INTRODUCTION

This review of thinking about corporation income tax incidence will take us through several steps—the traditional trichotomy, the general equilibrium revolt against it, the open economy revolution, and some smoke–and–mirrors issues. Finally, it will take special aim at corporation tax incidence in today’s developing nations, and conclude with some reflections on their use of the corporate income tax. For further elaboration of many of the points made here, see Harberger (2008).

THE TRADITIONAL TRICHOTOMY

The typical public finance textbook of, say, the 1940s and 1950s, took what it thought was a quite general (and, hence, quite safe) position. Some of the tax was surely passed on to consumers, some of it was likely passed back to workers, and the rest of it had to be borne by the residual claimants—the shareholders. Little in the way of genuine analysis was offered in support of this view, but it nonetheless succeeded in establishing itself as the standard treatment.

The biggest flaw in this approach was its confusion with respect to the time dimension. Shareholders are indeed the residual claimants, but the negative shock created by a new tax does not stay with them forever. Capital will flee from areas with lowered rates of return and, as it does, so will move the whole capital market to a new equilibrium rate of return. Thus, all segments of the capital market will tend to share in whatever fate ends up being inflicted on the equilibrium net–of–tax rate of return of corporate shareholders. If this real rate of return goes down, so too will all other returns, including real interest rates on bonds, real rental rates on buildings and land, and real yields on bank deposits.

While the traditional trichotomy could claim to be right about shareholders being the residual claimants in the very short run, it is not in the short run that product prices would be driven upward, and real wages, downward, to absorb part of the tax. Indeed, it would be the very process of the capital market seeking its new equilibrium that would set in motion those product and labor market adjustments.
THE GENERAL EQUILIBRIUM REVOLT

It was this revolt, in which I was one of the players (Harberger, 1962), that tried to formalize the above critique of the traditional trichotomy. Perhaps its defining feature was a model with two sectors (corporate and non–corporate) and two factors (labor and capital). Factor supplies were taken as given and a closed economy was assumed. Equilibrium meant equalizing real wages and real after–tax rates of return across the two sectors.

Perhaps the greatest insight that emerged from this analysis was that capital bearing 100 percent of the burden of the corporation income tax was not an unlikely limiting case (the upper limit of the shareholders’ fraction of the trichotomy), but was rather a result situated somewhere in the middle of the plausible range of outcomes. My classroom illustration of this result starts with a capital stock earning a nine percent return in both the corporate and non–corporate sectors, in the no–tax situation. When a tax is imposed taking 50 percent of the income from corporate capital, but nothing from capital in the non–corporate sector, we have two extreme cases. One is that the net–of–tax return stays at nine percent. The corporate gross–of–tax return goes to 18 percent, and the burden is pushed forward to consumers of the corporate product. The wage rate is the numeraire for this example. Thus, with both the wage rate and capital’s net–of–tax rate of return remaining the same as before, and with the prices of corporate–sector products rising to reflect the tax, we have both capital and labor sharing the burden of the tax—but only in their roles as the consumers of the output of the corporate sector.

At the other extreme we have the case where, when the tax is imposed, the gross–of–tax rate of return stays at nine percent for the corporate sector. That means that the net–of–tax rate of return goes down to 4.5 percent in both sectors. The fall to 4.5 percent in the corporate sector reflects, in the post–tax equilibrium, what the government collects in corporate tax revenue. But capital’s burden is a lot greater than this, as its take from the economy has been cut in half (over both sectors). The fall from nine percent to 4.5 percent in the non–corporate sector is reflected (under assumptions of competition) in a gain to consumers of non–corporate products. Capital, thus, ends up bearing a burden equal to \( \left[ K_x + K_y (1 - \beta_y) \right] / K_z \) times the burden of the tax, where \( \beta_y \) is the fraction of the non–corporate product that ends up being bought by capitalists.

