The Value-Added Tax—A Review of the Issues

R. W. HAFTER and MICHAEL E. TREBING

RECENTLY many groups have called for major tax reform. These groups maintain that the existing U.S. tax system has altered economic incentives and negatively influenced the performance of the economy. One possible solution to this problem is for the United States to adopt a value-added tax (VAT) similar to that used by European governments. This article provides a general economic framework for examining the current debate over the introduction of a VAT into the U.S. tax system.

BACKGROUND

Value added is the difference between a firm's receipts from the sale of a product and the payment for the resources or raw materials used in producing it. In other words, value added is equivalent to a firm's payment to the factors of production—land, labor, and capital—in the form of rent, wages, interest, and profits. These payments represent the "base" to which a VAT would be applied.

A simplified example of how value-added can be determined is shown in table 1, which illustrates a hypothetical four-step process of converting wheat into a loaf of bread. The miller purchases wheat from the farmer at a price of 10 cents and sells the resulting flour to the baker for 20 cents. Since one-half of the price to the baker represents the farmer's receipts, 10 cents of the miller's receipts represent the value added to the raw wheat during this stage of the production process. After converting the flour into bread, the baker sells the loaf of bread to the retailer for

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Table 1

<table>
<thead>
<tr>
<th>Stage</th>
<th>Receipts</th>
<th>Value-Added</th>
</tr>
</thead>
<tbody>
<tr>
<td>Farmer</td>
<td>.10</td>
<td>.10</td>
</tr>
<tr>
<td>Miller</td>
<td>.10 + .10</td>
<td>.20 = .10 + .10</td>
</tr>
<tr>
<td>Baker</td>
<td>.10 + .10 + .10</td>
<td>.30 = .10 + .20</td>
</tr>
<tr>
<td>Retailer</td>
<td>.10 + .10 + .10 + .10</td>
<td>.40 = .10 + .30</td>
</tr>
</tbody>
</table>

Final sales price to consumer = $.40
Total value added = $.40

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The following discussion is found in a number of writings. The following approaches to the treatment of capital concern is the treatment of capital goods. There are many of the economic effects of a VAT. Of particular special exemptions should be made. Exemptions from included in the calculation of the base or whether however, over whether all of a firm's costs should be its cost of purchases from other firms. A debate exists, as the difference between a firm's sales receipts and its cost of production (again, its value added).

Table 2 illustrates a hypothetical example of how the additive procedure is used to calculate the VAT due.

<table>
<thead>
<tr>
<th>Calculation of VAT Liability Via Additive Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wages: $500,000</td>
</tr>
<tr>
<td>Value added = $600,000</td>
</tr>
</tbody>
</table>

There are two basic methods of calculating the VAT. In the additive method, the tax base for the VAT is the sum of the firm's payments to the factors used in producing the good. Under this scheme, the VAT rate, say 10 percent, is applied to the firm's costs in terms of wages, interest, rents, and profits. Table 2 illustrates a hypothetical example of how the additive procedure is used to calculate the VAT due.

Table 3 provides the information needed to calculate the VAT payable under the second method, the subtractive procedure. Essentially, this approach makes the base to which the VAT rate is applied equal to the difference between a firm's sales receipts and its cost of production (again, its value added). The actual tax liability using this procedure is identical to that derived using the additive approach.

The Tax Base and Its Calculation

As noted before, the VAT base is usually calculated as the difference between a firm's sales receipts and its cost of purchases from other firms. A debate exists, however, over whether all of a firm's costs should be included in the calculation of the base or whether special exemptions should be made. Exemptions from the tax base are important because they determine many of the economic effects of a VAT. Of particular concern is the treatment of capital goods. There are three general approaches to the treatment of capital goods: the gross product, the income, and the consumption approaches.

Under the gross product approach, firms are not permitted to deduct the purchase price of capital goods when calculating their VAT base, nor are they allowed to deduct the depreciation of existing capital. The tax base at each stage of production, therefore, includes wages, interest, rent, profits, and depreciation. Since there is no deduction for either capital goods depreciation or their purchase, the VAT applies to all income earned in the production of the firm's output. Thus, in an economy-wide sense, the tax base is associated with the value of gross national product—the total current market value of all goods and services produced or the total income derived from their production.

