
TAX HARMONIZATION IN EURASIAN ECONOMIC UNION

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ABSTRACT

Purpose: The purpose of this article is to theoretically substantiate the process of tax harmonization and assess its level in the countries of the Eurasian Economic Union (EAEU) in the context of increasing integration processes between us, as well as assessing its results and developing recommendations for bringing together the main elements of the tax systems of countries.

Methods: The empirical method in combination with systematization and generalization of theoretical and practical aspects of tax harmonization, economic-statistical and comparison method were used in the process of the research. The study used legislative and regulatory documents in the field of taxation of the EAEU countries, official statistics.

Results: It has been established that as a result of the strengthening of integration processes within the framework of the EAEU countries, the main elements of the economic policy are coordinated, including in the fiscal sphere. The factors constraining and stimulating the processes of tax harmonization in the countries of the integration alliance are identified. It has been proved that at present in the EAEU countries the highest level of harmonization has been achieved in the value added tax and excise taxes that significantly affect foreign trade - the main terms, the mechanism for forming the tax base, the procedure and terms of payment have been agreed. At the same time, the increase in income tax harmonization occurs in a «natural» manner.

Significance: The practical significance of the research results is that the use of the proposed recommendations for strengthening tax harmonization will enable the EAEU countries to move towards harmonizing economic policies in the fiscal sphere, overcome crisis trends together and return to the trajectory of sustainable economic growth.

KEYWORDS: tax harmonization; tax competition; Eurasian Economic Union, Eurasian Economic Commission, tax policy, tax policy coordination, tax systems, VAT, excises.

I. INTRODUCTION

Active competition in the conditions of globalization in the market of goods and services helps to

improve their quality, accelerate the exchange of information, etc. Tax competition between countries, on the one hand, leads to the same result - conditions for the «consumer of the tax system» are improved (tax rates are reduced, tax administration is improved, the list of benefits is expanded, etc.). But, on the other hand, we are talking about competition between the largest economic entities that are influenced by a much larger number of factors, so tax competition poses a potential threat to the sustainability of any economic system, which predetermined the appearance at the state level of measures to level these effects. Indeed, in an effort to increase the competitiveness of national goods on the world market, countries are trying to introduce such tax rates that would be lower than in competing countries. As a result, taxpayers seek to transfer capital from a country with a high tax burden to a country with a more liberal tax regime.

In such a situation, an ambiguous assessment of the effects of tax competition by some authors justified the need to regulate tax competition [23, p. 8]. In order to overcome the contradictions arising as a result of increased tax competition, the thesis was put forward on the desirability of harmonizing tax systems, allowing for the maximum extent to take into account the interests of all subjects of tax systems. In a sense, they even began to oppose tax harmonization of tax competition, highlighting their advantages and disadvantages, and linking the process of tax harmonization with the situation in which taxpayers face similar or identical rates, regardless of where they work, buy goods and services, save and invest.

II. METHOD

The methodological research apparatus is based on general scientific and special methods. The theoretical works were studied by the author using the methods of systematization and generalization of scientific concepts, the method of comparative analysis and classification, which allowed to determine the level of harmonization of the EAEU countries on basic taxes. The analysis of the current situation was ensured by applying economic-statistical methods for processing information and the method of interpreting the analysis results. To identify the characteristic properties and patterns of the objects under study, methods of structural grouping were used.

The level of harmonization of tax rates we propose to evaluate using the coefficient of variation (CV):

$$CV = \sigma / t,$$

где σ – standard deviation;

t – average tax rate for a specific tax.

The level of harmonization with the coefficient of variation $CV < 10\%$ is suggested to be considered high; at $10 < CV < 20\%$ is average; at $20 < CV < 30\%$ is low; with $30\% < CV$ - insignificant (i.e. it is possible to speak about the absence of harmonization of tax rates).

III. LITERATURE REVIEW.

D. Mitchell believes that tax harmonization, eliminating competition, impedes the flow of capital and labor and capital from developed countries to countries with a more liberal tax regime [20]. On the other hand, professors of the Israeli university A.Razin and E.Sadka pointed out the importance of coordination when developing the tax policy of the countries of one economic grouping [22].

From the point of view of achieving development goals by the state, tax competition at first glance seems more attractive due to the fact that business taxation is stimulated by lowering tax rates, while tax harmonization is associated with financial difficulties. At the same time, tax harmonization allows to avoid tax discrimination and double taxation, to stabilize the movement of foreign capital, which in the conditions of strengthening of integration processes or instability of the economy becomes a rather significant factor. After all, the convergence of tax parameters within the countries of one integration group allows to ensure similar conditions for the functioning of the subjects of the economies of these countries.