Thus, if capital ends up being equally split between the two sectors, and if capital’s gross–of–tax share in the product ends up at 40 percent, then in the first extreme case, the burden of the tax would be ten percent of GDP, and it would be shared between labor and capital in the proportions \( \beta_{Lx} \) and \( \beta_{Kx} \). At the other extreme we would have capital bearing between one and two times the burden of the tax (depending on the fraction of the non–corporate product that is bought by capitalists).

In the interesting case where Cobb–Douglas production functions prevail in both sectors, and where product demands are determined by a Cobb–Douglas utility function, capital ends up bearing precisely the full burden of the tax. In the numerical example, this would correspond to the rate of return going down to six percent, and the ending capital stock being split between the two sectors. The government collects \( (0.12 - 0.06)K_x \) and capital loses \( (0.09 - 0.06)(K_x + K_y) \). These end up equal to each other, of course, when \( K_y = K_z \) (i.e., capital’s burden equals government tax revenues).

THE OPEN ECONOMY REVOLUTION

We will soon show how an open economy model yields very different conclu-
sions from its twin for a closed economy. Though some authors have leaped to the conclusion that this invalidates the closed economy model for practical purposes, such a leap is not warranted. It is far better to think of the closed economy case as applying to an increase or a reduction of corporate tax rates across many countries at roughly the same time, while the open economy model traces the consequences of rate changes in just one country. Thus, the closed economy is quite relevant for the major reform movement that took place over the last few decades, in which the corporation tax rates of major countries were reduced from a range around 50 percent to a range of some 30–35 percent.

We must, thus, consider that a general worldwide, roughly parallel change in rates is a different scenario from a similar change taking place in just one country (or perhaps a small subgroup of countries). The biggest difference is the likelihood that the allocation of the national capital stock will end up responding quite differently under the two scenarios.

The most basic open–economy analyses have operated under the assumption that the world capital market “works” (Harberger, 1980). While there may be differences across countries in the net–of–tax rate of return to capital (owing mainly to differences in perceived risks), there is little reason to believe that a unilateral change in a country’s corporation tax rate will have an important effect on its “country risk premium.” Thus, it may be that it takes a ten percent net–of–tax return in Paraguay to match a six percent return in New York. But if that is true before a change in Paraguay’s tax law, it is likely also to be true in the new equilibrium, after such a change. (Modelwise, we usually assume balanced trade in both the no–tax and the with–tax equilibrium. Trade gets unbalanced, of course, in the transition from one of these equilibria to the other, as the capital stock responds to the unilateral tax change in question.)

The basic model also follows tradition in assuming that the world prices of tradable goods are determined in world markets, and do not themselves change in response to any one country’s shifts in tax policy. The bottom line of a simple open–economy model is that country A’s tax change cannot affect the net rate of return to capital, nor can it affect the world prices of tradable goods and services. Thus, it can only be reflected in the wages of labor and in the prices of non–tradables.


When we insert into such a model a special tax on the income from capital in the corporate sector, manufacturing occupies center stage. For in the manufacturing sector, the price of its product cannot change due to the tax (because it is tradable), and the net rate of return to capital cannot change, because capital is mobile internationally. Thus, whatever tax ends up being paid in that sector has to be reflected as a reduction in the real wage rate paid there. But we cannot have real wages falling in one sector and not in another (except during a transition period). So the fall in real wages that permits manufacturing to stay in business in the taxing country has to apply throughout the labor market of that country. In agriculture, this fall in wages generates an equal and opposite rise in the rents to land. In non–tradable services, it generates a benefit that is passed on to consumers via lower competitive prices for services. Finally in “public utilities and transport”
(PUT), the product price will likely rise because PUT is typically a lot more capital intensive than manufacturing. (If the two corporate sectors have equal capital intensity, the result in PUT would look exactly like that in manufacturing, where (owing to tradability) the product price remains unaffected by the tax.) So we end up with labor bearing a large burden, with landowners and consumers of services also benefiting, and with consumers of PUT bearing an additional cost.

