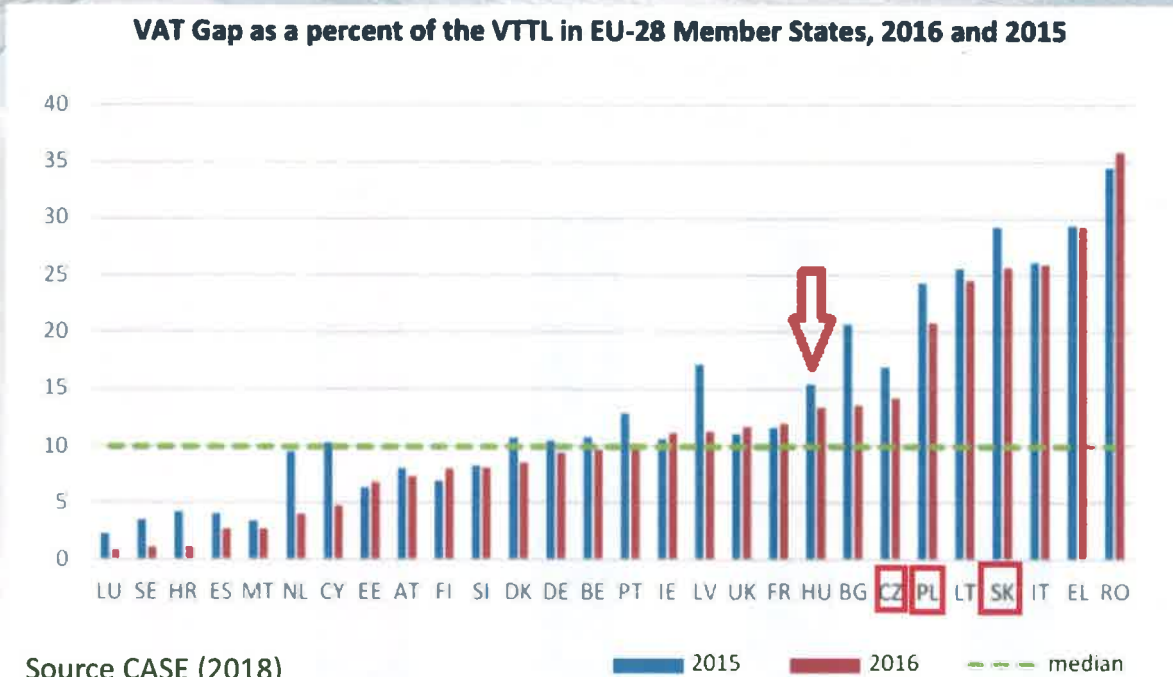
Source: MoF citizens budget 2018 (2017)

## Stable state budget without austerity measures



Source: National convergence programme of Hungary

## Tax gap: top-down example, the EU VAT-gap indicator



**13,3% (2016), since 2012 VAT GAP indicator fell roughly  
9 percentage points in Hungary**

## Tax gap: bottom-up method

- **Joint project of the MoF and NTCA started in 2017**
  - VAT
  - CIT
- **Based on tax audit data;**
- **Use of risk based selection and random audit data**
- **Wide range of information extracted form tax inquiry minutes to prevent miscalculation**
- **Result not published yet**

**Main goal: identify different aspects of tax gap and improve compliance strategy and tax policy.**





**NTCA**

**Thank you for your attention!**



**NAV**





Australian Government  
Inspector-General of Taxation

# Review into the Australian Taxation Office's Fraud Control Management

A report prepared at the request of the  
Senate Economics References Committee

Inspector-General of Taxation

June 2018



obtain relevant information for identification and investigation.<sup>784</sup> Similarly, the release of the 'Paradise Papers' highlighted the 'commoditisation' of tax avoidance and the services offered by 'facilitators' and the need for international collaboration to analyse large data sets.<sup>785</sup>

7.26 Furthermore, the introduction of international transparency measures such as the Common Reporting Standard (CRS)<sup>786</sup> and the US Foreign Account Tax Compliance Act<sup>787</sup>, where offshore account information is exchanged between jurisdictions, is expected to significantly reduce opportunities to evade tax. For example, the CRS is a global standard for the collection, reporting and exchange of financial account information on foreign residents for tax purposes. Under the CRS, banks and other financial institutions collect and report financial account information of non-residents to their revenue agencies. Such information may then be exchanged amongst these revenue agencies.