Harmonization trends in the tax sphere arose at the initial stages of integration, namely when creating customs unions, when it came to the unification of tax legislation and certain tax parameters affecting the mutual trade of the participating countries (including the unification of customs duties when trading with third countries). As a result, the concept of “harmonization” is often interpreted either insufficiently clearly in the economic literature or seems to be an analogue of unification. For example, R. Baldwin and P. Krugman equalize harmonization with unification, defining it as «setting the same tax rates». [17, P. 1-2]. A similar point of view is held by D. Mitchell, who defines tax harmonization as a situation in which «the same tax rates are applied to the taxpayer ...». B. Larkin in the International Tax Dictionary of the International Bureau of Financial Documentation (IBFD) defines tax harmonization as the elimination of differences or inconsistencies between the tax systems of different jurisdictions [19]. This position again replaces harmonization with unification. A more general interpretation of tax harmonization is given by P. and R. Musgrave, noting that it is a process of creating national fiscal systems corresponding to a number of common economic goals [21, p. 59-86]. It is generally difficult to agree with such a definition, since economic goals can not only differ, but also be achieved not only by reforming tax systems.

When disclosing tax harmonization, such terms as coordination, coordination, unification are used. The agreement involves the achievement of a preliminary agreement, a general agreement on issues for the development and adoption of a common decision or joint actions [11, p. 317]; with respect to taxes, this means reaching agreement in setting the tax and tax system parameters. However, this does not mean the adoption of common parameters. Moreover, at different stages of integration processes, it is possible to distinguish the use of various methods for the harmonization of elements of tax systems.

The essence of coordination initially came down to the coordination or the establishment of a reasonable correspondence between individual actions and phenomena [11, p. 201]. With reference to economic processes, the term was clarified - coordination or streamlining of actions of different parts of the controlled system [15, p. 163]. Unification is defined as the establishment of uniformity, reduction to a uniform form, as the process of introducing obligatory and uniform legal norms and rules [3, p. 435; 15, p. 349]. That is, the unification in relation to the tax sphere implies the following:

- the selection of several subjects whose tax systems need to be unified;
- the creation of a «reference» sample, which will take into account all the wishes and requirements of unified subjects;
- monitoring compliance with the prescribed requirements.

In a sense, unification is a limited concept, since reflects only the legal component of integration processes, namely, bringing to a uniform model a number of tax systems with their specific features. However, this term may be applicable to describe the processes at the stage of formation of a free trade zone and the customs union.

Thus, it can be noted that in Russian sources there is an extended interpretation of tax harmonization - tax unification, coordination of tax systems, coordination of tax policies of countries belonging to international and regional groups [4, p. 258; 11, p. 87]. Particular, from the point of view of A.V. Barkov harmonization is defined as «harmonization and regulatory consolidation of the provisions of international treaties in domestic legislation or changes in acts of national legislation aimed at applying uniform norms and rules» [1, p. 87]. This means that the harmonization processes cover all aspects of the tax mechanism: the basic concepts and indicators of tax systems, the tax law of various countries, the problems of international double taxation, taxation of investment activities, tax administration, etc. [8, p. 56]. The official documents - the Treaty on the Eurasian Economic Union «often uses the term» harmonization (convergence) «of tax legislation and tax rates» [7, p. 87]. At the same time, we believe that the effectiveness of tax harmonization in the integration alliance will be enhanced if, apart from the gradual unification of tax legislation, coordination of tax policy and tax elements, certain tax issues will be transferred to supranational bodies of the alliance.

And although the initial goal of harmonization processes was the elimination of double taxation, carried out to optimize customs policy, later the strategic role of harmonizing tax systems was considered more widely - creating a single market for goods, services, capital, labor, currency and political unions.

