

UDC 658.152

DOI: <https://doi.org/10.32847/business-navigator.66-3>

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DETERMINING THE PREREQUISITES FOR MANAGING THE TAX POTENTIAL OF INDUSTRIAL ENTERPRISES

Klius Yuliia, Nikitiuk Oksana, Mohamed Saad Hussein Ibrahim. Determining the prerequisites for managing the tax potential of industrial enterprises. The study identifies factors that significantly inhibit the development of the national economy and make it impossible to realize the tax potential of the state. Significant negativism is the phenomenon of underpayment of taxes, which is based on the phenomenon of property relations. This led to the conclusion that the incomplete payment of taxes of industrial enterprises is inherently a multifactorial phenomenon: first, it is based on property relations; second, this phenomenon has been known since ancient times and none of the states has managed to eliminate it to this day; third, practice confirms that with the improvement of forms and methods of preventing underpayment of taxes, their taxpayers spend significant funds on finding mechanisms to reduce payments to the state treasury. The study of motives and reasons for incomplete payment of taxes allowed us to offer a definition of its multifactorial phenomenon as a unique occurrence inherent in economies of different types, which is based on economic, moral and ethical, regulatory, socio-political factors, property relations, which together contribute to destruction. Failure to pay taxes distorts public morality and the level of tax culture in the state, as well as the national economic interests of the state. Tax potential is characterized by the economic structure and the provision of its taxable resources, certain tax bases. The initial component of determining the tax potential should be the definition of the tax base, which is a quantitative, physical characteristic of the object of taxation and is determined for each type of tax. Article 22 of the Tax Code of Ukraine of 02.12.2010 determines the essence of the object of taxation: "The object of taxation may be property, goods, income (profit) or part thereof, turnover from the sale of goods (works, services), transactions for the supply of goods (works, services) and others objects defined by the tax legislation, with the presence of

which the tax legislation connects the occurrence of the taxpayer's tax liability". Therefore, the calculation of the tax base should be determined in the regional context, taking into account the industry structure for each type of tax. The formation of the tax potential of industrial enterprises in the region should be based on the results of the analysis of tax compliance, as well as monitoring and forecasting the macroeconomic situation in the regions.

Key words: tax potential, income, budget, factors, industry, enterprise.

Ключ Ю.І., Никитюк О.В., Мохамед Саад Хуссейн Ібрахім. Визначення передумов управління податковим потенціалом промислових підприємств. У дослідженні визначено чинники, які суттєво гальмують розвиток національної економіки та унеможливають реалізацію податкового потенціалу держави. Значний негативізм у собі несе явище неповної сплати податків, основу якого становить феномен відносин власності. Це дало підставу дійти висновку про те, що неповна сплата податків промислових підприємств за своєю суттю є мультифакторним феноменом: по-перше, її основу становлять відносини власності; по-друге, це явище відоме з давнини і жодній із держав його не вдалося ліквідувати до сьогодні; по-третє, практика підтверджує, що із вдосконаленням форм та методів запобігання неповній сплаті податків їх платники витрачають значні кошти на вивчення механізмів зменшення платежів у казну держави. Дослідження спонукальних мотивів та причин неповної сплати податків дозволило запропонувати дефініцію її мультифакторного феномену як унікального явища, притаманного економікам різного типу, в основі якого знаходяться економічні, морально-етичні, нормативно-правові, суспільно-політичні чинники, відносини власності, що у сукупності сприяють підриву національних економічних інтересів держави шляхом несплати податків та деформують суспільну мораль і рівень податкової культури у державі.

Ключові слова: податковий потенціал, надходження, бюджет, фактори, промисловість, підприємство.

