

DOI: 10.55643/fcapter.6.53.2023.4204

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Received: 04/10/2023

Accepted: 12/11/2023

Published: 31/12/2023

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SYSTEMIC PREREQUISITES FOR SHAPING THE LOCAL BUDGETS' TAX REVENUE: THE CASE STUDY OF DEVELOPED COUNTRIES

ABSTRACT

The study aims to determine the systemic prerequisites for shaping the local budgets' tax revenue and analyze its impact on the development of municipalities in developed countries.

The authors examine the impact of the following factors on the municipal budgets' tax revenue: the behavioural patterns of economic entities (in particular, in terms of property management), the role of the state in shaping the municipal budgets' tax revenue, and the comprehension of the nature of the tax.

Using the example of defining the economic nature of personal income tax, the article proves (based on the analysis of municipal budgets' tax revenue in EU countries) that the policy of local governments regarding the accumulation of the tax for their budgets changes as the essential characteristics of the tax change.

Based on a comparison of the experience of municipalities in developed countries, the authors identify the factors influencing property taxation systems that shape property tax revenue: differences in the structure of the economy and the effects of its change, behavioural reactions of economic entities and existing traditions of property ownership in different countries, peculiarities of the property market development in various countries, etc. Trends in the structure of the economy and their potential impact on the tax capacity of local budgets are analyzed. The need for diversification of tax revenue sources to provide municipalities with an adequate level of resilience in the face of constant economic changes and permanent crises is emphasized.

Keywords: taxes, local budgets, systemic prerequisites, developed countries, Ukraine, personal income tax, property taxes

JEL Classification: H21, H25, R11

INTRODUCTION

In the current conditions, the systems of interbudgetary relations in most developed countries are formed on the basis of the subsidiarity principle, according to which public functions should be carried out at a lower – regional or local – level of government, provided that their execution is not more efficient at a higher level. Analyzing the distribution of expenditure competencies in the EU countries, the researchers note that the vast majority of countries adhere to this principle and specify that the state level of government is mostly responsible for defence functions, foreign economic relations, and central government administration, while education, health care, and housing and communal services are the functions of local government. Meanwhile, the way local governments are financed in these countries varies considerably: in some, the tax revenue collected on the territory is the main source of financial resources, while in others, it is interbudgetary transfers from higher-level budgets.

LITERATURE REVIEW

The analysis of scientific literature on financial assistance for the development of local governance and the role of taxes as a source of budget revenue at the local level reveals that it is a widely researched topic by both foreign [1-10] and domestic researchers [11-16].

The results of scientific research conducted by Canavire-Bacarreza G., Martinez-Vazquez J., Yedgenov B. [1] and Ligthart J. E., Oudheusden van P. [2] provide evidence of a positive causal relationship between the redistribution of tax revenue in favour of local budgets and economic growth at the local level. Herrmann B. comes to a similar conclusion in his study of the role of individual taxes in EU municipalities on the dynamics of economic activity, but he records the influence of certain factors on local budgets' tax revenue (they directly impact the amount of accumulated tax revenue, taxpayer behaviour, the level of efficiency of tax administration, etc.) [3].

The scientific conclusions of the author (Herrmann B.) are confirmed by Johal S., Alwani K., Thirgood J., Spiro P. [4]. Using Canadian municipalities as an example, researchers highlight the problem of excessive dependence of the process of tax revenue accumulation to local budgets on changes in market conditions, pointing out the risks for local governments that such dependence entails. In this regard, World Bank researcher Sprahn P. B. notes the stability of the tax base and administrative simplicity of tax collection among the main principles of local taxation. The author emphasizes that "steady outlay performance calls for a reliable and sustainable revenue base, a base that remains largely sheltered from the cyclical variations of economic activity" [5].

Today, the majority of economists agree that a sufficient amount of municipal budgets' tax revenue is a fundamental condition for ensuring the autonomy of local self-government. Nonetheless, as Sprahn P. B. notes, the issue is more comprehensive, and we should talk about the efficiency of the system of tax revenue generation at the local level rather than the amount of accumulated taxes [5]. Determining this efficiency lies in identifying the systemic preconditions for shaping municipal tax revenue, which include the behavioural patterns of economic entities (households and business entities), the perception of tax, the fairness of its collection, the tax culture of taxpayers, etc.

AIMS AND OBJECTIVES

The study aims to determine the systemic prerequisites for shaping the local budgets' tax revenue and analyze its impact on the development of municipalities in developed countries.

METHODS

The article uses a number of methodological approaches and scientific methods. The systematic approach and method of analysis made it possible to identify and holistically investigate the conceptual, legal, institutional and behavioral prerequisites for the formation of tax revenues of local budgets. The method of dialectics is used to highlight the development, interrelationship, and determinism of the specified determinants. The main information and statistical sources were investigated using the method of source base analysis (content analysis). Research work consists of several stages, in particular, it includes an analysis of the dynamics, composition and structure of tax revenues of municipal budgets in OECD countries and in Ukraine. The visualization method was used to visually present the obtained results. With the help of methods of generalization, formalization and synthesis, conclusions are made and proposals for further research on the relevant topic are substantiated.

RESULTS

The choice of the method of financial support for local governance impacts the level of financial autonomy of municipalities and their ability to choose their own development paths. The World Bank's research shows that municipalities in countries where tax revenue predominates in local budget revenue have the highest level of financial autonomy [5]. The Scandinavian countries (Sweden, Iceland, Denmark, and Finland) traditionally exhibit the highest rates of tax revenue redistribution through the local level of government (Figure 1).

