

# CHAPTER: I

## INTRODUCTION

### 1.1 General Background

Nepal is one of the least developed among developing countries of the world. A probe into the nature and conditions of Nepalese economy reveals the dominant features. The prominent characteristics are mainly; widespread poverty, rapid population growth, low income level, extreme disparity, dependence on agriculture, lack of industries, lack of saving and capital, dependence on foreign aid, unemployment, unexploited resources, lack of infrastructure and adverse balance. Despite, Nepal aims for self reliant economic system to accelerate the living standard of people. With the view of attaining full employment equilibrium, high growing level of national income and high economic growth along with maintaining economic stability, government is supposed to employ its revenue and spending programs. Hence, government plays significant role in producing desirable effects and avoid undesirable effects on the level of income, output, and social welfare. On this light, it can be stated that the perquisite for economic development is productive utilization of revenue. And good tax system a perquisite to attain goal of required revenue. The goal may be obtained through many ways. In this modern age, a government needs a lot of revenue in order to influence the macroeconomic performance of economy or fiscal policy to carry out functions of the government: national defense and to redistribute resources among individuals or classes in the population. In this context, tax is a significant and indispensable source of State Revenue of the government. According to its nature, it is the most reliable, certain, flexible and convenient source to obtain the required amount. Therefore, the government of any country upholds main priority in tax revenue.

The sources of government revenue can be classified into external and internal. External sources of government are uncertain, inconvenient and not good for healthy development of nation because they have to pay after a certain period. So, it is better to mobilize internal sources rather than external sources.

Income can be collected from both internal and external sources. External resource can be obtained as loan grants bilaterally or through international institution. External resources are uncertain and guided by socio-political motives of the donor countries. So, it is not good for healthy development if there is highly dependency on them. It is used for economic development, reconstruction, foreign exchange, to recover from crisis condition etc. Internal sources include public borrowing government bonds surplus on public under taxing and taxation. The internal sources should be mobilized effectively due to weakness of external sources. Nepal governments try to mobilize internal sources for regular and development activities.

Internal source of fund is own source derived within the country. Internal source of fund includes both tax and non-tax sources. Tax sources include the amounts which are compulsorily contributed by tax payers to the government. Taxes are emphasized on all countries developed as well as developing countries because they have the option for increasing the yield of tax system. It shows that taxes are the better sources of public revenue and it has been taken as the best effective tool for raising the public fund.

Among internal resource, taxation is a prime factor. It is the pillar of the fiscal policy. It is the backbone of welfare of the state. Government mostly imposes tax to finance, various welfare and social service. The amount which is legally collected from the people to manage the expenditure of the government from its

net income is called income tax. According to the INCOME TAX ACT 2058(2002), income includes all the income which is received from business, investment and employment.

Tax may be classified into two types; direct and indirect taxes. Direct tax which is directly paid by a person on whom it is legally imposed. Some of the direct taxes are income tax, property tax, interest tax, death tax and vehicle tax. Indirect tax is that tax which is imposed on one person but paid partly or fully by another. Some of the indirect taxes are sales, entertainment tax, passenger tax, hotel tax, important export duty, excise duty and Value Add Tax (VAT) etc. Income tax is one of the main components of direct tax. It is collected from public enterprises, semi-public enterprises, private corporate bodies and individuals. In other words, tax is collected by both direct and indirect ways.

Developing countries like Nepal, having low per capita income highly depend on the indirect tax rather than the direct tax. The share of income tax is much lower in the composition of direct tax revenue. In the initial stage of economic development, indirect tax has its own significant role similarly after a certain stage of economic development direct tax plays a vital role.

To build up sound financial status and achieving social justice, economic sources should be mobilized effectively, through direct tax like income tax. It has given high preference to the developed and developing countries. People who have paid tax are invested on public expenditure, although they cannot get any direct benefit from their income taxes. They can observe the use of collected fund through it has significant role. Nepal still has been unable to maximize the collection of income tax. At present, the contribution of income tax is insignificant. It is only about 17.13% in total revenue in the fiscal year 2065/2066 (2008/09).

This study has been designed to get information on contribution of income tax to national revenue of Nepal. So, ten years period from fiscal year 1999/2000 to fiscal year 2008/09 have been taken into consideration for the study.

## **1.2 Statement of the Problem**

The prime concern of every nation of the world is economic development. Under-developed countries are facing serious problem in the process of economic development. Nepal is also not an exception to this condition. The majority of people have been unable to get even basic facilities. The Government wants to fulfill the basic needs of the people and accelerate development activities one at a time. Thus, every nation of the world is accomplished various activities to fulfill these objectives. The various measures adopted by the Government to boost revenue collection. But resources gap of the country has been widening in the recent years. Resources gap was 20650.2 million in the fiscal year 1999 /2000 and it was 39802.52 million in fiscal year 2008/09. The rate of Government expenditure exceeding the rate of revenue growth almost every year, Expenditure has 50723.7 million in fiscal year 1999/2000 and 72282.08 million in fiscal year 2008/09. It shows that Nepal has been facing persistent budget deficit from the beginning. External deficit, currency depreciation, inflationary pressure, rising interest rate which may cause crowding out effect and reduction in economic growth are the consequence of the budget deficits. Rising the government, revenue helps to overcome from the serious bottleneck problem of resource gap in the process of economic development programs by mobilization additional resource from domestic sources.

Income tax in developing nations has been regarded as an instrument of growth and social justice. But Nepal Government is being unable to mobilize the expected

income tax from person as well as corporation it was 45.58% in 1999/2000 and 51.56% in 2008/09 from personal.

Most of the personal/individual taxpayers don't reveal the sources of income even they earn significant amount. They hardly keep and show their account. So, experience shows that there is poor taxpaying habit in Nepalese. Similarly, tax evasion has become a serious problem in Nepal. Awareness of tax payers, lack of training and education to tax personnel, delay in making assessment, irresponsible tax administrators in their duties, inconvenient tax system and existence of corruption are main cause for low contribution of income tax to national revenue.

The main issues have been addressed for the study is:

- a. Whether the government collect significant amount from the income tax or not?
- b. In the composition of direct tax, income tax plays vital role or not?
- c. Whether Nepalese taxpayer are aware about tax system or not?
- d. Whether the resource gap of Nepal is increasing or decreasing trend?
- e. Whether the government applied effective measure to collect significant amount of tax or not?
- f. Whether the tax system of Nepal is effective?

### **1.3 Objectives of the Study:**

The main objective of the study is to analyzed the contribution of income tax on government revenue in Nepal

The research study has the following objectives:

- a. To study the structure and trend of income tax in Nepal.

- b. To assess the impact of income tax on government revenue in Nepal. To know the composition of direct tax and indirect tax.
- c. To examine the problems and prospectus of income tax in Nepal.
- d. To find out most important factors for effective collection of income tax.
- e. To provide suggestions for improvement of income tax system of Nepal.

#### **1.4 Significant of the Study**

Nepal is an agro-based least developed country of the world. The government needs huge amount of funds to spend on daily expenses as well as development activities. The resources collected internally are sufficient to maintain day-to-day administration of the country but the revenue surplus is not adequate to undertake development activities. Every year, Nepal has been presenting deficit budget, there is incensement. So the country is heavily dependent on the foreign aids and grants to undertake developmental activities.

