

უკრაინა საერთაშორისო რეიტინგებში: სამეწარმეო საქმიანობის წარმართვის პირობები და საგადასახადო სფეროს ზემოქმედება

UKRAINE IN THE INTERNATIONAL RANKINGS: CONDITIONS FOR ENTREPRENEURSHIP AND INFLUENCE OF TAX ENVIRONMENT

ნატალია შალიმოვა

ეკონომიკურ მეცნიერებათა დოქტორი, ცენტრალური უკრაინის ეროვნული ტექნიკური უნივერსიტეტის აუდიტისა და გადასახადების კათედრის გამგე

NATALYYA SHALIMOVA

Doctor of Economics, Professor, Head of the Department of Audit and Taxation, Nentral Ukrainian National Technical University

გალინა კუზმენკო

ეკონომიკურ მეცნიერებათა კანდიდატი, უკრაინის დამსახურებული ეკონომისტი, ცენტრალური უკრაინის ეროვნული ტექნიკური უნივერსიტეტის აუდიტისა და გადასახადების კათედრის დოცენტი

HALYNA KUZMENKO

PhD in Economics (Candidate of Economic Sciences), Honored Economist of Ukraine, Associate Professor of the Department of Audit and Taxation
Nentral Ukrainian National Technical University

ანოტაცია

გაანალიზებულია სამეწარმეო საქმიანობის მდგომარეობა უკრაინაში ისეთი მიმართულებებით, როგორებიცაა მეურნეობრიობის სუბიექტების რაოდენობა და სტრუქტურა სახეებისა და ზომების მიხედვით/ გამოკვლეულია ინდიკატორები, რომლებიც აყალიბებენ საერთაშორისო რეიტინგებს „DoingBusiness“ და „PayingTaxes“. განსაზღვრულია იმ მაჩვენებლების ზემოქმედება, რომლებიც ახასიათებენ ქვეყანაში დაბეგვრის სისტემას. გაანალიზებულია ცვლილებები უკრაინის რეიტინგებში 2010-2017 წლებისათვის. საერთაშორისო რეიტინგების „DoingBusiness“ და „PayingTaxes“ შეხებაშია გაკეთებული შედარებითი ანალიზი უკრაინასა და მსოფლიოს სხვა ქვეყნებს შორის. წარმოდგენილია უკრაინისა და საქართველოს მაჩვენებლების დეტალური შედარებითი ანალიზი. გამოყოფილია ძირითადი ნეგატიური ფაქტორები, რომლებიც განსაზღვრავს უკრაინის საგადასახადო სისტემის დაბალ კონკურენტულ პოზიციებს. დაკონკრეტებულია უკრაინის საგადასახადო სისტემის ოპტიმიზაციის ძირითადი მიმართულებები.

საკვანძო სიტყვები: მეწარმეობა, სამეწარმეო საქმიანობის სუბიექტები, დაბეგვრის სისტემა, საერთაშორისო რეიტინგები, „DoingBusiness“ რეიტინგი და „PayingTaxes“ რეიტინგი.

Abstract

The state of development of entrepreneurship in Ukraine according to the number and structure of business entities and their types and sizes were analysed. The indicators that form international rankings ~Doing Business~ и ~Paying Taxes~ were studied. The influence of the indicators that characterize the state taxation system on the values of the international rankings was determined. The changes in the rankings of Ukraine during 2010-2017 were analyzed. A comparative analysis of the place of Ukraine among other countries of the world in accordance with the international rankings of ~Doing Business~ and ~Paying Taxes~ was made. The results of a detailed comparative analysis of Ukraine and Georgia are presented. The main negative factors that determine the low competitive positions of the tax system of Ukraine were singled out. The trends of optimization of the tax environment of Ukraine have been specified.

Keywords: entrepreneurship, business entities, taxation system, international rankings, „Doing Business~ ranking, “Paying Taxes~ ranking.

Relevance of the problem. The development of entrepreneurship and creating a favourable environment for its functioning is a priority of the state, as "an invisible hand of the market~ does not always provide essential and equal conditions. The importance of assessing the conditions and their comparability worldwide are crucial for investors, creditors and other interested parties („stakeholders”) because they are interested in the state of development, specific conditions and protection of their interests.

One of the indicators of the ease of doing business in the world is the international rankings which include the assessment of the taxation system of the country. The most popular international ranking assessing the ease of doing business in the world recently is „Doing Business” index which is prepared by The World Bank Group and is promulgated at <http://www.doingbusiness.org.ua> [1]. „Doing Business” index determines the quality of business regulations which enhance or constrain business activity, the use of the regulations in different countries, regions and selected cities. In order to improve business climate in Ukraine and Ukraine's position in the ranking of Doing Business, the Ministry of Economic Development together with the Better Regulation Delivery Office developed a roadmap which consists of 43 issues. The implementation of the issues should bring Ukraine in the top 20 countries with the best business climate according to the World Bank in 2017 (Doing Business 2018). The roadmap was approved by the Cabinet of Ministers of Ukraine №1406 on December 16, 2015 [2].

