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The Treasury
Langton Crescent
PARKES ACT 2600

By email: taxforum@treasury.gov.au

Dear Sir/ Madam

Tax Forum Discussion Paper (DP) on Tax Reform – Next Steps for Australia

CPA Australia represents the diverse interests of more than 132,000 members in over 110 countries. Our vision is to make CPA Australia the global accountancy designation for strategic business leaders. We welcome the opportunity to provide feedback on this consultation paper.

The discussions about reforming Australia's tax system has a significant history. Most recently it has evolved from the government's 2020 Summit, into the comprehensive Australia's Future Tax System (AFTS) Review and recommendations, and now the forthcoming Tax Forum.

There is widespread agreement amongst authorities including the Treasury, the Reserve Bank, the OECD and the IMF that Australia's future prosperity relies on our ability to increase productivity. CPA Australia is concerned that Australia's poor productivity growth over the last decade, largely masked by the success of our resources sector and favourable terms of trade, means that policy making that would enhance Australia's productivity is not being addressed effectively by the Parliament.

We recognise that major tax reform that will strengthen Australia's economy and facilitate essential productivity improvements is a long-term project but it is important that a start is made at the upcoming tax forum at least in terms of broad agreement being reached on the need to remove a range of inefficient state taxes funded by other revenue sources. Given that funding from the proposed carbon tax and mineral resource rent tax (MRRT) is already earmarked for other purposes, CPA Australia believes that the only alternative and viable option to enable this to be achieved is to consider changes to the GST. A paper prepared by KPMG Econtech for CPA Australia outlines how this might be done, including how such measures could positively impact on productivity and the improvements to living standards that would flow from such changes. The relevant KPMG Econtech research paper accompanies this submission.

Another significant issue here and one which should, in our view, be addressed at the Forum is the long-standing vertical fiscal imbalance (VFI) problem whereby the states are heavily reliant on Commonwealth financial assistance to meet their spending obligations.

Also enclosed are CPA Australia's views on each of the six discussion topics for the Tax Forum. We also provide comments on the opening framing questions relating to the essential tax bases for Australia's tax system.

If you wish to discuss any of the above matters, please contact Garry Addison on 03 9606 9771 or via email at garry.addison@cpaaustralia.com.au.

Yours sincerely

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Tax Reform – Next steps for Australia

The following submission addresses the key issues raised in the discussion paper.

Discussion questions

- At the Commonwealth level, are there opportunities to further balance the tax system towards more efficient revenue bases?
- At the state level, are there opportunities for the States to further balance the tax system towards more efficient revenue bases?

Comments

As noted in the Discussion Paper, revenue raising should be concentrated on four robust and efficient broad-based taxes:

- personal income
- business income
- rents, including rents from natural resources; and
- consumption.

It is also noted, however, that:

- narrow-based taxes may be used where they improve social outcomes or market efficiency through better price signals;
- the transfer system should remain structurally separate from the tax system and remain highly targeted; and
- administration of the tax system needs to be more transparent and responsive to problems experienced by taxpayers.

CPA Australia supports the broad thrust of the abovementioned criteria for a good tax system.

Government's reform agenda

- At the Commonwealth level, are there opportunities to further balance the tax system towards more efficient revenue bases?
- At the state level, are there opportunities for the States to further balance the tax system towards more efficient revenue bases?

We note in this context that the Henry Tax Review recommended the abolition of various relatively inefficient state taxes such as conveyancing duties and insurance taxes. However, to maintain revenue for the government, other relatively more efficient taxes may need to be raised to fund the abolition of the inefficient taxes. This has the potential to improve the overall efficiency of the economy by reducing costs for businesses and households, and increasing overall productivity.

One of the relatively efficient taxes in Australia is recognised to be the GST. Furthermore, Australia's GST rate is amongst the lowest of all OECD countries, making it a potential candidate for reform. Thus, while there are challenges in re-designing the current GST framework, it is nevertheless important to include it in any discussions about tax reform.