7.27 The ATO has also sought to identify alternative channels to share relevant information with international agencies. For example, in April 2018, the ATO had commenced a trial of its use of the Financial Criminal Investigation Network (FCINet) platform which allows [international partner agencies] to [establish the existence of relevant information] [before formally requesting] such information [under an exchange agreement]. The FCINet platform is a technology-based information sharing initiative led by the Belastingdienst (Dutch Taxation Office) and the HMRC and has been used in the European Union for over a decade. The ATO is also exploring the possibility of using the FCINet platform as a channel to facilitate information sharing with members of the SFCT, such as the ACIC and AUSTRAC, and their international counterparts.<sup>788</sup>

## **Working with law enforcement**

### **Referrals to the AFP**

7.28 There are three ways in which the PGH business line can refer a matter to the AFP for criminal investigation. First, a referral may be made to the ATO-led SFCT, which is the taskforce<sup>789</sup> responsible for identifying and addressing the most serious and complex financial crimes. Formed on 1 July 2015, the SFCT comprises the AFP, ACIC, AGD, AUSTRAC, ASIC, CDP and Australian Border Force (ABF) as well as the ATO. The Government has allocated \$127.6 million to the SFCT over four years to lead the Commonwealth's operational response to high-priority serious financial crimes which currently include phoenix fraud, trust fraud and international tax evasion fraud.<sup>790</sup> Serious financial crimes that align with these priorities will be referred by the

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<sup>784</sup> See Appendix F.

<sup>785</sup> See Appendix G.

<sup>786</sup> *The Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016*; ATO, 'Common Reporting Standard' (5 June 2017) <[www.ato.gov.au](http://www.ato.gov.au)>.

<sup>787</sup> *The Tax Laws Amendment (Implementation of the FATCA Agreement) Act 2014*; ATO, 'Foreign Account Tax Compliance Act reporting' (6 February 2018) <[www.ato.gov.au](http://www.ato.gov.au)>.

<sup>788</sup> ATO communication to the IGT, 5 March 2018.

<sup>789</sup> Note: The SFCT sits within the FAC Centre which is a prescribed taskforce under *Taxation Administration Regulations 2007* reg 67.

<sup>790</sup> AFP, 'Serious Financial Crime Taskforce' (August 2015) <[www.afp.gov.au](http://www.afp.gov.au)>.





Search

# How digital technology can raise tax revenue in Asia-Pacific

Published by [Yasushi Suzuki \(/author/yasushi-suzuki\)](#) and [Richard Highfield \(/author/richard-highfield\)](#) on Thursday, 13 September 2018



Making systems easier to understand can enhance tax compliance across the region.

Tax administration is a complex and critical issue for countries in Asia and the Pacific. An efficient and effective tax system allows a country to mobilize local resources and target them toward economic and social development.

Based on the latest available data surveyed by ADB, the average tax-to-GDP ratio for 28 economies in the region was only 17.5% in 2015, just a little over half the average tax ratio among OECD economies, 34%. Almost a third of Asian countries have a tax-to-GDP ratio of less than 15%, the minimum threshold required for sustainable development in the absence of other sources of government revenue.

Studies have shown that setting up modern tax collection systems through the use of electronic services, such as e-filing and e-payment of taxes, is one way of improving tax compliance. Simple services—such as providing comprehensive information on the website, tools and calculators on website, integrated tax payment accounts, online applications for taxpayers, electronic invoice systems for business, data capture from third parties, and digital mailbox capability—can make a huge difference.

Many citizens and business owners are often unfamiliar with the technical jargon of tax-related topics. That is why it is imperative for revenue agencies to have plans to reduce taxpayers' compliance burden by making it easy for

them to understand the system.



### **In digital age, Asian economies gradually reshaping tax administration**

([https://twitter.com/intent/tweet?url=https%3A%2F%2Fblogs.adb.org%2Fblog/how-digital-technology-can-raise-tax-revenue-asia-pacific&text=In+digital+age%2C+Asian+economies+gradually+reshaping+tax+administration&via=ADB\\_HQ](https://twitter.com/intent/tweet?url=https%3A%2F%2Fblogs.adb.org%2Fblog/how-digital-technology-can-raise-tax-revenue-asia-pacific&text=In+digital+age%2C+Asian+economies+gradually+reshaping+tax+administration&via=ADB_HQ))

It is good to note that many Asian economies are gradually making progress in transforming their tax administration in the digital age.

The identification and registration of both individual and corporate taxpayers is fundamental to a revenue body's system of managing all aspects of taxpayers' affairs. The systematic recording and updating of taxpayers' identifying and updating of information, and the allocation of a unique high-integrity taxpayer identifier number (TIN) enables the efficient conduct of all downstream administration processes.

While the challenges of tax administration are many, several countries in the region have useful models that others can adapt to their own circumstances. For instance, considerable progress has been made with the use of electronic filing of tax returns for major taxes in India, Kazakhstan, Malaysia, Mongolia, Nepal, Singapore, and Taipei, China.

Electronic filing systems can facilitate the process for revenue bodies and taxpayers alike to collect the most basic and important data that taxpayers are required to provide to revenue bodies. One outstanding example here is Bhutan, where the rate of e-filing of personal income tax jumped from 23% to 70% in just one year in 2015.