Among the areas of evaluation much emphasis is put on tax system. The „Paying Taxes” indicator which is an important component of the ranking is additionally published in separate reports „Paying Taxes” which are compiled by the World Bank in collaboration with the auditing firm PricewaterhouseCoopers (PwC) to assess the quality of the tax system for business and are officially published on the website <http://www.pwc.com> [3].

A continuous assessment and comparative analyses, identification of the factors that influence the changes of indicators and their critical assessment is an insistent task of scientific and practical direction.

Analysis of recent research and publications.

The issue of Ukraine's place in the international rankings in various aspects (entrepreneurship, impact on economic security, elimination of information asymmetry at the macroeconomic level, investment attractiveness of the country, human development, the effectiveness of the institution of bankruptcy, development of the taxation system and implementing tax policy etc.) was studied by the scholars L. Antoniuk, O. Bilorus, O. Butska, B. Danylyshyn, Ya. Zhalilo, Yu. Ivanov, I. Kryvovov~yazyuk, D. Lukyanenko, O. Moldovan, V. Moroz, V. Muntian, G. Pasternak-Taranushenko, N. Pedchenko, O. Plastun, D. Pokryshka, I. Repina, T. Chechetova-Terashvili, O. Shkurpiy, M. Shuba, Yu. Hvatov, G. Yastrebova et al. The scholars critically analyze the methodology of calculation of the international rankings; constantly develop complex scientific and practical recommendations to improve the investment, business and tax environment in Ukraine [4-17]. Nevertheless, we consider the appropriate deep study of the place of Ukraine in the international rankings with a focus on the assessment of the taxation system as an important and integral part of the business environment.

The objective of the article is the evaluation of quantitative characteristics of entrepreneurship development in Ukraine and comparative characteristics of Ukraine's position among other countries by the international „Doing Business” and „Paying Taxes” rankings.

Main material. According to the State Statistics Service of Ukraine in 2010 the number of business entities in Ukraine was about 2.2 million. Their number declined significantly during 2011-2012 – to 1.6 million. But in subsequent years their number grew and in 2015 it reached 1,974,318.

The data of the State Statistics Service of Ukraine show that the largest share in the structure of business entities is individual-entrepreneurs – 82.7% (2010), 77.2% (2012), 82.6% (2015) and the share of companies do not exceed ranges during 2010-2015 from 17.3% (2010) to 22.8% (2012 and 2013). The number of individual-entrepreneurs in 2010 was 1.8 million and the number of enterprises was 379 thousand. During 2010-2015 the number of individual-entrepreneurs decreased to 1.6 million (by 9.7%) and the number of enterprises decreased to 343 thousand (9.3%). (Table. 1).

Table 1

Number and structure of business entities of Ukraine in 2010-2015

	2010	2011	2012	2013	2014	2015
Number of enterprises	378810	375695	364935	393327	341001	343440
Number of individual-entrepreneurs	1805118	1325925	1235192	1328743	1591160	1630878
Ratio of indicator of enterprises in the total number of business entities	17,3	22,1	22,8	22,8	17,6	17,4
Ratio of indicator of individual-entrepreneurs in the total number of business entities	82,7	77,9	77,2	77,2	82,4	82,6

Source: summarized and calculated on the basis of the official data of the State Statistics Service of Ukraine [19-21].

The data of the State Statistics Service of Ukraine show a significant dominance of individual-entrepreneurs in the structure of business entities with the share of almost 97% in 2015 (Table 2). The share of other small

businesses was 2.4%, the percentage of medium business entities was 0.8% and the share of large businesses was only 0.02%.

Table 2

Structure of business entities of Ukraine in 2010-2015

Indicator	2010	2011	2012	2013	2014	2015
<i>Large business entities</i>						
number	586	659	698	659	497	423
Ratio of indicator in general indicator of business entities	0,03%	0,04%	0,04%	0,04%	0,03%	0,02%
<i>Medium business entities</i>						
number	21338	21059	20550	19210	16618	15510
Ratio of indicator in general indicator of business entities	0,98%	1,24%	1,28%	1,12%	0,86%	0,79%
<i>Small business entities including micro business entities</i>						
number	2162004	1679902	1578879	1702201	1915046	1958385
Ratio of indicator in general indicator of business entities	99,0%	98,7%	98,7%	98,8%	99,1%	99,2%
<i>Small business entities excluding micro business entities</i>						
number	68316	71083	68103	65021	55159	47555
Ratio of indicator in general indicator of business entities	3,1%	4,2%	4,3%	3,8%	2,9%	2,4%
<i>Micro business entities</i>						
number	2093688	1608819	1510776	1637180	1859887	1910830
Ratio of indicator in general indicator of business entities	95,9%	94,5%	94,4%	95,1%	96,3%	96,8%

Source: summarized and calculated on the basis of the official data of the State Statistics Service of Ukraine [19-21].

The data of the State Statistics Service of Ukraine show the decrease of all types of businesses among companies and among individual-entrepreneurs.