IV. DISCUSSION

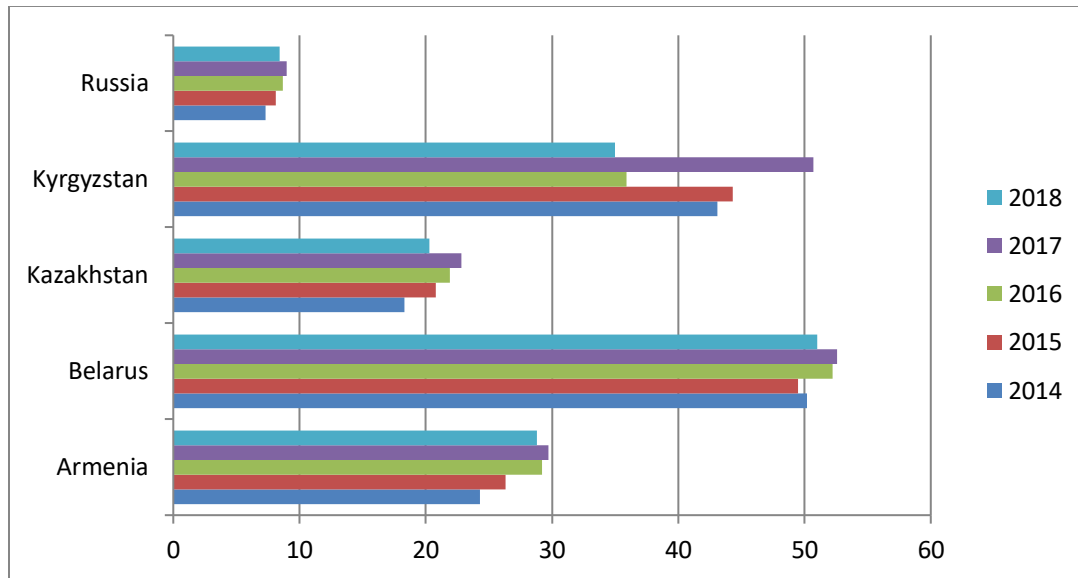
For the EAEU (first within the framework of the Customs Union), the importance of tax harmonization

has increased dramatically after the decision to create a single capital market, goods, services and labor. After all, at different stages of integration of the post-Soviet countries, there was a rapprochement, coordination, coordination and gradual unification of the parameters of tax systems, characterized by different results (Table 1).

Table 1 The relationship of the stages of economic integration of the post-Soviet countries and methods for the harmonization of elements of tax systems

<i>Integration stage</i>	<i>Method</i>	<i>Results</i>
CIS (focus on political union)	approximation of tax structures	the formation of the general principles of tax legislation and the structure of the tax system
Customs Union (focus on trade union)	approximation of tax rules for export-import transactions coordination of individual aspects of tax policy	unification of the principles of taxation on indirect taxes in mutual trade, the establishment of general rules for the application of a zero rate of VAT, the introduction of zero rates of customs duties between the member states of the alliance
EAEU (focus on economic union)	convergence of elements for individual taxes coordination and coordination of tax policy unification of legislation on individual taxes	approximation of tax legislation on taxes affecting mutual trade approximation of excise rates for the most sensitive excisable goods tax administration convergence coordination of key aspects of tax policy

However, due to differences in parameters, primarily in indirect taxes, the share of mutual trade of countries in the total foreign trade turnover in most EAEU countries is characterized by unstable and multidirectional dynamics (Fig. 1). Naturally, one should take into account the short term of functioning of an integration group consisting of five states, the influence of such factors as the preservation of the instability of the economy, the imposition of sanctions against Russia, the presence of its own national interests, etc.



In 2018, data for January-November were taken into account.

Fig. 1. Dynamics of the share of mutual trade of the EAEU countries in total foreign trade in 2014-2018.

Source: Compiled by the authors according to the EEC -

http://www.eurasiancommission.org/ru/act/integr_i_makroec/dep_stat/tradestat/time_series/Pages/default.aspx.

To manage tax harmonization in the countries of the integration alliance, it seems appropriate to proceed from the following postulates:

1. Tax harmonization, which is an integral and natural consequence of global processes in the economy, affects the interests of all countries, having a positive impact on the economies of some and a negative effect on the economies of other countries (which is also characteristic of the impact of globalization itself).
2. In conditions of economic stability, tax competition between countries of different integration groups (which, together with the cyclical nature of the development of the economic system, can provoke new crises), first of all intensifies, and harmonization takes place within the countries of one integration group.
3. As a rule, tax harmonization at the initial stage presupposes priority harmonization of taxation of export-import operations and revenues (profits) of organizations. However, property and social taxes should be harmonized subsequently.

4. Tax harmonization due to its importance for the country's budget system should be managed both at the supranational (within the countries of the integration alliance) and at the national level. This is important because in order to achieve the desired results, the interests of the alliance should be prioritized, not of each individual country.
5. Implementation of tax harmonization is associated with a number of additional costs of states arising in the process of reforming national tax legislation, changes in tax parameters, etc. At the same time, in the process of harmonization significant benefits are manifested - stability of investments and tax revenues is ensured, double taxation is eliminated, protection is provided interests of national taxpayers in international markets, etc.