The income approach, on the other hand, does allow firms to deduct capital depreciation from their tax base. Since firms "use up" a percentage of their existing capital stock each year, this approach taxes firms on their net instead of gross income. The tax base of the income-type VAT is analogous, therefore, to the net national product of the economy.

4 An algebraic expression similar to the national income account identities taught in elementary economic textbooks can aid in distinguishing the income base of each type of VAT discussed. Ignoring government expenditures, taxes, and the foreign sector, the expression

\[ \text{CNP} = C + I \]

shows the equivalence of total output or income earned in the economy and the sum of consumption (C) and investment (I) expenditures. With no VAT exemptions, GNP is the base of the gross income VAT. We define

\[ I - D = I_n \]

\[ \text{NPI} = I_n + C \]

\[ \text{NY} = \text{NPI}, \]

where I_n is net investment, D is depreciation, NY is national
Table 3
Calculating VAT Liability Via Subtractive Procedure

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total sales of goods and services</td>
<td>$1,000,000</td>
</tr>
<tr>
<td>Total interest, dividends, and rents received</td>
<td>$200,000</td>
</tr>
<tr>
<td><strong>Total (A)</strong></td>
<td>$1,200,000</td>
</tr>
<tr>
<td>Taxes</td>
<td>$200,000</td>
</tr>
<tr>
<td>Purchase of materials, services, power, and capital on which VAT has been paid</td>
<td>$300,000</td>
</tr>
<tr>
<td>Interest, dividends, and rents paid to other firms</td>
<td>$100,000</td>
</tr>
<tr>
<td><strong>Total (B)</strong></td>
<td>$600,000</td>
</tr>
</tbody>
</table>

Value added = A - B

= $600,000

Tax payable = $600,000 x 10% (VAT rate) = $60,000


The third approach to the treatment of capital goods, called the consumption approach, is the most widely used VAT. It is the type that much of Europe has adopted, that Congress is currently considering, and that will be analyzed for the remainder of this article. Under this scheme, each firm may deduct its capital expenditures on plant and equipment in addition to depreciation. The tax base becomes the firm's gross receipts less its purchases of materials and capital outlays (plant and equipment). In an aggregate sense, the VAT base under the consumption approach corresponds to the output of consumer goods or, equivalently, income earned in producing consumer goods.


Note that the dollar amounts of the income and consumption bases are equivalent over time. The main difference between the two types is that, under the consumption concept, the tax base is smaller the first year and slightly larger in the following years. The total base added over the full depreciation period is identical under both methods. Tax Foundation, "A Value-Added Tax for The United States?" (June 1979), p. 1.

Norman Ture argues that the "consumption-type" label has been misnamed. The name promotes the view that it is a tax exclusively on consumption. Savers, who directly or indirectly are owners of capital, do not escape the tax because value added by capital is subject to the tax. For a given interest rate, the tax on the goods produced with capital raises the amount of net income firms must derive from a capital asset in order to justify its purchase. In other words, the tax reduces the demand for funds and, other things remaining the same, the interest earned by savers. See Charles E. McLure, Jr. and Norman B. Ture, Value-Added Tax: Two Views (Washington, D. C.; American Enterprise Institute for Public Policy Research, November 1973), pp. 89-92.


CRITERIA FOR EVALUATING THE VAT

The effect of taxation on economic efficiency is linked to the concept of potential output. Potential output, as it relates to a market-type economy, may vary according to incentives available in the marketplace. The economist defines these incentives in terms of income and relative prices. To the extent that taxes can alter economic incentives or the return to productive activity, they induce changes in economic behavior.

Economists use several criteria to judge the desirability of a given tax or tax system. These criteria involve both efficiency and equity considerations.