The subjects of large business are presented only by enterprises as individual-entrepreneurs may not be large business entities, and their number decreased from 586 units in 2010 to 423 units in 2015. The subjects of medium business are represented by enterprises (with the share of 98% in 2015) as well as by a small number of private entrepreneurs. During 2010-2015 their total number decreased from 21.3 thousand to 15.5 thousand. The subjects of small business entities are small businesses (their share in 2015 was 16.7%) and private entrepreneurs (with the share of 83.3% in 2015). The total number of small businesses decreased from 2.2 million to 2.0 million during 2010-2015. As a part of small business entities individual-entrepreneurs have the share of 97.6%.

Large enterprises are mainly registered in the following activities: industry (233 companies), trade and repair (106 companies), transport (32 companies) agriculture, forestry and fishery (29 companies), information

and telecommunications (6 companies), civil engineering (5 companies), food, financial and insurance activities, real estate, professional, scientific and technical activities, arts, sports and entertainment (3 companies), administrative and support services (1-3 companies). The main share of enterprises in Ukraine in 2015 in all businesses is represented by micro enterprises.

„Doing Business” is the ranking which has existed since 2003 and is usually published in autumn. The number of countries covered by the ranking is constantly increasing: 2004 – 133, 2005 – 145, 2006 – 155, 2007 – 175, 2008 – 178, 2009 – 181, 2010-2012 – 183, 2013 – 185, 2014-2016 – 189, 2017 – 190. The studies indicate not only the problems that hold back business development but determine the cause and include recommendations on the necessary reforms. Currently the ranking consist of 11 indicators including ten major and one extra (Table 3). The additional indicator (11) describes the state of the labour market regulation, and its specificity is that it is not included in comprising the overall ranking (in 2011 a similar indicator was part of the main indicators).

Table 3

„Doing Business“ indicators	
Indicator	Description
Basic	
Starting a business	reveals the bureaucratic and legal obstacles that an entrepreneur must overcome in the process of creation and registration of a new company. The total number of procedures as well as their costs and duration which entrepreneurs must undergo to register a limited liability company from applying to the beginning of operation are determined
Dealing with construction permits	records all procedures required for a business in the construction industry to build a warehouse along with the time and cost to complete each procedure; deals with building regulations, including approvals, permit issuance and inspections
Getting electricity	records all procedures required for a business to obtain a permanent electricity connection and supply for a standardized warehouse
Registering property	records the full sequence of procedures necessary for a business (the buyer) to purchase a property from another business (the seller) and to transfer the property title to the buyer's name so that the buyer can use the property for expanding its business
Getting credit	measures the legal rights of borrowers and lenders with respect to secured transactions through one set of indicators and the reporting of credit information through another
Protecting minority investors	measures the protection of minority investors from conflicts of interest through one set of indicators and shareholders' rights in corporate governance through another
Paying taxes	records the taxes and mandatory contributions that a medium-size company must pay in a given year as well as the administrative burden of paying taxes and contributions and complying with post-filing procedures
Trading across borders	records the time and cost associated with the logistical process of exporting and importing goods (including the time for preparation of the required documents)
Enforcing contracts	measures the time and cost for resolving a commercial dispute through a local first-instance court and the quality of judicial processes index, evaluating whether each economy has adopted a series of good practices that promote quality and efficiency in the court system
Resolving insolvency	studies the time, cost and outcome of insolvency proceedings involving domestic entities as well as the strength of the legal framework applicable to judicial liquidation and reorganization proceedings. The data for the resolving insolvency indicators are derived from questionnaire responses by local insolvency practitioners and verified through a study of laws and regulations as well as public information on insolvency systems
Additional	
Labour market regulation	studies the flexibility of regulation of employment, specifically as it relates to the areas of hiring, working hours and redundancy

Source: summarised on the basis of the report „Doing Business – 2017“ [22] and official data of the website <http://doingbusiness.org/data/exploreeconomies> [1].

According to the report of 2017 [22] Ukraine ranks 80 among 190 countries rated by „Doing Business – 2017“ (tab. 4) which is one position higher in comparison with the rating of „Doing Business – 2016“. The le-

ader is New Zealand. According to the average estimates of experts of the World Bank one point in the ranking of „Doing Business“ brings the country about 500-600 million US Dollars of investments.

Table 4

Ranks of Ukraine in ~Doing Business~

საშუალო	Doing Business 2010	Doing Business 2011	Doing Business 2012	Doing Business 2013	Doing Business 2014	Doing Business 2015	Doing Business 2016	Doing Business 2017
Ease of doing business rank	142	145	152	137	112	96	81	80
Starting a business	134	118	112	50	47	76	24	20
Dealing with construction permits	181	179	180	183	41	70	137	140
Employing workers	83	-	-	-	-	-	-	-
Getting electricity	-	-	169	166	172	185	140	130
Registering property	141	164	166	149	97	59	62	63
Getting credit	30	32	24	23	13	17	19	20
Protecting minority investors	109	109	111	117	128	109	101	70

საგ	Doing Business 2010	Doing Business 2011	Doing Business 2012	Doing Business 2013	Doing Business 2014	Doing Business 2015	Doing Business 2016	Doing Business 2017
Paying taxes	181	181	181	165	164	108	83	84
Trading across borders	139	139	140	145	148	154	110	115
Enforcing contracts	43	43	44	42	45	43	93	81
Resolving insolvency	145	150	156	157	162	142	148	150

Source: summarised on the basis of the official data of the website <http://doingbusiness.org> [1].