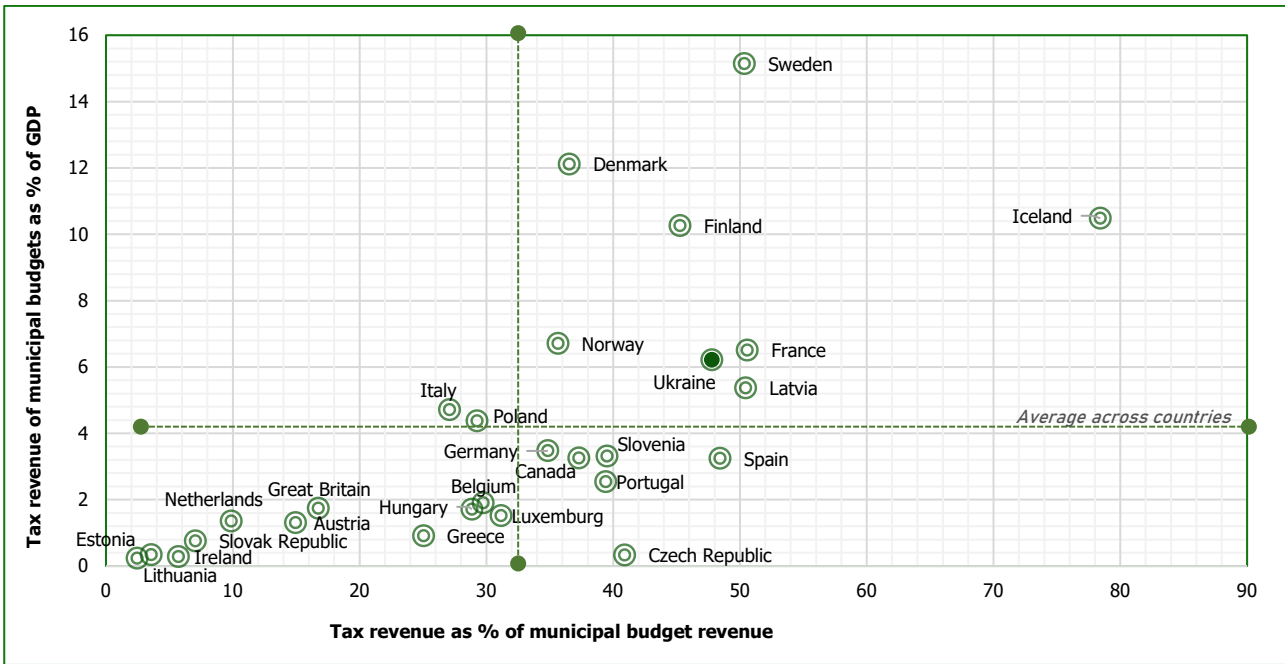


Figure 1. The role of tax revenue in shaping municipal budget revenue in selected countries, 2020. (Source: [17])

Ukraine also belongs to the countries with a high share of tax revenue in the budgets of territorial communities (their share in GDP is 6.2%, in local budget revenue – 47.8%), which indicates a high level of financial autonomy. However, our country has lower tax revenue per capita (USD 301.7). Therefore, *despite the high level of financial autonomy, territorial communities in Ukraine are characterized by a lower level of financial capacity compared to municipalities in economically developed countries* (Figure 2). For this reason, the issue of the efficiency of tax collection to the budgets of territorial communities is particularly relevant for our country.

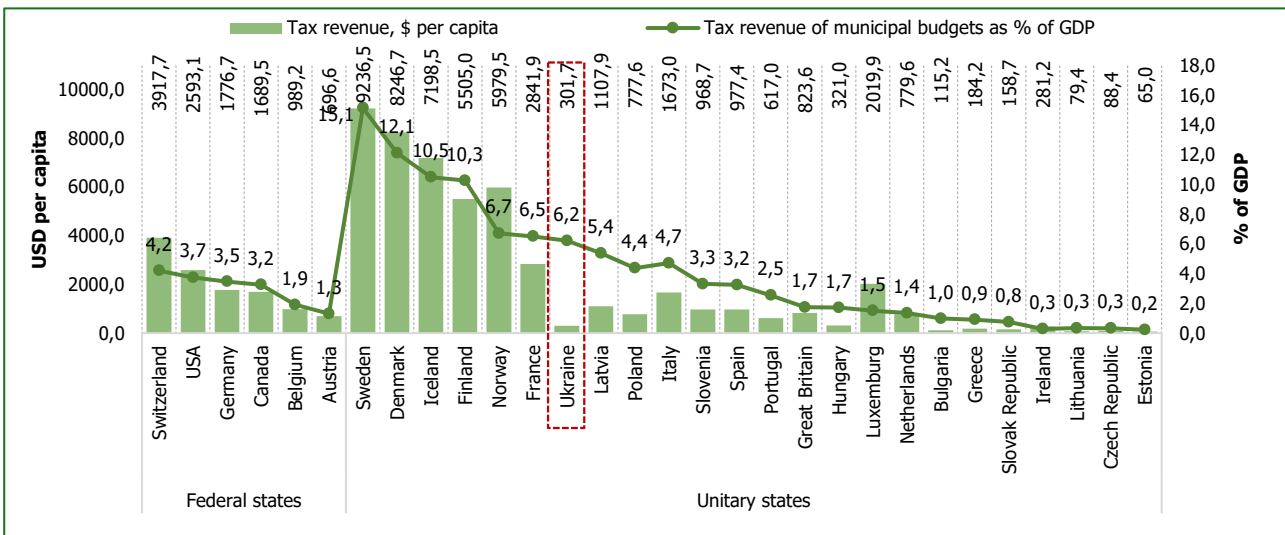


Figure 2. Tax revenue per capita and tax revenue of the budgets of the basic-level administrative-territorial units as a percentage of GDP in OECD countries and Ukraine, 2020, %. (Source: [17])