Ключ Ю.И., Никитюк О.В., Мохамед Саад Хуссейн Ібрахим. Определение предпосылок управления налоговым потенциалом промышленных предприятий. В исследовании определены факторы, которые существенно тормозят развитие национальной экономики и делают невозможным реализацию налогового потенциала государства. Значительный негативизм в себе несет явление неполной уплаты налогов, основу которого составляет феномен отношений собственности. Это дало основание сделать вывод о том, что неполная уплата налогов промышленных предприятий по своей сути является мультифакторным феноменом: во-первых, ее основу составляют отношения собственности; во-вторых, это явление известно с древности, и ни одной из стран его не удалось ликвидировать до сих пор; в-третьих, практика подтверждает, что с совершенствованием форм и методов предотвращения неполной уплаты налогов плательщики тратят значительные средства на изыскания механизмов уменьшения платежей в казну государства. Исследование побудительных мотивов и причин неполной уплаты налогов позволило предложить дефиницию ее мультифакторного феномена как уникального явления, присущего экономикам различного типа, в основе которого находятся экономические, морально-этические, нормативно-правовые, общественно-политические факторы, отношения собственности, которые в совокупности способствуют подрыву национальных экономических интересов государства путем неуплаты налогов и деформируют общественную мораль и уровень налоговой культуры в государстве.

Ключевые слова: налоговый потенциал, поступления, бюджет, факторы, промышленность, предприятие.

Problem Setting. The main problem with Ukraine's tax system today is not only that entrepreneurs and individuals pay high taxes, but also that the system is inefficient and tax laws are contradictory. The experience of the 2014–2020 transformation period convinces us that an effective vertical of state power should be created in Ukraine for the general well-being

of society. A strong state and a wealthy society are usually impossible without adequate funding, which taxes can provide. The need to resolve such contradictions sets scientists the task of solving a number of important theoretical and practical problems, one of which is to assess the scale and determine the reserves of the tax potential of the Ukrainian economy.

Execution of the State budget for revenues and expenditures is the key to the success of the state in solving the problems of economic and social policy, the implementation of social and other programs, the proper functioning of the government machinery and the entire system of institutions and organizations of the public sector. Therefore, it is essential to meet important government tasks to increase tax revenues at all levels. This requires the development of a new scientific and methodological approach to determining the essence and quantitative assessment of tax potential, and is relevant to the assessment of the tax potential of industrial enterprises in the region in terms of economic challenges of today.

Study on Recent Research and Publications.

It should be noted that this scientific problem, paradoxically, is currently insufficiently studied not only in domestic economic science but also in the world one. We usually find that the problem of the functioning of public finance in Western economic science has taken many steps forward. However, this cannot be said about the investigation of the essence and content of the phenomenon "tax potential". Moreover, such a financial category is virtually non-existent in foreign sources. In contrast, in domestic science there are a number of fundamental studies concerning the research of this phenomenon performed by: Lenz H., Kudrina O., Shpileva V., Chorna O., Khrystenko L. and others. It is difficult to overestimate the contribution to the theory of tax potential of these scientists, as its content allows fruitful development of ideas and analytical approaches. To date, many questions about the tax potential remain unresolved, the volume of which is an essential indicator of the fiscal capacity of the budget: approaches to its interpretation are debatable. Insufficient attention has been paid to identifying its components and the relationships between them. At the same time, ensuring the effective formation and use of tax potential in the mechanism for regulating economic growth processes in Ukraine can be one of the factors stimulating economic development,

achieving dynamic equilibrium, and increasing the efficiency of tax policy.

Therefore, the **purpose** of the article is to study the prerequisites for determining and assessing the tax potential of industrial enterprises in the region.

Presenting main material. In order to objectively determine the tax base of industrial enterprises and calculate the tax potential of the region on its basis, a system of indicators that determine the development of the macroeconomic situation in the regions, the influence of industry and regional factors on the state of the base and the prospects for its development should be formed. At the same time, to calculate the tax base, indicators that directly affect its formation should be taken into account first [2]:

- place and role in the country's economic system;
- specialization of the region by types of activity, peculiarities of the location and functioning of the main sectors of the economy;
- the population of the region, the proportion of the urban population;
- gross regional product (by type of activity in the region);
- the volume of industrial output in physical and monetary terms by industrial activities;
- the financial and economic condition of the enterprise of the main activities of the region– the number of profitable and unprofitable enterprises;
- the level and dynamics of wages (information on wage arrears will allow to determine budget revenues from personal income tax, will not be received in the budget on time);
- large payers of the region;
- volumes of export supplies by type of activity of the region's economy (for forecasting the amount of VAT refunds to exporting enterprises).