### **Bhutan is Asian success story on e-filing of personal income tax**

([https://twitter.com/intent/tweet?url=https%3A%2F%2Fblogs.adb.org%2Fblog/how-digital-technology-can-raise-tax-revenue-asia-pacific&text=%23Bhutan+is+Asian+success+story+on+e-filing+of+personal+income+tax&via=ADB\\_HQ](https://twitter.com/intent/tweet?url=https%3A%2F%2Fblogs.adb.org%2Fblog/how-digital-technology-can-raise-tax-revenue-asia-pacific&text=%23Bhutan+is+Asian+success+story+on+e-filing+of+personal+income+tax&via=ADB_HQ))

As for tax payment, again the use of modern payment systems can deliver significant benefits to taxpayers, revenue bodies, government, and the finance sector. Mandatory electronic payments are required by revenue bodies in the People's Republic of China, Indonesia, Mongolia, and Viet Nam.

Fully electronic payment methods have been shown to be significantly less costly to administer, and typically enable quicker updating of taxpayers' accounts.

An example of an e-payment initiative recently implemented by Indonesia is the so-called "Mini ATM" – an electronic payment device initiated by the Directorate General of Taxes (DGT) to facilitate and to expand access in tax payments. The Mini ATM uses an electronic data capture machine on which the taxpayer can simply swipe a debit card to pay tax.

The payment process starts with taxpayers obtaining an electronic billing code from several channels, including through the official DGT website, internet banking, application service providers, and short messaging service. Once obtained, taxpayers can use the billing code to complete the tax payment procedure using the Mini ATM.



### **Tax administration is critical area for ADB knowledge sharing**

([https://twitter.com/intent/tweet?url=https%3A%2F%2Fblogs.adb.org%2Fblog/how-digital-technology-can-raise-tax-revenue-asia-pacific&text=Tax+administration+is+critical+area+for+ADB+knowledge+sharing&via=ADB\\_HQ](https://twitter.com/intent/tweet?url=https%3A%2F%2Fblogs.adb.org%2Fblog/how-digital-technology-can-raise-tax-revenue-asia-pacific&text=Tax+administration+is+critical+area+for+ADB+knowledge+sharing&via=ADB_HQ))

This new feature is expected to deliver good results so that it can be implemented nationwide. It can also be integrated with other tax services, such as the mobile tax unit.

Over the last four years, ADB has made tax administration a critical area for knowledge sharing. We recently published the third edition (<https://www.adb.org/publications/comparative-analysis-tax-administration-asia-pacific>) of *A Comparative Analysis of Tax Administration in Asia and the Pacific*. Covering 28 economies in Asia and the Pacific, the series compares brings a comparative focus to the arrangements in place for national tax administration arrangements across much of the region.

The report surveys revenue bodies and related research and provides analyses of the frameworks, structures, processes and performance of revenue bodies, while contrasting various developments and their progress. It complements many of its observations by referencing examples of practical guidance and diagnostic materials promoted by international bodies such as the International Monetary Fund and the OECD.

Significantly, the latest study yields useful highlights enormous divergences in administrative setups and performance, in large part reflecting differences in the level of economic development of the countries covered by the series.

**Tags:** [Yasushi Suzuki \(/author/yasushi-suzuki\)](#) and [Richard Highfield \(/author/richard-highfield\)](#), [tax administration \(/tags/tax-administration\)](#), [tax-to-GDP ratio \(/tags/tax-gdp-ratio\)](#), [modern tax collection \(/tags/modern-tax-collection\)](#), [electronic tax filing \(/tags/electronic-tax-filing\)](#), [electronic tax payment \(/tags/electronic-tax-payment\)](#), [tax compliance \(/tags/tax-compliance\)](#), [taxpayer compliance burden \(/tags/taxpayer-compliance-burden\)](#), [taxpayer identifier number \(/tags/taxpayer-identifier-number\)](#), [Bhutan \(/tags/bhutan\)](#), [Indonesia \(/tags/indonesia\)](#), [Mini ATM \(/tags/mini-atm\)](#), [mobile tax unit \(/tags/mobile-tax-unit\)](#), [tax revenues \(/tags/tax-revenues\)](#), [tax collection \(/tags/tax-collection\)](#), [Asian tax administration \(/tags/asian-tax-administration\)](#)



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# What is the black economy?

The black economy refers to people who operate entirely outside the tax and regulatory system or who are known to the authorities but do not correctly report their tax obligations.

It encompasses a wide range of practices, including understatement of takings, the payment and acceptance of cash wages off the books, welfare fraud, sharing economy contractors not declaring their income, moonlighting and phoenixing (where businesses deliberately liquidate to avoid paying employees and creditors). Complex interactions with illegal activities, including money laundering, must also be taken into account. Other terms used include: the shadow economy, cash economy and underground economy.