Accordingly, to inform debate around the potential role of the GST in the Australian tax environment (particularly ahead of the upcoming Tax Forum), CPA Australia commissioned KPMG Econtech (KE) to undertake an objective economic study to inform discussion around the potential role of the GST in the Australian tax environment. The relevant report prepared by KE examines the economic impacts of increasing the GST to fund a reduction in a number of more inefficient taxes. The four alternative scenarios examined in this report are listed below:

- 12.5% GST replacing less efficient taxes – increase the GST rate to 12.5% to fund the abolition of selected relatively inefficient taxes;
- 15% GST replacing less efficient taxes – increase the GST rate to 15% to fund the abolition of selected relatively inefficient taxes;
- 20% GST replacing less efficient taxes – increase the GST rate to 20% to fund the abolition of selected relatively inefficient taxes; and
- uniform GST replacing less efficient taxes – extend the 10% GST to all goods and services (except those that are currently input-taxed) to fund the abolition of selected relatively inefficient taxes.

The inefficient taxes to be abolished are in the following order:

1. Insurance taxes – insurance duty and fire insurance levy (where relevant);
2. Motor Vehicle taxes – stamp duty and motor vehicle registration charges;
3. Conveyancing duty on commercial property transactions; and
4. Payroll tax.

Residential conveyancing duty is excluded from the above list because of the more complex policy issues involved with this tax, including negative gearing, CGT discounts and the tax-free status of the main residence.

Any remaining revenue could be used to:

- reduce the marginal tax rate applicable to the top income tax bracket by 1 percentage point;
- reduce the company tax rate by 1 percentage point; and
- return the remainder to the community, e.g. a distribution to households via an appropriate compensation package.

For each of the scenarios modelled the increases in total gross domestic product (GDP) are as follows:

- 12.5% GST - 0.4%
- 15% GST - 0.7%
- 20% GST - 0.5%
- Uniform GST - 0.9%

Session 1 : Personal tax

We note that the Government is currently implementing a range of personal income tax reforms and that it remains committed to further reforms subject to fiscal circumstances to continue to simplify the system including to address disincentives to labour force participation.

Comments on Discussion questions

The main disincentives to workforce participation relate to the impact of effective marginal tax rates (EMTRs) on lower income earners in receipt of social security benefits. While some steps can and have been taken in recent times to ameliorate this problem to some extent, it does not appear to be feasible to completely eliminate the problem while still retaining appropriate means testing arrangements on access to welfare benefits to ensure the sustainability of the existing system which appears to be generally supported by the community including CPA Australia.

Further opportunities to simplify taxpayers' interactions with the personal tax system

There is often a lot made of simplification of individual tax returns. This is something that CPA Australia has researched over many years, and there are no doubt improvements that could be made. However, in our view, the case for retaining some kind of return for taxpayers is not without support either.

In our view, it is unlikely that the 'I' return will ever be scrapped completely. And in fact CPA Australia strongly supports the retention of the I return or its equivalent. For example, in our evidence to one of the many meetings with the Henry Tax Review Committee, we went to some lengths to make the point that elimination of the I return should not be a reform objective, as the I return is at the core of the effective administration of Australia's income tax system and should remain so going forward.

Amongst other things, it is the mechanism that draws together all income and expenses and keeps individual taxpayers engaged with the revenue authorities on an annual basis. This is in our view a key factor – and one often overlooked by many of those calling for *'simplification'* – in having a robust income tax system.

The necessity to complete an annual individual tax return is also an enabler that encourages an annual financial 'health check up' where the client and the adviser can discuss future business, investment and tax strategies. Arguably, those who call the loudest for the abolition of individual returns will also be those with the least to lose.

CPA Australia supports simplification, including pre-population of returns, and also the proposed standard deduction initiative to make compliance easier for taxpayers. But as regards the I return as such, there remain some very good reasons for keeping it, for a while longer at least.

From CPA Australia's point of view, the real simplification value and productivity enhancement lies elsewhere – such as in Federal/State tax reform, albeit we recognise that such reform will not be an easy task.

What is the best way for the personal tax system to be integrated with the business tax system in order to maintain the integrity and fairness of the overall system?

We note that the AFTS Review suggested that Australia should consider in the future moving the existing company income tax system towards a business level expenditure tax such as an allowance for corporate equity on a number of grounds including that it would provide a more effective mechanism for company and personal tax integration in a world of increased capital mobility. However, we note that the Review also indicated that dividend imputation continues to provide a range of benefits and that it should be maintained in the short to medium term. Accordingly, we do not see any persuasive business case for a move away from the existing imputation system at this stage, particularly given its continuing strong support by investors and shareholders.