In this context, the easy and long lasting way to increase revenue to strength the internal sources is income tax. So, the importance of income tax cannot minimize for reducing economic inequality as well as development activities. Thus," A study on contribution of income tax to national revenue of Nepal" has been chosen as a relevant topic for the study.

The study might be fruitful for all policy makers, planners, tax officer, tax administrators, civil society, stakeholders, students, researchers, and all the interested people who want to know about income tax.

## **1.5 Limitations of the Study**

Any research study is limited by the information and data, time and area of the study. This study has also some limitations they are as follows.

- This study covers only recent ten years data from fy1999 to 2008/09
- The secondary data were used in the study, the reliability depends upon it.
- The study has been based on the availability of reliable data.
- Focus is given to income tax.
- This study has been conducted to fulfill the requirement of the MBS programmers of T.U. for the prescribed time.
- Primary data has been collected from opinion survey.
- Field study limited to Katmandu valley for primary data propose, so it may not represent the country as a whole.

## **1.6 Organization of the Study**

The entire study has been designed into five different chapters are explained including introduction to conclusion. The first introduction chapter includes statement of problem objective of the study significant of study, limitation of the study.

The second chapter review of literature includes theoretical framework and review of related books articles booklets newspaper, and thesis.

Research methodology is mentioned in the third chapter it includes research design nature and sources of data, data collection procured population and size of sample tools and techniques used for data analysis.

Presentation and analysis of data has been made in fourth chapter. It is main body of the study. Collected data from various sources has been tabulated in sequential order and data has described, analyzed and projected using various statistical tools.

The fifth chapter consists of brief summary, conclusions and recommendation of the study. Lastly, bibliography essential appendices have been presented at the end of the study.



## **CHAPTER: II**

### **REVIEW OF LITEATURE**

#### **2.1 Conceptual Frameworks**

##### **2.2.1 Historical Development of Income Tax in Nepal**

Great Britain is the first country to introduce Income Tax Act in the world. The British government introduced Income Tax Act in 1799 in order to generate revenue to finance for the war against France. The Income Tax Acts were introduced in USA in 1862, Italy in 1862, India in 1886, Switzerland in 1869 and in Nepal in 1959 (Bhattarai and Koirala, 2004:5).

Idea of introducing Income Tax Act in Nepal originated along with the first 'Budget' on Magh 21, 2008 B.S (1952). In the first budget speech the finance minister said, 'a proposal to levy an income tax including tax on agriculture income is under consideration'. Several attempts were made to introduce income tax in subsequent years. However, it could not be introduced until 2016 due to political instability. For the first time finance, Act 2016 had imposed tax on business profit and employment in Nepal (Amatya, 2004:13).

In 2017 (1960) "Business Profit and Remuneration Act 2017" was enacted. This was the first income tax act in Nepal. This act was not broad and detail. There were only 22 sections in the act.

Following were the main feature of this act:

- a. Only remuneration and business profit were subjected to tax.
- b. Deductions were not specified for calculating the taxable income.

- c. Tax on remuneration was to be deducted at source.
- d. The cases of default fines were prescribed.
- e. The tax payer was given the right to appeal against tax assessment to local “Bada Hakim”.
- f. Government employer was the main income tax payer.

The experience of three years indicated that this act was narrow. So, it was replaced by Income Tax Act 2019 (1962).

### **Income Tax Act 2019 (1962)**

The main purpose of the imposition of this act was not only raise government revenue but also reduce inequality in distribution of income and wealth with social justice. Create taxpaying habit of the taxpayers also the purpose of this act. There were 29 sections in the act. It was amended in 2029 (1978).

The main features of this act were as follows.

- Income tax was defined as all kinds of income such as, profit from business, profession, remuneration occupation, house and land rent, agriculture, insurance agency and other sources of incomes in addition to business profit and employment incomes.
- Tax assessment was specified on the basis of best judgment estimate to the tax officers.
- For the first time, provision was made for the installment basis of tax and agriculture income was brought under the scope of income tax but finance Act 2023 B.S. made provision that income from agriculture was fully exempted from the income tax. Again finance Act 2030 made agriculture income taxable.

- Provision for reassessment of tax as well as rectification of arithmetical errors was made again exempted from tax in 2034.
- Carry forward of loss was allowed for a two years period.
- Taxable income calculation methods and deductible expenses were specific.

This act has some weakness so; this act was replaced by “Income Tax Act 2031 (1974)” to cope with the changing needs of the country.

### **Income Tax Act 2031(1974)**

Income Tax Act 2031 had 66 sections. It was amended for eight times to make it more practical and to eliminate confusing term.

Key features of this act were as follows:

- Clarified certain definitions relating to tax such as assessment of tax, income year personal status of the tax payers, non-resident persons, firm, company, family, philanthropic work etc.
- Head and sources of income were classified into five categories for the income tax assessment. i. agriculture ii. Industry, trade, profession or occupation iii. Remuneration iv. House and compound rent v. other sources.
- This act had identified the chargeable income and admissible expenses of each head of income.
- Provision of self assessment ,small tax payers tax assessment, fine/penalty appeal, tax deduction at source, tax refund, tax exemption, avoidance of double taxation etc.

## **Income Tax Act 2058(2002)**

In 2058, ITA2058 (2002) was enacted by the parliament by replacing the existing Act. This Act is broad as compared to the previous Act and has been made in accordance with the global standard. ITR 2059 was framed by the government of Nepal (so called HMG/N during that period) to clarify some provision of the Act. Finance ordinances have been making slight amendments in the Act every year. This Act has classified the heads of income into three categories VIZ, employment, business and investment. The main objectives of this act are as follows,

- To bring all income generating activities into tax net
- To widen the tax base
- To harmonize tax rates and concessions on equity grounds
- To make income related provision clear and transparent
- To minimize tax avoidance and tax evasion
- To interlink Nepalese tax system with the tax system of foreign countries
- Reducing the scope of discretionary interpretation of the tax authorities
- To confine all the income related matters within the Act
- Make income tax elastic and revenue productive
- To make tax payers more responsible by enforcing the self assessment systems
- To make tax system based on account.

This act was broad, scientific and international standard the differences of this act with other act are made clear by its key features, they are as follows (Bhattarai and Koirala, 2004: 5).

- All income tax related matters are confined within the Act by abolishing all tax related concessions, rebates and exemption provided by different Acts. This Act has been made super in regard to all income tax matters.
- The Act has broadened the tax base. Unlike previous tax Act, tax rates have been spelled out in the Act. The tax rates and concessions have been harmonized on equity grounds.
- The Act has introduced a pool system of charging depreciation. A provision has also been made for depreciating intangible assets.
- The act has first introduced the taxation of capital gains.
- The act has provided liberal loss set-off and carry forward/back ward provisions. Interned adjustments of losses have been clearly specified. Such provision has been made from international perspective.
- The Act has first introduced a provision for administrative review to allow the tax administration to correct mistakes made by the tax administrators internally.
- The Act has made provisions for a stringent fine and penalty for the defaulters. There have been made provisions for punishment in the fines up to Rs 300000 and imprisonment on conviction up to 3 years.
- Global incomes of a resident are made taxable. Non residents are also taxed on their incomes with source in Nepal.
- List of expenses are inclusive. All expenses relating to income have been made admissible.
- The act has made provision for international taxation. Foreign tax credit has been introduced for the first time.
- The Act has separated administrative and judicial responsibilities by distinguishing civil liabilities of the taxpayers from criminal liabilities.