Despite the different approaches to the accumulation of tax revenue in municipal budgets in different countries, it is evident that local governments are limited in this process, as they are dependent on higher-level management decisions and are forced to adapt. Moreover, analyzing the peculiarities of the tax revenue redistribution among various levels of government in recent decades in the EU-15 countries (1975-2015), researchers have recorded a constant “resistance” of the central and regional levels of government to the redistribution of the “economic pie” in favour of local governments [6]. This, in their opinion, is evidenced by a slight increase (by 1.15 pp) in the share of municipal budgets’ tax revenue in the consolidated budgets’ tax revenue of countries in recent decades.

The situation is further aggravated by the constant change in economic conditions (changes in the labour market, different rates of development in certain sectors of the economy), the increasing pace and magnitude of these changes (Covid-19 pandemic → digitalization → change in supply chains → change in the structure of the economy; war in Ukraine → food and energy crises → change in supply chains → change in the structure of the economy).

The analysis of the structure of tax revenue of local budgets in OECD countries (Figure 3) reveals two differentiated models of taxation at the municipal level:

- focused on profits and income taxation (Sweden (97.5%), Luxembourg (93.2%), Finland (92.1%), Denmark (89.3%), Norway (86.6%), Latvia (86.1%), Switzerland (80.5%), Iceland (80.4%));
- focused on property taxation (United Kingdom (100%), Canada (97.3%), Greece (95.6%), Ireland (89.8%), Lithuania (83.6%), Estonia (83.1%)).

Let's look at the factors shaping the municipal budgets' tax revenue based on these two models.

Economic nature of the tax. In recent years, the Ukrainian scientific and expert community has been actively discussing the role of taxes in ensuring the economic growth of territorial communities. This discourse is driven by the 2014 tax reform and the expansion of sources of tax revenue of the budgets of basic-level administrative-territorial units. In this context, the role of local governments in shaping tax policy, finding ways to expand it, and the impact of taxation on community development are the most pressing issues. It is important to study the experience of developed countries and determine the relationship between tax policy and the economic growth of municipalities considering the short period of community development.

In recent years, the role of taxes on economic activity (personal income tax, property tax in terms of commercial property taxation, and income tax that goes to local budgets) for the development of municipalities has been studied extensively. This is useful information for Ukraine, as taxes paid based on the results of economic activity account for the largest share of tax revenue in the budgets of territorial communities (personal income tax, single tax, property taxes in terms of commercial real estate taxation – over 70%).