Does the tax system provide the right support to Australians who locate to areas where their skills are most in demand?
There are arguably two separate regimes at present which appear to deal with issues in this area being the zone rebate arrangements and the current process for the distribution of GST payments to the various states by the Commonwealth in accordance with advice from the Commonwealth Grants Commission (CGC) whereby states with lower population densities generally receive higher per capita payments than other states. As we note also that the federal government has recently established a GST Distribution Review to consider the existing CGC arrangements, we do not propose to make any further comments on issues in this area pending the outcome of this review.

Should consideration be given to moving towards a more neutral and consistent tax system for savings?
Yes. We support the approach proposed in Australia's Future Tax System Review (the AFTS review) that Australia's personal tax system should continue to represent a hybrid model with owner–occupied housing and superannuation being taxed at a lower rate or exempt from income tax, but with other savings taxed more consistently to achieve a more productive and better allocation of resources.

Are their opportunities to improve efficiency in the housing market with alternate tax settings and policies?
We broadly support the key directions toward more affordable housing as outlined in the AFTS report, particularly changes that would improve equity and efficiency in housing markets, such as replacing public housing rent concessions by an expanded rental assistance program and a new form of assistance for high-needs tenants, to improve equity and work incentives. The proposal to replace transfer taxes on property by a land tax on all land on a more efficient and uniform basis over a lengthy transition period also appears to have merit and should be addressed in a broader state tax reform context.

Superannuation

CPA Australia does not support the recommendations made by the AFTS review in relation to superannuation as on a whole we believe they would increase the average tax paid by individuals and reduce retirement savings.

However, we do believe the measures announced by the government in response to the AFTS review, particularly the increase in the compulsory Superannuation Guarantee (SG) to 12 per cent and the introduction of the government contribution for low income earners, will lead to a significant improvement in the adequacy of retirement savings for many Australians.

Despite the improvements announced by the government however, the self-employed and people on the fringes, such as people out of the workforce or working in casual or part-time employment, still may not have adequate opportunities or incentives to save. We believe further initiatives and policy changes are required to ensure all Australians have the opportunity to adequately save for their retirement. We believe the following measures would remove the impediments to adequate retirement savings and improve the equity of the superannuation system:

1. We believe the current contribution caps, particularly the concessional contribution caps, are both confusing and inflexible. As a consequence, they act as a deterrent that prevents many ordinary Australians from saving adequately through superannuation in order to maintain an appropriate standard of living in retirement. Further, the penalties for

exceeding the caps are excessive, even for the most inadvertent errors, compared to penalties in other areas. We believe the contribution limits are too low, too complex and inflexible and should at least be restored to their previous limits. We also believe the government should consider the introduction of a ‘lifetime’ concessional contribution cap whereby any ‘unused’ contribution limit, i.e. the amount above the actual contribution made in one year, could be accumulated and added to the limit in later years.

2. Abolish the current SG threshold of $450 per month and replace it with a ‘one-off’, one month only threshold of $450. With the proposed increase of the SG to 12 per cent, more people are at risk of being excluded from the SG system and not having access to adequate retirement savings. For example, an individual working two or three casual jobs, each earning just under the $450 threshold each month, could be missing out on SG contributions of $800 to $1200 each year. The one-off threshold would minimise the administrative burden for employers of casual or itinerant workers.
3. Abolish the ‘10 per cent rule’ for the deductibility of superannuation contributions to provide greater incentive and flexibility to people who have to make their own superannuation provisions. This would provide greater incentive for the self-employed to adequately save for their retirement and also allow employees to claim a deduction for their personal superannuation contributions. Essentially there should be no difference between the treatment of employer, salary sacrifice and personal deductible (i.e. self employed) contributions,
4. Extend the co-contribution scheme to individuals outside the paid workforce and align the top threshold with the cut-off of the 30 per cent marginal tax bracket. These changes would ensure more universal coverage and greater access to appropriate incentives for all middle-income earners.
5. The tax treatment of superannuation death benefits to be reviewed to ensure consistent and equitable treatment of payments to dependants and non-dependants alike.