[Black Economy Taskforce](#)

[What is the black economy?](#)

[Terms of reference](#)

[Interim Report](#)

[Final Report](#)

[Government Response](#)

[Consultations](#)

Participation in the black economy penalises honest taxpayers, undermines the integrity of Australia's tax and welfare systems and creates an uneven playing field for the majority of small businesses doing the right thing.

The black economy also imposes significant costs on the economy and society. Black economy activities undermine trust in the tax system, create an unfair commercial environment that penalises businesses and individuals doing the right thing, can enable and entrench the exploitation of workers, undermine tax revenue and enable abuse of the welfare system.

If left unchecked, black economy participation can lead to a dangerous dynamic. It can foster a culture which legitimises and supports this participation, spurring its further growth. As revenues fall, those remaining in the formal economy may be faced with higher tax burdens, providing a greater incentive to move into the shadows. All other OECD countries are grappling with the black economy issue – Australia is not alone.

While the black economy is a long-standing problem, new vulnerabilities and threats are emerging as a result of fundamental economic, social and technological changes. Tax and non-tax regulatory burdens, pressure on business margins, the proliferation of new business models (including the sharing economy) and new forms of work, complex interactions with illegal activities and changing social norms are influencing this landscape.

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## Australian tax gaps overview

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- <https://www.ato.gov.au/About-ATO/Research-and-statistics/In-detail/Tax-gap/Australian-tax-gaps-overview/> (<https://www.ato.gov.au/About-ATO/Research-and-statistics/In-detail/Tax-gap/Australian-tax-gaps-overview/>).
- Last modified: 23 Jan 2019
- QC 53161

## Australian tax gaps – overview

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The tax gap is an estimate of the difference between the amount the ATO collects and what we would have collected if every taxpayer was fully compliant. Tax gaps exist in all countries to some extent. The gaps are driven by cultural and human factors, global forces, complexity in business and legal systems, those who take aggressive tax positions, and genuine errors.

Estimating tax gaps is a challenging task for any jurisdiction. Tax gaps are, in effect, about measuring what is not visible – what people have not told us about their compliance, whether through misunderstanding, by choice, or by taking a tax position that differs from the ATO view of the law. As a result, all tax gap estimates are subject to a degree of error, and can change from year to year due to improvements in the methodologies used and revisions of underlying data.

Tax gap estimates and their trends over time provide useful insights into the longer-term operation of the tax and superannuation systems. Along with other performance measures, they tell a story about the performance and integrity of the system, including levels of willing participation and significant shifts in compliance. They guide us in determining priority risks and opportunities, and where to invest our resources.

Rapid changes in the economy, society and technology mean the issues driving tax gaps continue to evolve. No tax system can eliminate tax gaps; the cost of doing so would be excessive.

Instead, we aim to identify, manage and sustainably reduce tax gaps over time. Effective tax gap management requires engagement with all stakeholders on the size of the gaps, the risks and drivers, and how we can collaboratively address these issues.

In the main, the estimates we have published reflect a system that is operating well. The estimates are backed by methodologies we have confidence in. As we develop new improved methodologies, we will release more estimates covering more taxes and revenue streams.

Here you'll find an overview of tax gaps in Australia, how and why we measure them, our approach and a summary of the latest available data.

### **On this page:**

- [Why we measure the tax gap](#)
- [Tax gaps internationally](#)
- [Engagement, advice and assurance](#)
- [Addressing the gap](#)
- [Tax gap research program](#)
- [How to use the estimates](#)
- [Summary findings](#)

### **See also:**

- [Principles and approaches to measuring gaps \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Principles-and-approaches-to-measuring-gaps/\)](#)
- [Fuel excise tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Fuel-excise-tax-gap/\)](#)
- [Fuel tax credits gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Fuel-tax-credits-gap/\)](#)
- [Goods and services tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Goods-and-services-tax-gap/\)](#)
- [Individuals not in business income tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/individuals-not-in-business-income-tax-gap/\)](#)
- [Large corporate groups income tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Large-corporate-groups-income-tax-gap/\)](#)
- [Large super funds income tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Large-superannuation-funds-income-tax-gap/\)](#)
- [PAYG withholding gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/PAYG-withholding-gap/\)](#)
- [Petroleum resource rent tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Petroleum-resource-rent-tax-gap/\)](#)

- [Small super funds income tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Small-superannuation-funds-income-tax-gap/\)](#).
- [Superannuation guarantee gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Superannuation-guarantee-gap/\)](#).
- [Tobacco tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Tobacco-tax-gap/\)](#).
- [Wine equalisation tax gap \(/About-ATO/Research-and-statistics/In-detail/Tax-gap/Wine-equalisation-tax-gap/\)](#).