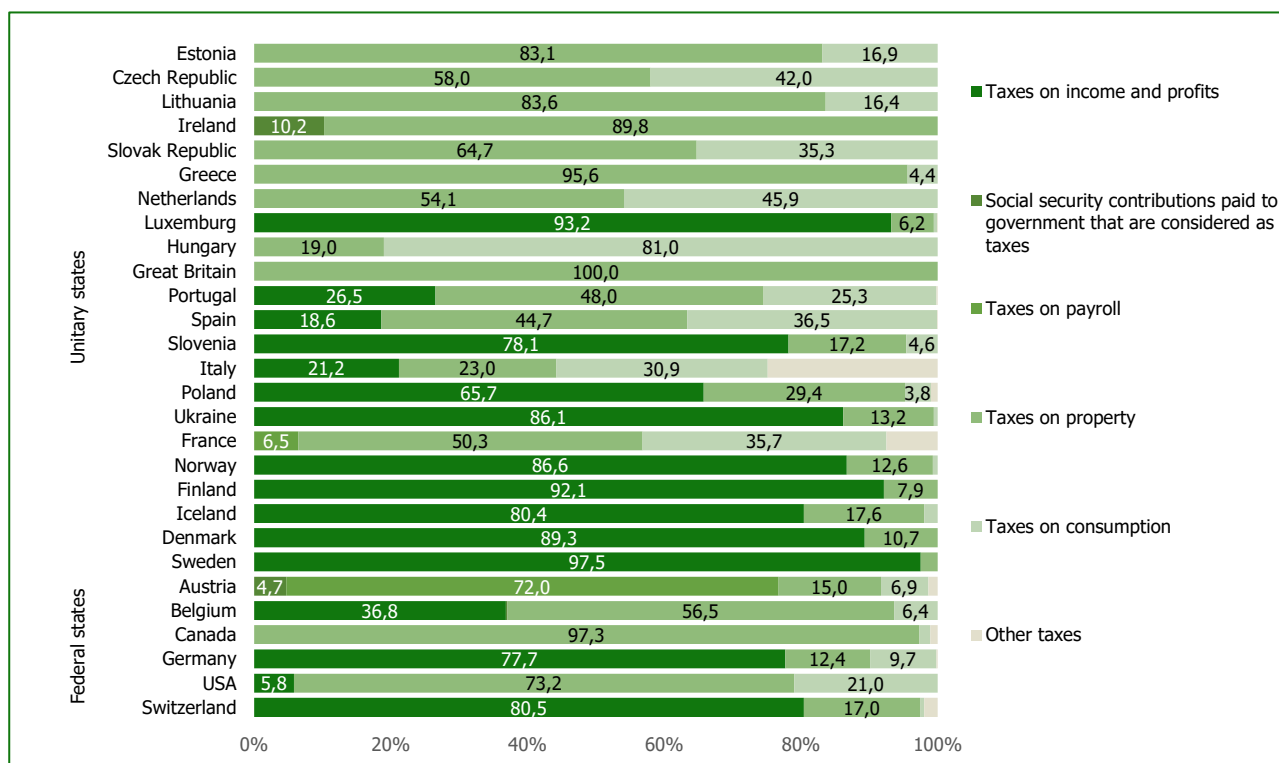


Figure 3. The structure of tax revenue of the budgets of basic-level administrative-territorial units, 2020, %. (Source: [17])

In this context, the European Commission conducted a study [3] on the impact of taxes on economic activity on local development. It reveals that a larger share of the revenue from taxes on economic activity in municipal tax revenue ensures faster economic growth: in countries with a share of taxes on economic activity in municipal tax revenue higher

than the EU average (23%), the average GDP growth rate over the five-year period was 3.75%, compared to 2.34% in countries with lower-than-average shares (Figure 4).

According to the researchers, the findings have a logical explanation: tax revenue accumulated as a result of economic activity in the municipality is considered by local governments as a reward for efficient local policy and the establishment of favourable business conditions. As a result, the tax-generated revenue triggers a “chain reaction” in the interactions between local governments and businesses.

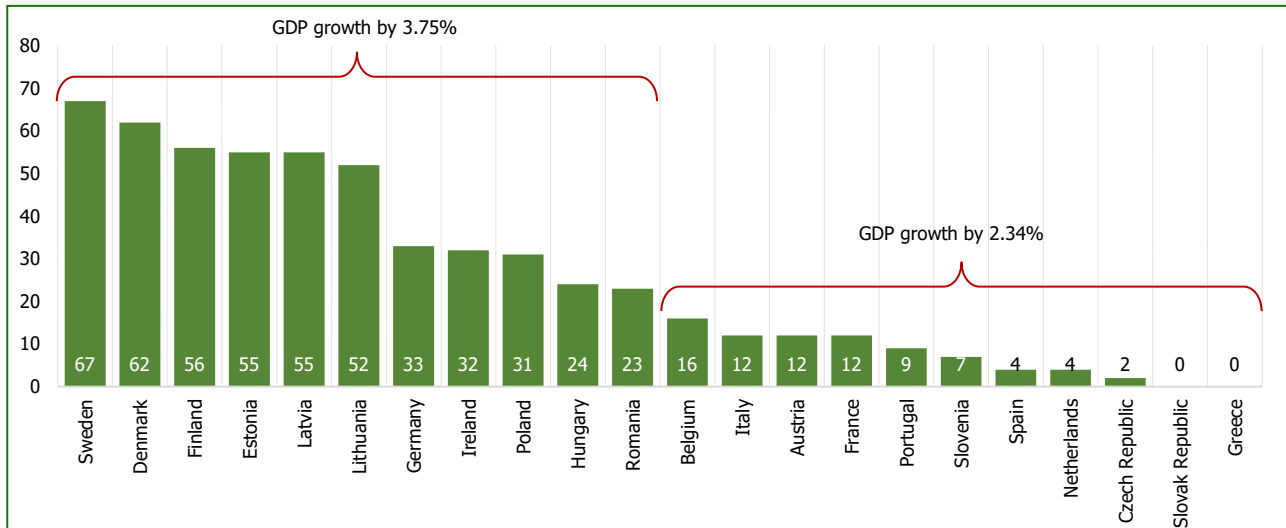


Figure 4. Revenue from taxes on economic activity as a percentage of municipal budgets' tax revenue in EU countries, 2021, %. (Source: [3])

This applies, in particular, to personal income tax. In most developed countries (including Ukraine), this tax is not a local tax but a national one. Local governments do not generally influence the algorithm of its accumulation in the budget. However, some countries have introduced a mechanism that provides for the right of local governments to set an additional rate on top of the basic rate determined at the state level (Sweden, Denmark, Finland, Iceland, USA, Switzerland).

In Ukraine, local community budgets receive 64% of the personal income tax accumulated on the territory, and local governments, according to the law, have no control over the terms of their collection. Nevertheless, this is a budget-forming tax, which generally accounts for the largest share of tax revenue in community budgets. Since the first consolidated territorial communities were formed and started functioning in 2016, there has been a debate about the budget the tax revenue should be credited to – at the place of registration of the enterprise or at the location of the separate subdivision. At present, its resolution is ensured on a case-by-case basis through individual agreements between the business entity and local authorities.

On the other hand, another scientific and expert discussion has been ongoing for the last five years regarding the budget for crediting personal income tax revenue – the budget at the location of the business entity or the budget at the place of registration of the employee. In this context, the approach to tax treatment is completely changing:

- if the tax revenue is credited to the budget at the payer's place of registration, it should be considered as a payment for access to social services in the community of residence (educational, healthcare, cultural, etc.);
- in the case of crediting at the location of the enterprise – as a payment for the possibility of conducting business activities in a specific territory.