Are their opportunities to improve the rules for superannuation during the drawdown phase?

We note in this regard that the AFTS review proposed that the tax on superannuation fund earnings during the accumulation phase should be reduced from 15% to 7.5%, but the tax on investment earnings during pension phase would be increased from 0% to 7.5%.

The reduction in superannuation investment tax rates during the accumulation phase would have a significant positive impact on retirement income outcomes because of the tax savings that would be available and invested on a compounding basis. The tax during pension phase, however, could represent a significant cost to members particularly in respect to the capital gains tax that would then be payable on assets supporting pensions. This is of particular concern as individuals close to retirement, or recently retired, have not enjoyed the benefits of a mature SG system for their whole working lives and often have inadequate retirement savings. Accordingly, we would not support such a measure.

We believe more flexibility is needed to allow individuals to move in and out of retirement, in turn improving workforce participation and productivity, by allowing them to continue to contribute to their superannuation when able, i.e. by removing the work tests, and to add to existing superannuation income streams.

We also believe greater tax incentives are needed to encourage long term investment vehicles to support annuity type products to address the increasing longevity risks associated with increased life expectancies.

Are their unintended or inappropriate concessions in the tax system that could be removed to help fund priorities elsewhere? Are there better ways to structure and deliver concessions?

The latest Treasury tax expenditure list should be closely reviewed in order to appropriately formulate a response to this issue. In general, we believe that government financial assistance should be provided direct from the Budget to ensure that the effectiveness and/or need for any such assistance is subject to ongoing scrutiny via the annual budget process.

Session 2: Transfer Payments

We note that the Government is implementing a range of important reforms in this area and we support the broad thrust of these proposed reforms, including particularly the focus on ensuring the welfare of children and encouraging people to take up opportunities to build skills and obtain employment.

Comments on Discussion questions

Are there ways to make the transfer system simpler for individuals and families?
CPA Australia believes that the most effective way to simplify the transfer system is to ensure that it is kept separate from the tax system since the move in recent years to effectively pay some transfer payments via the individual tax return has increased the complexity of the 'I' return and forced a higher proportion of individual taxpayers to use tax agents. In particular, family tax benefits should be re-named and paid direct to eligible beneficiaries via the transfer system rather than via the individual income tax return.

How should family payments and child care assistance support parents' choices about how to balance and share work and caring roles at different stages in their children's lives?
One option to simplify the family payments system could be to simply make a single payment to eligible families with young children via the transfer system rather than separate payments as at present.

What incentives and obligations in transfer payments could further encourage skills formation, workforce participation and promote early childhood development?
It would seem desirable for eligibility for certain transfer payments to be made subject to appropriate conditions in respect to such matters as skills development and/or work participation. The proposed increase in the child care rebate and reforms to improve the quality of child care should assist in promoting early childhood development.

How well do the characteristics of our income support system reflect current patterns of work life for Australians?
Some of the Government's recent proposed reforms seem to be aimed at modernising Australia's income support system and thus addressing the issues raised in the abovementioned question.

Does the current provision of public housing impact on workforce participation and, if so, what incentives could be introduced to address this issue?
We broadly support the AFTS recommendation that income-linked rents should be phased-out in social housing (other than in some circumstances such as in respect to remote indigenous communities) with providers charging their tenants rents linked to the market rate, and with existing rent-setting for current tenants phased out using appropriate transitional arrangements.

Are there unintended or inappropriate concessions in the transfer system that could be removed to help fund priorities elsewhere?
We would broadly support appropriate changes to or removal of any such concessions as identified by the AFTS Review.

Session 3 : Business tax

We note that the Government is currently implementing a range of personal income tax reforms and that it remains committed to further reforms subject to fiscal circumstances to continue to simplify the system including to address disincentives to labour force participation.

Comments on Discussion questions

What is the appropriate business tax system for Australia to maintain business tax revenue and economic growth?
CPA Australia broadly supports the current business tax system including retention of the dividend imputation arrangements. However, in order to ensure the competitiveness of the existing system, we believe that the company tax rate should be reduced in stages to 25% consistent with a responsible fiscal policy as soon as practicable.

