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CANADA

INSTITUT DE RECHERCHE EN POLITIQUES PUBLIQUES (IRPP)

Pierre Lefebvre, Philip Merrigan, « *Assessing Family Policy in Canada – A New Deal for Families and Children* », dans *Choices*, vol. 9, no 5, 10 juin 2003, 100 pages.

<http://www.irpp.org/fr/newsroom/index.htm>

La Prestation fiscale pour enfants : un moyen inefficace de lutter contre la pauvreté, selon les auteurs.

■ Cette étude décrit, analyse et évalue la politique familiale du fédéral et des provinces depuis 1996 et propose une stratégie alternative. Elle soulève deux questions : quelles familles ont bénéficié des changements, et comment se distribuent les gains suivant les niveaux de revenu familial? L'étude conclut à l'inefficacité des changements opérés pour ce qui est de réduire la pauvreté chez les enfants et d'atténuer les conséquences de la vulnérabilité socio-économique. L'étude démontre que les récentes initiatives fédérales et provinciales ne respectent pas les critères habituels d'efficacité, d'investissement social éclairé, d'incitation, d'équité ou de justice. Les auteurs proposent plusieurs réformes, et soutiennent notamment que la politique canadienne de prestations fiscales est un cul-de-sac et doit être remplacée par une allocation familiale universelle pour chaque enfant.

MINISTÈRE DES FINANCES DU CANADA

Ministère des Finances, *Favoriser l'esprit d'entreprise et les petites entreprises*, août 2003, 4 pages.
http://www.fin.gc.ca/tocf/2003/entrepreneur_f.html

Un résumé des mesures visant à renforcer l'avantage fiscal canadien pour la petite entreprise.

■ Le gouvernement du Canada a annoncé dans le budget de 2003 des mesures pour renforcer l'avantage fiscal canadien. Celles-ci s'appuient sur le Plan quinquennal de réduction des impôts lancé en 2000, la plus importante initiative de ce genre que le pays ait entreprise. Ce bulletin fiscal du Ministère des finances du Canada offre un résumé des mesures adoptées par le Gouvernement du Canada pour renforcer son appui au secteur des petites entreprises, notamment par la réduction des impôts sur le revenu et sur les gains en capital.

ASSOCIATION DU BARREAU CANADIEN (ABC)

Association du Barreau Canadien, Comparution devant le Comité sénatorial des finances au sujet du projet de loi C-28, *Loi d'exécution du Budget 2003*, le 10 juin 2003, 7 pages.

Mémoire de l'ABC (24 avril 2003) : <http://www.cba.org/ABC/pdf/retrofisc.pdf>

L'ABC se prononce fermement contre la législation rétroactive en matière fiscale.

■ La dernière tentative de législation rétroactive proposée en matière fiscale comprend les modifications apportées par le gouvernement fédéral en réponse à l'arrêt Des Chênes. Dans cette cause, la Cour fédérale d'appel a statué que la TPS ne s'appliquait pas à certaines acquisitions faites par l'administrateur d'un service de transport scolaire et que le contribuable avait droit de se faire rembourser la TPS payée. Le ministère des Finances a proposé une modification non seulement pour imposer la taxe sur les achats de cette nature, mais en décrétant le caractère rétroactif de cette modification à compter de 1990, ce qui anéantit la décision de la Cour. L'ABC fait valoir que le caractère rétroactif de cette modification empiète sur les droits acquis et viole le principe fondamental de l'imposition, soit la certitude de ce qui est imposable ou non. L'ABC soutient que les contribuables doivent pouvoir se fier à des lois fiscales stables afin d'organiser leur budget en conséquence, que la proposition du gouvernement visant à renverser rétroactivement des décisions judiciaires équivaut à nier la Règle de droit et que ce dernier a tort de modifier à sa guise et rétroactivement une loi.