Neutrality

Price theory suggests that prices established in a competitive market are reflections of both consumer preference for goods and services and the least-cost combination of inputs used to produce those goods. A tax system is considered optimal if it does not interfere with the price allocation mechanism established in the market—that is, it is neutral toward economic behavior. Although all taxes distort or alter economic behavior to some degree, certain taxes can be judged "superior" on efficiency grounds. VAT proponents claim that the value-added tax would achieve the objectives of neutrality toward both economic behavior and allocative efficiency.

A tax on each firm's value added can be thought of as a proportional tax on the firm's use of the factors of production. If each firm combines land, labor, and capital in the most efficient (least-cost) manner, resources are bid into their most productive use. Payments to these factors in a competitive market are approximately equal to each factor's contribution to the market value of each firm's output. Thus, a uniform VAT on all firms imposes the same proportional tax cost—with respect to each firm's payments to the sum of factor payments (value added)—and is, therefore, neutral toward the choice of production methods or the use of productive resources.
VAT: The European Experience

The VAT is by no means a new idea. Following World War I, the possibility of implementing a VAT-type system was discussed in certain European countries and in the United States.\(^1\) Although the debate continued over the next several decades, it was not until the 1950s that a VAT system was introduced in France and in the state of Michigan.\(^2\)

**Table A1**

**VAT Implemented**

<table>
<thead>
<tr>
<th>Country</th>
<th>Effective Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belgium</td>
<td>1971</td>
</tr>
<tr>
<td>Denmark</td>
<td>1967</td>
</tr>
<tr>
<td>France</td>
<td>1954</td>
</tr>
<tr>
<td>Ireland</td>
<td>1972</td>
</tr>
<tr>
<td>Italy</td>
<td>1973</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>1970</td>
</tr>
<tr>
<td>Netherlands</td>
<td>1969</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>1973</td>
</tr>
<tr>
<td>West Germany</td>
<td>1966</td>
</tr>
</tbody>
</table>

In an attempt to foster trade between its members, the Council of the European Economic Community (EEC) issued a directive on April 1, 1967, which required all member nations to establish a VAT system by January 1, 1970.\(^3\) Although the directive concerned only the current members—Belgium, France, Germany, Italy, Luxembourg, and the Netherlands—it was extended to the United Kingdom, Denmark, and Ireland upon their joining the EEC in 1973 (table A1). Since most popular discussions of the VAT refer to the “European experience,” it may be useful to briefly examine the basis of its adoption and its record to date.

\(^1\)The idea of the VAT originated with a German industrialist by the name of F. Von Siemens. In 1918 he advocated the substitution of the VAT for the newly implemented turnover tax. T. S. Adams suggested using such a tax in the United States in 1921. In the same year, the tax was included in an amendment to the Revenue Act of 1921 proposed by Sen. Reed Smoot. For a general discussion of the development of the VAT, see Due, “The Value-Added Tax,” p. 185.

\(^2\)France adopted the VAT as a replacement for existing turnover taxes. Michigan used a modified form of the VAT from 1953 to 1967 when it formed the Single Business Tax. This tax was introduced primarily to replace existing business income taxes.

\(^3\)This directive is reprinted in G.S.A. Wheatcroft, Value-Added Tax in the Enlarged Common Market (New York: John Wiley & Sons, 1973), Appendices I and II.

**Table A2**

<table>
<thead>
<tr>
<th>Country</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belgium</td>
<td>16.0%</td>
</tr>
<tr>
<td>Denmark</td>
<td>20.2%</td>
</tr>
<tr>
<td>France</td>
<td>17.6%</td>
</tr>
<tr>
<td>Ireland</td>
<td>20.0%</td>
</tr>
<tr>
<td>Italy</td>
<td>14.0%</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>16.0%</td>
</tr>
<tr>
<td>Netherlands</td>
<td>8.0%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>12.0%</td>
</tr>
<tr>
<td>Germany</td>
<td></td>
</tr>
</tbody>
</table>


The VAT was introduced in various European countries as an alternative to turnover taxes. These turnover taxes, sometimes referred to as cascading turnover taxes, are characterized by the payment of taxes at each level of production without regard to relief for the tax paid at a prior stage. Because of the way in which these taxes were implemented, there was considerable incentive for a firm to control all the stages of production (vertical integration). Also, there was a variety of rules and regulations about the taxation of certain exports and imports, which reduced the foreign trade potential between the countries. The VAT provided for the general tax exemption of export goods and services. Thus, the goal of the EEC in introducing VAT was twofold: to “harmonize” the members’ tax systems and to encourage intra-EEC trade.