(This is a good place to point out a useful trick in incidence analysis. It distinguishes between the “burden” of a tax, which equals the amount collected by the government, and the “excess burden” or “deadweight loss” associated with that tax. If we think of these as two separate categories, we greatly simplify the analysis of incidence. In this vein, incidence analysis deals with first-order effects—$X_i \Delta P_i$, $L_i \Delta W_i$, etc., while deadweight losses are typically measured as second-order effects—$1/2 \Delta X_i \Delta P_i$, $1/2 \Delta L_i \Delta W_i$, etc. If we combine these two in our measurement of incidence, we have, in effect, two sets of problems to solve. If, on the other hand, we follow the convention of separating the “burden” analysis (first-order) from the excess burden (second-order), we reduce our task from two sets of problems to one, and the easier one at that. Once we are in the world of first-order effects, it is clear that overall gains and losses have to add up to zero. So if we show the government getting the tax revenue, and other private groups (landowners, demanders) also winning significant net benefits, then the remaining group (labor in our case) must end up bearing more than the full burden of the tax.)

SMOKE–AND–MIRRORS ISSUES

I use this term to refer to situations where things are not what they seem. Perhaps the prime case of this kind occurs when there is full integration between personal and corporate taxes, so that the corporate tax simply represents a withholding device for the domestic owners of capital. If everything works well, with no evasion at any point, domestic capital owners will end up earning the same gross–of–tax rate of return, regardless of whether they hold their capital at home or abroad, or in the corporate or non–corporate sector. If their supply of funds is inelastic with respect to the rate of return in the relevant range (a typical assumption), then their after–tax rate of return will fall to absorb the full burden of the personal income tax, regardless of whether the withholding tax on corporate earnings exists or not, and regardless of its rate.

We never see full integration of this type in the real world, partly because the allocation of corporate savings to particular shareholders presents a host of problems. What we typically do see is integration based on dividends actually paid. In this case, with a 50 percent corporate tax rate, shareholders receiving a dividend of ten would declare an income of 20 and a tax withheld of ten. Corporate savings (retained earnings) would be fully taxed at the 50 percent rate, however, with no remission at any point. This distortion in turn would be partly offset, if capital gains (typically assumed to be mainly generated by corporate savings) were free of tax.

This example makes clear that it can really turn out that the corporation income tax is not even much of a tax at all, and functions mainly as an alternative route for collecting the personal income tax itself (in the case of integration based on dividends) or a rough surrogate for the income tax (where the corporate tax is levied on corporate savings, but the resulting capital gains are then free from personal tax).

This example should also help readers see that it is hard, in a real–world setting, even to define what we mean by the incidence of the corporation income tax. Much of the literature has focused on this tax as
being a tax on the income from capital in the corporate sector of an economy, with no corresponding tax prevailing in the non–corporate sector. This is clearly a high stylized scenario, but it is one that gives us a clear answer, and that we can quite easily “model,” assuming that the corporation income tax is the only serious distortion in the economy. When we get into real–world cases, however, we not only have links with the personal income tax (mentioned above), but also with the property tax (which may burden housing much more heavily than it strikes the return to corporate capital), and the housing subsidies (both direct and through the non–taxation of the imputed rent to owner–occupied housing) that prevail in many, or even most, countries. (Readers should be aware that in most countries the housing sector accounts for more than half of non–corporate reproducible capital.)

Once one realizes the complexities of general–equilibrium connections across sectors, among factors, and across product markets, one has to recognize that if one is going to talk about corporation income tax incidence at all in general analytical terms, one had better stick with tradition and model it as the only tax in a world divided into corporate and non–corporate (and perhaps tradable and non–tradable) sectors.

