

**THE USE OF FOREIGN EXPERIENCE OF TAX ADJUSTING IN THE MANAGEMENT OF ECONOMIC DEVELOPMENT OF INDUSTRIAL ENTERPRISES****Saienko O.R.***Zaporizhzhia National University  
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**Key words:**taxes, tax adjusting, tax instruments,  
system of taxation, tax deductions

In the article is devoted to the tax adjusting and its influence on the development of industrial enterprises on the basis of foreign experience taking into account domestic features. The use of foreign experience of tax adjusting in modern conditions of harmonization of the Ukrainian tax system with the tax system of the world is extremely important. Within the framework of the purpose of this article the question of the approach to the use of instruments of taxation in the developed countries of the world (The USA, *Great Britain*, France, Japan), it has been found out similar and distinguishing features of the domestic mechanism of the tax adjusting, the analysis of instruments of the tax adjusting has been conducted, their elements have been described, their advantages and disadvantages have been reflected. The result of the research has created the formed classification of instruments of management of the tax adjusting of industrial enterprises of Ukraine. In accordance with world experience, the offered classification confirms that the domestic instruments of the tax adjusting are used in the activity of industrial enterprises in almost all directions, but the regulatory influence does not been fully realized in connection with absence of the use of such direction as stimulation of investment and innovation activity. The necessity of improvement of the instruments of the tax adjusting in Ukraine has been well-proven with the purpose of stimulation of investing and innovative development of industrial enterprises. Directions of the use of foreign experience of harmonization of private and public interests have been offered both in the field of taxation and in the field of investing and innovative development of industrial enterprises in Ukraine. The prospect for further research in this direction is the optimization of domestic instruments of the tax adjusting of industrial enterprises with the purpose of concordance of investment and tax interests.

**ВИКОРИСТАННЯ ЗАРУБІЖНОГО ДОСВІДУ ПОДАТКОВОГО РЕГУЛЮВАННЯ В УПРАВЛІННІ ЕКОНОМІЧНИМ РОЗВИТКОМ ПРОМИСЛОВИХ ПІДПРИЄМСТВ****Сасенко О.Р.***Запорізький національний університет  
Україна, 69600, м. Запоріжжя, ул. Жуковського, 66***Ключові слова:**податки, податкове регулювання,  
податкові інструменти, система  
оподаткування, податкові пільги

Досліджено суть податкового регулювання та його вплив на розвиток промислових підприємств на основі зарубіжного досвіду з урахуванням вітчизняних особливостей. Використання зарубіжного досвіду податкового регулювання в сучасних умовах гармонізації української податкової системи зі світовою є надзвичайно актуальним. У межах поставленої мети визначено питання підходів до використання інструментів оподаткування в розвинених країнах (США, Велика Британія, Франція, Японія), виявлено спільні й відмінні риси вітчизняного механізму податкового регулювання, проведено аналіз інструментів податкового регулювання, описано їх види, елементи, висвітлено недоліки та переваги. Результатом дослідження стала сформована класифікація інструментів податкового регулювання діяльності промислових підприємств України. Запропонована класифікація підтверджує, що відповідно до світового досвіду, вітчизняні інструменти податкового регулювання використовуються в управлінні промисловими підприємствами майже за всіма напрямками, але їх регуляторний вплив залишається реалізованим не в повному обсязі у зв'язку з відсутністю використання такого напрямку, як стимулювання інвестиційної та інноваційної активності. Доведено необхідність удосконалення інструментів податкового регулювання України з метою стимулювання інвестування та інноваційного розвитку промислових підприємств. Запропоновано напрями використання зарубіжного досвіду гармонізації приватних і суспільних інтересів у сфері оподаткування, а також у сфері інвестування та інноваційного розвитку промислових підприємств України. Перспективами подальших досліджень у цьому напрямі є оптимізація вітчизняних інструментів податкового регулювання промислових підприємств для узгодження інвестиційних та податкових інтересів.

### Statement of the problem

Forming the mechanism of management of industrial enterprises on the basis of the use of the tax adjusting is one of the basic ways of optimization of activity of industrial enterprises in Ukraine and making high level of income.

It is very important to take into account world experience of the developed countries for forming the mechanism of management of an enterprise, which can develop the effective mechanism of influence of the tax adjusting on optimization of economic development of industrial enterprises.

### Analysis of recent studies and publications

Problems of government control of economic development of industrial enterprises using tax methods and instruments were considered in scientific works by V. Andruschenko, Z. Varnaliy, I. Vlasova, V. Geyc, M. Diba, T. Efimenko, Yu. Ivanov, A. Krisovatiy, P. Layko, S. Londar, T. Mayorova, V. Melnik, O. Moldovan, S. Onishko, L. Tarangul, K. Shvabiy, S. Urij and others.

In addition, tax influence on entrepreneurial activity and the role of fiscal instruments in its stimulation was probed by D. Gelbreyt, L. Gitman, D. Keynes, A. Laffer, A. Mayburov, P. Samuel'son, P. Solou, D. Stiglic, M. Fridmen and others.