In comparison with 2016 Ukraine improved its positions by the following indicators:

- starting a business – from 24 to 20;
- getting electricity – from 140 to 130;
- protecting minority investors – from 101 to 70;
- enforcing contracts – from 93 to 81.

The report of ~Doing Business – 2017" highlights the reforms made in Ukraine in the spheres of protecting minority investors and enforcing contracts.

But there are spheres in which indicators lowered or stayed at the same positions. They are:

- resolving insolvency – from 148 to 150;

trading across borders – ifrom 110 to 115;

paying taxes – from 83 to 84;

registering property – from 62 to 63;

getting credit – from 19 to 20;

dealing with construction permits – from 137 to 140.

The new report shows that it is necessary to implement reforms of deregulation because Ukraine is considerably behind the neighbouring countries: Georgia holds the 16th place, Poland – 24, Romania – 36, Belarus – 37, Hungary – 41, Moldova – 44 and Turkey – 69. The comparison of indicators of Georgia and Ukraine in the ranking of ~Doing Business – 2017" is presented in Table 5.

Table 5

Indicators of Georgia and Ukraine in the ranking of ~Doing Business – 2017"

Indicator	Georgia	Ukraine	Distance
Ease of doing business rank	16	80	+64
Population	3,679,000	45,198,200	+41,519,200
GNI per capita (US\$)	4,160	2,620	-1,540
Starting a business	8	20	+12
Procedures (number)	3	4	+1
Time (days)	3	5	+2
Cost (% of income per capita)	2.4	0.5	-1.9
Minimum capital (% of income per capita)	0.0	0.0	0
Dealing with construction permits	8	140	+132
Procedures (number)	7	10	+3
Time (days)	48	67	+19
Cost (% of warehouse value)	0.2	15.2	+15
Building quality control index (0-15)	7.0	8.0	+1
Getting electricity	39	130	+91
Procedures (number)	4	5	+1
Time (days)	71	281	+210
Cost (% of income per capita)	354.0	637.6	+283.6
Reliability of supply and transparency of tariffs index (0-8)	6	6	0
Registering property	3	63	+60
Procedures (number)	1	7	+6
Time (days)	1	23	+22
Cost (% of property value)	0.0	1.9	+1.9
Quality of land administration index (0-30)	21.5	15.5	-6
Getting credit	7	20	+13
Strength of legal rights index (0-12)	9	8	-1
Depth of credit information index (0-8)	8	7	-1
Credit bureau coverage (% of adults)	88.6	40.0	-48.6
Credit registry coverage (% of adults)	0.0	0.0	0
Protecting minority investors	7	70	+63
Extent of disclosure index (0-10)	9	6	-3
Extent of director liability index (0-10)	6	2	-4
Ease of shareholder suits index (0-10)	8	6	-2
Extent of shareholder rights index (0-10)	7	6	-1
Extent of ownership and control index (0-10)	8	5	-3
Extent of corporate transparency index (0-10)	8	9	+1
Paying taxes	22	84	+62
Payments (number per year)	5	5	0
Time (hours per year)	270	355.5	+85.5
Total tax rate (% of profit)	16.4	51.9	+35.5
Post-filing index (0-100)	87.22	79.26	-7.96
Trading across borders	54	115	+61
Time to export			
Documentary compliance (hours)	2	96	+94
Border compliance (hours)	14	26	+12
Cost to export			
Documentary compliance (US\$)	35	292	+257
Border compliance (US\$)	383	75	-308
Time to import			
Documentary compliance (hours)	2	168	+166

Indicator	Georgia	Ukraine	Distance
Border compliance (hours)	15	72	+57
Cost to import			
Documentary compliance (US\$)	189	212	+23
Border compliance (US\$)	396	100	-296
Enforcing contracts	16	81	+65
Time (days)	285	378	+93
Cost (% of claim)	29.9	46.3	+16.4
Quality of judicial processes index (0-18)	12.0	9.0	-3
Resolving insolvency	106	150	+44
Time (years)	2.0	2.9	+0.9
Cost (% of estate)	10.0	42.0	+32
Recovery rate (cents on the dollar)	39.5	7.5	-32
Strength of insolvency framework index (0-16)	6.0	7.5	+1.5

Source: summarised on the basis of the official data of the website <http://doingbusiness.org/> [1].

Georgia is ahead of Ukraine by almost all indicators. Only six indicators in Ukraine have slightly better position:

cost of starting business (% of income per capital);
building quality control index;
extent of corporate transparency index;
border compliance (cost of export)
border compliance (cost of import);

strength of insolvency framework index.