At the same time, the ongoing tax harmonization can be effective only in the case of competent management of it. Otherwise, the adopted laws and decisions will be inconsistent and controversial, and also will not take into account the impact of external factors and the possibility of harmonized countries. At the same time, the management of tax harmonization should contribute to achieving a balance of interests of the subjects of tax relations, minimizing the risk of discrimination of economic entities and citizens, accounting and protecting the rights of taxpayers, maximally taking into account factors of the external and internal environment, etc.

The subjects of tax harmonization management are supranational bodies of harmonized countries and international organizations, as well as national tax services. One of the initiators of the development of the tax harmonization process is rightly recognized by the EU, under which the governing body, the Commission on the EU Tax Policy, whose activities are primarily aimed at eliminating tax barriers to the principle of free movement of goods, services, capital and labor and ensuring coordination between the tax authorities of the EU countries (a similar commission operates in the EAEU).

Since 2001, the Coordination Council of Heads of Tax Services of 10 CIS Member States and the Coordination Council of Heads of Tax (Financial) Investigations of the CIS Member States involved in the coordination of tax policy have been operating on the territory of the post-Soviet countries in the CIS countries. Within the framework of the countries of the Customs Union, the Commission of the Customs Union operates, whose decisions in the field of taxation have created the basis for the harmonization of tax legislation and tax policy. In the EAEU countries, the Tax Policy Commission and the Tax Policy and Administration Advisory Committee have been established, the main tasks of which are such as developing proposals for harmonizing tax legislation, developing common approaches to tax policy, improving tax administration and a mechanism for exchanging information between tax authorities. bodies, joint participation in exercising control over the activities of the largest companies operating in the country ah Alliance, etc.

Accordingly, legislation, administration, the structure of the tax system (the number and list of applicable taxes), relations between subjects of tax systems, elements of tax, tax accounting system can be identified as objects of management of tax harmonization. Moreover, we consider it expedient to single out two aspects (two sides) of tax harmonization:

- harmonization of qualitative parameters - concepts of the object of taxation, the tax base, the tax period, the product, work, etc.;
- harmonization of quantitative parameters (tax rates).

The harmonization processes in the tax sphere of the EAEU countries, aimed at more favorable integration into the world community, occur under the influence of both stimulating and limiting factors. The most significant stimulating factors should recognize the formation and transformation of tax systems in similar economic conditions and, as a consequence, the formation of tax systems that are close in structure; improvement of tax legislation; strengthening economic integration and creating a single market for goods, services, capital and labor. At the same time, there are also significant differences and trends that hinder tax harmonization - differences in the level of development of economies, tax burden and the share of different taxes in budget revenues, resource support, social obligations, the amount of taxes, etc. (Table 2).

Table 2 Parameters of the tax systems of the EAEU countries in 2018

Параметры	Armenia	Belarus	Kazakhstan	Kyrgyzstan	Russia
Availability of the Tax Code	2016	2002	1995	1996	1999
Availability of special tax regimes	+	+	+	+	+
Share of taxes in GDP, %	22,0	29,8	13,5	21,0	28,7
The place in terms of «Taxation» in the world ranking «Doing business» 2019	82	99	56	150	53
Aggregate tax rate,% in profit	18,5	53,3	29,4	29,0	46,3
Structure of revenues of the consolidated budget at the beginning of 2018, %:					
- VAT	32,4	29,2	15,4	30,2	16,8
- excise taxes	10,5	7,4	2,4	6,4	5,2
- income tax	0,0	13,7	6,9	7,4	10,6
- corporate income tax	10,5	9,2	21,5	2,9	10,7

Source: Compiled according to EEC-

http://www.eurasiancommission.org/ru/act/integr_i_makroec/dep_stat/finstat/Documents/finstat_1_120_92016.pdf,

<http://svspb.net/danmark/nalogov-v-vvp-stran.php>

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http://russian.doingbusiness.org/content/dam/doingBusiness/media/Annual-Reports/English/DB2019-report_web-version.pdf.

The idea of harmonizing taxation within the framework of the CIS countries was first recorded in 1992. The Treaty on the creation of an economic union contained the principles of a phased transition to the form of integration, which was voiced in its name. In Art. 18 substantiated the need for consistent harmonization of tax systems by unifying the types of main taxes, provisions on the procedure for collecting taxes and tax rates [7]. However, almost all the positive provisions of this agreement due to the refusal of its ratification by certain CIS countries were declarative in nature.