Au même effet, voir la lettre du Toronto Board of Trade en date du 12 mai 2003, 4 pages :

<http://www.acef.ca/pdf/jcpdf/BOTretroactive.pdf>

ainsi que celle du Comité mixte sur la fiscalité de L'Association du Barreau canadien et de l'Institut canadien des comptables agréés, en date du 23 juin 2003 (2 pages) : <http://www.acef.ca/pdf/jcpdf/jun2303letter.pdf>

INSTITUT C.D. HOWE

William B.P. Robson, *Time and Money: The Fiscal Impact of Demographic Change in Canada*, C.D. Howe Institute Commentary, no 185, juillet 2003, 26 pages.

http://www.cdhowe.org/pdf/commentary_185.pdf

Les changements démographiques au cours des 50 prochaines années entraîneront des obligations financières supplémentaires nettes de 300 milliards \$ pour les gouvernements canadiens, fédéral et surtout provinciaux.

● The changing age-profile of Canada's population makes estimates of implicit government assets and liabilities as demographic change interacts with key programs a useful supplement to standard government balance sheets. Implicit assets arise when demographic change reduces spending relative to a benchmark level; implicit liabilities arise when it increases spending. Using program spending relative to gross domestic product in 2001 as a benchmark, this Commentary estimates implicit federal and provincial assets and liabilities associated with publicly funded health care and education, as well as elderly and child benefits. Evaluated at a 6-percent discount rate over a 50-year time horizon, these programs add roughly \$300 billion to the net liabilities of Canadian governments. Ottawa comes out ahead as a result of the prospect of declining spending on the Child Benefit. The provincial outlook is bleaker, with sizeable prospective increases in health-care spending only partially offset by declining education budgets. These figures indicate that maintaining the current age.sex distribution of public expenditure in these programs will require taxpayers in the future to pay more for the entire package of public programs than their predecessors did. They also point to the desirability of continued budget surpluses and the need for greater fiscal capacity at the provincial level. Calculating the sensitivity of demographically driven assets and liabilities to assumptions about productivity growth rates also highlights the unique importance of growth-friendly economic policies to the sustainability of Canada's social programs.

SAMSON, BÉLAIR, DELOITTE ET TOUCHE

Le « palmarès de l'ADRC », Bulletin fiscal à l'intention des cadres, été 2003, 2 pages.

<http://www.deloitte.com/dtt/cda/doc/content/03-%C9t% E9-fr%281%29.pdf>

Les 10 éléments de la déclaration les plus susceptibles d'être vérifiés par l'ADRC.

- La saison de l'impôt des particuliers venant à peine de se terminer, le moment est bien choisi pour établir la liste des dix éléments de la déclaration de revenus fédérale des particuliers qui pourraient faire l'objet d'un examen approfondi par l'Agence des douanes et du revenu du Canada (ADRC). Cette liste a été dressée à l'aide des résultats d'un sondage non scientifique auquel ont répondu nos professionnels de partout au Canada. Elle couvre une vaste gamme de sujets, allant de la simple demande d'envoi des copies papier des documents justificatifs pour les particuliers qui envoient leur déclaration par transmission électronique aux examens plus complexes des demandes d'allégement fiscal relativement aux pertes d'entreprise.

ÉTATS-UNIS

CONGRESSIONAL BUDGET OFFICE

Douglas Holtz-Eakin, *The Economic Costs of Long-Term Federal Obligations*, témoignage devant le Budget Committee de la Chambre des Représentants, 24 juillet 2003, 10 pages.

<http://www.cbo.gov/44xx/doc4439/07-24-LongTerm.pdf>

Un exposé sur les causes et les conséquences du déficit à long terme du gouvernement fédéral américain.