Are there ways to reform the business tax system that can assist Australia to meet the challenges of mining boom mark II and make the most of the opportunities from the shift in global economic weight from West to East?
See comment re need for a lower company tax rate above.

Should the company tax rate be lowered further, and if so, what other reforms within the business tax system might be used to fund this?
As indicated above, we believe that the company tax rate should be reduced to 25% as soon as practicable. Further, given that the company tax base in Australia is generally considered to be relatively broad following reforms in this area some years ago, we do not believe that a reduction in the company tax rate should be funded by further broadening of the corporate tax base since that would not enhance the competitiveness of the existing system.

That said, however, there may be a case for a review of some existing concessional arrangements in respect to capital allowances as proposed by the AFTS Review such as those relating to statutory effective life caps, capital works (including buildings), exploration expenses and certain taxation provisions relating to agriculture and forestry.

Are there ways to further simplify business interactions with the tax system, especially for small business?
In order to reduce compliance costs for small business, we support the following proposals for simplification of some of the provisions relating to small business as canvassed in the AFTS Review, including the proposed extension of small business access to the small business tax concessions under the small business tax framework by increasing the relevant 'small business entity test' (turnover test) from $2 million to $5 million, and for adjustments to the $6 million net asset value test to also be considered.

These measures would, of course, be in addition to those small business reforms which the Government has already implemented re the proposed reductions in the company tax rate for small business entities and the replacement of the Entrepreneurs' Tax Offset with simpler and more generous depreciation arrangements.

Should there be more symmetrical treatment of tax losses?
CPA Australia believes that more symmetrical treatment of tax losses should be considered such as introducing appropriate loss carry-back provisions for companies into the income tax law as proposed by the AFTS.

Should further consideration be given to potential longer-term directions for the business tax system, such as deductions for equity financing?
CPA Australia does not support a move to deductions for equity financing if this is considered to be a replacement for the existing dividend imputation arrangements.

Are there unintended or inappropriate concessions in the business tax system that could be removed to help fund other priorities elsewhere?
CPA Australia is not aware of any such unintended/inappropriate concessions in the business tax system at this stage.

Session 4: State Taxes

Discussion questions

Does the tax system create disincentives for Australians to locate to the areas where their skills are most in demand?
The application of conveyancing duties by all the States/Territories to real property transfers is likely to be a disincentive for some Australians to locate to areas where their skills are most in demand,

Are there opportunities for the States to replace stamp duties on property conveyances with reformed land taxes?
There would appear to be such opportunities for the States to vary their existing tax mix (as discussed by the AFTS and relevant state government inquiries into their existing tax systems) but we are not aware of any such move by any state jurisdiction at this stage.

Should States abolish insurance taxes? If so, how could that revenue be raised more efficiently?
As noted above, CPA Australia believes that insurance taxes are inefficient and that the states should remove such taxes at the earliest opportunity and replace the lost revenue via an increase in other more efficient taxes such as the GST.

How might the reform or greater harmonisation of State payroll taxes be pursued?
Our understanding is that the various states have already agreed and implemented the harmonisation of state payroll taxes both at the policy and administrative levels at least in respect to the payroll tax (PRT) base while still leaving the payroll tax rates in the different jurisdictions to be set according to their fiscal requirements, etc. It would also seem desirable for the various PRT thresholds in the various jurisdictions to be reduced and more closely aligned to enhance the efficiency of the existing PRT. While our preferred option is for the PRT to be removed and replaced by an increased GST, if the PRT is to be retained then consideration should be given to transferring its administration to an appropriate Commonwealth agency such as the ATO.

Do GST sharing arrangements create the right incentives for States to make their tax bases more efficient?
As we note that the current GST sharing arrangements between the states based on horizontal fiscal equalisation (HFE) are currently under consideration by a separate review (GST Distribution Review) which is required to release an Interim Report by February 2012 and a final report by September 2012, we do not propose to make any detailed comments on the abovementioned matter at this stage. That said, though, we note below some comments by the AFTS Review which are relevant to this issue.

Within our Federation, what responsibility should the States take for reforming the taxes they impose?
In theory it would be highly desirable for the various states to exercise more responsibility in reforming their own taxes and this approach has recently been recommended by the AFTS Review. In particular, the Review recommended that reforms to state taxes should be co-ordinated through intergovernmental agreements between the Australian government and the States to provide the States with revenue stability and to facilitate good policy outcomes.