On four indicators Georgia and Ukraine have equal positions:

minimum capital of starting business (% of income per capital);
reliability of supply and transparency of tariffs index;
credit registry coverage (% of adults);
payments of taxes (number per year).

In the report "Doing Business-2017" Ukraine and Georgia are in the group of countries "Europe & Central Asia" which covers 25 countries. The indicators of the countries with this mini-ranking are presented in Fig. 1.

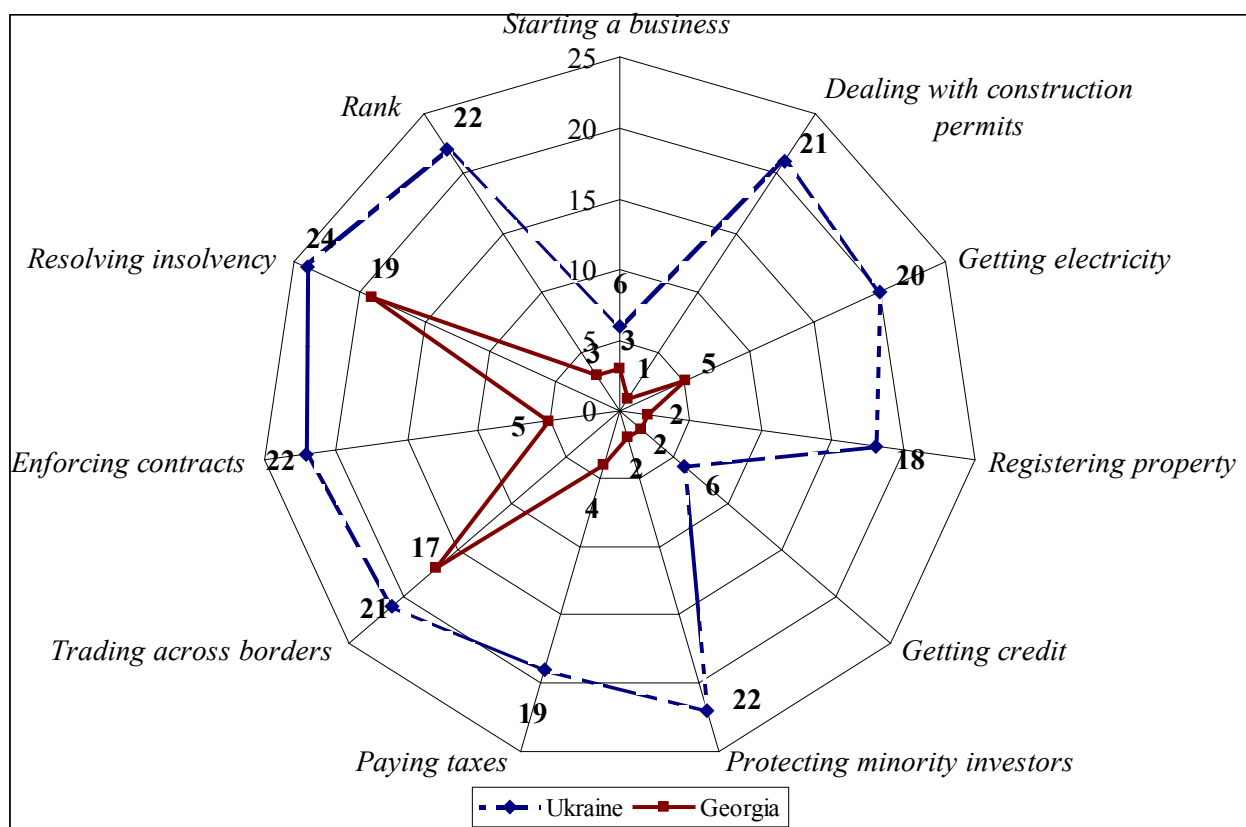


Figure 1. Ranking of Ukraine and Georgia among Europe & Central Asia countries (25 countries)

Source: summarised on the basis of the official data of the website <http://doingbusiness.org> [1].

Georgia ranks the 3rd among the countries of Europe & Central Asia giving upper places only to Macedonia & Latvia. Ukraine holds the 22nd place being ahead only of Bosnia and Herzegovina, Uzbekistan and Tajikistan. Over 10 indicators position Georgia in the top five. Only by two indicators (resolving insolvency and trading across borders) Georgia holds the lowest position. Ukraine, by contrast, only by two indicators (starting a business and getting credit) holds high positions.

Rating of "Paying Taxes" evaluates tax burden of an average enterprise in terms of administration and payment of corporate income tax, social contributions, taxes withheld from the income of employees, property taxes, taxes on transfer of property, taxes on dividends and other obligatory payments which have to be paid by business. In addition, the analysis is made on the information on the frequency of submission of tax returns and payment of taxes, as well as the time required to perform tax obligations by business. The ranking also includes the assessment of the processes that follow tax payments, in particular tax audits, receiving budgetary claims, administrative appeals, which allows making a detailed analysis of tax systems.