- Over the long term, the U.S. government faces enormous demands for federal spending, which are not adequately reflected in the budget. Every dollar of federal spending has a cost. It makes no difference if the payment is charged to the general fund, a trust fund, or an enterprise fund; nor does it matter if the payment purchases goods and services, provides income support, subsidizes an activity, or liquidates a guarantee or an insurance claim. Government spending is usually a good measure of the cost of government to the economy—its economic cost—because that spending preempts the use of resources by others for other purposes. The dollars spent measure the value of forgone alternatives for the private sector and within the budget. The budgetary costs of federal commitments should reflect their economic costs. Even though the government commits to future spending in a variety of ways, including social and other insurance, federal pensions, credit programs, and the support of international organizations, all uses of funds can be compared in terms of their economic costs. Reliable, comparable, and comprehensive cost information for all federal activities would inform Congressional decisions and align federal spending with the value of alternative uses of those funds. It is timely to reassess the principles of federal budgeting to better measure economic costs. CBO has begun to provide supplementary estimates of mandatory and discretionary spending, the effects of expiring legislation, the effects of risks on spending, and costs of federal activities not currently shown in the budget.

INTERNAL REVENUE SERVICES (IRS)

Leonard E. Burman, William G. Gale, Jeff Rohaly, Benjamin H. Harris, *The AMT : Out of Control*, conférence présentée au *IRS Research Conference*, juin 2003, 12 pages.

<http://www.irs.gov/pub/irs-soi/urban.pdf>

D'ici peu, un américain sur trois devra payer l'impôt minimum de remplacement. Cette conférence propose une analyse des problèmes relatifs à l'IMR aux États-Unis, et des propositions de réforme afin d'atteindre les objectifs visés.

- Originally targeted at high-income households, the individual alternative minimum tax (AMT) is now on the verge of switching from a "class" tax to a "mass" tax. Under current law, the AMT will encroach dramatically on the middle-class over the next decade and will become the de facto tax system for upper-income households. These changes occur because of the non-indexation of the AMT for inflation and the tax cuts enacted in 2001. The trends are troubling because the AMT is notoriously complex, its effects on efficiency and equity are questionable, and its underlying purpose is controversial. This paper provides information on the AMT, its economic effects, and options for policy reform, and is intended to help inform the debate and the eventual reforms that will be required in the near future.

Voir également le texte intégral de cette étude : « The Individual AMT: Problems and Potential Solutions » (78 pages),
http://www.urban.org/UploadedPDF/410561_AMT-DP-final.pdf

Susan Dynarski, *Tax Policy and Education Policy: Collision or Coordination? A Case Study of the 529 and Coverdell Saving Incentives*, conférence présentée au *IRS Research Conference*, juin 2003, 37 pages.
<http://www.irs.gov/pub/irs-soi/dynarski.pdf>

En raison du manque de cohérence du système fiscal et des programmes d'aide financière aux étudiants, les fonds d'épargne-études sont imposés à plus de 100% pour certaines familles américaines.

- 529 saving plans and Coverdell Educational Savings Accounts are marketed as attractive vehicles for college savings. The main finding of this paper is that college savings plans can actually harm some families. The joint treatment by the income tax code and financial aid system of college savings creates tax rates that exceed 100 percent for those families on the margin of receiving additional financial aid. Since even families with incomes above \$100,000 receive need-based aid, the impact of these very high taxes is quite broad. I find that an aid-marginal family with funds in a Coverdell is worse off than if it did not save at all. Simulations show that \$1,000 of pretax income placed in a Coverdell for a newborn and left to accumulate until college will face income and aid taxes that consume all of the principal, all of the earnings and an additional several hundred dollars. This perverse outcome is the product of poor coordination between the tax code and the financial aid system.
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Eric J. Toder, John L. Guyton, John F. O'Hare and Michael P. Stavrianos, *Estimating the Compliance Cost of the U.S. Individual Income Tax*, présenté au 2003 National Tax Association Spring Symposium, juin 2003, 29 pages.
<http://www.irs.gov/pub/irs-soi/toder.pdf>

IBM et l'IRS développent un logiciel permettant d'estimer le temps et le coût d'observation des particuliers suite à l'introduction de nouvelles mesures fiscales.