## Why we measure the tax gap

Estimating tax gaps forms part of our broader accountability and transparency as a leading administrator. It is consistent with contemporary international best practice in tax administration.

Australians all benefit from healthy tax and superannuation systems that support our society and economy. The community expects us to manage all aspects of the systems, including advising on the tax gaps and what we are doing about them. As such, we measure and publish tax gaps, where they are credible and reliable, to inject our perspective into the community debate.

Tax gap estimates are also important for us to better understand levels of compliance and risk in the tax and superannuation systems, to inform our resource allocation, and to assess the effectiveness of our work over time.

Tax gaps are an indication of the system in operation. The insights gained from this analysis guide us in determining priority risks and development of strategies, including administrative design, help and education, and audit strategies.

## Tax gaps internationally

Other administrations also measure tax gaps, including:

- Her Majesty's Revenue and Customs (HMRC) – United Kingdom
- Internal Revenue Service (IRS) – United States
- Danish Customs and Tax Administration (SKAT)
- Canada Revenue Agency.

The European Commission (EU) uses external researchers to identify the value-added tax (VAT) gap in each of its 28 member countries, providing trends over time. The International Monetary Fund (IMF) provides support to jurisdictions in estimating tax gaps.

Our gap measurement methodologies draw on the experience of the above contemporary administrations to ensure our estimations meet best practice. We also share our tax gap information with our counterparts in HMRC and the IRS.

## Engagement, advice and assurance

In developing our estimates, we engage key stakeholders and subject matter experts within the ATO and the community, including tax gap experts, researchers, academics, government agencies and taxpayer representative groups.

Work with our broad range of advisors and stakeholders, on refining our methodologies and developing approaches to estimating other tax gaps, is ongoing.

## **Holistic view of the tax gap program**

There are three main principles to the tax gap program; the outcomes from gap estimation need to be:

- reliable
- credible
- meaningful.

Each of the principles listed above provide us with a framework that we have codified in our reliability assessments for each estimate.

### Reliable

For the reliable principle, we assess ourselves against two main outcomes:

1. Trustworthy
2. Dependable

For an outcome to be trustworthy, the outcome needs to be transparent, concise and open to evaluation and critique. To achieve a dependable outcome, the estimate needs to use the best practice methods available. The results from those methods need to be repeatable, and the results must be evaluated by experts.

### Credible

For the credible principle, we assess ourselves against the two outcomes of:

1. Believable
2. Complete

For the credible principle, an outcome is believable when it explains why the gap is the size it is, and what the wider issues and impacts are. To be complete the outcome needs to cover all the bases; this includes all associated issues and the black economy.

## Meaningful

For the meaningful principle, we assess ourselves against the two outcomes of:

1. Explained
2. Communicated

This last principle ensures the outcomes that are obtained through our estimates are more than just numbers on a page. This principle looks to ensure that our stakeholders are able to understand and engage with us in an informed conversation about the tax and super systems. Therefore, an outcome is explained if it answers the why questions. It identifies the contributing factors of a gap, the key risks and drivers, as well as acknowledging the caveats and limitations of the estimate. Lastly, all this information must be communicated. Effective communication means it can be used by stakeholders to inform strategy and treatment plans, and to understand the health of the system.

Two of the three principles of the tax gap program are externally assessed by our expert panel to provide us with an independent assessment of our effectiveness at achieving the above principles. The third principle of meaningful is assessed internally to ensure the reliable and credible outcomes have appropriate context, and are therefore meaningful to the intended audience.

## Independent expert panel

Recognising the importance of having reliable and credible tax gaps, we engage an independent expert panel to provide advice on the suitability of our gap estimates and methodologies. The panel was established in 2013.

The panel's advice considers:

- whether proposed methodologies can be relied on to produce a sufficiently robust gap estimate
- whether the methodologies are likely to be broadly accepted as a way of estimating a gap and whether alternative methodologies should be considered
- international comparability, including global developments in the use of tax gap estimation methodologies and practices.

The panel currently comprises:

- **Neil Warren** – Professor of Taxation, School of Taxation and Business Law, University of New South Wales. Neil is a respected economist, specialising in public sector

economics with a special focus on taxation policy and fiscal federalism. Neil has received several grants, organised numerous conferences and consulted widely, preparing reports for state and federal government agencies. He has provided expert opinion to government inquiries and parliamentary committees, and advice to political parties and welfare and industry groups. Neil has been a member of the panel since 2013.

- **Richard Highfield** – a highly experienced tax professional having worked within the fiscal areas of the International Monetary Fund (IMF) and the Organisation for Economic Co-operation and Development (OECD). Richard has a wealth of experience in both domestic and international taxation. He is an adjunct professor with the School of Taxation and Business Law, University of New South Wales, and has been a member of the panel since 2013.
- **Saul Eslake** – an independent economist, and vice-chancellor's fellow at the University of Tasmania. Saul has decades of experience in the Australian financial markets, and has been previously employed as Chief Economist at ANZ, Bank of America Merrill Lynch, and National Mutual Funds Management. Saul joined the panel in 2017, following the stepping down of Chris Richardson.

