# SPECIAL PROVISION AND INCENTIVE TO MANUFACTURING INDUSTRIES UNDER ITA 2058

A Thesis

By

Dipendra Raj Karki Central Department of Management Symbol No.: 689/016 T.U. Regd. No.: 7-2-770-2-2010

Submitted in partial fulfillment of the requirements for the degree of

Master of Business Studies (MBS Semester)

in the

**Faculty of Management** 

**Tribhuvan University** 

Kirtipur, Kathmandu August, 2019

## **CERTIFICATION OF AUTHORSHIP**

I certify that the work in this thesis entitled **Special Provision and Incentive to Manufacturing Industries Under ITA 2058** has not previously been submitted for a degree nor has it been submitted as part of requirements for a degree except as fully acknowledged within the text.

I also certified that the thesis has been written by me under the supervision of Prof. Dr. Gopi Nath Regmi. Any help that I have received in my research work and the preparation of the thesis itself has been acknowledge. In addition, I certified that all information source and literature used are indicated in the reference section of the thesis.

Dipendra Raj Karki August, 2019

### **RECOMMENDATION LETTER**

It is certified that thesis entitled **Special Provision and Incentive to Manufacturing Industries Under ITA 2058** submitted by Dipendra Raj Karki, is an original piece of research work carried out by the candidate under my supervision. Literary presentation is satisfactory and the thesis is in a form suitable for publication. Work evinces the capacity of the candidate for critical examination and independent judgement. Candidate has put in at least 60 days after registering the proposal. The thesis is forwarded for examination.

Prof. Dr. Gopi Nath Regmi Thesis Supervisor Central Department of Management Tribhuvan University Kirtipur, Kathmandu, Nepal

August, 2019

### **APPROVAL SHEET**

We, the undersigned, have examined the thesis entitled **Special Provision and Incentive to Manufacturing Industries Under ITA 2058** presented by **Dipendra Raj Karki**, a candidate for the degree of **Master of Business Studies** (**MBS**) and conducted the viva voce examination of the candidate. We hereby certify that the thesis is worthy of acceptance.

.....

Prof. Dr. Gopi Nath Regmi Thesis Supervisor

Internal Examiner

External Examiner

.....

Prof.Dr. Sanjay K. Shrestha

Chairperson, Research Committee

.....

Prof. Dr. Ramjee Gautam Head, Central Department of Management

Date: 2076/4/28

### ACKNOWLEDGEMENTS

I owe a deep debt of gratitude to my thesis supervisor Prof. Dr. Gopi Nath Regmi, Central Department of Management, for his constant encouragement, guidance and valuable supervision.

I would like to express debt of gratitude to Prof. Dr. Ramjee Gautam, Head of Central Department of Management, for the approval of thesis.

I am very much thankful to all the teachers and staffs of Central Department of Management who cooperated and helped me during my thesis writing.

I would like to express my thanks to all my colleagues and friends for their regular help and support during thesis writing.

Similarly, I would like to express my hearty thanks towards all of my family members and relatives who spent their valuable time and effort and made great sacrifice for my higher education.

August, 2019 Kathamandu

Dipendra Raj Karki

#### **ABSTRACT**

The research work has been carried out on Special Provision and Incentive to Manufacturing Industries Under ITA 2058 with the aim to analyze the impact of special provisions in manufacturing industries provided by income tax act 2058. For the study purpose, questionnaires are used for primary data and for secondary data publication was used hence descriptions as well as analytical research design are used for research purpose. Tax administrators, tax experts and taxpayers were considered as the total population. Out of them, 20 tax administrators, 20 tax experts and 20 of taxpayers were requested to fill the questionnaire for this 20 each has been used as sample size. Hence, the total respondents have been divided into three different groups. Information collected through the questionnaire was on raw form. To meet the objective of this study, they are checked, rechecked, edited and tabulated for computation. According to the nature of data, they have been inserted in meaningful tables. Homogenous data are sorted in one table and various tables are prepared in under stable manner.

The internal revenue is sometimes in sufficient even to meet regular expenditure and most of the development activities depend on foreign aid where Nepal has been compelled to harmonize the donor. The major problems of domestic resource mobilization are poor utilization of the natural resource base, small and fragmented industrial sector, poor performance of public sector enterprises, poor economic growth and inadequate tax efforts etc. So, in this context, revenue generation form internal sources is very important in which income tax is one of the major sources and it is considered as a good remedy to cure growing resource gap problem in Nepal.

The provisions provided to industrial sector is aiding to promote industries. The impacts of ITA 2058 in manufacturing sectors has positively influenced by the manufacturing sectors with the increment in number of industries, timely reporting and recording, registration and renewals, apart form this excess depreciation facilities for special industries have promoted the growth of industrial sectors which ultimately have contributed in increasing tax revenue.