- This paper focuses on the design, development, and use of the Individual Taxpayer Burden Model (ITBM) – a microsimulation model developed jointly by IBM and the IRS to estimate the amount of time and money that individuals spend on federal tax compliance. First, the authors summarize the methodology that was used to define, measure, and model tax compliance burden. Next, they present estimates of overall compliance burden, and results from a simulation of economic and policy changes that took place between Tax Year 2000 and Tax Year 2001. Finally, they discuss applications of the burden model and review future development plans.

NATIONAL TAX ASSOCIATION

Marcus Berlant, Paul Rothstein, Possibility, « *Impossibility, and History in the Origins of the Marriage Tax* », 56 National Tax Journal 303-17 (June 2003), 33 pages.

<http://rstein.wustl.edu/MarriageTaxVI.pdf> (résumé seulement, texte intégral accessible aux membres du NTA)

Analyse systématique de « l'impôt sur le mariage » aux États-Unis et des différentes solutions proposées pour améliorer la neutralité du système fiscal eu égard à la situation familiale.

- We examine the marriage tax in a formal setting. We begin with precise statements of the basic normative principles in the literature and proofs of old and new impossibility claims. Along the way we document and resolve important ambiguities in the existing literature. We then characterize the tax systems that are piecewise linear, linear, and proportional in terms of familiar normative principles and a new principle we call local marriage neutrality. Earlier analytical work emphasizes that all tax structures must violate certain principles. Local marriage neutrality permits a more nuanced analysis of the conflicts among tax principles that is more relevant to the study of moderate tax reform. We use these results to give a brief yet comprehensive analysis of the properties of the income tax system at key points in time. The last section uses the same results to offer observations about recently proposed and enacted changes for reducing the marriage tax.

Sanjay Gupta, Lillian F. Mills, « *Does Disconformity in State Corporate Income Tax Systems affect Compliance Cost Burdens?* », 56 National Tax Journal 355-71 (June 2003), 1 page.

<http://ntj.tax.org/wwtax/ntjrec.nsf/0/b578cb4e1157ab7185256d8d0078f569?OpenDocument>

<http://ntj.tax.org/wwtax/ntjrec.nsf/009a91c225e83d852567ed006212d8/b578cb4e1157ab7185256d8d0078f569?OpenDocument> (résumé seulement, texte intégral accessible aux membres du NTA)

La non-conformité des systèmes fiscaux des États américains entraîne des coûts d'observation élevés pour les entreprises.

- Prior multistate tax research on differences in state tax rules, while investigating the effects on revenue, investment, and tax burden, is silent regarding the effect on compliance costs. We investigate factors that explain state income tax compliance costs for large firms. We find that state compliance costs increase in the number of filing states and entities (or in the number of state tax returns), firm size, and variables proxying for state tax complexity. Our evidence that multistate disconformity increases compliance cost burdens informs the debate about the costs of tax competition.

U.S. CONGRESS – JOINT COMMITTEE ON TAXATION

Joint Committee on Taxation, *The U.S. International Tax Rules: Background And Selected Issues Relating To The Competitiveness Of U.S. Businesses Abroad*, 14 juillet 2003, 48 pages.

<http://www.house.gov/jct/x-68-03.pdf>

Document d'information et de discussion sur les règles du système fiscal international américain.

- The Senate Committee on Finance has scheduled a public hearing for July 15, 2003, on the effects of the U.S. international tax rules on the competitiveness of U.S. businesses abroad. This document, prepared by the staff of the Joint Committee on Taxation, provides general background on these rules and discusses selected issues relating to the tax treatment of the foreign activities of U.S. businesses.

Joint Committee on Taxation, *Description Of The Chairman's Amendment In The Nature Of A Substitute To H.R. 1776, The "Pension Preservation And Savings Expansion Act Of 2003"* (JCX-69-03) as well as estimated revenue effect (JCX-70-03), 18 juillet 2003, 84 pages et 3 pages.

<http://www.house.gov/jct/x-69-03.pdf>,
<http://www.house.gov/jct/x-70-03.pdf>

Projet de loi sur la réforme du système de régimes de retraite.