The intensification of harmonization processes was a reaction to the consequences of the 1998 crisis, when the CIS countries signed an agreement on the Principles for levying indirect taxes on exports and imports of goods (works, services) between the CIS member states, in which not only basic concepts were introduced in this area (including pseudo-export), but it was noted that «neither of the parties imposes indirect taxes on goods (work, services) exported to the territory of the other side», and when importing goods (works, services) taxation I'm in the importing country in accordance with national legislation [16].

In 1999-2002 between individual countries - Azerbaijan, Armenia, Belarus, Kazakhstan, Moldova, Russia, Tajikistan and Turkmenistan - agreements were signed on the principles of collecting indirect taxes on the export and import of goods (works, services).

In June 1999, it was decided to establish the Coordination Council of the heads of tax (financial) investigations of the CIS member states, which began to function since 2000 as the body of sectoral cooperation of the CIS.

In general, the period of the 1990s. for the CIS countries, it is possible to consider not only the stage of formation of their tax systems, but also the stage of declaring the need for tax harmonization, since not all CIS countries have chosen similar trends in the development of tax systems, which, firstly, was one of the first differences from similar processes in the EU, and, secondly, it was one of the factors hindering tax harmonization in the CIS.

In 2001, an international economic organization was created, an integration group uniting Belarus, Kazakhstan, Kyrgyzstan, Russia and Tajikistan, - the Eurasian Economic Community (EurAsEC). The main goal of the functioning of the EurAsEC is to strengthen integration and create conditions for the effective functioning of the Customs Union (CU) and the Common Economic Space (CES) of the participating countries.

Within the framework of the functioning of EurAsEC, it was intended, inter alia, to ensure a regime of free trade and free movement of capital; the creation of a common unified system of customs regulation; creation of equal conditions for production and business activities; approximation and harmonization of national legislation; ensuring the interaction of the legal systems of the EurAsEC states [13]. In 2003, the President of Tajikistan E. Rakhmonov at a meeting of heads of tax services of the EurAsEC member countries noted the need for «maximum harmonization of the tax legislation of the EurAsEC countries, ... the need to approximate the taxation system, including in terms of taxing small businesses» [10].

At the same time, three directions of tax unification were identified:

- establishment of a single list of basic taxes, calculated on the basis of the results of financial and economic activities of taxpayers;
- development and implementation of common approaches to the determination of the taxable base, calculated on the basis of the results of financial and economic activities;
- application of agreed tax rates for indirect taxes in the implementation of mutual trade.

A large set of proposals was developed - on the procedure for registering taxpayers as VAT payers in the territory of EurAsEC member states, on improving the taxation system of large taxpayers, on assessing the results of applying intergovernmental agreements on avoiding double taxation, on the exchange of tax preferences with respect to foreign citizens engaged in entrepreneurial activities in the EurAsEC countries; establishing the process of information exchange between tax services and so on. [9]. In practice, during 1999-2007. Of all the measures listed, only a few were implemented: cooperation and exchange of information in the field of taxation. Closer cooperation began in 2008, when many CIS countries almost simultaneously decided to lower the rates on individual taxes (income tax), to bring together approaches to the calculation of tax bases, and so on.

In the conditions of free movement of goods / services, labor and capital in the EAEU countries, tax harmonization processes have accelerated - goods imported into the territory are subject to indirect taxation according to the principle of the country of destination, non-discrimination is in mutual trade, excise rates on individual goods are harmonized, etc. At the same time, if the harmonization of indirect taxes is important to stimulate trade and increase the competitiveness of national goods in foreign markets, the harmonization of direct taxes is important for the inflow of investments from the countries participating in the integration alliance.

Signed in 2014 by the Treaty on the Eurasian Economic Union and the Protocol on the procedure for levying indirect taxes and the mechanism of control over their payment when exporting and importing goods, performing works, rendering services, the main concepts used in the taxation process are - goods, services, work, exports, import, etc., the procedure for levying indirect taxes [14]. At the same

time, it is stipulated that these international norms take precedence over national tax legislation. In particular, VAT is calculated on the basis of the country of destination principle, the VAT base for import operations is contractual value, tax collection is made by the tax services, for taxpayers there is a single list of documents submitted to justify the use of a zero rate of documents, the import tax deduction is set product codes, etc.