While introduction of the VAT system has increased foreign trade among the EEC nations, harmonization of the various tax systems is still far from complete. As table A2 indicates, the “standard” VAT rate varies considerably among the various EEC countries. Moreover, each country may choose to apply different rates to various groups of goods and services. For example, Belgium has two basic rates: a standard rate of 16.0 percent on necessities, and a 25.0 percent rate on luxury goods. Likewise, Germany and the United Kingdom each have different rates for necessity and luxury items.

In addition, each country exempts certain items from taxation. Although a complete listing would point out the wide diversity of possible exemptions, there are several areas commonly exempted from VAT. As mentioned earlier, exports are fully exempt from VAT. Also, sales of securities, stocks and bonds, doctors’ services, financial services such as insurance and banking, and postal services are generally exempt.
A question remains regarding the neutrality of the consumption or the income approaches. Economic theory suggests that the consumption approach is less distorting since it does not alter the individual's choice between consumption and saving (i.e., current vs. future consumption). The income approach, however, discriminates against saving since capital expenditures are not deductible from the tax base.

Capital Formation and Growth

A common complaint about our tax system is that it discourages economic growth. VAT proponents claim that a consumption-type VAT would not. Since they believe that a reliance upon income taxation has altered individual consumption-savings choices through the income tax’s impact on relative prices, proponents argue that the VAT would support both a higher level of savings and investment. Behind this argument lies the “double-tax issue,” one of the oldest controversies in economics. In other words, “Should taxes be based on consumption or on income?” Consumption-base tax advocates claim that a tax levied on income is also a tax on savings and is therefore inefficient because it raises the “price” of saving (future consumption) relative to current consumption. Since a saver eventually is taxed on the interest earned from present savings, some analysts argue that the income is taxed twice. Hence, the double-tax issue.

The exemption of capital expenditures with a VAT would offset the non-neutral aspects of the current tax system, which relies heavily on income taxation, and may result in a higher level of overall savings and investment.

In addition, VAT would directly affect labor supply. Some analysts contend that existing income and social security taxes have altered the relative price of work and leisure. These taxes, they claim, have induced individuals to reduce their supply of labor at prevailing market wages below which might otherwise have been supplied without these taxes. Whether VAT would correct these distortions depends upon the relative responsiveness of labor to the removal or reduction of the existing taxes and the changes in relative commodity prices that may result from the VAT.

Distribution of the Tax Burden

Another question of interest is “Who bears the burden of taxation?” An economic examination of this issue can be made through what economists call “incidence analysis.” Incidence is the change in an individual’s real income (nominal income adjusted for changes in the price level) that results from the imposition of a tax. The key to understanding incidence lies in distinguishing between statutory incidence (the legal liability of the tax) and economic incidence (the final burden of the tax). The sales tax provides a clear example of this distinction. Although its legal liability is imposed upon the retailer, the sales tax often is assumed to be fully passed on to the individual who purchases goods from the retailer. However, since the prices of the retailer’s goods are now higher, the quantity demanded will be reduced, and the owner’s income therefore will be changed. In this case, the economic incidence of the tax differs from the statutory liability since the former takes into account both the final resting point of the tax as well as the economic ramifications on others (the retailer, for example).

Tracing the final burden of a VAT is difficult because it ultimately depends upon the number of exemptions. Assuming that the tax is applied equally to all goods and services and is an “additional” tax, its burden would be fully shifted to consumers. If taxes can affect real income in two ways. They affect individuals in their role as producers by affecting incomes received from their supply of labor or capital. Alternatively, taxes can affect real income by altering the purchasing power of a given amount of nominal income — that is, the tax alters prices in the marketplace.