■ Le premier document est un énoncé technique décrivant les mesures du *Pension Preservation And Savings Expansion Act Of 2003* introduit à la Chambre des Représentants le 11 avril 2003. Ce projet de loi veut amender le Internal Revenue Code de 1986 afin de consolider et bonifier les mesures fiscales qui contribuent à l'accumulation de fonds de retraite. L'autre lien fournit les estimations des impacts de ces mesures sur les revenus budgétaires du gouvernement américain.

CENTER ON BUDGET AND POLICY PRIORITIES

Peter R. Orszag and Robert Greenstein, *The Ways and Means Committee Pension Tax-Cut Legislation: Unsound Policy That Digs The Nation's Fiscal Hole Deeper*, 22 juillet 2003, 9 pages.

<http://www.cbo.org/7-21-03tax.pdf>

Critique du contenu du *Pension Preservation And Savings Expansion Act Of 2003*: une législation mal ciblée qui entraînerait des conséquences trop onéreuses dans un contexte de déficits budgétaires.

■ The mark-up of pension legislation in the House Ways and Means Committee on July 18 generated unusual controversy on procedural matters. This paper examines the substance of the legislation. This measure includes both promising and problematic provisions. Most of the provisions that involve the largest revenue losses, however, represent problematic policy. At a time when the nation faces substantial budget deficits for the foreseeable future, these provisions would make the deficits still larger, primarily by providing additional tax subsidies to high-income individuals. Moreover, most of those individuals would likely save without the new tax breaks, and even without additional tax subsidies they tend to be much better prepared for retirement than other Americans with less income and wealth. This analysis focuses on the most expensive components of the Ways and Means legislation, which also are the most regressive — the effective reduction in taxes on withdrawals from 401(k)s and IRAs and the acceleration of increased contribution limits for tax-advantaged retirement accounts. The analysis finds these proposals represent unsound pension policy and would be fiscally imprudent in the current budget climate.

THE BROOKINGS INSTITUTION

William G. Gale, *Perspectives on Long-Term Budget Deficits*, témoignage devant le Budget Committee de la Chambre des Représentants, 24 juillet 2003, 2 pages.

<http://www.brook.edu/views/testimony/gale/20030724.htm>

Le gouvernement fédéral fera face à d'importants déficits à long terme.

■ L'auteur explique les principales raisons pour lesquelles il est certain que le gouvernement américain fera face à un déficit budgétaire important au cours des prochaines décennies. L'augmentation évidente des dépenses de santé en raison de la conjoncture démographique, le nombre impressionnant de clauses crépusculaires dans le système fiscal, les faibles revenus que le gouvernement pourra tirer des prestations de régimes enregistrés de retraite et l'effet économique négatif des déficits budgétaires sur la détention de richesse du pays sont principalement mentionnées par l'auteur pour appuyer sa thèse.

Alan J. Auerbach, William G. Gale, and Peter R. Orszag, *Reassessing the Fiscal Gap: Why Tax-Deferred Saving Will Not Solve the Problem*, 17 juillet 2003, 34 pages.
<http://www.brook.edu/dybdootviews/papers/orszag/20030714.pdf>

Contrairement à une autre étude récente, les auteurs concluent que l'écart négatif entre les revenus et les dépenses du gouvernement fédéral américain continuera d'augmenter à long terme.

- A variety of recent studies have found that the United States faces a substantial fiscal gap — that is, a sizable imbalance between projected federal outlays and receipts. A recent study by Boskin (2003) suggests these findings are overstated because they largely or entirely omit projected revenues from tax-deferred saving plans. This paper reassesses estimates of the long-term fiscal status of the United States in light of Boskin's analysis and draws three principal conclusions. First, the nation continues to face a substantial long-term fiscal gap, as conventionally estimated. Second, Boskin's projections of revenue from tax-deferred accounts have only a very modest effect on the long-term fiscal outlook because almost all of the relevant revenue is already incorporated into the revenue projections that generate sizable fiscal gaps. Third, the primary focus of Boskin's analysis is the overall effect on the budget from retirement accounts — not how much of that effect is already included in the budget projections. We also find that his estimated overall budgetary effect is substantially overstated.