### **2.2.2 Meaning of Tax**

Government of any country requires sufficient revenues to launch development programs to handle the daily administration to keep peace and security and to launch other public welfare. The government or public revenues are collected through various sources. These sources can be i. Taxes ii. Revenues from government, iii. Fees iv. Special assessment v. Fines and penalties vi. Foreign grants. Among them tax is the main source of collecting the public revenues because it occupies the most important part of the government treasure. In Nepal, about 77% of total revenue comes from tax revenue and the rest 23% from non-tax revenues (Amatya, 2004: 40). Tax is any compulsory levy from individual, household as and firms to central or local government. It is simply a liability to pay an amount to the government. It is a compulsory contribution from the taxpayers (Bhattraai and Koirala, 2064:1).

Seligman (N.D) defines “a tax is compulsory contribution from a person to the government to defray expenses incurred in the common interest of all without reference to special benefit conferred”(Dhakal, 2057:2).

According to Plehen, “Taxes are general Contribution of Wealth levied upon persons, natural or corporate to defray expenses incurred in conforming common benefits upon the residents of the states” (Dhakal, 2058: 2). According to layer “A tax is compulsory payment to the government without expectation of direct benefit in return to the payers” (Amatya, 2060: 25). From the above definition, it is clear that tax is compulsory contribution to the state from a person the natural person and artificial person having tax liabilities pay the taxes to the government otherwise the laws punish him. The government doesn't provide any corresponding benefit to the tax payers for the amount of tax he pays. Tax is paid to the state to

perform the function of the government and the amount of tax is spent for common benefits and interest of the people (Acharaya, 2008:15).

### **2.2.3 Classification of Taxes**

Tax may be classified into various types, among them direct tax and indirect tax are most significant (K.C., 2006: 8).

#### **Direct Tax:**

In the word of Dalton, “A direct tax is really paid by the person on whom it is legally imposed. Some of the example of direct taxes are, income tax, property tax, interest tax, gift tax, vehicle tax etc (Amatya, 2060, :2).

#### **Indirect Tax:**

According to Dalton, “an indirect tax is imposed on one person but paid partly or wholly by another.” Some of the indirect taxes are sales tax, entertainment tax, VAT, excise duty, hotel tax, export and import duty etc. (Amatya, 2065)

Income tax is one of the most popular direct taxes. It is charged on person’s income according to the law of nation. Income includes all the income, which are received from business, investment and employment. Income tax is superior to indirect tax because it is imposed on the basis of paying capacity of the taxpayers. People whose income is below the taxable income are free from the obligation of income tax (Achraya, 2008: 16)

### **2.2.4 Final Withholding Payments**

As per sec 92, following payments will be taxed as final withholding payments

- Dividend received from resident company.
- Rent for the lease or a building associated fittings and fixtures having a source in Nepal and individual other than in conducting a business receives that.
- Interest received by a natural persons from bank, financial institute (but not related business)
- Gain from investment insurance received from resident company.
- Amount received from recognize retirement fund.
- Gain from unrecognized retirement fund.
- Meeting fees.
- Amount received from accumulated home or sick leaves.
- Part time teaching salary, writing articles.

### **2.2.5 Tax Exempt Organizations**

Exempt organization means any entity that should not pay the tax social and religious organization these are not operated for profit earning is provided with such facilities. ITA2058 sec (2) has included the following entities with tax exempt organization.

- A religious educational or charitable organization of public charter reregistered without having a profit motive.
- A political party registered with the election commission.
- A village development committee, municipality, or district development committee.
- An amuter sporting association forward for the purpose of promoting social or sporting amenities not involving the acquisition of gain.
- Nepal Rastra Bank.



- The government of Nepal.
- An entity that has been declared as exempt organization issuing notice by the government.

### **2.2.6 Source of Income in Nepal under Income Tax Act 2058 (2002)**

Source of income are considered as focal point for tax system. Computation of taxation depends upon the type and nature of income source. In every income tax act sources of income should be well defined. “Income Tax Act 2058” has divided the sources of income into three categories which are as follows:

- Income from employment
- Income from business
- Income from investment

#### **2.2.6.1 Income from Remuneration /Employment**

Income from remuneration or employment is one of the important sources of income under the current income Tax Act. Remuneration means amount given to employee against the service provided by him. In case of remuneration there used to be one getting service and another providing service. People who get service are called employer and person who provide service is employee. Certain conditions are required to come under remuneration; Income Tax Act 2058 has defined about employment as the past, present or prospective employment of future. It has specified the income from employment under section 8. As per the act, any type of income from any employment is taxable income. According to section 8 of the act, the remuneration received by a person from the employment is the following payment made by the employer:

- Wages, salary, leave pay, overtime pay fees, commission, gifts, prizes, bonus and other facilities.
- Amount received from retirement fund.
- Amount of contribution of the employer to a retirement fund.
- Amount received in reimbursement of personal expenses of the employee and related person.
- Amount received in lieu of acceptance of any condition with regarded to the terms of employment.
- Payment received for loss or termination of the employment.
- Other amounts as given in chapter 6 of the Act i.e. perquisites and any gains due to change in tax accounting required to be included.
- Any other payment made in respect of the employment.
- Dearness allowance, cost of living expenses, rent, retirement and transportation allowance and other personal allowances. However, according to section 38 of the *Income Tax Act 2058*. Remote area allowance up to Rs 30000 for 'A' class area, Rs 24000 for 'B' class area, 18000 for 'C' class area, Rs 12000 for 'D' class area and 6000 for 'E' class area is not included in taxable remuneration of the employee.(Income Tax Act,2058,B.S.)

In addition to above items of remuneration, the following types of remuneration of person also are included.

- Market value of assets in case of the transfer of the assets.
- Value prescribed by Inland Revenue Department (Under section 27)
- The amount of expenses to be paid by the employer for following facilities of the employee as reduced by any contribution in this regard made by the employee.
- Service of housekeeper, cook, driver, and other domestic assistant.

- Service provided to the residence of the employee such as installation and cost of water, electricity and telephone.
- Any meal, refreshment or entertainment.
- Provision of residence to the employee. However, this amount is limited to only 2% of salary (sec 13 of Income Tax Rules)
- Availability of motor vehicles wholly or partly for private purpose. However such amount will be limited only up to 0.5% of this salary (sec 13, Income Tax Rules)
- Any facilities paid in cash or in kind as per chapter 7 of this Act.
- The amount of the difference of interest on loan paid by employee at concession rate from the standard highest rate.
- Discharge or reimbursement of costs incurred by the individual or his associates.

#### **2.2.6.1.1 Non-taxable Income under ‘Income from Employment’**

The following account is excluded in calculating an individual’s remuneration from an employment.