In other words, we ignore here the question of tax substitution — that other taxes may be reduced by the amount of the tax increase. An analysis of “balanced-budget incidence” — that is, the effect of the tax given an equal decline in other taxes and the assumption that real government expenditures are the same — is a more realistic approach and will be discussed below.
exemptions are allowed or if other taxes are reduced, however, there will be changes in relative prices and in the production mix of the economy.

**Equity Criteria**

Equity criteria are often used to evaluate different taxes (and thus incidence patterns). These criteria attempt to answer the questions, "Who should pay taxes?" and "How should the burden of taxation be distributed among different individuals?" Although objective economic analysis provides few answers to these questions, it can provide a perspective on relative costs and benefits and on the trade-offs between economic efficiency and equity considerations.

A principal equity concern is over the relative tax burden imposed on individuals of different income levels. The concept behind our income tax system, for example, is that those individuals who earn a higher income should pay a higher percentage of their income in taxes. This is a "progressive" tax system. A "regressive" tax, in contrast, takes a lesser proportion of income from individuals who earn a larger income.

Critics of the VAT claim that it would be a regressive tax since it taxes consumption and since lower income individuals spend a larger proportion of their incomes on consumption goods relative to higher income individuals. Although this argument is straightforward, its validity depends on several unsettled issues.

First, one might question the preceding analysis of regressiveness on the grounds that it ignores the benefit side of fiscal policy. In other words, the net benefits derived from government spending or transfer payments is not taken into account. Thus, a more meaningful evaluation would include the benefits received from government-related programs as well as the costs.  

On the other hand, the regressiveness of the tax could be alleviated either by adjustments to the income tax rate and/or by special tax credits. For example, the exemption of necessity items such as food, shelter, clothing, and medical care has been proposed. These exemptions, however, would reduce the tax base and thus necessitate higher tax rates to insure the same yield as under a comprehensive base approach. In general, therefore, attempts to alleviate the regressiveness of the tax are likely to complicate the administrative problems and interfere with the neutrality criteria discussed earlier.

**Administrative Costs**

The cost of administration is another criterion for evaluating the merits of a tax system. The initial administrative costs of introducing a VAT (or any other tax for that matter) would be relatively high.

Perhaps the most important factor affecting the cost of using a VAT is the degree of complexity of the tax. The use of multiple rates and numerous exemptions, in contrast to a single uniform rate, would raise the administrative costs. Indeed, it has been estimated that if the VAT system used involves more than a single rate, administrative costs may rise by 50 to 80 percent.  

The VAT in Germany in 1968, small noncomputerized firms involved in collecting a 5 percent tax is essentially the same as that for a 10 percent tax. Another consideration is whether the tax is used to replace part of an existing tax or as a supplementary source of government revenue. If the VAT replaces only part of an existing tax or is merely added to the present system, administrative cost savings may be negligible. In fact, adding a VAT may increase the current cost of the government's tax collecting apparatus. This can be seen by considering the influence on costs from a reduction in existing tax rates. Since the previous tax system still exists and since there is little or no change in collecting or reporting procedures, the time and manpower involved in collecting a 5 percent tax is essentially the same as that for a 10 percent tax.

Furthermore, adding a VAT to the existing array of taxes would have differential cost effects on business. For instance, soon after a VAT was introduced in Germany in 1968, small noncomputerized firms estimated that tax-related administrative costs increased up to 20 percent. Relatively large businesses,

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however, reported negligible administrative cost increases.\textsuperscript{17}

The frequency of collection is also a significant cost factor. Most of the European countries currently using a VAT require monthly payments.\textsuperscript{18} In the United Kingdom, however, the collection period is quarterly. Although a monthly payment schedule may create cash-flow problems for some businesses, the European experience suggests that this frequency is feasible since most firms already record the data needed to calculate their VAT liability on a monthly basis.