V. RESULTS

Analysis of the indicators of the five countries of the EAEU indicates a convergence in corporate income tax rates (Table 3). Moreover, in order to mitigate the effects of the current global crisis, corporate income tax rates were reduced in most of the analyzed countries - in Belarus in 2012 from 24 to 18%, in Russia in 2009 from 24 to 20%.

Regarding the value added tax, the situation is a bit more complicated, since there are multidirectional trends in its parameters: Kazakhstan, in order to stimulate demand, reduced the rate from January 1, 2009 from 13% to 12%, while for the sake of increasing budget revenues during the acute phase of the global crisis Belarus has increased it from January 1, 2010 from 18 to 20%, and Russia from 2019 from 18 to 20%.

Table 3 Parameters of tax rates of the EAEU countries in 2010-2019

Types of taxes	Armenia		Belarus		Kazakhstan		Kyrgyzstan		Russia	
	2010	2019	2010	2019	2010	2019	2010	2019	2010	2019
VAT	20	20	20	20	12	12	12	12	18	20
Income tax	24,4	22	12	13	10	10	10	10	13	13
Corporate income tax	20	20	24	18	20	20	10	10	20	20
Property tax	0,3-1,0	0,3	0,1-2	0,1-1	0,1-1,5	0,1-1,5	0,3-0,8	0,3-0,8	0,1-2,2	0,1-2,2

Source: Compiled according to the official websites of the tax authorities of the EAEU countries.

And if the categories of taxpayers of corporate income tax (corporate tax) and the tax on personal income are quite similar, the categories of value added tax payers in the EAEU countries differ, although they are converging (Table 4).

Table 4 Transformation of the category of VAT payers in the EAEU countries

Until 2017	After 2017
Armenia	
natural and legal persons conducting independent economic activities	organizations, individual entrepreneurs and notaries, who are registered with the tax authority as VAT payers
Belarus	
organizations, individual entrepreneurs selling goods (works, services)	organizations, individual entrepreneurs selling goods (works, services), trustees, individuals who are charged with the obligation to pay tax when importing goods into the territory of Belarus
Kazakhstan	
persons charged with registering as a VAT payer; individual entrepreneurs; resident legal entities (with the exception of public institutions); non-residents operating in the Republic of Kazakhstan through a branch or representative office; trustees	
Kyrgyzstan	
taxable subject and subject of taxable import	
Russia	
organizations, individual entrepreneurs, as well as persons recognized as payers when moving goods through the customs territory of the Customs Union	

Source: Compiled according to the official websites of the tax authorities of the EAEU countries.

Table 5 Comparative analysis of the elements of VAT in the EAEU countries in 2019

Indicators	Armenia	Belarus	Kazakhstan	Kyrgyzstan	Russia
Tax rates					
- basic	20	20	12	12	20
- lowered	16,67	10	3,6	-	10
- zero tax	x	x	x	x	x
The tax base	differentiated depending on the object of taxation				
Number of groups of tax objects	4	2	2	2	4
Reporting period	month	month/q quarter	-	-	-
Taxable period		год	month	month	quarter

Source: Compiled according to the official websites of the tax authorities of the EAEU countries.

The disclosure of the category of payers of excise taxes (Table 6) has approached.

Table 6 Transformation of the category of excise payers in the EAEU countries

Until 2017	After 2017
Armenia	
legal entities and individuals importing or producing excisable goods, including those producing bottling or other packaging	organizations and individual entrepreneurs who carry out transactions and operations considered as an object of taxation (supply of goods, import of goods), supply of compressed natural gas
Belarus	
organizations, individual entrepreneurs, producing excisable goods and importing excisable goods, as well as individuals who are charged with paying excise taxes when importing excisable goods	
Kazakhstan	
individuals and legal entities producing excisable goods in Kazakhstan; importing excisable goods to Kazakhstan; carry out retail, wholesale realization of gasoline; selling confiscated excisable goods; carrying out the sale of property of excisable goods; assembling excisable goods	
Kyrgyzstan	
entities producing on the territory of Kyrgyzstan and / or importing excisable goods to Kyrgyzstan	
Russia	
organizations, individual entrepreneurs, as well as persons recognized as payers when moving goods through the customs territory of the Customs Union	

Source: Compiled according to the official websites of the tax authorities of the EAEU countries.