The calculation of the taxable base of the regions should take into account the estimation of the profitability of the territorial property of the region and the budgetary efficiency, the quality of the production and social infrastructure, the requirements of technological renewal of the activities of the region, resources, transportation and others.

In addition, it is necessary to consider a number of factors that significantly affect the base: non-payments in the economy, wage arrears, forms of payment (cash, barter, promissory notes, etc.). The impact of main and major taxpayers on the change in the tax base in the regions, their financial condition, forms of settlement,

legal status and holding structures is necessarily analyzed.

The indicators should form the basis of the information base for calculating the total income of the region, its economic, financial and tax potential. This information base will indicate the possibility of economic growth in the region and an increase in the volume of tax revenues of industrial enterprises. This problem could be solved by filling out the so-called "Tax passport of industrial enterprises", which would contain a comprehensive description of the tax potential of industrial enterprises in the region and the tax burden [4].

These circumstances are a major component and are very important in the formation of budgets at all levels, as they should better reflect the needs of the regions in terms of subsidies, subventions, grants and so on. The use of the proposed system of indicators will establish the trends of functional relationships between the selected macroeconomic indicators and the state of the tax base of industrial enterprises, and thereby provide a more objective assessment of the tax potential of industrial enterprises in the region by type of activity and regions of the country.

The size of the tax potential of industrial enterprises in the region is directly proportional to the state of the region's economy. The more developed the economy of the region, the greater the amount of tax revenues. At the same time, the more diversified the structure of tax revenues in the region by type of economic activity, the more obvious their growth in the future.

In the process of analysing the compliance of tax collection with the fiscal potential, it was found that real budget revenues are characterized by a certain instability [2]. Percentage of actual execution of revenues (indicative determinant) for income tax in Ukraine in 2016–2020 was accordingly 111.9; 100.2; 118.5; 111.9; 110.5 with a simultaneous stable increase in budget revenues for the same period in absolute terms: in 2016 – UAH 54.3 billion, 2017 – UAH 63.9 billion, 2018 – UAH 95.7 billion, 2019 – UAH 107.1 billion, 2020 – UAH 95.8 billion. It was established that in general in 2016 the indicator of personal income tax revenue implementation, in accordance with the budgetary assignments, was UAH 127.3 billion, or 107.7 %, in 2017 – UAH 170.6 billion, or 98,1 %, in 2018 – UAH 211.2 billion, or 100.4%, in 2019 – UAH 253,03 billion, or 107.2 %, and

in 2020 – UAH 271.18 billion, or 105.9%. It was established that the level of implementation of planned revenues (indicative indicators) to the consolidated budget of Ukraine from the payment of VAT reached 88%, in 2017 – 113.2%, in 2018 – 93.9%, in 2019 – 114.2%, in 2020 – 104.4%. Based on the analysis, the conclusion is substantiated that if the relative indicators of the budget revenues for certain years are not met (there is no stable growth trend) and there is simultaneous growth of absolute indicators, there are reserves for the growth of the budget revenues.

The results of the analysis of the collection of taxes on income and profits, property and consumption confirm the negative impact on the tax potential performance indicators. It is determined that in monetary term, the budget losses during 2015–2019 continued to grow and, over the years they amounted to UAH 55.35 billion, UAH 30.26 billion, UAH 26.8 UAH, UAH 35.74 billion, UAH 42.73 billion accordingly. The structure of consolidated budget losses with the largest share in the total amount of tax benefits is: the share of total budget losses from VAT benefits in 2019 amounted to 72.4%, which is 18.8% more than in 2015, and in absolute terms amounted to UAH 30.9 billion – almost 2% of all revenues of the consolidated budget of the country; property tax benefits – took second place in “weight” and amounted to UAH 9.2 billion in 2019, which is three times more than in 2015 (UAH 3.8 billion); excise tax benefits for the period from 2015 to 2019 increased by 0.3% of the total amount of benefits provided under current legislation; The third place in terms of share is taken by income tax benefits – 4.0% in 2019 (UAH 1.7 billion) of the total consolidated budget benefits compared to 0.4% in 2015.