William G. Gale, *Estate tax: Tax Needs Reform, But Repeal Would be a Giveaway to the Wealthy*, Spartanburg Herald-Journal, 27 juillet 2003, 2 pages.
<http://www.brook.edu/views/op-ed/gale/20030727.htm>

Les droits successoraux ne devraient pas être éliminés, mais plutôt améliorés afin de viser les contribuables les plus riches.

- The estate tax plays an important role in our economy and society. It does have flaws, but it should be improved, not abolished. A sensible reform would bolster the strengths of the estate tax and reduce the problems. Abolishing the tax is a bad idea. After all, a tax that is progressive, closes loopholes, provides equality of opportunity and encourages charitable giving can't be all bad. It should be saved and enhanced, reformed to emphasize its virtues and minimize its costs. This could be done by closing loopholes, reducing rates modestly, indexing the tax for inflation and letting the exemption rise as scheduled. This would focus the tax on the truly wealthy and at the same time make it simpler and fairer.

Paul R. Masson, *Fiscal Policy Coordination in EMU*, HM Treasury, 9 juin 2003, 2 pages.
<http://www.brook.edu/views/papers/masson/20030609.htm>

Les défis que l'Union européenne devra relever au cours des prochaines décennies quant à l'harmonisation et la coordination de la politique fiscale.

- HM Treasury invited Paul Masson to revisit his 1996 paper 'Fiscal dimensions of EMU' in which he wrote : « To my mind, it seems inevitable in any case that there will be pressure to move away from independent fiscal policies toward some system where national sovereignty in this area is more limited. ». The author maintains this opinion today : « I have not changed my views concerning the need to harmonize and coordinate fiscal policies within a monetary union like EMU, but I now think that what is more likely to occur in the next few decades is harmonization of tax and benefit policies and increased spending on education, research and infrastructure in the EU budget. ».

William G. Gale, Peter R. Orszag, *Sunsets in the Tax Code*, Tax Notes, 9 juin 2003, 9 pages.
<http://www.brook.edu/views/articles/gale/20030609.pdf>

Le gouvernement devrait cesser d'introduire des clauses crépusculaires dans la législation fiscale dans le but de camoufler le coût réel des baisses d'impôt.

■ Events leading up to the enactment of the Jobs and Growth Tax Relief Reconciliation Act of 2003 (JGTRRA) highlighted the role of tax provisions that expire at a given date, which are commonly known as “sunsets.” Sunsets have long been a feature of the tax code, but they have traditionally involved relatively minor provisions. The 2001 tax cut represented a dramatic departure from this history, by including a massive sunset at the end of 2010. The potential extension of these expiring provisions should now be considered a central determinant of the fiscal and economic outlook. According to the authors, removing all the sunsets in the tax code, including those in JGTRRA, would involve a revenue loss of almost \$2 trillion over the next decade. In principle, sunsets might be justifiable under certain circumstances. Sunsets are appropriate for policies that are designed to be – and should be – temporary. They may also provide flexibility in policymaking, and be useful in focusing policymakers' attention on fiscal issues. In practice, however, none of these potential justifications appears to be the motivation for the recent dramatic expansion in sunsets. Recent sunsets have been motivated by the desire to manipulate budget rules and hide the likely costs of new tax cuts. That is, in practice, the sunsets are being used to fit a larger annual tax cut within a given multiyear budget total. Sunsets used to manipulate budget limits create needless uncertainty over the future structure of the tax code.