- Amount excluded under section 10 and final withholding payment.
- Remuneration under bilateral or multilateral agreement with foreign government.
- Remuneration under the employment of public service of foreign government.
- Remuneration paid by Nepal government (previously known as HMG/N) to foreign national on condition of tax exemption.
- Allowance paid by Nepal Government (previously known as HMG/N) to widows, senior citizens or disable persons.

- Remuneration derived by foreign national from foreign government.
- Pension received by retired army or police from public fund of foreign government.
- Reimbursement of expenses incurred for the employer.
- Payment of an amount up to Rs 500 for such a purpose. The amounts, which are deductible while deriving the net income from employment , are as follows:
  - Contribution to approved retirement fund with in the limit.
  - [Rs 3 lakhs or one third of the employee’s assessable income whichever is less]
  - Donation amount equal to 50% of taxable income, 100000, or actual which is less. But HMG may notify through official gazette that donation given to such institution will be expected for deduction of to the notified limit. Such donation shall be allowed as per the notification.

For computation of tax liability, medical tax of 15% of the approved medical cost plus carried forward excess amount greater than the limit can be adjusted. However, upper limit of medical tax credit for is Rs. 750 per year. The remaining balance of uncovered medical tax credit can be recouped in next year. Similarly, amount of tax paid in foreign countries provided that such amount do not exceed average rate of Nepalese income tax can be adjusted.(Income Tax Act 2058. B. S.)

#### **2.2.6.2 Income from Business**

ITA, 2058 has defined business as an industry, a trade, a profession, or the like isolated transaction with a business character and includes a past, present, or prospective business. A person’s income from a business for an income year is the person’s profit and gain from conducting the business for the year. It is the income generated with the help of capital –labor activities (Bhattari and Koirala, 2004: 35).

Business income mainly refers to different types of income earned from different sources of business. The amounts that are included in computation of “Income from Business” are as follows:

- Service fees including commission, meeting management or technical service fees.
- Amount received from disposal of trading stock.
- Net gains from the disposal of business assets or liabilities of the business.
- Amount treated as net profit from disposal of depreciable assets of business. (I.e. capital gain from pool disposal of depreciable assets).
- Gifts received in respect of the business.
- Amount received in connection with business operation and not included in the income from investment
- Amount received in view of any restriction accepted in relation to the business operation.
- The Amount to be adjusted due to the change in accounting system.
- Any income derived proportionately from a long term contract.
- Income of general insurance.
- Income under chapter 7
- Interest charged on loan and advance at the rate lower than the prevailing market rate i.e. different amount
- Income deemed to be derived from transfer pricing and other arrangement between assets. (Income tax act 2058, B.S.)

#### **2.2.6.2.1 Tax Exempted Income from Business**

The following expenses are allowed for deduction while computing income from business.

- **General Deduction:** For calculating income from business all expenses incurred during the year, by the person and in the production of income from the business are deductible.
- **Interest:** The interest incurred during the year for the debt obligation of the person shall be available for the deduction to the extent that the borrowed money is used in that year or if the money is borrowed for purchase of an asset, that asset is used for that year. The debt obligation is created in the production of the income from business.
- **Cost of Trading Stock (sec. 15):** Trading stock includes raw material, chemicals, work in progress, finished goods, stores etc. the cost of trading stock is derived as follows:

	Rs.
Cost of opening stock	XXX
Add: purchase or production during the year	XXX
Less: cost of closing stock	(XXX)
Cost of trading stock consumed or sold	XXX

The cost of trading stock should be taken at cost price or selling price whichever is lower. The person keeping account on cash basis can adopt either of the prime cost or factory cost basis for valuation. In case if actual cost could not be derived for the particular trading stock, either of the FIFO or weighted average cost can be adopted.

- **Repair and Maintenance Expenses (sec. 16):** The repair and maintenance expenses is allowed for deduction up to 7% of depreciation base of assets of

each group and the rest of the expenses should be capitalized in respective group.

- **Pollution Control Expenses (sec.17):** This deduction should not be more than 50% of (taxable profit before pollution control cost plus donation plus Research & Development expenses). The portions of the pollution control expenses are not allowed, as deduction shall be capitalized in Group D of the assets.
- **Research & Development Expenses (Sec.18):** This deduction should not be more than 50% of (taxable profit before R & D expenses plus donation plus pollution control expenses). The portion of the R & D expenses is not allowed, as deduction shall be capitalized in-group D of the asset.
- **Depreciation Expenses (sec.19):** Depreciation at the prescribed rate is allowed on used depreciable assets owned by the person. The group wise details and rate of depreciation are given as follows:
  - 'Group A' includes building, structures and similar works of permanent nature. Rate of depreciation for this group is 5%
  - 'Group B' includes computer, data processing equipments, fixtures, office furniture and office equipments. The rate of depreciation for this group is 25%
  - 'Group C' includes automobiles, buses and minibus and the rate of depreciation for this group is 20%
  - Group 'D' includes construction and earth moving equipment and any tangible assets not included in above groups and portion of pollution control cost and research and development cost not absorbed. The rate of depreciation applicable for this group is 15%.

- ‘Group E’ includes intangible assets like goodwill, patent rights, copyright etc. for this group; rate is calculated as divided by the useful life of assets in the pool at the time the assets is most recently acquired by the person and rounded down to the nearest half year.
- **Donation and Contribution (sec.12):** Donation or contribution given to any tax exempted institutions, who have registered in the Inland Revenue Department, shall be deducted for the taxable income of the person subjected to the limitation of Rs. 100,000 or actual amount or 5% of taxable income whichever is less.

#### **2.2.6.2.2 Income not Allowable for Deduction from the Taxable Income**

- Expenses of domestic or personal nature,
- Tax payable as per this Act,
- Penalty or any other fines payables as per any Acts,
- Expenses incurred to derive the amount exempted under sec10 or final with holding payment,
- Cash payment for more than Rs. 50000 at a time to a particular person by a person having annual transaction more than Rs. 2 million,
- Distribution of income,
- The amount where the deduction is not allowed by any sections.

#### **2.2.6.3 Income from Investment**

According to Income Tax Act 2058, “Investment means an act of holding or investing one or more assets of a similar nature that are used in an integrated fashion”. However, it excludes the act of holding assets, other than non-business



taxable assets for personal use by the person owing the assets or investing amount in such assets or employment or business related income.

For the purposes of calculating income from investment, following income is to be included:

- Any dividend, interest, rent, royalty,
- Gain from investment insurance, gain from an unapproved retirement fund and amount received from an approved retirement fund,
- Net gain from disposed of the persons' non –business chargeable assets of the investment as calculated under chapter 8,
- The excess amount of incoming over the depreciation base including outgoing on the disposal of depreciable assets of the investment of the person
- Gifts received by the person in respect of the investment,
- Retirement contribution including those paid to a retirement fund in respect of the person and retirement payment in respect of the investment,
- Amount received in lieu of any restriction accepted in relation to the investment,
- But amounts those are included in calculating the person's income from any employment or business that should be excluded in calculating a person's profit from investment. Similarly, amount exempted under section 10 and divided as per section 54, and 69 and final with holding payment.

The following expenses are admissible for deduction while computing taxable income from the head of investment.