Clearly, the policy of local governments regarding tax accumulation in their budgets changes with the change of its essential characteristics. In the first case, local governments strive to attract new residents to the community, so they encourage them to register in the community, try to develop, diversify, and improve the quality of social services on their territory, and stimulate the construction of new housing in the community – in general, they will be resident-oriented. In the second case, they will aim to attract new businesses, improve the quality of engineering networks in light of their suitability for business, formulate investment proposals, and improve the investment climate in the community – that is, they will be business-oriented. Meanwhile, in the first case, the role of the tax as payment for economic activity is completely offset, which is likely to have an impact on the level of economic growth of communities in the long run.

Changes in economic structure. The situation with the collection of taxes in Canadian municipalities exemplifies how various factors influence the tax revenue accumulation in municipal budgets. Taxes account for 37.3% of municipal budget revenue, and interbudgetary transfers (from the provincial and federal levels) are another important revenue source. Obviously, taxes represent the cornerstone of the budgetary autonomy of Canadian municipalities. But taxes on immovable property are the main source of tax revenue for local budgets in the country (97.3%) (see Figure 3).

The complete predominance of one type of tax payment in the structure of municipal budget revenue laid the foundation for increased risks of losing financial stability at the local level of government in the long run due to changes in market conditions and the behaviour of economic entities.

In recent years, the Canadian economy (as well as most developed countries) has undergone a process of deindustrialization. This resulted in a decrease in production space and demand for it, while the number of warehouses and distribution centres increased. And the spread of e-commerce has led to a significant decline in demand for retail space. Accordingly, in light of the ongoing development of the service industry and rapid digitalization, the average workspace per employee in the country has experienced a substantial decrease [4].

These trends have been further magnified by the COVID-19 pandemic, which has popularized remote employment predicted by Canadian researchers to remain the foundation for the development of the country's labour market in the coming decades [7].

Government intervention. On the other hand, the pandemic has become a trigger for the growing trend of "interference" by higher levels of government in local self-government, primarily concerning the collection of taxes for local budgets. The practice of "supporting" businesses and the population by public authorities by restricting the rights of local governments to accumulate tax revenue has become widespread during the pandemic in many countries around the world (including Canada [7], the United States [8], and Ukraine).

The observed events have directly affected the ability of local governments in Canada to accumulate sufficient tax revenue to fulfil their responsibilities. Due to the decreasing role of non-residential property in the context of property taxation, the dependence on taxation of residential property is growing, which eventually leads to an increase in the tax burden on the residents of municipalities. As of 2019, Canada has one of the highest property tax rates in the world and relies more heavily on tax revenue than other OECD countries [18].

Analyzing the structure of municipal budgets' tax revenue in OECD countries (Figure 3), it is clear that the lack of diversification of tax revenue sources is typical for many countries. This, in turn, poses a threat of loss of financial capacity of municipalities in the face of changes in the structure of the economy and, accordingly, sources of tax revenue.

Behaviour of the population. Having studied the changing economic structure and the deindustrialization process, which has been actively developing in recent decades, the example of Canadian municipalities shows trends towards instability in filling local budgets through the taxation of non-residential property (in particular, industrial space) and the preservation of the role of residential property in the collection of property taxes. Therefore, it is advisable to consider this aspect of property taxation as well.

When researching property taxation in terms of residential property from the perspective of its efficiency in ensuring economic growth at the local level, researchers come to varying and occasionally conflicting conclusions [9] (particularly in the context of their regressiveness or progressiveness). Different conditions and specifics of tax collection for municipal budgets across different countries are the reasons for the difference in opinions and the lack of a common position.

In most countries of Central and Eastern Europe, for instance, the share of property taxes in GDP is low and does not exceed 1% (Figure 5). Economists often interpret it as an inefficient use of existing capacity by municipalities in these countries. However, upon analyzing the specifics of property taxes, a number of factors can be identified that first, lead to the emergence of such tax collection systems and second, have a deterrent effect on raising rates or ensuring wider coverage of taxpayers.

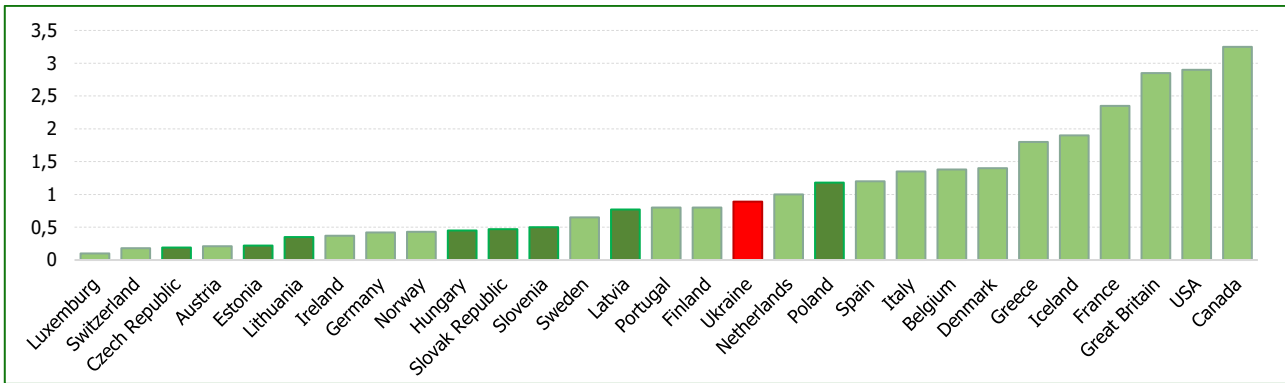


Figure 5. Property tax revenue in selected countries, % of GDP, 2020. (Source: [12])

The specific behaviour of the population in different countries is an important factor in this case, particularly with regard to property ownership traditions. In the majority of developed Western countries, residential property ownership is concentrated among high-income households, while rental housing is widespread in the property market (Figures 6, 7).