The indicator "Paying Taxes" is evaluated by the following parameters:

- the number of payments, which measures the frequency with which the company has to file and pay different types of taxes and contributions, adjusted for the manner in which those filings and payments are made;
- total tax rate (the measure of tax cost, the total of all taxes borne as a percentage of commercial profit);
- the time to comply with the three main taxes (corporate income taxes, labour taxes and mandatory contributions, and consumption taxes) which captures the time required to prepare, file and pay each tax type;
- post-filing index, based on four equally weighted components:
 - 1) time to comply with a VAT refund (hours);
 - 2) time to obtain a VAT refund (weeks);
 - 3) time to comply with a CIT audit (hours);
 - 4) time to complete a CIT audit (weeks).

The comparison of Ukraine with other countries and groups of countries (tab. 5) shows that Ukraine has favourable conditions by the indicators such as "Number of tax payments" and "Post-filing index" but too much time for calculation and payment of taxes and a relatively high overall tax rate.

Table 5

Comparison of the indicators of Ukraine by the indicator "Paying Taxes" with other countries and group of countries

Indicator	Ukraine	Europe and Central Asia (25 countries)	OECD high income (32 countries)	New Zealand	Georgia	აზერბაიჯანი
Rank among all countries	84	-	-	11	22	47
Number of tax payments	5,0	17,6	10,9	7,0	5,0	7,0
Time for calculation and tax payments	355,5	221,5	163,4	152,0	270,0	271,0
Overall tax rate (% of income before taxation)	51,9	33,8	40,9	34,3	16,4	40,4
Post-filing index (0-100)	79,3	71,9	85,1	96,9	87,2	92,2

Source: summarised on the basis of reports of Doing Business – 2017 [22] and Paying Taxes – 2017 [23], official data of the websites <http://doingbusiness.org/> [1]; <http://www.pwc.com/gx/en/services/tax/paying-taxes-2017> [3].

As noted in the report "Paying Taxes 2017" average companies in the world spend 251 hours on tax calculation, preparation of reports and payments, perform 25 payments at an average total tax rate of 40.6% of income before taxation.

In the report of "Paying Taxes 2017" Ukraine and Georgia are analysed in comparison with 19 countries of Central Asia & Eastern Europe.

Among these countries Ukraine has the lowest number of tax payments (including Georgia) which is 5. Other countries have more payments: from 6 (Azerbaijan)

to 51 (Kyrgyzstan). The total tax rate in Ukraine is one of the highest which is 51.9% (ahead of Ukraine only Belarus – 54.8% and Tajikistan – 65.2%). In Georgia, the total tax rate is 16.4%. Index of calculation of taxes is one of the highest in Ukraine and equals 355.5 (the indices are higher only in Bosnia and Herzegovina – 411 hours). But this index (270 hours) is also high in Georgia. According to the index of procedures after reporting Ukraine is on 79,3 position of this mini-ranking, and Georgia has a better index (87.2) due to the following factors (tab. 6).

Table 6

Components of Post-filling index of the countries of Central Asia& Eastern Europe

Indicator	Ukraine	Georgia	Serbia (easiest)	Turkey (most difficult)
Post-filling index	79.3	87.2	94.0	3.9
Components:				
1. VAT compliance time (hours)	16.0	20.5	4.0	No refund
2. VAT waiting time (weeks)	28.2	8.5	8.2	No refund
3. CIT audit compliance time (hours)	3.0	1.5	5.0	47.5
4. CIT audit completion time (weeks)	0.0	0.0	0.0	32.1

Resource: summarised on the basis of the report of Paying Taxes – 2017 [23], official data of the website: <http://www.pwc.com/gx/en/services/tax/paying-taxes-2017> [3].

Indicators of mini-ranking of the EU countries are:

general tax rate: from 20.8% (Luxembourg) to 62.8% (France);

time for calculation and payment of taxes: from 52 hours. (San Marino) to 453 (Bulgaria) (Bulgaria is far ahead of other EU countries; Hungary in ahead of it with the figure of 277 hours.)

number of payments: 4 (Norway) to 31 (Croatia); index of procedures after reporting: from 48.4 (Italy) to 98.6 (San Marino).

If the assessment of an economy of "Paying Taxes" indicator increased or decreased by 2% or more to the extreme limit, the changes in tax legislation that led to it can be qualified as a reform. Moreover, these reforms fall into two categories: reforms that simplify business and reforms that complicate business. Since 2004 there have been 443 reforms in the tax area in the world. The reforms were aimed at doing business easier.

The positive indicators should be considered critically. In 2010 Ukraine was on the 181 position in the ranking "Paying Taxes", and it was almost the worst among the countries of the world. The main negative factors that determined the low competitive position of the Ukrainian tax system were:

- instability, internal contradictions and inconsistencies in tax legislation;
- high tax burden on business;

• misallocation of tax burden among factors of production;

• complexity of tax administration;

• indiscriminate and unjustified tax privileges and exemptions which increase the tax burden on efficient companies that honestly pay taxes [7, p. 11-13].