The alternative sensible way to go is to try to construct a computable general equilibrium model that takes into account the precise conditions, economic structure and tax laws prevailing in a particular country at a given moment in time. One can then simulate the results of an increase or decrease in the corporate tax rate, given all the bells and whistles that characterize that country’s tax system. In this case the incidence of the corporation income tax \( T_c \) would not add up to what the government collects from \( dT_c = K_c dT_c + T_c dK_c \), but would also include \( \Sigma_i T_i (\partial L_i / \partial T) dT_c + \Sigma_h T_h (\partial K_h / \partial T) dT_c \). That is to say, the burden to be borne would be the full net impact on government revenues of the change \( dT_c \) in the corporation income tax rate. This would include the changes in revenue from other taxes on capital income (property taxes \( [T_j > 0] \) and housing subsidies \( [T_j < 0] \)) in other sectors, the taxes \( T_i \) on labor income in all sectors, and the taxes \( T_h \) on the output of the different sectors. (In the latter case we have the important observation that most value–added taxes have a much higher effective rate in the tradable than in the non–tradable sectors of the economy.) To my knowledge, nobody has yet tried to do this, but it is an inviting topic for new research, and perhaps an interesting breeding ground for a new family of doctoral dissertations.

**MONOPOLY PROFITS IN DEVELOPING COUNTRIES**

I have been impressed by the high estimates we get when we try to measure the real rate of return to capital in developing countries. This is especially true when we focus on business capital—excluding public infrastructure and housing capital in particular. Such returns are almost always above 15 percent and quite commonly above 20 percent in real terms. They seem to persist year after year, even decade after decade, so one cannot pass them off as transitory phenomena. Yet anyone who thinks he/she can collect a real rate of return of 20 percent on a regular basis by putting money into, say, Mexico or El Salvador (where we have persistent estimated rates of return of over 20 percent) should please send me an e–mail telling me how to do it.

Something seems to be missing here. I think the best hypothesis is that the measured real rate of return to capital will typically include whatever monopoly profits are being actually garnered by an industry’s owners. Now we return to basic price theory to realize that monopoly profits: a) are not, in principle, part of the income from capital, and b) basically...
function as a privately imposed, privately collected excise tax on the monopolized product or products. Thus, we learn in elementary economics that under competition a productive factor will tend to earn the value of its marginal product \( \phi_f P_x \), while under monopoly it will tend to earn its marginal revenue product \( \phi_f MR_x = \phi_f P_x [1 + (1/\eta)] \), where \( \phi_f \) is the marginal physical product of factor \( F \), \( P_x \) is the price of the product, \( MR_x \) is its marginal revenue, and \(-1/\eta\) is the implicit monopoly excise tax rate \( \tau_m \). Note that \( \eta \langle 0 \rangle \) is the elasticity of demand that the monopolistic firm applies to the demand for its product. It is in no sense the elasticity of demand for an industry’s product.

In this case, we must model the corporation income tax as striking both the true income from capital and the monopoly tax revenues that are collected by the corporate sector. For the closed economy case, we will assume a Cobb–Douglas world, with equal exponents of one–half applying to capital and labor in every sector. But above and beyond that we will assume a monopoly “tax” of ten percent of U.S. gross product applying in the corporate sector but not the non–corporate sector.

Suppose the national product is 1,400, with 800 going to the corporate and 600 to the non–corporate sector, and with labor and capital accounting for half of the product of each sector in the no–tax situation. Monopoly profits are one–fourth of the receipts of the monopolized corporate sector and, thus, amount to 200. The “true” earnings of capital are 300 in each sector, and there is an equal amount of capital in each sector. But the measured earnings of capital in the corporate sector are 500. This looks like a 25 percent rate of return on a corporate capital stock of 2,000, but it really reflects a 15 percent return to capital plus a 25 percent monopoly “tax” on the entire product of the corporate sector.

When the government imposes a 50 percent corporation income tax, we assume that overall spending continues to be divided 800 and 600 across the two sectors. The monopoly tax continues to be 200, but now half of it is taken away by the government. The net earnings of corporate capital continue to be 300, but half of this is also taken by the government. So the net earnings of capital are now only 150 in the corporate sector, but stay at 300 in the non–corporate sector. This means that the capital stock, which was initially divided 2,000 and 2,000 between the two sectors, now gets divided 1,333 and 2,667. The true earnings of capital go down by one–fourth, from 600 to 450, while the “measured earnings” stay at 800 gross of tax and become 550 net of tax. It appears as if the full burden of the tax is borne by capital (as in the standard Cobb–Douglas case without monopoly complications), but the true burden is shared, 150 being “truly” borne by capital as such, and 100, by the holders of monopoly power.