- Interest (Section 14)
- Loss from the investment (Section 20) or for
- Depreciation (Section 19)
- Related expenses (Section 13)
- Repair and maintenance expenses (Section 16)
- Donation (Section 12)

### **2.2.7 Objectives of Income Tax in Developing Countries like Nepal**

Taxation has been a very essential element of a government from the very beginning of the state system. The main objective of taxation of any country was economic development. Income taxation is the best source of revenue generation in the hands of government for the purpose of internal resource mobilization in the developing countries. Appropriate taxation policy should help in promoting savings. Taxation services as major tool for transferring resources from the private to the public sector.

In Nepal, the broad objective of progressive taxation of income tax, property is to reduce the unequal distribution of wealth. It should be create the taxpaying habits among the people rather than collecting the government revenue. The other specific objectives of income tax are as follows:

- To discourage the growing tendency to invest In unproductive real estate and levy increased taxes to property owners,
- To collect some resource from established industries,
- To promote industrial development providing tariff protection,

After more than 40 years of introduction of income tax, Nepal has not yet developed a proper system of tax assessment. Though at the time of first

implementation of income tax, the objective was to create a habit of taxpaying to general public yet it has not achieved the goal till now. However, among direct tax, income tax is an important source of revenue in developed as well as developing countries. All people pay tax of proportion of their income.

### **2.2.8 Problems of Income Tax Administration in Nepal**

From the very beginning, the contribution of income tax to the revenue of the government has been very minimum. This is because the income tax system in Nepal has been facing many problems. The inefficiency of income tax administration is one of the reasons. Income tax management in developing countries like Nepal has been facing many problems. The contribution of direct tax and income tax to the public revenue is very low to meet the growing public expenditure. Nepalese government has been using deficit financing. As the consequence of this, there is significant resource gap in Nepalese budget. The problem can be avoided only when the problems of tax administration is a complex technical matter. The major problems, which the income tax administration in Nepal has been facing, can be discussed as follows (Lamsal, 2002: 27).

- Failure to locate new taxpayer
- Assessment delay
- Poor tax payer's compliance
- Failure to maintain proper account and records
- Lack of motivation of tax personal
- Existence of corruption
- Instability in government policy
- Complicated tax laws and procedures
- Lack of trained and competent tax personnel

### **2.2.9 Income Tax Evasion in Nepal**

There are different ways of reducing tax liabilities. Tax evasion is the way of reducing tax liability by illegal means. It is done through different ways like non-reporting income, under reporting of income, making fraudulent changes in accounts books, maintaining multiple sets of accounts, operating business transactions under different names, opening bank account in dummy name. Over reporting of expenses fragmentation of income, transfer of pricing etc, tax evasion is unethical, illegal, uneconomic activity and not paying of tax is against of moral ethics. It is illegal because the law does not permit to evade the tax. It is unethical because the activity of not paying tax is against of moral ethics. In the same way, it is uneconomic because it promotes black money in a country.

Basically, there are three types of effects of tax evasion in the economy, ie loss of revenue to the state, redistribution of income that affects the efficiency of resources allocation in the economy and creating wrong statistics leading to errors in government policies. Evasion of income tax is also associated with the evasion of sales tax, excise duty, custom duty and so on. Since the government imposes higher tax rate to fulfill the growing need of the revenue, it is the honest taxpayers the really bear the burden of tax.

Income tax evasion should be controlled effectively because it has serious affects to the economy. Income tax evasion affects negatively to the economics position as well as the social status of a country. If income tax evasion is not controlled, Nepal can never solve its problems of resource gap either it increase its taxes rates or applies new sources of tax (Subedi, 1982: 17).

Income tax evasion has been paralyzed all over the world, whether it is developed or underdeveloped countries. But the people of the underdeveloped countries have high practice towards tax evasion. There is widespread evasion in income tax in Nepal, especially due to the poor taxpaying habit, administrative difficulties and defectives laws. Tax evasion is increasing day by day due to the low standard of education of tax responsibility among taxpayers. In western and developed countries, the evasion is considered as a social crime. But in Nepal, this act is regarded as cleaver on the part of taxpayers (Siwakoti, 1987: 14).

### **2.2.9.1 Ways of Tax Evasion**

The important ways or methods used in tax evasion in Nepal are as follows (Agrawal, 1980: 124).

- Concealment of income within a source of income,
- Misrepresentation on facts and information,
- Incorrect claim for allowances and deductions,
- Artificial contract for commission, discount etc,
- Falsification of accounts and records (rigging of invoices, fictitious payments, payment of bills twice etc.),
- Profit shifting, cost shifting, or price transfer,
- Over and under invoicing,
- Over statement of expense,
- Fictitious transaction,
- Fraudulent transaction,
- Maintenance of multiple sets of books of accounts and submitting the manipulated set for taxation purpose,

- Deliberate failure to maintain accounts and record and get the tax assessment done on a ‘committee’ or best judgment basic etc,
- Non-reporting of income earned from illegal activities likes smuggling corrupt business practice etc.

The committee on fiscal affairs of the organization for Economic Co-operation and Development (OECD) has observed that “With in tax evasion a distinction is sometime made between the less serious offence of omission e.g. failure to submit complete returns of income and more serious offence, such as false declarations, fake invoices etc”(OECD, 1980: 5).

### **2.2.9.2 Causes of Tax Evasion**

The main causes for widespread evasion of income tax in Nepal can be listed as follows (Agarwal, 1980: 126).

- Corruption by tax officials:
- Widespread Illegal business Activities:
- Reluctance of Taxpayers to maintain Accounts:
- Higher Marginal Rates of taxes:
- Ineffective marginal rates of taxes:
- Inadequate Auditing and Investigation:
- Difficulties in Locating Taxpayers:
- Lack of support from public:
- Poor Development of Intermediaries:
- Unnecessary Interference by Influential persons:
- Unlimited Convertibility of Indian Currency:
- Poor development of corporate sector:

### **2.2.10 Review of Related Studies**

Since 1959/60, income tax was started in Nepal. After its establishment, many individuals and institutions have studied in this subject regarding legal aspect, administrative problems, historical aspect, trend of income tax and income tax structure etc. they have made appreciable efforts in the field of income tax.

Many dissertations, books, articles and newspapers reviewed while preparing this thesis. Many books in this field are written to fulfill the course requirement of Tribhuvan University. An attempt is made here to review some of the books, thesis, articles, and reports, which have been written in field of income taxation in Nepal.

#### **2.2.10.1 Review of Books**

**Amatya (1965)** wrote a book entitled “**Nepal ma Ayakar Byabashta**”. In this book, he gave a simple description of “Nepal Income Tax Act 1962” with some examples how taxable incomes are derived from different sources of income. He has also analyzed the legal aspect of the income tax. This book is old concept and not all things mentioned in it are suitable at present. But it becomes the historical document in the field on income tax.

**Agrawal (1980)** wrote a book entitled “**Resource Mobilization in Nepal**”. In this book, he explains details about resource mobilization through income tax; Nepalese policy, effective tax system and tax policy, income tax in Nepal, role of income tax in Nepalese tax structure, administrative and legal aspects of income tax in Nepal. His main contribution from this book is concerned to the empirical investigation of facts and figure about the income tax in Nepal.