In Germany, for example, less than one-third of households own real estate; among them, only one in five households in the bottom income quintile owns real estate, while over 65% of those in the top quintile do. In other words, residential property is owned mainly by households with higher incomes.

In contrast, in Central and Eastern Europe, homeownership rates reach 60-90% of households, which is significantly higher than in Western Europe, the United States, and Canada. Moreover, representatives of all income quintiles equally are residential property owners (Figure 7). Accordingly, it is not uncommon for property owners to have low incomes, which limits their ability to pay high property taxes. And, given the unpopularity of property taxes among municipal residents (potential voters), since they cover a wide range of taxpayers and raise issues of fairness in taxation (in particular, the tax base), the rates are typically not raised, and the range of taxpayers isn't expanded.

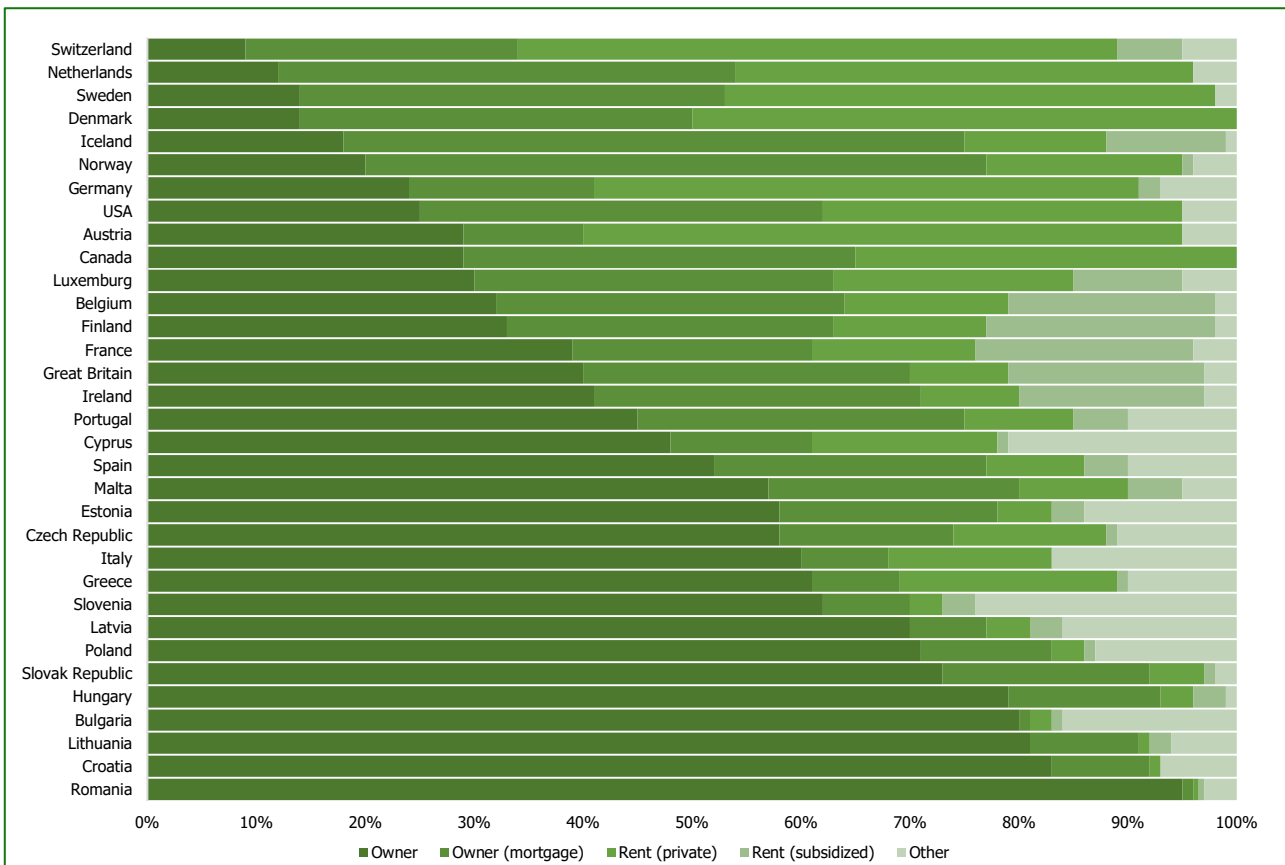


Figure 6. Share of households with different types of housing tenure, %, 2020 (or the last year available for analysis: 2019 – Germany, Italy; 2018 – Canada, Iceland). (Source: [19])