This is the same result that one would come to by simply considering an excise tax on the monopoly profits themselves. The monopolist tries to maximize monopoly profits, regardless of whether they are taxed or not. His choice of monopoly markup should, therefore, be the same, whether those profits are taxed or not. The incidence of a tax on monopoly profits, therefore, falls on the monopolist. I have not explored the whole gamut of possibilities to find the conditions under which the above conclusion would have to be modified. But for the moment I am satisfied that it is a result of wide, if not totally general, applicability.

The open–economy case presents a problem, in that monopoly profits are not compatible with tradable–goods prices being determined in the world market. This complication could be handled by introducing a semitradeable sector producing differentiated products, where individual producers could be assumed to have at least a moderate degree of monopoly power. We will not do that here, however, and will instead only consider
the case where monopoly profits are being earned in the non–tradable corporate sector of the economy (e.g., Mexico’s major telephone company, Telmex). For this sector, I see no reason why the same sort of analysis that we have applied in the closed–economy case would not also be relevant. That is to say, the monopoly power in question would be present in both the no–tax and the with–tax situation, and monopolistic firms would have the incentive to maximize profits in both cases. This line of thinking leads to the conclusion that insofar as monopoly profits end up constituting part of the base of the corporation income tax, there is a presumption that that part of the corporation tax burden will end up being borne by the monopolists themselves.

MULTINATIONAL CORPORATIONS IN DEVELOPING COUNTRIES

Even before the great wave of globalization over recent decades, multinational corporations had a significant presence in many developing countries. That presence has, of course, by now been greatly magnified. This obviously adds to the importance of the question of how their presence impacts the policy decisions of host countries with respect to the corporation income tax rate.

Here let us first consider the fact that the corporation income taxes paid by multinationals to host countries often end up being credited against the income tax that would otherwise be due (on the same income) in the multinationals’ own base countries. If these firms were immediately liable for base–country taxes on their host–country earnings, then one could say that it makes great sense to set the corporation tax rates of developing countries at the same rate as applies in the base countries. In this case it is strictly true that the tax that is collected from multinationals by, say, Brazil would otherwise end up in the treasuries of, say, the U.S. or the U.K.

Actually the above line of thinking probably misleads more than it guides sensible policy discussion. Typically, the profits of multinationals are taxed by their base countries only to the degree and at the time they are repatriated. This creates a strong incentive to postpone repatriation, an incentive that is only strengthened by the likelihood that the profits that are reinvested (in the best venues of the developing country world) typically promise very attractive real rates of return. The consequent postponement of base–country taxes blunts the force of the argument that the money collected by corporation income taxes levied on multinationals represents simply a free good for the taxing country (because of tax substitution in the base country). Once postponement enters the picture, the multinationals will no longer be indifferent with respect to taxes levied in the host country, even at rates lower than those prevailing in the base country.

In the presence of postponement, the multinationals would not be truly indifferent to a much lower tax rate by the host country. The indifference comes only when the tax payments in the two countries occur at the same time (on the same income), for then they are both either undiscounted or discounted at the same rate. But if the host country tax $\tau_h$ is paid “now” and the base country tax $\tau_b$ is paid later (with a corresponding credit for the $\tau_h$ previously paid), then the present value of total tax is $[\tau_h + d(\tau_b - \tau_h)]$, where $d$ is a discount factor representing the present value of $1$ dollar paid at the time of expected repatriation. Clearly, even the first dollar of host country tax adds $\tau_h(1 - d)$ to the multinational’s present value of expected taxes. (This result arises because even with $\tau_h = 0$, the multinational would want to postpone repatriation, thus reducing the present value of the tax paid to the base country. One could, of course, restore indifference, even in the presence of postponement, by
making \( \tau \), also postponable until the date of repatriation.