TAX POLICY CENTER (URBAN INSTITUTE – BROOKINGS INSTITUTION)

Leonard E. Burman, Deborah Kobes, *Income Tax Brackets Since 1985*, 28 juillet 2003, 1 page.
http://www.taxpolicycenter.org/UploadedPDF/1000547_TaxFacts_072803.pdf

Tableau présentant l'évolution des fourchettes d'imposition de l'impôt fédéral des États-Unis de 1985 à 2003, ainsi que le pourcentage de contribuables se situant dans chacune.

MULTISTATE TAX COMMISSION

Multistate Tax Commission, *Corporate tax sheltering and the impact on state corporate income tax revenue collections*, 15 juillet 2003, 9 pages.
<http://www.mtc.gov/TaxShelterRpt.pdf>

Les abris fiscaux des sociétés ont diminué l'impôt sur les sociétés des états américains de 35 % en 2001.

● State corporate income taxes as a proportion of corporate profits declined by 34 percent –from approximately 9.0 percent during the period from 1980 to 1989 to 5.9 percent in 2001. This reduction in the effective tax rate on corporate income can be attributed in part to tax sheltering and in part to state tax policy changes. Corporate tax sheltering reduced state corporate income tax revenues by more than a third of actual collections in 2001. These findings indicate that state corporate income tax revenue, which totaled \$35.4 billion in 2001, would have been as much as \$12.38 billion (or 35 percent) higher had such widespread tax sheltering of income not taken place. The lost revenue attributable to domestic and international income tax sheltering is adding to the size of state budget deficits while undermining the equity and integrity of state tax systems. It is not enough to say that state corporate tax revenues are declining just because of federal tax law changes or state tax-cutting during the 1990's. It is apparent that various corporations are increasingly taking advantage of structural weaknesses and loopholes in the state corporate tax systems.

INTERNATIONAL

INTERNATIONAL BUREAU OF FISCAL DOCUMENTATION

Wolfgang Schön, *Tax Competition in Europe*, 2003 (ISBN 90-76078-55-6)

Pour commander: <http://www.ibfd.org> (section Publications/Books)

Analyse de la compétition fiscale entre les pays de l'Union Européenne.

- This book, comprising the proceedings of the 2002 conference of the European Association of Tax Law Professors (EATLP), provides an in-depth analysis of tax competition in Europe. Focusing on the political, economic and legal implications of international tax competition in their respective countries, academic tax lawyers from 16 European countries present their national reports. The main features of these national reports are analysed, and the general aspects as well as the advantages of tax competition are discussed. Finally, tax competition is examined from an EU perspective and the harmonization effects of state aid rules in the field of tax law are discussed.

ROYAUME-UNI

INSTITUTE FOR FISCAL STUDIES

Richard Blundell, Carl Emmerson, *Fiscal effects of reforming the UK state pension system*, juillet 2003, 43 pages.

<http://www.ifs.org.uk/workingpapers/wp0313.pdf>

La réforme du système de pensions de retraite en Angleterre : hausse de l'âge normal de la retraite.

- The fiscal and distributive impacts of three reforms to the social security pension system in the UK are evaluated. All three reforms are designed to increase the retirement age by changing the incentive structure underlying the pension system. The first increases the state pension age by three years. The second introduces an actuarial adjustment to retirement both before and after age sixty five allowing deferral to age 70. The final reform adapts the second reform to include a cap and a floor so as to mirror more closely the existing state pension scheme in the UK. Using a transition model of retirement, the simulations show that increasing the state pension age leads to a lower level of expenditure on the state pension, which is only partially offset through increased state spending on both means-tested income support and disability benefit (invalidity benefit). Employee national insurance receipts are also directly increased through the increase in the state pension age. The increase in retirement ages would also lead to an increase in government revenues arising from increased income tax and employee and employer national insurance contributions. As a result there would be lower levels of government borrowing (or larger government surpluses) than under the base system.

Équipe de rédaction du Bulletin de veille

Marie-Pierre Allard, Gilles N. Larin, Denys Allain, Marc Bachand, Dominic Castonguay, Marc Desjardins, Mélanie Dolbec, Amélie Guimont, Pierre-Louis Le Saunier, Hélène Oigny