We look to the expert panel to review our detailed methodology and provide independent assessment on it, and on the reliability rating for each of our tax gap estimates. Reliability ratings provide a transparent assessment of our gap estimates.

## Addressing the gap

Our focus on prevention (before correction) influences the gross tax gap and drives it down. To focus just on correction would influence the net gap only.

We take this into consideration as we continue to refine and develop the range of strategies we employ to manage tax gaps.

Our primary strategy is to make it as easy as possible for Australians to comply with their tax obligations. We look at this from many perspectives:

- enhancing our digital services
- improving our processes and technology, including our data-matching capability
- providing advice to government, via Treasury, where we see law reform options
- working with partner agencies and stakeholders to improve the tax and superannuation systems
- providing guidance and advice to clarify areas of uncertainty, including issuing Taxpayer Alerts if we see potential risks
- dealing with non-compliance, including investigating aggressive tax planning.

## Tax gap research program



The diagram below shows the various tax gaps that form our overall gap research program, within the context of the Australian tax and superannuation systems.

The gaps are grouped into three programs of analysis:

- **transaction-based tax gaps** – for taxes collected and paid by an entity higher up in the supply chain (with the cost generally borne by the consumer), such as goods and services tax (GST) and fuel excises
- **income-based tax gaps** – income tax (for both individuals and businesses), large and small super funds, and fringe benefits tax gaps
- **administrative gaps** – non-tax gaps, including for pay as you go (PAYG) withholding, superannuation guarantee and other administered programs.

The relationship between the various gaps is complex. While some are mutually exclusive, some are closely related or form subsets within the established gap estimates. For example:

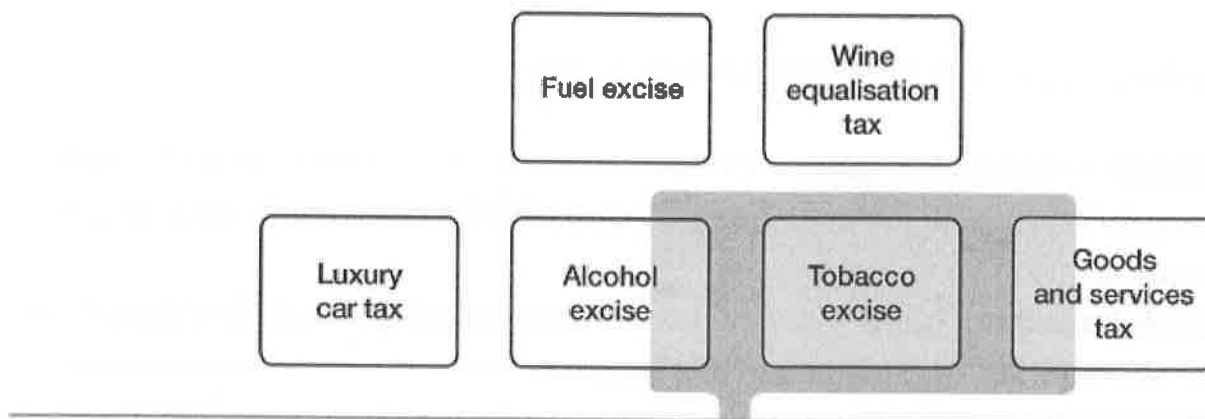
- work-related expenses, levies, rebates and concessions are subsets of the income-based tax gaps for small business and individuals
- some gaps arise through employment – employment-related gaps include PAYG withholding, superannuation guarantee and fringe benefits tax (for individuals).

In addition, the black economy manifests in a number of gap estimates. For example, unreported income is included in individuals not in business, small business, PAYG withholding and superannuation guarantee. The black economy affects these gaps to varying degrees.