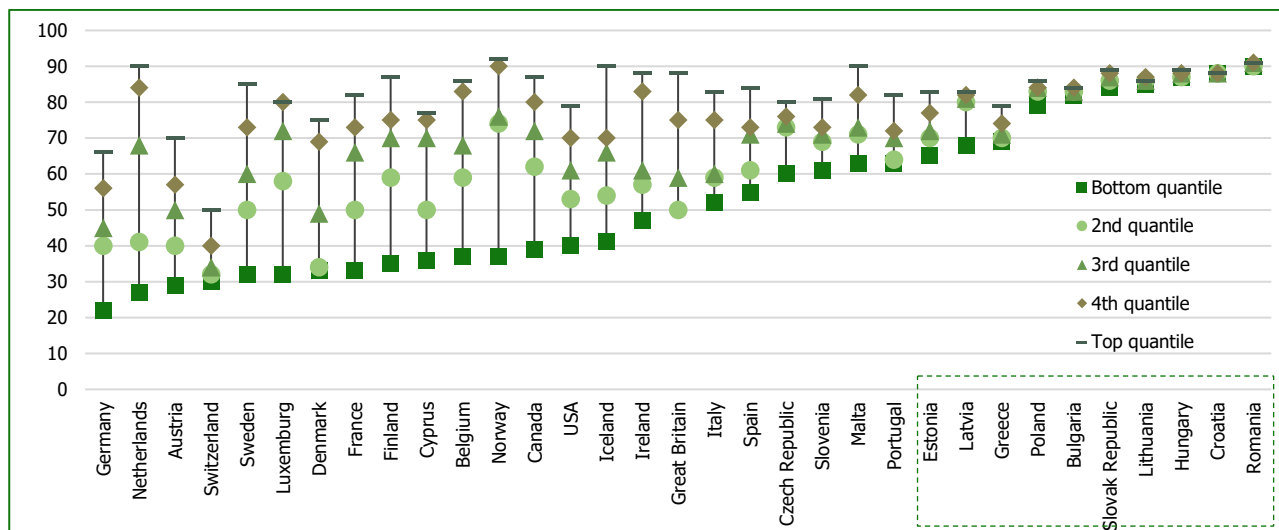


Figure 7. Share of households owning property (including mortgage) by income quantile, %, 2020 (or the last year available for analysis: 2019 – Germany, Italy; 2018 – Canada, Iceland). (Source: [19])

Tax administration. The specifics of tax administration are an important factor influencing the accumulation of property tax in the community budget.

First, property taxes are based on the conditional value of property, which requires the creation of a well-functioning valuation system and an efficient mechanism for appealing the property value. In most OECD countries, the property tax base is determined on the basis of its market value, whereas in Poland and the Czech Republic (as well as in Ukraine), it is based on the property size. The calculation of the tax base on the basis of property value has certain advantages compared to its calculation on the basis of property size. It ensures the progressive nature of the tax, as there is a strong link between the taxpayer’s income and the amount to be paid. Moreover, it is sensitive to the economic situation and its changes. Nevertheless, determining the tax base by value is efficient only when the property market is sufficiently developed, as the value of the property is estimated based on data on recent property transactions.

Second, one of the biggest difficulties in managing this tax is the constant need to update its value. Two methods are used for this purpose: revaluation and indexation. According to a comprehensive study conducted by the OECD, revaluation proves to be more advantageous than the indexation method, which, in the long run, leads to a mismatch between the values obtained and the actual market value of the property [20]. However, the frequency of updating the property value remains an issue in this process, as an outdated assessment generally indicates an understatement of the value and impedes the increase of tax revenue. This problem is typical for most developed countries, including Estonia, Finland, France, Germany, Greece, Portugal, and Sweden. For instance, Belgian law provides for the revaluation of property once a decade; while the last revaluation was carried out in 1975, in the UK – in 1991, in Estonia – in 2001. Some other countries revalue property on an annual basis (Hungary, the Netherlands), Portugal – every three years, Lithuania – five years, etc. [20].

The issue of property revaluation is crucial for both taxpayers and tax-collecting authorities, particularly in terms of housing prices. For example, over the past decade, residential property prices in Central and Eastern Europe have risen significantly compared to other OECD countries. Accordingly, property revaluation may present a considerable challenge to tax payment in these countries, so it should be preceded by a thorough analysis of the potential consequences for households and the state.

Third, although the conditions for administering the tax vary from country to country, local governments are generally greatly limited in their powers. Typically, they have the right to 1) independently set tax rates within legal limits (23 out of 25 countries); 2) establish tax exemptions (8 out of 25 countries); 3) have certain (limited) powers to determine the tax base (3 out of 25 countries) (Table 1).

Table 1. Peculiarities of property tax administration and collection in OECD countries and Ukraine. (Source: [20])

		Competencies of local government				
		Setting tax base	Setting benefits and exemptions from taxation	Setting tax on its own territory	No right for local government to determine the terms of tax collection	Setting tax rates (within the limits established by law)
Budget	<i>State/ regional/ local</i>	Spain				
	<i>State / local</i>	Norway				
		Iceland				
		Great Britain				
	<i>Regional/ local</i>	Switzerland				
		France				
		USA				
		Denmark				
	<i>Local</i>	Hungary				
		Estonia				
		Lithuania				
		The Netherlands				
		Poland				
		Austria				
		Canada				
		Czech Republic				
		Finland				
		Germany				
		Ireland				
		Luxemburg				
Portugal						
Slovak Republic						
Slovenia						
Latvia						
Ukraine						

The right to set tax rates, which is essentially the only prerogative of local government granted by the state, allows municipalities to conduct their own tax policy and form relationships with business entities and community residents, i.e., it is an important tool for local governments to shape the investment climate on their territory. On the other hand, legislative restrictions on the size of the rates aim, firstly, to equalize differences between jurisdictions to avoid “foot voting”, and secondly, differences between various tax bases within a jurisdiction (in terms of residential and non-residential property) to prevent taxpayers from attempting to evade them or conceal the true nature/conditions of property use.