For the EAEU countries, a list of traditional excisable goods is characteristic, but in addition to them, each country has special excisable goods — Armenia (compressed natural gas), Belarus (liquefied hydrocarbon gas and natural gas), Kazakhstan (cars, motor vehicles), Kyrgyzstan (crude oil and crude oil products) and Russia (cars, motorcycles, benzene). However, excise rates are quite different (Table 7). In 2016, the ECE Board approved agreements on the harmonization of excise rates on alcoholic beverages and cigarettes and proposed tobacco rates in the amount of 22 euros per 1000 pieces (by 2020, 32 euros). But for Armenia, Belarus and Kyrgyzstan, the deviation of rates in the amount of 10-55% was allowed, and for Kazakhstan and Russia - 10-30% [12]. Currently, in all EAEU countries cigarette excise rates are, for example, lower than in Russia. This leads to an increase in the illegal importation of cigarettes into Russia: if in July-September 2017 the share of counterfeit cigarettes was 4.5% of the market, in July-September 2018 it was 8.4%. And if Russia is in favor of harmonizing

excise rates on cigarettes and beer, then Belarus is not profitable. For alcoholic products, this is not beneficial for Kazakhstan and Kyrgyzstan. As a result, due to the presence of serious contradictions, the process of harmonization of excise rates is delayed. For alcohol products, rates are expected to come closer by 2022: the average rate for one liter of anhydrous ethyl alcohol is planned at a rate of 9 euros (however, the rates themselves and the range of their deviations have not yet been approved).

Table 7 Comparative analysis of excise elements in the EAEU countries in 2019

Indicators	Armenia	Belarus	Kazakhstan	Kyrgyzstan	Russia
List of excisable goods and rates (euro)					
- beer	30% but not less 0,19	0,3	0,1	0,4	0,5
- alcohol products	30% but not less 5,42	5,4	0,6	2,5	6,5
- cigarillos for 1000	29,8	23,4	14,2	13,2	36,8
- cigarettesfor 1000	15% but not less15,1	6,4-15,9	19,8	18,8	not less32,1
- motor gasoline	72,2	213,5	n/a	62,6	163,9
- diesel fuel	23,5	67,9	n/a	10,0	106,9
Tax rates					
- ad valorem		x	x	x	
- specific	x	x	x	x	x
- mixed	x				x
The tax base					
volume of goods in physical terms	x	x	x	x	x
cost based on selling prices		x	x		x
customs value	x	x	x	x	x
market price			x	x	
Taxable period	month	month	month	month	month

Source: Compiled according to the official websites of the tax authorities of the EAEU countries.

At the same time, if in countries with a value added tax and excise taxes, a similar option is used for determining the tax base and calculating the amount of taxes, then for income tax and personal income there is a different mechanism for calculating the taxable base. In particular, countries have allocated different groups of income and apply a different option of tax deductions for personal income tax, different approaches to determining tax bases for income tax for residents and non-residents, etc.

The EAEU countries are characterized by a low level of harmonization of tax rates for basic taxes. At the same time, there was a decrease in the coefficient of variation in the value-added tax due to the increase in the VAT rate in Russia, on the profit tax (due to a decrease in the rate in Belarus) and on the personal income tax (Table 8), which indicates a closer convergence rates. The reason for the higher value of the coefficient of variation in the tax on personal income is the preservation of the progressive scale of taxation in Armenia.

Table 8 Dynamics of average statistical indicators for assessing the level of tax rates harmonization in the five EAEU countries in 2010–2019

<i>Indicators</i>	VAT		Corporate income tax		Income tax	
	2010	2019	2010 г.	2019	2010	2019
Absolute variation range, %	8	8	14	10	14,4	12
Relative magnitude variation	0,49	0,48	0,74	0,57	1,04	0,88
Mean linear deviation	3,52	3,84	3,52	3,04	4,21	3,36
Standard deviation	3,67	3,44	4,66	3,88	5,39	4,41
The coefficient of variation	22,4	20,5	24,8	22,0	38,8	32,4
The level of harmonization of tax rates	low	low	low	low	minor	minor

VI. CONCLUSION

The study, carried out within the framework of the PFUR «5-100» project, allows us to conclude that, despite declaring the need for tax harmonization within the initial CIS countries, then the Customs Union, and now the EAEU for a long period, we can note the extremely low its level (although it has risen). Moreover, by indirect taxes, the quality parameters are harmonized to the greatest extent: the basic terms (product, service, place of sale, etc.), the procedure for forming the tax base, the procedure for collecting VAT and excises when importing goods and the moment of origin of the tax base for them, terms of payment are unified; list of submitted documents.