\textbf{ECONOMIC EFFECTS OF VAT}

\textit{Price Effects}

A major concern about the implementation of a VAT is the resulting price effects. The introduction of the VAT, it has been widely asserted, will lead to a one-time increase in the general level of prices. In fact, it can be easily demonstrated that, although a uniform VAT rate (an identical rate for all goods and services) applied without exemption will not alter relative prices within the economy, it will result in a one-time increase in the overall level of prices.\textsuperscript{19} It should be noted, however, that this conclusion is based on several assumptions.

Perhaps the most important assumption is that all sellers raise their prices by the exact amount of the VAT, thus passing the additional cost on to the consumer. There are several reasons why this actually may not occur.

A VAT is usually applied with a varying rate structure—for instance, a 5 percent rate on food and a 10 percent rate on nonfood items—and/or with some items exempt from taxation.\textsuperscript{20} If sellers face different cost increases due to the VAT, then it is uncertain that all prices will be raised by an equal amount. Since none of these conditions will lead to identical increases in all prices, the consequent relative price changes would induce a shift-ing in the pre-VAT pattern of demand for goods and services. In this way, the production (and employment) decisions of producers are affected by the introduction of a VAT.

Introducing a VAT may cause a one-time change in the level of prices if the tax is merely a supplement to existing taxes. It is generally assumed that firms face higher costs because of the VAT and, therefore, attempt to pass this on to consumers. However, if the tax burden is reduced in some other area—for instance, the reduction in firms' contributions to social security—then this assumption is unwarranted. To determine the final price effect of a VAT in this case requires knowledge of the tradeoff between reductions in existing taxes (if any) and the cost to the firm of administering the VAT.

Finally, it is unlikely that a rise in the general level of prices can be maintained without an increase in the money stock held by the public or an increase in the velocity of the existing money stock (decline in real money balances). If neither of these situations occurs, then changes in production and employment will occur since consumers would not be able to maintain previous consumption levels at the higher level of prices. Thus, the reaction of the government to observed changes brought on by the initial price effects of a VAT may further complicate the foregoing analysis.

\textit{Interjurisdictional Intrusion}

How VAT might interfere with existing state and local taxes is also an important issue. State and local governments likely will be apprehensive about a VAT, given that the tax appears to be an intrusion into an area upon which these governments traditionally have relied—namely, the sales tax. Continued use of the retail sales tax should not conflict with federal use of the VAT from an economic efficiency view, however. If the VAT is applied at a uniform rate, relative prices will not be affected.

Some have argued, however, that a VAT may change taxpayers' perceptions of the cost of government expenditures and may alter the level of public services demanded. If the tax is "invisible" or hidden in the price of goods, taxpayers may demand a higher level of public expenditures since the costs are not fully perceived. On the other hand, if the tax is fully perceived at the retail level (for example, if the VAT portion is stated separately at purchase), consumers may object to additional retail sales taxes, and state and local governments will find it more difficult to tax by this method.
Stabilization

An important feature of a tax system is its overall response to cyclical fluctuations in the economy. For a given set of tax rates, the growth of the tax base normally will change with the level of aggregate economic activity. Provided that the change in tax revenues does not affect the level of government spending, these changes will cause variations in the overall budget surplus or deficit. "Built-in flexibility" is said to exist if tax liabilities rise (and fall) at a faster rate than income. Our tax system, based primarily on a progressive income tax, posits that the overall federal budget has a stabilizing effect on the economy since the tax acts to dampen fluctuations in economic activity. A substitution from income and social security taxes to a VAT likely would reduce such built-in flexibility. 21

Summary

The purpose of this article has been to provide a general background for understanding the value-added tax. Recent examinations have narrowly addressed the tax's price effects and its potential to reduce the existing tax burden imposed by federal income and social security taxes. While these are indeed important issues, a complete analysis of VAT must go deeper, examining the tax base, its neutrality, regressiveness, incidence, and effects on capital formation. In addition, the administrative costs of the tax itself must be considered as well.

21 Stated alternatively, a tax whose income elasticity of yield is greater than one is considered an automatic stabilizer. Elasticity is defined as the percentage change in tax yield divided by the percentage change in income (consumption) base.