But the above exercise is not the most relevant one because so much of investment by multinationals in developing countries is essentially “footloose”—it can locate in a wide variety of places, and gain much the same basic cost advantages. Major companies end up weighing very seriously all the aspects of current and prospective costs and risks in each location. They, thus, may end up going to China not because China’s taxes or even its wage rates are lower, but rather because the prospect of China’s huge domestic market promises advantages that outweigh what is perhaps a higher Chinese tax rate. That said, there is no doubt that for any developing country a lower tax rate makes that location more attractive to multinationals. However, reducing the tax rate also means that $1 of multinationals’ investment will generate a lower total flow of benefits to the host country.

WEIGHING THE ALTERNATIVES IN DEVELOPING COUNTRIES:
SOME CONCLUDING REFLECTIONS

It is not a good idea to dream up “general solutions” to complex policy problems. Underlying conditions differ from country to country, as do administrative capacities, especially in the developing world. So I will refrain from trying to give general advice, and instead try to highlight the types of consideration that should be borne in mind as different possible solutions are explored and weighed.

First, concerning the corporation income tax rate itself, as it applies to the “normal” rate of return to capital in a developing country, there can be little doubt that it ends up causing wage rates to be lower than they would have been without the tax. The reason, of course, is that the capital stock would be higher without the tax than with it. Thinking about this aspect, it is tempting to focus on foreign direct investment, perhaps concluding that such investment is drawn to this particular country only or predominantly in the extractive industries, and then opt for a high tax rate to capture a bigger share of the economic rents generated by the country’s natural resources. This temptation should be resisted, for policymakers should realize that it is quite natural for owners of wealth who reside in developing countries themselves to hold part of that wealth abroad, both for reasons of economic diversification and also as a hedge against political risks. The most compelling reason to keep capital in the country is the prospect of a higher net-of-tax real return. Thus, even where direct investment by multinationals does not play an important role, or is mainly concentrated in the extractive industries, the consideration is still relevant that a higher corporation income tax will lead to a lower capital stock and to a lower level of real wages.

Second, when it comes to extractive industries, royalties or separate taxes focused on those particular industries tend to make more sense than allowing “extractive considerations” to govern one’s choice of a corporation income tax rate. Royalties are a quite natural way to handle this problem in countries in which legal ownership of subsoil resources is vested in “the people” or “the government.” Here there is no doubt that arrangements in which these owners get a share of the value of the extracted resources is far preferable to one in which the rights of exploitation are auctioned off to the highest bidder or are otherwise sold for a fixed price in advance of exploration and/or exploitation.

The reason for the above assertion is that there is always huge uncertainty with respect to what a mineral right is worth, when its exploitation will stretch over many future years. Normally one at best only has a rough idea of how much
mineral is there and what its extraction costs will be. But more important even than these uncertainties are those concerning the future price (in real terms) that will prevail in the world market for a mineral product. In the presence of these uncertainties, what can be better than a contingent contract? If the deposit turns out to be rich, the people are paid more; if poor, they get less. Likewise, if the future price of the mineral is high, the people get more; if low, less. Contingent contracts genuinely reduce the risk to be borne by mineral operations and lead to higher expected payments. If competitive bidding among alternative exploiting firms is opened, then the bids should concern the fraction of the market value of future output that will be paid to the host government, rather than dealing with a one–time price to be paid now to the government now in power. (Note, however, that myopic or corrupt governments would always, or almost always, prefer an immediate lump–sum payment.)

Third, the greater is the extent to which corporation income taxes fall on monopoly profits, the stronger is the case for a higher rate of corporation income tax. I make this statement on analytical, not moral grounds. It is based on the fact that the part of the tax falling on monopoly profits has few if any efficiency effects, while the part falling on the economic equilibrium return to capital has important efficiency effects. Increasing the corporation tax rate \( \tau_c \) at the margin will have an efficiency cost equal to \(-\tau_c \rho_c^e (\partial K_c / \partial \tau) d \tau \) in all cases (\( \rho_c^e \) is the equilibrium competitive gross–of–tax rate of return to corporate capital \( K_c \) at the “point” where this tax increment is “counted”). But the revenue increment is \((\rho_c^e K_c d \tau + \tau_m X_m P_m d \tau_c)\). That is to say, raising the tax by one percentage point takes an extra one percent from equilibrium competitive profits and also an extra one percent from monopoly profits. Recall that \( \tau_m \) accrues to the monopolist, not to the government. If we have two countries, otherwise similar, but one of which has an important monopoly sector and the other one not, both will suffer the same efficiency cost (from a reduced equilibrium capital stock) as a consequence of a higher corporation tax rate, but the one with a big monopoly sector will raise a lot more revenue from the same extra one percentage point in the rate. So the benefit–cost equation comes out more positive in the monopoly case, for a given increment in the corporation income tax rate.