Such a paradoxical situation in Ukraine has developed due to the tax evasion, lobbying of interests by powerful and sustainable industries (benefits received: agriculture, forestry and fisheries – UAH 0.2 billion, processing industry – UAH 5.32 billion, trade, maintenance of motor vehicles and motorcycles – UAH 7.71 billion, in 2019 the total share of these industries in GDP was 38.41%), as well as the use of tax benefits in “political bidding”.

Careful accounting of taxpayers is defined as the basis for high-quality and reliable tax control. Since 2016, there has been a steady trend towards an increase in the total

number of registered taxpayers in Ukraine: in 2016 – 2700 thousand, in 2017 – 3340 thousand, in 2018 – 2271.1 thousand, in 2019 – 3126 thousand, and in 2020 – 3144.6 thousand. However, analytical data showed that this growth was caused by a constant increase in the number of payers of personal income tax.

For other taxes, the number of payers is decreasing. It was found that the number of taxpayers subject to tax control decreased between 2016 and 2020. In 2016, tax control (scheduled inspections) covered 4200 payers, in 2017 – 4834, in 2018 – 5300, in 2019 – 6632, in 2020 – 1940.

At the same time, an increase in the number of taxpayers who violated tax legislation was noted during these years (Table 1).

If in 2016 there were 35.4 thousand or 63.6% of the audited, in 2017 - 28.3 thousand or 64.8%, in 2018 – 28.6 thousand or 69.3%, in 2019 – 43.7 thousand or 71%, in 2020 – 32.6 thousand or 73%.

The results of the study showed that a decrease in the number of tax audits in Ukraine caused an increase in the number of violators of tax legislation. As a result of the analysis of the effectiveness of tax control over the collection of taxes by individual entrepreneurs, it was found that for the period 2016–2020 the number of tax law offenders increased from 42.1% in 2016 to 49.6% in 2017. In 2018–2020, this share was respectively by years 55.7%, 55.4% and 75.9% of the total number of audited.

The calculations determined the average percentage of violations committed by payers in the collection of certain taxes in 2016–2020: 62.7% on VAT, 60.3% on income tax, 52.5%

on excise tax, 26.9% on property tax, 46.74% – on personal income tax, 55.7% – on other taxes and fees.

Assessment of the macroeconomic situation in the regions with the analysis of tax revenues of industrial enterprises, trends in the development of the tax base and development of changes in tax legislation will create a basis for sound budgeting, as well as objective redistribution of funds between the budgets of all levels in order to balance the budget security of the regions.

The work should take into account the modernization and formation of a new system of inter-budget relations based on a balanced division of revenues and expenditures of budgetary funds between the state budget and budgets in the regions. With such a delineation of planned revenues between the budgets of all levels, there will be an interest in the most complete and timely collection of taxes, increasing the tax potential at each level of the budget system [2]. Such an approach to the distribution of financial aid from the state budget will allow attention to those regions where the tax potential of the region's industrial enterprises does not allow to cover the minimum necessary budget expenditures.

Unfortunately, the indicators of the tax potential of industrial enterprises in the region, the collection of taxes and fees and the methodology for calculating the tax base, on which the target revenue indicators of the budgetary system are based, are still not recognized by economic statistics. The uncertain status of these indicators reduces the efficiency of the fiscal process. It is understandable that a decline in average tax revenues of at least a few per cent results in significant tax shortfalls. Therefore, indicators

Table 1

The proportion of payers found to be in violation of the tax legislation in relation to the total number of inspected by the state tax service of Ukraine in 2016–2020, (%)

Name of the payment to the budget	Year				
	2016	2017	2018	2019	2020
Taxes and payments of enterprises, institutions, organizations	63,6	64,8	69,3	71,0	73,0
of them:					
Income tax	51,2	51,6	58,4	63,9	76,2
VAT	55,3	57,8	66,1	69,2	65,1
Excise tax	43,1	43,5	51,6	50,1	69,3
Property tax	23,9	24,7	27,5	31,6	26,9
Personal income tax	27,9	41,6	48,3	52,8	63,1
Other taxes and fees (including single tax of groups I, II)	42,1	49,6	55,7	55,4	75,9

Source: calculated by the author's

of the tax potential of industrial enterprises and their estimation methods should be considered as full instruments of fiscal planning and statistical accounting [8].