Income tax laws and administration in Nepal are to be deeply scrutinized and properly implemented. Act itself is not bad, some provisions would have to be mentioned clearly. Strong commitment, fair and uniformly imposition are to be stored and revitalized. Manpower development planning within the administration is desired for the efficiency of tax personnel side by side, tax education packages are to be made and initiated, hence tax administration and tax compliance could be improved.

#### **TABLE OF CONTENTS**

	Page No.
Title Page	i
Certification of Authorship	ii
Recommendation Letter	iii
Approval Sheet	iv
Acknowledgements	v
Abstract	vi
Table of Contents	vii
List of Tables	viii
List of Figures	ix
Abbreviations	х

#### **CHAPTER I: INTRODUCTION**

1.1 Deckground of the Study	Error! Bookmark not defined.
1.1 Background of the Study	EITOF: DOOKIIIAITK HOU UEIIIIEU.
1.2 Statement of the Problem	Error! Bookmark not defined.
1.3 Objectives of the Study	Error! Bookmark not defined.
1.4 Significance of the Study	Error! Bookmark not defined.
1.5 Limitations of the Study	Error! Bookmark not defined.
1.6 Organization of the Study	Error! Bookmark not defined.
CHAPTER-II: LITERATURE REVIEW	8
2.1 Theoretical Review	Error! Bookmark not defined.
2.1.1 Taxation	Error! Bookmark not defined.
2.1.2 Classification of Taxes	Error! Bookmark not defined.
2.1.3 History of Income Tax in Nepal	Error! Bookmark not defined.
2.1.4 The Features of Income Tax Act, 2058 (2	002 A.D.) Error! Bookmark not
defined.	
2.1.5 Source of Income	Error! Bookmark not defined.
2.1.6 Types of Industries	Error! Bookmark not defined.
2.1.7 National Priority Industries	Error! Bookmark not defined.

2.1.7 National Priority Industries
2.1.8 Types of Tax Incentives
2.1.8.1 Objectives of Tax Incentives
2.1.8.2 Targeting of Incentives
2.1.8.3 Forms of Tax Incentives
2.1.9 Specimen for Calculation of Income from Industry as per ITA 2058
2.1.9 Chereif section of Districts on the Davie of Leductric light of Ledu

2.1.10 Classification of Districts on the Basis of Industrialization Error! Bookmark not defined.

2.2 Review of Books

**Error! Bookmark not defined.** 

1

2.4 Review of Research Report and Articles	Error! Bookmark not defined
2.5 Review of Theses	Error! Bookmark not defi
2.6 Research Gap	Error! Bookmark not defined.
CHAPTER -III: RESEARCH METHODOLOGY	<b>40</b>
3.1 Research Design vii	Error! Bookmark not defined.
3.2 Conceptual Framework	40
3.3 Population and Sample	Error! Bookmark not defined.
3.4 Sampling Procedures	Error! Bookmark not defined.
3.5 Nature and Sources of Data	Error! Bookmark not defined.
3.6 Data Collection Procedure	Error! Bookmark not defined.
3.7 Data Processing, Procedure and Analysis Tools	Error! Bookmark not defined.
CHAPTER-IV: RESULTS AND DISCUSSION	43
4.1 Tax Structure of Nepal	Error! Bookmark not defined.
4.2 Result of Empirical Investigation	Error! Bookmark not defined.
4.2.1 Income Tax as an Important Source of Gov	ernment Revenue Error!
Bookmark not defined.	
4.2.2 Contribution of Special Facilities in Collect	tion of Income Tax Error!
Bookmark not defined.	
4.2.3 Necessity of Special Facilities for Manufac	turing Industry Error!
Bookmark not defined.	
4.2.4 Attitudes Towards the Need of Increasing t	he Special Facilities Error!
Bookmark not defined.	
4.2.5 Effective Implementation of Special Facilit	ies Error! Bookmark not
defined.	
4.2.6 Impacts of the ITA 2058	Error! Bookmark not defined.
4.2.7 Classification of Total Area for Tax Purpos	eError! Bookmark not defined.
4.2.8 Attitudes Towards Rebate Rate	Error! Bookmark not defined.
4.2.9 Excess Depreciation for Special Industry/E	ntity Error! Bookmark not
defined.	
4.2.10 Necessity of One-Third More Depreciatio	n for Natural Person Error!
Bookmark not defined.	
4.2.11 Concession Provided by the Act	Error! Bookmark not defined.
4.3 Sufficiency of the Provision of Tax Incentive	es, Concession and Facilities for
Manufacturing Industries	62
4.3.1 Charging of Depreciation and Depreciation	Allowance 63
4.3.2 Tax Rebate	63
4.3.3 Tax Holidays for Manufacturing Industries	64
4.3.4 Sufficiency of Exempted and Deduction Ite	ems 65
4.3.5 Sound and Effectiveness of Tax System in	Nepal 65
4.4 Effect of Tax Incentives on Growth of Manufactu	uring Companies 66