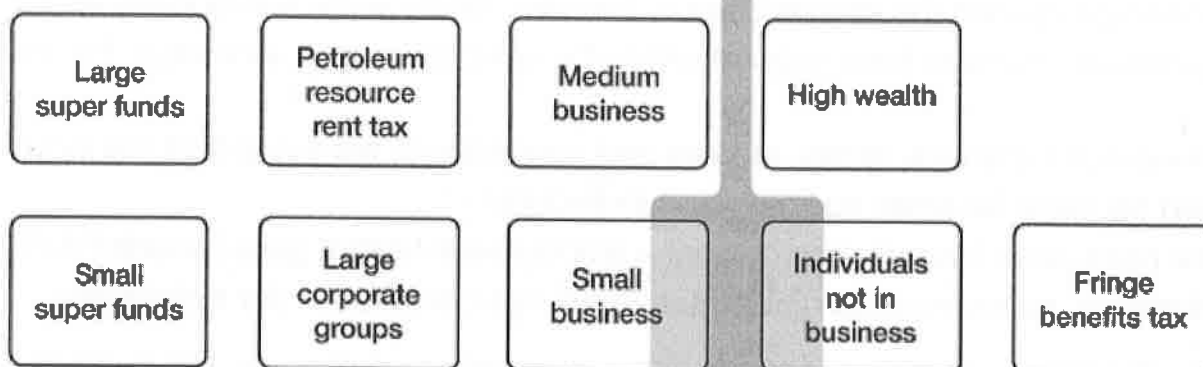
These complexities demonstrate why the gap estimates cannot be aggregated into one figure.

## **Tax gap research program overview**

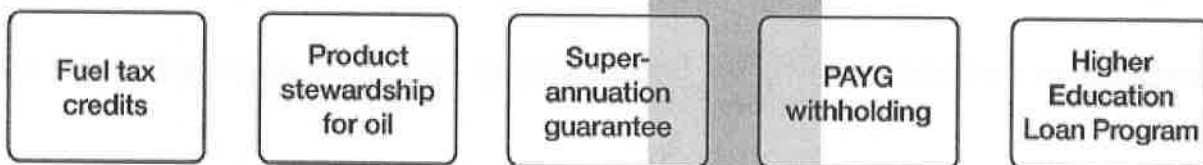
### Transaction-based tax gap



### Income-based tax gap



### Administrative gap



Administrative gaps cannot be added to transaction or income-based gaps due to potential overlaps

■ Affected by the black economy

## How to use the estimates

The tax gap estimates should be viewed as trends over time, in conjunction with our performance measures. The dollar value is indicative rather than definitive.

All estimates have a margin of error, which may not be quantifiable. The estimates are subject to limitations and caveats that need to be considered when using them and drawing conclusions. These limitations are explained in [Principles and approaches to measuring gaps](#) ([/About-ATO/Research-and-statistics/In-detail/Tax-gap/Principles-and-approaches-to-measuring-gaps/](#)).

Gap estimates should not be aggregated into one figure or divided by annual ATO collections, or other aggregated revenue amounts.

## Summary findings

In October 2018, we updated our estimates for goods and services tax (GST), wine equalisation tax (WET), fuel excise, pay as you go (PAYG) withholding, and fuel tax credits (FTC). We are in the process of refreshing our estimates and anticipate the next updates will be published in October 2019.

We have also added new gaps: superannuation guarantee and large corporate groups income tax in 2017 and Tobacco and Individuals not in business income tax in 2018.

We continue working towards developing tax gap estimates for all of the taxes and programs we administer.

The following is a summary of our latest gap estimates in alphabetical order (note that the latest data varies depending on the particular gap).

- **Fuel excise gap** – the net fuel excise gap is estimated to be \$326 million (1.9%) in 2015–16. The excise products covered in this estimation are concentrated in an industry with a small number of large taxpayers who we have generally observed to be highly compliant.
- **Fuel tax credits** – the net fuel tax credits gap for 2016–17 is estimated to be –\$19 million (–0.3%). This reflects our findings from random enquiries that suggest the under-claiming of fuel tax credits exceeds the over-claimed amounts. This result is consistent with previous estimate outcomes.
- **GST gap** – the net GST gap estimate for 2016–17 has trended slightly downwards from previous years to \$5.26 billion (7.9%). This fall is largely driven by a notable contraction in the contribution by taxable household consumption to the theoretical liability for the year. In other words, households are spending more money on GST free goods and services such as food, health and education. Australia ranks relatively well among similar nations that have estimated GST/VAT gaps.
- **Individuals not in business income tax gap** – for 2014–15 we estimate a net tax gap of \$8.76 billion (6.4%). Analysis shows the main components driving the gap include incorrect claims for deductions for work-related expenses and omitted income particularly in relation to undeclared cash wages. Another contributor is deductions for rental property expenses.
- **Large corporate groups income tax gap** – in 2015–16, the net large corporate income tax gap is estimated to be \$1.8 billion (4.4%). This gap has reduced over previous estimates. Part of this reduction is due to the inclusion of income tax assured through our engagement activities as part of our justified trust program. Further, we

have refined and improved our methodology to include additional information and more accurately estimate our projected outcomes where we do not have complete information.