DISCUSSION

Some findings can be drawn from the study of the taxation system trends in foreign countries and their comparison with Ukrainian realities. These conclusions are worth discussing.

First, unlike many developed countries, Ukraine has avoided excessive dependence of local governments on the collection of certain taxes for local budgets. The diversification of tax types has provided territorial communities with an appropriate level of resilience in the face of enduring economic change and permanent crises.

Second, the problem of low financial capacity is an issue for domestic communities. Despite the fact that, as a result of decentralization reforms, our country is classified as having a high level of financial autonomy of budgets at the local level, which allows communities to independently manage their own resources, the amount of these resources (USD 301.7 per capita) is significantly lower than in the majority of developed countries. Therefore, the issue of the efficiency of collecting taxes for the budgets of territorial communities and finding ways to increase their revenue is crucial for our country.

For Ukraine, these issues are particularly relevant in the light of changes in economic structure as a country in which hostilities are ongoing (accompanied by different trends in different territories and, in fact, a complete change in the socio-economic situation), as this will have a direct impact on community budget revenue in the post-war period. On the other hand, this aspect is important in view of the ongoing improvements in the system of redistribution of tax revenue between budgets of different levels and the discussion on the need to apply a particular approach to tax collection and administration (in particular, personal income tax, property taxes, and a single tax). A revised approach to tax collection for local community budgets should be preceded by a comprehensive analysis of the potential short- and long-term outcomes (since it is possible that in the first stages after the changes the community will receive additional resources, but in the long term it will suffer significant losses due to changes in behavioural reactions). This aspect, in particular, is important in light of 1) discussions on modifying the model of personal income tax transfer to local budgets (at the place of registration of an employee/place of location of a business entity), which will result in a change in the fundamental approach to tax collection; 2) changes in the administration of property taxes and the transfer of the administration function to the basic level of government.

CONCLUSIONS

The analysis made it possible to identify the factors influencing property taxation systems in various countries and determine their development, in particular: differences in economic structures and the impact of their change, behavioural reactions of economic entities, existing property ownership traditions in different countries, peculiarities of property market development in different countries, etc. Being the subjects of the development and implementation of tax policy at the level of territorial communities/municipalities, local governments should take these factors into account in their work. Therefore, it is crucial for them to analyze the community's economic structure and identify trends in its evolution.

Analyzing the structure of municipal budgets' tax revenue in OECD countries, it is clear that the lack of diversification of tax revenue sources is typical for many countries. This, in turn, poses a threat of loss of financial capacity of municipalities in the face of changes in the structure of the economy and, accordingly, sources of tax revenue.

The specific behaviour of the population in different countries is an important factor in this case, particularly with regard to property ownership traditions. In the majority of developed Western countries, residential property ownership is concentrated among high-income households, while rental housing is widespread in the property market.

Thus, based on the analysis of property tax collection in OECD countries and Ukraine, there is no and cannot be a single approach to determining the conditions for collecting this tax for local budgets. This can be attributed to a multitude of factors that have contributed to the emergence of specific tax administration systems in each country, which are manifested differently. While the use of the value approach is a suitable and the only accurate method for determining taxation in one country, it may be impossible to implement in another.

ADDITIONAL INFORMATION

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Writing – original draft: *Iryna Storonyanska, Khrystyna Patytska, Tetiana Medynska, Lilia Benovska*

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СИСТЕМНІ ПЕРЕДУМОВИ ФОРМУВАННЯ ПОДАТКОВИХ ДОХОДІВ МІСЦЕВИХ БЮДЖЕТІВ: НА ПРИКЛАДІ РОЗВИНЕНИХ КРАЇН

Метою дослідження є визначення системних передумов формування податкових доходів місцевих бюджетів та здійснення аналізу їхнього впливу на розвиток муніципалітетів у розвинених країнах.

Проаналізовано вплив на формування податкових доходів бюджетів муніципалітетів таких чинників: поведінкові закономірності суб'єктів економіки (зокрема щодо управління майном), роль держави у формуванні податкових доходів бюджетів муніципалітетів, розуміння суті податку.

На прикладі визначення економічної сутності ПДФО доведено (на основі аналізу справляння податку до бюджетів муніципалітетів у країнах ЄС), що зі зміною сутнісних характеристик податку змінюється й політика органів місцевого самоврядування щодо його акумулювання до свого бюджету.

На основі порівняння досвіду муніципалітетів у розвинених країнах встановлено чинники впливу на системи оподаткування майна, які зумовлюють формування надходжень від майнових податків: різницю структури економіки та вплив її зміни, поведінкові реакції суб'єктів економіки й існуючі традиції володіння майном у різних країнах, особливості розвитку ринку нерухомості в різних країнах тощо. Проаналізовано тенденції зміни структури економіки та їхній імовірний вплив на податкову спроможність місцевих бюджетів. Доведено доцільність диверсифікації джерел податкових надходжень, що забезпечить муніципалітетам відповідний рівень стійкості в умовах постійних змін економіки та перманентних криз.

Ключові слова: податки, місцеві бюджети, системні передумови, розвинені країни, Україна, ПДФО, майнові податки

JEL Класифікація: H21, H25, R11