**Dhakal (2001)** has presented extended, enlarged and modified edition of his book named “**Income Tax and House & Compound Tax Law and Practice**”. This book is extremely based on the syllabuses of B.B.S third year. In this book he has described the provision made under income tax and the methods of income tax assessment have been described with numerical examples. His book is informative rather than analytical. He has not analyzed the role of income tax, income tax structure and defects of income tax system of Nepal. His book is more helpful to know about general information and provision made under “Income tax act 1974”.

**Aryal and Paudel (2003)** wrote a book entitled “**Taxation in Nepal**” This book is based on ITA 2002. This book is divided into three parts. It has described about tax, features of ITA 2058, capital receipts or revenue receipt, special provision for entities and retirement saving, classification of taxpayers, head and source of income, assessment, collection and recovery, tax authorities and their powers, rights and duties etc. This book is also based on the B.B.S. level. Method of income tax has been dealt with numerical illustration. This book is useful for academic purpose and practical point of view of income tax in Nepal.

**Adhikari (2003)**, wrote a book entitled, “**Modern Taxation in Nepal**” Adhikari has described the Provisions and laws related to income taxation of Nepal according to new ITA 2002. This book has been divided into five chapters. First chapter has described about theoretical concept of taxation. Second chapter has described about income tax system in Nepal. In this chapter, writer has described about head and sources of incomes, employment or remuneration income, tax on pension income, international taxation etc. VAT has been described in part three. Fourth part has been described about property tax, house and compound tax etc. windfall gain tax and other provision has been described in fifth chapter. This book



is written for students of TU, especially for BBS, MBS and MPA students. However, it is useful to taxpayers, tax administrators and others.

**Kandel (2003)** wrote a book entitled “**Tax Law and Tax Planning in Nepal**” which is based on government rules & regulation. It is very timely work and extremely helpful for the Master and Bachelor level students. The second edition has attached unofficial transaction of the tax laws. Both acts and rules related to value added tax and income tax appendices. But, he had not analyzed the role of income tax, tax structure and problem of income tax.

**Bhattarai and Koirala (2004)** in their book “**Tax Laws and Tax Planning**” described the theoretical and practical aspect of income tax with related provisions. It was based on TU syllabus. They were unable to describe the tax structure of Nepal and problems of income tax system.

#### **2.2.10.2 Review of Thesis**

**Shrestha (1967)** in his thesis entitled “**Income Tax in Nepal.**” He has discussed about income tax act and rules, historical background and administrative aspects of income tax. In his research he has pointed out various recommendations, some remarkable recommendations of the researcher were as follows.

- ) Income tax should be made more scientific, systematic and the social and economic justifiable.
- ) Exemption limit should be determined on the basis of member of the family.
- ) Taxed should be charged on agricultural income.

**Agrawal (1980)** wrote a thesis entitled “**Resource Mobilization for Development**”, had described the resource mobilization through income tax, fiscal

policy, and role of income tax, legal provision relating to income tax, legal aspect of income tax and administration aspects of income tax etc. He had shown per capita income, buoyancy coefficient of income tax, burden of income tax, elasticity and coefficient of income tax etc. He had identified the major problem in income tax system, which is inefficient for tax administration and tax evasion. He found that, there were no integrated programs for taxpayers, education, assistance, guidance and counseling. The major problems of taxes are inefficient tax administration, corruption, unfair dealing, harassment and incompetent personnel etc.

This study is a comprehensive and included various aspects of tax system of that period, but not all things mentioned in it are fully relevant today. Some of the problem identified in it is still in existence.

**Siwakoti (1987)** has discussed in his thesis named **“An Analytical Study of Income Tax in Nepal”**, has focused his effort for scanning out various factors persisting in the field of income tax. The major problems identified by him are evasion at high level, delay in assessment and normal role of income tax, lack of public information, complicated act and other defects of existing income tax act. He has suggested for progressive tax honest and efficient administration and research units in tax offices. He has specially analyzed the income tax act 1974, which is outdated for present context of Nepal. In the same year, Mr. P.P. Timsina in his thesis named **“Income tax evasion in Nepal”** has tried to show the evasion of income tax in Nepal and by identifying causes and ways. He has tried to give some suggestion for the correlation of evasion so that maximum resources could be mobilized from income tax but he has not proved it statistically.

**Bhandari (1994)** wrote a thesis entitled “**Contribution of Income Tax to Economic Development of Nepal**”, concerned mainly on the contribution of income tax to public revenue. He noticed that the actual collection of revenue through income tax is lower than its estimated targets because of poor taxpaying habit of Nepalese taxpayers, poor tax administrative system and widespread evasion of income tax and so on. His study had been conducted with purpose of examining the income tax structure, trend of income tax collection and the above problem and to make suggestions to solve this problem. He had not mentioned the legal provision of income tax and problem of income tax system.

**Shahu (1995)** presented his thesis “**Contribution of Income Tax in National Revenue of Nepal**” has focused his study on role and contribution of income tax in the process of economic development. He has found only 0.35% of population in Nepal comes under the category of taxpayers. He has also observed that in the composition of government revenue of Nepal, income tax comes in the fourth place from the viewpoint of different items contribution. The first three places are occupied by custom excise and sales tax respectively.

**Pant (1996)** in his thesis, “**A Study of Income Tax Management in Nepal**” has tried to show the income tax system and its role on national economy. He has identified various problems of income tax management in Nepal. Lack of managerial efficiency is one of the major problems of income tax in Nepal. Lack of effective personnel management, lack of reward and punishment system, poor income tax assessment procedure, poor tax information system, lack of taxpayer’s education, very narrow coverage of income tax is the major problems of income tax.

**Pradhan (2001)** had conducted a research in the topic, “**Contribution of Income Tax from Public Revenue of Nepal with reference to Nepal Telecommunication Corporation**”. In this study, she has explained the conceptual framework of public enterprises and NTC, conceptual framework of income tax, contribution of income tax to the public revenue and share of NTC to the income tax. She also found that NTC has contributed highest income tax in total income tax revenue from PEs. NTC shared 44% share of total income tax revenue from PEs, which was 84% in the FY 1993/94. Except in FY 1991/92 and 1996/97, the collection of income tax from NTC has been increasing gradually during the study period. Her suggestions are about the income tax system, promotion and reward to efficient and honest personnel motivation to personal tax education to tax payer and officers.

**Koirala (2004)** had conducted a thesis entitled on “**Contribution of Income Tax from Employment Income to Public Revenue of Nepal.**” He has mentioned about tax and not-tax revenue in Nepal. Composition of direct and indirect tax revenue in Nepalese tax structure, tax/GDP ratio, contribution of income tax & income tax from employment in total revenue, total tax revenue and direct tax revenue. He suggested various alternative and provision that should be done regarding taxation of employment income.

**Upreti (2007)** had conducted a research in the topic “**Contribution of Income Tax to Government Revenue in Nepal with Special Reference to Nepal Telecom.**” In this study, she has explained the conceptual framework of income tax, contribution of income tax to the government revenue and share on NTC to the income tax. She also found that NTC has contributed significant amount of income tax in total income tax revenue from PES, NTC shared 67.25% of total income tax revenues from PES, which was 80.36% in the fiscal year 2002/03. She also found

except in fiscal year 1999/2000 and 2000/01 the collection of income tax from NTC has been significant during the period. Her suggestions are about the income tax system are, timely assessment of tax, educated and trained tax officer, coordination between related authorities and clear cut rules and regulation.