Some specific options canvassed in that review included:

- existing stamp duties on property transfers to be replaced by more efficient taxes
- the structure of land taxes to be improved by broadening the land tax base to eventually include all land (subject to an exclusion for most agricultural and other low-value land), and
- over time, introduction of a destination basis broad-based cash flow tax to finance the abolition of other taxes, including PRT and inefficient state consumption taxes such as insurance taxes.

There is some evidence to suggest that a single state acting alone may be hampered in attempting major reform of its existing inefficient taxes by the existing HFE arrangements such that not all of the benefits of making changes of the kind mentioned above would accrue to that particular state. This indicates that the AFTS suggestion of such reform being co-ordinated via relevant IGAs would seem to be the most appropriate way to achieve major reform of existing inefficient state taxes.

Another issue that is relevant here as noted in our covering letter is the vertical fiscal imbalance in existing Commonwealth/State relations whereby the states have significant spending responsibilities but lack the taxing powers to enable them to meet such obligations and are thus heavily reliant on Commonwealth financial assistance. While we note that attempts have been made in the past to overcome this problem (such as the move by the Commonwealth between 1978 and 1989 to give the states some access to the personal income tax) but which ultimately did not succeed, our view is that this important issue needs to be addressed further at the upcoming Tax Forum.

Session 5: Environmental and social taxes

We note the Government's reforms in this area to date as listed in the Tax Reform Discussion Paper.

Comments on Discussion questions

Should Australia consider ways to more closely link road charging to the impact users have on the condition and upkeep of roads?
We support further investigation (particularly through existing COAG processes) of the proposal canvassed in the AFTS Review for existing fuel and motor vehicle registration taxes to be replaced by more efficient road user charges, particularly for heavy vehicles.

Is there a case to more closely link road charging to the impact users have on the level of congestion on particular roads?
We support further investigation of the use of congestion pricing for specified major roads in the major cities, but note that the interaction between any road user charges for light vehicles and any proposed congestion tax should be clarified at an early date.

Are there aspects of other tax arrangements that create unintended incentives for adverse environmental outcomes, or ways in which governments could use specific taxes to ensure that people take appropriate account of environmental impacts in their decision making?
We believe that the recently introduced carbon tax and subsequent ETS arrangements are sufficient at this stage, particularly bearing in mind the need to minimise the undue proliferation of taxes and charges which has been a feature of Australia's tax system in the past.

Session 6: Tax system governance

We note the Government's recent reform agenda in this area.

Comments on Discussion questions

How might the greater use of technology and improved coordination and management of information be used to improve taxpayers' experience with the tax and transfer system?
As mentioned earlier, CPA Australia believes that the existing income tax return for individuals ('I' return) should be retained as it remains at the core of the effective administration of Australia's income tax system. Amongst other things, it is the mechanism that draws together all income and expenses and keeps the individual taxpayer engaged with the revenue authorities on an annual basis. This is a key factor – and one often overlooked by many of those calling for simplification – in having a robust income tax system.

The necessity to complete an individual tax return is also an enabler that encourages an annual financial health check-up where the client and the adviser can discuss future business, investment and tax strategies as appropriate.

That said, however, CPA Australia supports simplification where necessary, including pre-populating returns and also the proposed standard deduction initiative to make compliance easier for taxpayers. But as regards the 'I' return, there remain very good reasons for keeping it, for a while longer at least.

From our point of view, the real simplification value to productivity lies elsewhere such as in Federal/State tax reform, although we recognise that it may not be easy.

What are the opportunities and challenges to further advance pre-filling of tax returns?
This presumably depends on the ability of technology to deal with the increased amount of data associated with the more complex 'I' returns.

Should the Government pursue its proposed online tax/transfer client accounts?
There may be some merit in such an approach but, as noted earlier, combining tax and transfer information in the 'I' return can result in undue complexity for individual taxpayers.

Are their better ways that institutional arrangements for the tax system can be used to improve taxpayers' experience with the tax system?
We note in this regard that the proposed Board for the ATO should over time work to improve taxpayers' experience of the tax system, including particularly individual taxpayers.