However, unlike in the EU countries, the tax rates of indirect taxes in the EAEU have so far been weakly harmonized, and until 2017, income tax rates have become more «random». Since 2017, the EAEU countries have stepped up work on the harmonization of excise rates (for tobacco and alcohol products) and VAT, but for a significant convergence of tax parameters, it is necessary to resolve controversial issues and take into account the interests of all countries. In terms of income tax and personal income tax, it is necessary to develop a unified approach to the formation of the tax base and applicable deductions.

REFERENCES:

1. Barkov A.V. Problems of harmonization in the Eurasian Economic Community // Journal of Russian Law. - 2003. - № 8. - P. 137-144.
2. Big Economic Dictionary / Ed. A.N. Asrilyana. Moscow: Institute of New Economics. - 2004. 1376 p.
3. Large economic dictionary. Ed. A.N. Azrilyana. M.: Foundation «Legal culture», 1994. 528 p.
4. Dal V.I. Explanatory dictionary of the living Great Russian language. M.: Publishing M.O. Wolf, 1882. Vol. 3. 670 p. - Vol. 4. - 683 p.
5. Treaty on the Establishment of the Eurasian Economic Community. Access mode: URL: http://www.consultant.ru/document/cons_doc_LAW_106656/.
6. Treaty establishing an economic union September 24, 1993. Access mode: URL: <http://base.consultant.ru/cons/cgi/online.cgi?base=LAW&n=5465&req=doc>.
7. Treaty on the Eurasian Economic Union. Access mode: URL: http://www.consultant.ru/document/cons_doc_LAW_163855/.
8. Evstigneev E.N., Viktorova N.G. Basics of taxation and tax law. SPb.: Peter. - 2004. - P. 56.
9. Results of the XXII meeting of the Council of Heads of Tax Services of EurAsEC Member States (SRNS) and the XIII Meeting of the Coordinating Council of Heads of Tax Services of the CIS Member States (CEACTS) (September 15, 2007, Cholpon-Ata, Kyrgyz Republic). Access mode: URL: <http://www.zakon.kz/4444781-itogi-xxii-zasedanija-soveta.html>.
10. Central Asian News <https://centrasia.org/newsA.php?st=1053336840>
11. Ozhegov S.I. Dictionary of the Russian language. M.: Publishing House «Russian language». - 1981. - 816 p.
12. The official website of the newspaper Izvestia <http://izvestia.ru/news/675878>.
13. The official website of the Eurasian Economic Community. Access mode: URL: <https://centrasia.org/newsA.php?st=1053336840>.
14. Protocol on the procedure for collecting indirect taxes and the mechanism of control over their payment when exporting and importing goods, performing works, and providing services (Appendix No. 18 to the Treaty on the Eurasian Economic Union) (Astana, May 29, 2014). Access mode: URL: <http://base.garant.ru/70675106/>.
15. Raizberg B.A., Lozovsky L.Sh., Starodubtseva Ye.B. Modern economic dictionary. M.: Infra-M. - 1997. - 496 p.
16. Agreement on the principles of levying indirect taxes on the export and import of goods (work, services) between the member states of the Commonwealth of Independent States. Access mode: URL: <http://www.e-cis.info/page.php?id=21494>.
17. Baldwin R., Krugman P. Agglomeration, integration and tax harmonization. HEI Working Paper. - 2002. - No. 1. Access mode: URL: <https://www.nber.org/papers/w9290.pdf>.
18. Golodova Zh.G., Ranchinskaya Yu.S. Analysis of the harmonization of indirect taxes in the CIS

- countries and the Customs Union //The International Accounting. - 2012. - No. 25 (223). - P. 27-36.
19. Larkin, B. IBFD International tax glossary. International Bureau of Fiscal Documentation. Amsterdam, The Netherlands: IBFD. - 2005. - 514 p.
 20. Mitchell D.J. The economics of tax competition: harmonization vs. liberalization // Index of economic freedom. - 2004. - P. 25-38.
 21. Musgrave P. Musgrave R. Fiscal coordination and competition in an international setting / Retrospectives on Public Finance. Durham, NC: Duke University Press. - 1991. - P. 65–66.
 22. Razin A. and Sadka E. International tax competition and gains from tax harmonization. Access mode: URL: <https://www.nber.org/papers/w3152>.
 23. Wilson J.D. and Wildasin D.E. Capital tax competition: bane or boon? Access mode: URL: <http://davidwildasin.us/pub/Wilson-Wildasin.pdf>. - P. 8.