**Acharya (2008)** had conducted a thesis entitled on “**Contribution on Income Tax Revenue with Consideration to Income from Employment**” he has mentioned about conceptual framework, contribution of income tax to government revenue of Nepal ,contribution of employment tax to total revenue, total tax revenue, direct tax revenue and income tax revenue of Nepal. He found that the contribution of employment income in total income tax revenue is insignificant, it is only 16.28% in F.Y.2005/06 and it is highest percent during his study period. From primary data he has suggest different suggestion, such as tax assessment provision should be made clear and simple, provision of fines and penalties for tax evaders, establish coordination between tax policy maker, tax personnel and other related authority, making tax deduction at source for increase the share of employment income in the tax revenue of Nepal etc.

**K.C. (2007)** wrote in his book *Tax Laws and Tax Planning: Theory and Practice,* " Taxes are only one of the many factors which people and organizations consider when making decisions. In some cases, taxes are a dominant factor; in others, tax considerations play a minor part. Good decision makers generally seek to manage taxes on every transaction. One way to measure how well a firm is managing its taxes is to look at its effective income tax rates. A firm's effective tax rate is the sum of total taxes paid by the firm, dividend by its (before-tax) net income. Thus, every people or organization always wants to reduce this share of tax from his income by either making planning or without tax planning. Tax planning is the device to reduce tax liabilities to increment after tax earning but

other than this is taken into account as crime to reduce tax liabilities". KC has recommended the following tax minimization strategies.

a) Tax minimization strategies related to income:

Under this strategy, KC has suggested to avoid income recognition because the Act has made provisions that allow various types of income to be excluded from the taxable base for example compensate employees with non-taxable fringe benefits, make a sale of land and a private building less than Rs 10 million, postpone recognition of income to a low-bracket year, pay family member to work in the family business etc.

b) Tax minimization strategies related to Deductions:

Tax liabilities may be reduced through planning of proper deductions. For this purpose, KC has suggested to maximize deductible amounts and accelerate recognition of deductions to achieve tax deferral.

c) Tax minimization strategies related to Tax Rates:

Tax minimization strategies should consider tax rates. Considering other factors of benefit, income should be deferred to take advantages. For this purpose, KC has suggested to shift net income from high-bracket years to low-bracket years, shift net income from High-bracket taxpayers to low-bracket taxpayers, shift net income from high-tax jurisdictions to low-tax jurisdictions, control the character of income and deductions, avoid double taxation, submit income statement in timely manner to get tax credit, tax credit from maximizing costs etc.

**Kandel (2001)** has written in his book *Corporate Taxation*, "The word Tax Planning is made from the combination of two words tax and planning. Tax means compulsory payment to the government and planning means taking decisions about

the future by choosing the decision while conducting its business activities. That means every business organization uses to plan as regards to its future activities. Such future activities may be of short term, medium term or long term and operational or strategic. If tax factor is considered while planning the business activities of an organization, it is tax planning." Further Kandel adds the purpose of enhancing the investment environment in a country; the government provides different types of facilities to the business organizations. Such facilities include reduction in tax rate, providing tax holidays, investment allowance, depreciation facilities etc. Tax planning means the use of all those facilities given by the government to reduce the tax liability. In other words, tax planning is the scientific planning of the companies operations in such a way as to attract minimum liabilities availing of various incentives, allowances, and rebates and relieves. It is not only the planning of infrastructure of the business and industries but also the planning of its various projects from time to time and day-to-day activities so as to acquire the maximum facility as per the existing law of the country. In short, it is a judicious use of tax incentives provided by the government.

**Poudyal (1998)** has written in his *Corporate Tax Planning in Nepal,* " Tax Planning is not only planning the basic structure of the business and industry but also the planning of its various projects from time to time and its day-to-day activities so as to acquire the maximum benefits under the provisions of the existing laws of the state. Tax Planning should not be mistaken for tax avoidance and tax evasion because the latter are clearly against the law or the spirit of the law. Tax Planning and its penetrating discrimination are bounded on all sides by the rigidity of the law and the effective consideration for them."

Further Poudyal says Tax Planning is the art and science of planning the company's operations in such a way as to attract the minimum liability to tax with the help of

various concessions, allowances and relieves provided for in the tax laws. As such, the basic purpose of corporate tax planning is to reduce or postpone the overall tax burden in the present and foreseeable future. Tax planning is a discipline and an attitude towards solving the corporate problems in a methodical way from a long-run point of view.

Tax Planning requires intelligent and well thought out strategy to reduce or postpone tax liability in the present and foreseeable future with stress on being honest, responsible and trustworthy citizen.

A company should aim at not only maximizing profits but also maximizing after tax profits. Tax Planning is to be done in advance with a view to minimizing the payment of tax within the framework of tax laws. Tax Planning presupposes a thorough knowledge of tax laws so that the best alternative may be thought of in order to attract least tax liability. Tax Planning is the method through which taxpayer makes use of all the concessions including exemptions, deductions and allowances under tax laws and pays the minimum possible tax.

According to Supreme Court of India, "Tax Planning may be legitimate provided, if it is within the framework of law. Colorable devices cannot be part of tax planning and it is wrong to encourage or entertain the belief that it is honorable to avoid the payment of tax by resorting to dubious methods".(Supreme Court of India, as cited in Adhikari, 2060)

And according to Goenka," It is scientific planning of the company's operation in such a way as to attract minimum liability to tax or postponement of the liability of the subsequent period by availing of various incentives, concessions, allowances, rebates and relieves provided for in the context of existing laws."



Kandel (2000), studied on 'Corporate Tax System and Investment Behavior in Nepal' in his Ph D research. Kandel has pointed out various findings; some of them are as follow:

- The effective tax rates for debt financed project are almost negative whereas the same for equity financed projects are positive and for more higher than the debt financed one.
- The effective corporate tax rate goes on increasing whenever the corporate body moves from debt financing to equity financing. In contrast, the effective personal tax rate increases with the move of the firm from equity financing to debt financing. The main reasons of happening so are the interest and dividend.
- There is room for improvement regarding selection of depreciation rates, stock valuation method, treatment of inflation, treatment of preliminary expenses, developing economic life of assets, selection of incentive system and so forth to make the Nepalese tax system sound.

### **2.2.10.3 Review of Reports**

**Agrawal** started the new phase of Nepalese income tax study from the elaborated and vibrantly explained research work “**Research mobilization for Development; The reform of income tax in Nepal**” published by CEDA in 1978. Agrawal presents details about income tax in Nepal, analyzing vibrantly about role of income tax, legal aspect, administrative aspect, role of income tax for resource mobilization and other important facts. This study focused the various aspects of income tax in Nepal. Some of the important objectives of this study were as follows:

- To examine the problem of growing resource gap in Nepalese finance in the context of the role of income tax.
- To examine the ways and means for increasing tax consciousness in the Nepalese public.
- To examine the optimism and elasticity of income tax in Nepal including projection of income tax.