The choice of an indicator that highlights the potential for balancing fiscal revenues is complicated by the lack of reliable statistics in the local database: data are often inaccurate or not available at all. The approach to assessing the tax potential of industrial enterprises in the region through actual revenue collection is considered completely incorrect; in practice, there is a gap between the amount of actual revenue from industrial taxes and the potential ability to balance fiscal revenues. For example, regions with equal industrial tax potential can collect different amounts of revenue through different tax rates or different performance of public tax administrations in those regions. Fiscal revenue is also affected by the level of tax discipline among industrial taxpayers themselves.

Attention should be paid to the need to improve the current scheme of tax reporting, which reflects the balanced results of tax revenues of industrial enterprises and reimbursement of fines and penalties to the accounts of taxpayers. Therefore, in addition to budget execution, it is necessary to consider data on the amount of money that will be returned to taxpayers' accounts during the reporting period, using data received from the territorial bodies of the State Treasury.

The problem of finding reserves to increase the tax revenues of industrial enterprises in the State budget of Ukraine is constantly relevant. This is due to many reasons, the main of which are as follows [5].

First, the State budget of Ukraine has been operating for many years with a certain deficit of funds, which is covered either by an increasing in the State debt or by money issuance. From the perspective of long-term development of public finance, these deficit-covering instruments are not optimal, as they may have some negative socio-economic consequences.

Secondly, the economy of Ukraine, according to numerous studies of domestic scientists, even with the current level of taxation of industrial enterprises has a significant tax potential, which the state is not able to fully use to have a balanced budget.

In connection with these and other circumstances, the problem of quantitative assessment of the tax potential of industrial enterprises in the region, rather than its quantification, i.e. the

quantitative expression of qualitative attributes, must be studied and solved.

Thus, the tax potential of industrial enterprises of the region can be considered, first of all, as an integral characteristic of modern state of social and economic development of the state; secondly, as an opportunity to mobilize financial resources in favour of the state, which is used today and can be used in the future, in developing the tax strategy of the state development on an alternative basis, taking into account the interests of expanded reproduction of industrial enterprises production, financial support of transformation, etc.; third, the state's tax potential allows it to be viewed as a separate and important area of its economic development research.

Conclusion. The study of the prerequisites for assessing the tax potential of industrial enterprises has made it possible to identify a number of major problems, with the following main problems:

1) the problem of monitoring and evaluation of the tax potential, which lies in the imperfection of determining the size of the shadow economy as a broad tax base. Its essence is that the phenomenon of shadow economy itself, its content, nature, sources of emergence are not deeply studied;

2) the problem of imperfect methodology of estimation of the industrial enterprises' tax potential;

3) the problem of lack of methodological support for assessing the tax potential of industrial enterprises;

4) the problem of developing a comprehensive assessment of the total tax potential of industrial enterprises, taking into account the probability of income by type of tax and determining the potential for fulfilment of obligations for each of them;

5) the problem of the lack of methodological support for the estimation of tax potential of industrial enterprises and absence of proper tools for the estimation of tax potential.

Thus, one of the important tasks, the decision of which is currently to be taken by the state and, to a greater extent, by the regions, is the construction of a scientifically grounded system of forecasting and planning of tax revenues to budgets of all levels on the basis of formation and comprehensive evaluation of tax potential of industrial enterprises. We believe that the emphasis in its implementation should be shifted not toward achieving the maximum tax "return", but toward the re-introduction of tax revenues taking into account macro-, meso- and micro-economic interests.

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