### Objectives of the article

The purpose of the article is the analysis of economic experience of developed countries for the optimization of activity of enterprises on the basis of the use of tax methods and instruments and estimation of the possibility of their application in the system of taxation of Ukraine.

### The main materials of the research

Basic instruments which are used in foreign countries for optimization of economic development of the business entity are the following:

- the price adjusting of production of goods;
- the tax adjusting;
- the credit-financial mechanism;
- the antimonopoly policy;
- the adjusting of foreign economic activity;
- special purpose programs [1].

The elements of taxes occupy a significant place among the tools used by the state to improve the efficiency of enterprises. Their advantages as a means of influence were due to the fact that today they are an integral part of the management mechanism of the majority of countries. Stimulating the activities of industrial enterprises in developed countries on a national and regional scale on the basis of the use of elements of taxes as instruments of state regulation has a steady character [2].

Let's consider the peculiarities of the application of tax regulation tools for industrial enterprises in individual countries of the world.

In Great Britain, low taxes are used to tax industrial enterprises. The key mechanism for state support for the development of production on a new technological basis in the UK is the application of tax incentives and tax incentives in the field of innovation, in particular, small and medium-sized enterprises engaged in R&D have the right to the following tax benefits: either an investment tax credit or an investment tax rebate. The investment tax discount starting from April 1, 2015, is deducted from profit and amounts to 130% of the qualified R&D expenses incurred. Thus, taking into account the costs incurred, an enterprise may reduce the tax base of income tax by 230% of R&D expenditures (100% – expenses, 130% – tax rebate).

The investment tax credit is granted to an enterprise in the event of a loss and is defined as the product rate of the loan and the amount of damage received. The credit amount is 14.5% of the R&D expenses incurred, increased by 130% tax rebate.

For large companies, from April 1, 2016, the tax credit rate is 11% of the number of qualified costs incurred for research and development work during the accounting year.

Thus, applying taxes operated in Great Britain, industrial enterprises can significantly reduce their investment costs in R&D and increase their own reimbursements in this area, which will further help ensure the growth of key performance indicators [3].

The system of tax privileges and tax incentives in the United States involves the use of an investment tax credit, called research credit.

For determining the sizes of research credit are used by two methods of calculation:

- the method of regular research credit;
- the method of the alternative simplified credit.

Applying the method of a regular research credit, the credit rate is 20% and applies to the amount of excess current qualified R&D expenses compared with the base amount determined by the payer in 1984-1988.

Applying the method of an alternative simplified credit, the credit rate is equal to 14% of the amount of excess current qualified R&D expenses over 50% of the average annual amount for the three previous tax years. In the absence of R&D expenditures for a specified period, the loan rate will be 6% of the current R&D expenditures [4].

In addition, US industrial enterprises have the ability to reduce their tax liability by using an investment tax credit under the federal program to encourage the use of environmentally friendly technologies for the production of heat or power from renewable sources (Business Energy Investment Tax Credit).

In Japan, an investment tax credit from a nationwide income tax is granted to enterprises in accordance with the costs incurred in research and development (R&D) cost. Also, there is a preferential taxation of income, investment-innovative character, received by Japanese companies in other countries of the world.

With regard to the features of calculating investment tax credit, then the credit rate is calculated on the basis of the method of growth and varies from 8% to 14%. The amount of such credit cannot exceed 25% of the total national income tax.

Small and medium-sized businesses have the right to an investment tax credit based on gross expenditures on R&D at a rate of 12%. The amount of the loan may also not exceed 25% of the amount of income tax [5].

In France, since 2008, companies have the right for the research tax credit. The loan rate is 30% of R&D costs, if their volume does not exceed 100 million euros, and in part of the excess, the loan rate is 5%. The amount of research tax credit is not limited [6].

World experience is convincing that the introduction of preferential rates of depreciation is one of the most effective methods of stimulating production activity. In some countries, the rate of accelerated depreciation exceeds 100%, in particular, in Japan it is even 200%. This rule applies to the formation of certain types of capital assets and depends on regional and sectoral applications. The value of this tax exemption is the use of different methods of the accelerated write-off of capital investment costs [5].

Together with tax breaks, in most countries, full tax exemption is applied without instalment and on the basis of approved tax holidays. Tax holidays are a lever of state regulation, which is used in a number of countries for newly created enterprises in the early years of their production activities. The purpose of tax holidays is to stimulate domestic and foreign investment to support the development of a new business.

The analysis of the experience of foreign countries regarding the impact on the efficiency of activities has shown that the elements of taxes used to regulate business activities in different countries of the world are similar: lower tax rates, the formation of non-taxable reserves, investment tax credit, investment tax rebate, accelerated depreciation and tax vacations.

The regulation of enterprises with the help of direct taxes is aimed at creating an effective management mechanism, affecting the level of costs and profits of economic entities, and is relatively neutral in terms of competition. The use of indirect taxes regulates the costs of enterprises and significantly distorts competition.