In 2015 Ukraine held the 108th position. This increase was due to the reforms in the tax sphere, adoption of the Tax Code and its reforming in 2015. The most significant improvements include the following:

1. Introduction of potentially effective set of tax incentives and stimuli for business support;
2. Establishment of the mechanism for automatic reimbursement of VAT.
3. Building up tax service centres that will provide a more comfortable environment for taxpayers;
4. Formation of electronic channels of communication with taxpayers;
5. Reducing the number of regulatory organisations.
6. Reducing social security payments and reduction of the amount of reporting [8].

During this period there was a decrease in the number of tax payments. But to some extent this improvement was "artificial" taking into account the changes that were made in the property and resource taxes (tab. 7).

Table 7

Transformation of the number of taxes and collections in Ukraine

2011-2014	since 2015
Fee for the first registration of a vehicle	Property tax, which consists of:
Fee for the land	tax on real property other than land;
Tax on real property other than land	transport tax;
	land tax
Fee for the rent of transportation of oil and oil products in pipelines and oil pipelines, transit pipeline transportation of natural gas and ammonia on the territory of Ukraine	Rental fee, which consists of:
Fee for the rent of oil, natural gas and gas condensate produced in Ukraine	rental fee for use of subsoil for mining;
Fee for using subsoil	rental fee for use of subsoil for the purposes not related to mining;
Fee for using the radio frequency resource of Ukraine	rental fee for the use of radio frequency resource of Ukraine;
Fee for special usage of water	rental fee for special use of water;
Fee for the special usage of forests	rental fees for special use of forest resources;
	rental fee for the transportation of oil and oil products in pipelines and oil pipelines, transit transportation

Source: summarised on the basis of the Tax Code of Ukraine [24].

As we see the taxes were not cut, they were only united in two taxes, within which there are several subtypes.

Improvement of the tax policy and development of tax environment should be conducted in the following areas:

improvement of consumption taxes; improvement of taxation system for legal entities; use of the experience of personal income tax of foreign countries in Ukraine; improvement of the tax benefits system [10];

reducing the number of social security payments and reduction of the amount of reporting; bringing to order the system of refunding VAT; introduction of the institution of a consolidated group of taxpayers; simplification of tax reporting and accounting for certain taxes; return to the previous mechanism for calculating income tax which was based on the actual rates of profit; improving information technology of communication between

payers and regulatory organizations and expand "on-line" services [8].

Conclusions. Recent years the number of business entities decreases despite the fact that Ukraine's position in the international rankings (including "Doing Business" and "Paying Taxes") increases. The further increasing of the ranking of our country in the world economy in general and in different areas in particular (trade, financial, social, etc.) is impossible without forming a solid basis for internal development which is provided by the taxation system. Despite some positive changes Ukraine has the potential to improve institutional, administrative and economic instruments in this sphere. However, it is important to avoid activities that "artificially" increase the ranking of the country without real improvement in the area as this may adversely affect the image and reputation of the country causing distrust of the governance and regulation.

REFERENCES

- 1 Site of Rating "Doing Business". <http://doingbusiness.org>
- Order of Cabinet of Ministers of Ukraine "On approval of an action plan for the implementation of best practices and effective quality control, reflected in the World Bank Group methodology for ranking" Doing Business "for 2016" of December 16, 2015. <http://zakon5.rada.gov.ua>. Retrieved from <http://zakon5.rada.gov.ua/laws/show/1406-2015-p> [in Ukrainian].
- Site of PricewaterhouseCoopers (PwC). <http://www.pwc.com>
- Ivanov, Yu., & Udovenko, A. (2015). Ukraine in the ranking of «Doing Business - 2016»: a breakthrough in the field of registration on the background of stagnation in other areas of deregulation. Analytical Note. Kharkov. <http://ndc-ipr.org>. Retrieved from <http://ndc-ipr.org/media/documents/Proruv.pdf> [in Ukrainian].
- Kravtsova, O. (2013). Efficiency of the institute of bankruptcy in Ukraine. *Scientific Bulletin of Poltava University of Economics and Trade. Series: Economics*, 2 (58), 330-337. Retrieved from http://nbuv.gov.ua/UJRN/Nv-pusk_2013_2_57 [in Ukrainian].
- Kryvovyzuk, Igor V., & Volynchuk, Yuliya V. (2014). Ukraine in International Economic Rating: Post-Crisis Syndromes or Apocalypse? *Actual Problems of Economy*, 10(160), 56-62. Retrieved from http://nbuv.gov.ua/UJRN/ape_2014_10_8. [in Ukrainian].
- Pokryshka, D., Zhalilo, Ya., Liapin, D., Belinsky, Ya., Moldovan, O., & Skyba, M. (2010). *Mechanisms of development of entrepreneurship in the conditions of post-crisis recovery of economy of Ukraine*. Kyiv: NISD <http://www.niss.gov.ua>. Retrieved from http://www.niss.gov.ua/content/articles/files/pokryshka_m_r-47e13.pdf [in Ukrainian].
- Moldovan, O. (2014). Creation of a Favorable Fiscal Climate for Business Activities in the Ukraine: Main Problems and Ways of Overcoming. *Economic Bulletin of Donbas*, №2(36). 98-104. Retrieved from <http://dspace.nbuv.gov.ua/bitstream/handle/123456789/88584/14-Moldovan.pdf?sequence=1> [in Ukrainian].
- Moroz, V., & Shepetko, R. (2015). The institutional framework of Ukrainian economy neo-industrialization in the light of global integrated indices. *Economic Annals-XXI*, 7-8(2), 12-14. Retrieve from http://soskin.info/userfiles/file/2015/7-8_2_2015/Moroz_Shepetko.pdf [in Ukrainian].
- Pedchenko, N., & Strilets, V. (2015). Implementation of foreign experience of tax policy in Ukraine. *Scientific Bulletin of Poltava University of Economics and Trade. Series: Economics*, 1 (69), 1, 179-187. Retrieve from [http://nbuv.gov.ua/UJRN/Nvpusk_2015_1\(1\)_27](http://nbuv.gov.ua/UJRN/Nvpusk_2015_1(1)_27). [in Ukrainian].
- Plastun, O., & Dudkin, O. (2012). International investment ratings as means of information asymmetry elimination on macroeconomic level. *Marketing and Innovation Management*, 3, 191-198. Retrieved from <https://essuir.sumdu.edu.ua/bitstream/123456789/29182/1/investment.pdf> [in Ukrainian].
- Riepina, I., Shergina, L. & Riepin, K. (2015). Entrepreneurship Development in Ukraine Indicators the World Bank "Doing Business". *Problems and prospects of business*, 2, 106-113. Retrieved from http://nbuv.gov.ua/UJRN/piprp_2015_2_21. http://nbuv.gov.ua/UJRN/piprp_2015_2_21. [in Ukrainian].
- Khvatov, Yu.Yu. (2013). Comparative analysis of international ratings of investment attractiveness. *Academic review*,