- **Large super funds** – in the 2015–16 year the net large super fund gap is estimated to be \$127 million (1.5%). Analysis shows the main drivers of this gap are over claiming of the foreign income tax offset, incorrect application of CGT provisions and over claiming of franking credits.
- **PAYG withholding gap** – the net PAYG withholding gap estimate for 2015–16 is \$3.36 billion (1.9%). This suggests that employers are generally compliant with their withholding obligations. We estimate that employers are paying about 95% of the PAYG withholding they are required to without intervention from us.
- **Petroleum resource rent tax** – in the 2015–16 income year, the net gap is estimated to be \$18 million (2.0%). The main drivers of this gap relate to the inherent complexities of the law that underpins the PRRT system; in particular, disputes and disagreements regarding the interpretation of the application of the expenditure provisions in the Act.
- **Small super funds** – for the 2014–15 year, we estimate the small super fund net tax gap to be \$39.9 million (3.2%). The analysis shows main drivers of this gap to be misunderstanding in the application of exempt current pension income (ECPI) provisions, incorrect reporting of franking credits and over-claimed deductions.
- **Super guarantee gap** – for 2015–16, we estimate the super guarantee gap to be \$2.79 billion. This represents 4.8% of the total estimated \$56.77 billion in super guarantee employers were required to pay. In 2015–16, superannuation funds reported to us that employers paid \$54.31 billion in super guarantee. This represents 95% of our adjusted theoretical super guarantee amount.
- **Tobacco tax gap** – for the 2015–16 year, the net tobacco tax gap is estimated to be \$594 million (5.6%). Our analysis indicates that sea and air cargo is the most significant source of detected illicit tobacco entering Australia.
- **Wine equalisation tax gap** – in the 2015–16 WET estimate, we included the payable and refundable WET amounts to generate a net WET gap estimate. The net WET gap estimate for 2015–16 is \$5 million (0.5 %). This is consistent with our observations of compliance within the WET system.

Our latest net gap estimates (both as a dollar value and percentage) are shown in the tables below. The tax reported and reliability assessment of each estimate are also shown.

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### Net tax gap estimates – direct and indirect taxes, latest available data

Tax gap estimate	Reliability assessment	Financial year	Tax paid (\$m)	Net gap (\$m)	Net gap (%)

<b>Fuel excise</b>	Medium	2015–16	16,891	326	1.9
<b>Goods and services tax</b>	Medium	2016–17	60,962	5,264	7.9
<b>Individuals not in business income tax</b>	Medium	2014–15	128,410	8,761	6.4
<b>Large corporate groups income tax</b>	Medium	2015–16	39,775	1,833	4.4
<b>Large superannuation funds</b>	Medium	2015–16	8166	127	1.5
<b>Petroleum resource rent tax</b>	Medium	2015–16	845	18	2.0
<b>Small superannuation funds</b>	Medium	2014–15	1215	39.9	3.2
<b>Tobacco</b>	Medium	2015–16	9,928	594	5.6
<b>Wine equalisation tax</b>	Medium	2015–16	896	5.0	0.5

**Note:**

- We are in the process of refreshing our estimates and anticipate the updates will be published in October 2019.
- All figures are rounded to the nearest \$1 million.
- Changes from previously published estimates are due to revisions to ABS data, updated ATO data and a modified approach to determining liabilities reported but not paid. The beer excise and duty gap estimate has been withdrawn due to identified issues with data.
- Net gap percentage is calculated as net gap divided by estimated total tax with full compliance (that is, tax reported plus the gap).
- For 2013–14 and prior years, the estimate is for WET payable only, not taking into account wine producer rebates.

Tax reported gap, as a dollar value and percentage, for each of our gap estimates for selected administered programs, for the latest year data is available.

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**Net tax gap estimates – administered programs, latest available data**

<b>Tax gap estimate</b>	<b>Reliability assessment</b>	<b>Financial year</b>	<b>Amount reported (\$m)</b>	<b>Net gap (\$m)</b>	<b>Net gap (%)</b>
<b>Fuel tax credits</b>	Medium	2015–16	6,089	–19	–0.3
<b>PAYG withholding</b>	Medium	2015–16	173,481	3,356	1.9
<b>Superannuation guarantee</b>	Medium	2015–16	54,309	2,790	4.8

### **Note:**

- We are in the process of refreshing our estimates and anticipate the updates will be published in October 2019.
- All figures are rounded to the nearest \$1 million.
- Changes from previously published estimates are due to revisions to ABS data, updated ATO data and a modified approach to determining liabilities reported but not paid.
- Net gap percentage is calculated as net gap divided by estimated total tax with full compliance (that is, tax reported plus the gap).
- The latest available year for the PAYG withholding gap estimate is 2015–16.

### **Our commitment to you**

We are committed to providing you with accurate, consistent and clear information to help you understand your rights and entitlements and meet your obligations.

If you follow our information and it turns out to be incorrect, or it is misleading and you make a mistake as a result, we will take that into account when determining what action, if any, we should take.

Some of the information on this website applies to a specific financial year. This is clearly marked. Make sure you have the information for the right year before making decisions based on that information.

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