The experience of developed countries testifies to the importance, complexity and contradictory use of tax

regulation tools to optimize the economic activity of enterprises.

With the help of tax regulation tools, the state can influence the structure of the economy, the development of production on a new technological basis, providing favourable conditions for the accelerated accumulation of capital in priority sectors and spheres. For the purpose of rapid economic development, state policy of management should allow coordinating the interests and possibilities of using state funds for optimization of economic activity of enterprises with their own sources of financing.

Summarizing and analysing the approaches and experiences of other countries of the world in this area can reveal the most effective directions, components and tools for using them in domestic practice, encouraging business entities to optimize the results of their activities.

It should be noted that the application of experience in economically developed countries in Ukraine does not allow for its simple transfer, it should take into account the specifics of the country and be adequate to the existing state of the economy. In addition, an important prerequisite for the successful application of tax regulation tools is the clarity of their definition in legislative acts. That is, the authorities and business entities must understand the purpose for which certain tax regulation instruments are introduced and what result can be obtained from them.

It is also important that in order to create an effective system of state incentives for economic development in Ukraine, it is expedient to systematically introduce a series of direct and indirect tax methods for influencing this process.

The improvement of the investment climate for the Ukrainian industry takes place on the basis of the Law of Ukraine "On Amendments to the Customs Code of Ukraine" [7].

For the equipment which has the privileges of import duties, there is a special regime of taxation of value added tax. From January 1, 2013, to December 31, 2022, upon import in the customs regime of import into the customs territory of Ukraine of equipment and component parts thereof, which is not subject to import duties, the taxpayers were granted the right to postpone payment of value added tax on this equipment by Issue of a tax bill to be repaid within two months.

Summarizing the results of the study on the effectiveness of the use of tax regulation on the basis of the Tax Code of Ukraine, it has been proposed the following classification of tax regulation instruments that affect the efficiency of Ukrainian industrial enterprises (Table 1) [8]

Table 1 – Classification of instruments of the tax adjusting of activity of industrial enterprises of Ukraine

Government control	Instruments of the tax adjusting	Direction of the use	Application in Ukraine
Elements of taxes	Tax rates	Tax loading	To the article 193, 194, 195 of TKU. Differentiation of rates of VAT, article 136 of TKU. Differentiation of rates is an income tax. (+)
	Tax benefits	Investment tax credit	Not used. (-)
		Investment tax abatement	Not used. (-)
		Tax deduction	Point of a 1 article 169 of TKU. Diminishing of object of taxation of PIT is due to a social privilege. (+)
		Tax vacations	A point of 44 subsections of 4 sections is XX «Transitional positions» of TKU. Application of a zero rate of income tax for separate payers in 31.12. 2021 to. (+)
		Exemption from taxation of individual taxpayers	Part of a 6 article 287 of CCU. Tax exemption by a duty the brought in equipment for creation of IP on a term 5 years. (+)
		Exemption from taxation of individual taxpayers	Point of a 1 article 197 of TKU. VATS of operation are not imposed a tax from the supply of child's food stuffs. (+)
		Exemption from taxation of individual taxpayers	The article 133 of TKU. Unprofitable enterprises are not the payer of tax. (+)
	Special modes of taxation	Simplified system of taxation	The head of a 1 article 291 of TKU. To the glava1 article 291 of TKU. Legal principles of application of the simplified system of taxation. (+)
	Change of terms of payment of taxes	Postponement of payment	To the article 32 of TKU. Transference of the set term of payment is on more late term. (+)
		Arranging on the installment system of payment	
	Tax approvals	Fines	The head of a 11 TKU. Features of application of penalty approvals are for violation of tax legislation. (+)
		Fine	The head of a 12 TKU. An order of extra charge of fine is in the case of delay of payment. (+)

Source: [developed by the author]

According to the above data, the practice of public administration of entrepreneurial activity has a large arsenal of tax regulation tools, most of which are applied in Ukraine. At the same time, their regulatory influence remains insufficiently implemented, including eliminating the negative effects of activities.

In addition, the analysis of the structure of tax regulation instruments has shown that the non-use in Ukraine of tax instruments of the investment direction, laying the foundations for economic development and growth.

However, the task of optimizing the use of tax regulation tools is not only to expand the list of fiscal instruments, but also to increase their effectiveness. Due to it, the comparison of the potential possibilities of tax regulation with problems that require a first-rate solution is particularly important.

### Conclusions

Summarizing the foregoing, the world economic practice has accumulated a significant arsenal of tax regulation tools for use in the enterprise management mechanism.

In order to increase the efficiency of industrial enterprises, it is necessary to take into account the experience of developed countries and to introduce such regulatory instruments as investment tax credit and investment tax rebate, which are the part of innovation-investment tax incentives, and include reduction of either tax liabilities on income tax or tax bases on a certain percentage of the amount invested in the purchase of non-current assets.

These kinds of tax privileges have been introduced in most countries of the world, which has promoted quick updating of the material and technical base of economic entities, re-equipment of production and modernization of production capacities.

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