- 2(39), 147-153. Retrieved from <http://duan.edu.ua/uploads/vidavnitstvo14/akademichnij-ogljad-2-13/6307.pdf>. [in Russian].
- Chechetova-Terashvili, T. M., & Malishko, Yu. M. (2014). Analysis of Disadvantages of the International Rating “Doing Business” Methodology. *Problems of economy*, 3, 38-44. Retrieved from http://www.problecon.com/pdf/2014/3_0/38_44.pdf. [in Ukrainian].
- Shkurupii, O. V., & Bazavluk, N. G. (2014). Factors that are Affecting the Dynamics of the Economy of Ukraine and National Competitiveness. *Problems of economy*, 2, 89-94. Retrieved from http://www.problecon.com/export_pdf/problems-of-economy-2014-2_0-pages-89_94.pdf. [in Ukrainian].
- Shuba, M. V. (2015). Ukraine in the International Rankings of Investment Attractiveness: an Analysis of the Views of Global Agencies and Organizations. *Business-Inform*, 9, 135-139. Retrieved from http://www.business-inform.net/pdf/2015/9_0/135_139.pdf. [in Ukrainian].
- Yastrebova, A. S. (2013). Efficiency of Tax Reforms in the Context of Specific Behaviour of a Tax Payer in Ukraine. *Business-Inform*, 8, 305-309. Retrieved from http://www.business-inform.net/pdf/2013/8_0/305_309.pdf [in Ukrainian].
- Activity of Large, Middle-Size, Small and Micro-Entrepreneurship Entities. (2016). Statistical Publication. State Statistic Service of Ukraine. Kyiv. <https://ukrstat.org>. Retrieved from <https://ukrstat.org/uk/menu/publikac.htm> [in Ukrainian and English].
- Activity of Business Entities. (2016). Statistical Publication. State Statistic Service of Ukraine. Kyiv. <https://ukrstat.org>. Retrieved from <https://ukrstat.org/uk/menu/publikac.htm> [in Ukrainian and English].
- Statistical Yearbook of Ukraine 2015. (2016). Statistical Publication. State Statistic Service of Ukraine. Kyiv. <https://ukrstat.org>. Retrieved from https://ukrstat.org/uk/druk/publicat/kat_u/publ1_u.htm [in Ukrainian].
- Ukraine in Figures 2015. (2016). Statistical Publication. State Statistic Service of Ukraine. Kyiv. <https://ukrstat.org>. Retrieved from https://ukrstat.org/uk/druk/publicat/kat_u/publ1_u.htm [in Ukrainian].
- Doing Business 2017. <http://www.doingbusiness.org>. Retrieved from <http://www.doingbusiness.org/~media/WBG/DoingBusiness/Documents/Annual-Reports/English/DB17-Report.pdf> [in English].
- Paying Taxes 2017. <http://pwc.com>. Retrieved from <http://pwc.com/gx/en/paying-taxes/pdf/pwc-paying-taxes-2017.pdf> [in English].
- Tax Code of Ukraine of December 2, 2010 (as amended). <http://zakon2.rada.gov.ua> Retrieved from <http://zakon2.rada.gov.ua/laws/show/2755-17> [in Ukrainian].