4.4.1 Major Factors that Effect Growth of Manufacturing Companies 66	
4.5 Major Findings	Error! Bookmark not defined.
4.5.1 Findings of the Secondary Data	Error! Bookmark not defined.
4.5.2 Findings of the Primary Data	Error! Bookmark not defined.
<b>CHAPTER-V: CONCLUSION</b>	71
5.1 Summary	Error! Bookmark not defined.
5.2 Conclusions	Error! Bookmark not defined.
5.3 Implications	Error! Bookmark not defined.
REFERENCES	75
APPENDICES	

viii

## LIST OF TABLES

## Page No.

Table 2.1: Computation of Income from Business	Error! Bookmark not defined.
Table 3.1: Group of Respondent and Sample Size	Error! Bookmark not defined.
Table 4.1: Structure of Government Revenue	Error! Bookmark not defined.
Table 4.2: Contribution of Tax Revenue and Non-Tax	Revenue to Total Revenue
	Error! Bookmark not defined.
Table 4.3: Share of Direct Tax on Total Revenue and	Total Tax Revenue Error!
Bookmark not defined.	
Table 4.4: Structure of Income Tax Revenue in Nepal	Error! Bookmark not defined.
Table: 4.5: Group of Respondents and Number from 1	Each Group Error! Bookmark
not defined.	
Table: 4.6: Tax as an Important Source of Governmen	nt Revenue Error! Bookmark
not defined.	
Table: 4.7: Contribution of Special Facilities in Collect	ction of Income Tax Error!
Bookmark not defined.	
Table: 4.8: Necessity of Special Facilities for Manufa	cturing Industries Error!
Bookmark not defined.	
Table: 4.9: Attitudes Towards the Need of Increasing	the Special Facilities Error!
Bookmark not defined.	
Table: 4.10: Effective Implementation of Special Facility	ilities Error! Bookmark not
defined.	
Table: 4.11: Impact of ITA 2058 on Manufacturing Ir	ndustries Error! Bookmark not
defined.	
Table: 4.12: Classification of Total Area for Tax Purp	bose Error! Bookmark not
defined.	
Table: 4.13: Satisfactory Towards Rebate Rate	Error! Bookmark not defined.
Table: 4.14: Appropriateness of Excess Depreciation	for Special Industry/Entity
	Error! Bookmark not defined.
Table: 4.15: Necessity of One-Third More Depreciation	on for Natural Person Error!
Bookmark not defined.	
Table: 4.16: Concession Providing by the Act	Error! Bookmark not defined.

Table : 4.17: Sufficiency of Provision of Tax Incentives, Concession and Facilities

Error! Bookmark not defined.
Table : 4.18: Depreciation Allowance for Manufacturing Industries Error! Bookmark
not defined.
Table : 4.19: Tax Rebate for Manufacturing Industries       Error! Bookmark not
defined.
Table : 4.20: Tax Holidays for Manufacturing Industries       Error! Bookmark not
defined.
Table: 4.21: Exemption and Deduction Item are Sufficient or Not       Error! Bookmark
not defined.
Table : 4.22: Sound and Effectiveness of Tax System for Manufacturing Industries
Error! Bookmark not defined.
Table : 4.23: Effect of Tax Incentives on Growth of Manufacturing Companies Error!
Bookmark not defined.
Table : 4.24: Major Tax Incentives for the Growth of Manufacturing Companies

### Error! Bookmark not defined.

## LIST OF FIGURES

	Page No.
Figure 4.1: Special Facilities Helping Collection of I	ncome Tax Revenue Error!
Bookmark not defined.	
Figure 4.2: Special Facilities Needed	Error! Bookmark not defined.
Figure 4.3: Impact of Act	Error! Bookmark not defined.
Figure 4.4: Helping to Collect the Tax Revenue	Error! Bookmark not defined.

## ABBREVIATIONS

CEDA	Center for Economic Development and Administration
FNCCI	Federation of Nepal Chamber of Commerce and Industry
Fy	Fiscal Year
GDP	Gross Domestic Product
Gov.	Government
IRD	Inland Revenue Department
ITA	Income Tax Act
Ltd.	Limited
MBS	Master of Business Studies
MOF	Ministry of Finance
NRB	Nepal Rastra Bank
NTC	Nepal Telecom
Pvt.	Private
Rs.	Rupees
SAARC	South Asian Association for Regional Cooperation
Sec.	Section
TU	Tribhuvan University
VAT	Value Added Tax