Needless to add, I would not make the above statements if I thought one could possibly design a special tax that would measure and strike monopoly profits per se. But in fact I do not feel that is a reasonable position to take. Direct monopoly policy can appropriately include the prudent regulation of public utility rates (natural monopolies) and the promotion of competitive behavior through anti–monopoly commissions (viz., the United States Federal Trade Commission), but to me at least, legislation that would take observed high rates of return themselves as direct evidence of monopoly power (held by the firm or firms in question) would be extremely unwise. Thus, unlike the case of extractive industries, where royalties or special taxes can easily deal separately with the problem of natural resource rents, I see no easy way of taxing monopoly profits except via a corporation (or enterprise) income tax.

Fourth, corporation income taxation is much easier to justify if there is some degree of integration with the personal income tax. I indicated above that full integration seems to have turned out to be impractical, but partial integration based on dividends makes a great deal of sense. To minimize administrative problems, one can conceive of taxing corporate profits at the personal marginal rate of the highest tax bracket, and then exempting dividends (generated by firms within the country) from the personal income tax. If the corporation tax rate \( \tau_c \) is lower than the top
personal tax rate $\tau_p^*$, one could proceed by taxing profits at the rate $\tau_c$ at the corporate level, and dividends at the rate $(\tau_p^* - \tau_c)$ at the personal level, or by giving individuals a tax credit of $\tau_p$ times dividends they received from home-country corporations while taxing those dividends themselves at each taxpayer’s own marginal rate $\tau_p$. Either of these treatments would still end up levying the corporation income tax on the earnings of foreign corporations and on earnings retained by domestic firms.

Fifth, to go beyond integration and have a genuine, separate and additional corporation income tax rate, the best justifications are: a) that such taxation will take on a bigger bite out of monopoly profits (striking them, presumably, at both the corporate and personal levels, and b) that such taxation may be a way to get at some of the mineral rents that accrue to extractive–industry companies operating under old arrangements that are considered to be inviolable. Often, such arrangements include provisions that the corporate income of the affected companies will be taxed at the standard rate generally applying to other corporations. Where such provisions exist, or where existing arrangements simply do not rule out taxation at the standard corporate rate, the tax collected on the income of extractive industries might well turn out to be a benefit (in addition to the monopoly benefits discussed above) of maintaining an unintegrated corporate income tax.

Sixth, no developing country should contemplate its tax policy with respect to corporation (or enterprise) income without giving extensive attention to the problem of tax competition from other developing countries. This problem mainly affects foreign direct investment, but may also be relevant vis–à–vis the use of tax havens by the taxing country’s own nationals. Put another way, the optimal corporation income tax rate for a single developing country (or for a small group of them) to impose is almost certain to be well below the rate that would be optimal if all (or nearly all) developing countries were to impose one jointly. But in the absence of joint action by developing countries with respect to corporation income tax rates, and given the unlikelihood of such joint action, individual countries must take seriously the observed fact of tax competition from other developing nations.

Seventh, and finally, the maintenance of the “shell” of a corporation income tax has administrative advantages even if all other considerations are absent. Administration of the personal income tax (apart from that withheld from the wage income paid by the government itself and by medium and large corporations) is notoriously difficult in developing countries. So we can be confident that catching corporate profits at the source will lead to a better and fairer collection of the taxes due on those profits than could plausibly be obtained by trying to tax them only after they reach the personal level.

REFERENCES