**Dhakal** had written an article entitle “**Historical Perspective on Income Tax in Nepal**” in 2008, this article has describe previous income tax act and shown main fatigue of income tax act 2058 are as follows:

- Provision of set and carry forward of losses,
- Classification and pooling of depreciable assets,
- Tax on capital gain,
- International taxation,
- Medical tax credit ,
- Withholding payment and qualification allocation and characterization of the amounts.

Some of the significant findings and recommendations of the reports were as follows:

**Findings:**

- Needs for additional resource mobilizations were growing by 85 times in Nepal and she was experiencing a serious and growing problem of resource gap.
- Income tax has been a fast growing category of tax revenue in Nepal.

- The individual taxpayers contributed more than 50% of the total income tax revenue.

### **Recommendations:**

- Additional domestic resource should be mobilized through taxation.
- Tax structure of Nepal needs to be redesigned in order to increase the role of direct tax.
- Income tax should be reformed in Nepal (Agrawal 1978).

### **2.3 Research Gap**

The rate of government expenditure is exceeding the rate of government revenue almost every year. Nepal has been facing persistent budget deficit from the beginning of her development phase. Mobilization of internal resources through income taxation is one of the vital solutions for collecting revenue. In this regard, contribution of income tax to government revenue of Nepal is conducted.

Nepalese income taxation has been playing a significant role in government revenue. Contribution of income tax is increasing every year but it is not satisfactory to meet the budget deficit. Tax evasion and inefficient administration are found to be the major causes for low income tax collection. So this study has been undertaken analytically and intensively to analyze the contribution of income tax to government revenue considering tax evasion in Nepal. Projections of future trend of income tax and empirical analysis of primary data have been done. This research will be equally beneficial to the policy maker, planners, tax administration researchers, students and the persons interested in income tax of Nepal.

## CHAPTER: III

### RESEARCH METHODOLOGY

The research methodology contains following aspect.

#### **3.1 Research Design**

The analysis of the study is based on certain research design keeping as the objectives of the study in mind. Generally, research design means definite procedures and techniques which guideline profound ways for research ability. Most of the materials of this study are concerned with past phenomena in numerical or theoretical terms. The study oriented to:

##### **I) Analytical Research**

In analytical research, the researcher uses the facts and the information already available and analyzes to make a critical evaluation of the materials. Analytical research was carried in terms of role of total tax revenue, income tax revenue in composition of direct tax, tax/GDP ratio etc.

##### **II) Descriptive Research**

Descriptive research includes surveys and facts finding enquiry of different kinds. It is concerned with finding of facts relating to the subject matter, obtaining important data and getting new areas of knowledge by describing them descriptive research will be carried out in this study on contribution of income tax to national revenue of Nepal.

### 3.3 Data Collection Procedure

A set of questionnaire was developed and distributed to the selected respondents in order to get actual accurate, fast and reliable information. Distribution work was done by personally rather than sending by any other means. Additional valuable information was also collected from interview with the respondents as well as group discussion with taxpayers.

### 3.4 Population and Sample

All the tax experts, tax administrator tax payers and other related persons of Nepal were considered as total population. Out of them tax experts, tax administrators and tax payers of the Katmandu valley were consider as target sample. Out of target population, 50-60 respondents have been taken as sample size.

**Table 3.1:**

**Groups of Respondents and Size of Sample**

<b>S.N.</b>	<b>Groups of Respondents</b>	<b>Sample Size</b>
1.	Tax experts	15
2.	tax administrator	15
3.	Tax payers	30
4.	Total	60

### 3.5 Nature and Sources of Data

Both primary as well as secondary data have been used in this study. The primary data were collected from opinion of tax experts, tax administrators and taxpayers. Primary data were obtained through the questionnaire method. In most of the

cases, face-to-face interview and discussion with selected persons included in the purposive sample. The secondary data have been obtained through economic surveys, budget speech, journals and newspaper.

### **3.6 Classification, Editing and Coding of Data**

The collected data by different techniques were classified according to the nature or characteristics and then coded and edited. The editing data; the necessary information were put accordingly and unnecessary things were removed or rectified. The data has been classified according to the characters and attributes.

### **3.7 Procedures of Processing and Analysis of Data**

After the classification, coding and editing of data, it was presented into tabulated form with separate format systematically in order to achieve the desire objectives. It has been presented into various tables, figures, and graphs according to the subject in order. Available and collected data has been presented and analyzed in descriptive way with the help of sample statistical tools, such as percentage, average, correlation, chi-square test for hypothesis etc.

### **3.8 Period Covered**

The research study has been based on historical data. So the study covers the data of past ten year's period i.e. from 1999/2000 to 2008/09.

### **3.9 Selection of the Respondents**

After carefully study of the subject matter, a set of questionnaire was developed and distributed to two respondents groups viz tax experts / tax administrators and tax payers. Tax experts comprises of charter accountant, professors, policy makers,

and lawyers. Taxpayers comprises of employees working in various government and private organization like banks, manufacturing organization etc.

### **3.10 Weight of Choice**

The questionnaire asked either to give (yes or no) response or to give their opinion. Respondents were also given alternative to rank. For this case, the first preferred choice alternative got the highest points and the last preferred choice alternative got the lowest point. The total points got by each alternative were converted into percentage of total points available to the all alternatives. The alternative with the highest percentage has been ranked as most important and an alternative with the lowest percentage has been ranked as the least important. For example, if there are five alternatives, the most important ranked by the respondents gets five points and the least important alternative ranked by the respondents gets one points. The alternative, which is not ranked, does not get any points.

### **3.11 Respondents Profile**

Questionnaires were distributed to sixty respondents. They are tax experts/tax administrators, tax payers (employees). Fifty-four responses out of total i.e. 54 questionnaires were received, twenty-seven each from both groups. The following table reveals the different denominations, number and percentage of the respondents.

**Table 3.2:**

**Respondents Profile**

<b>S.N.</b>	<b>Respondents</b>	<b>Total sample</b>		<b>Response Received</b>	
		<b>No</b>	<b>%</b>	<b>No</b>	<b>%</b>
1.	Tax experts and tax administrators	30	50	27	45
2.	Tax payers	30	50	27	45
	Total	60	100	54	90



## **CHAPTER: IV**

### **PRESENTATION AND ANALYSIS OF DATA**

In earlier chapters, general background and research methodology have been highlighted along with review of relevant literature pertinent to this purpose study. Now, it comes to the most important component of the study, which deals to the analysis of income tax and its contribution to national revenue. The whole analysis is based upon existing problems and prospects of the revenue collection. This very chapter is classifies into two parts. They are as follow:

#### **4.1 Analysis of Primary Data**

This chapter attempts to analyze the data on various subject matters directly collected from the respondents. The respondents were requested to fill the pre-structured questionnaire designed after the extensive preview of literature. Respondents were selected from various government and non government bodies of Kathmandu valley. Respondents are divided into two groups i.e. Tax Officers and Tax Payers. Tax Officers includes chartered accountants, auditors, tax administration and experts as well .Similarly, tax payers includes banks and financial institution and public.

The questionnaire was asked for either Yes/No responses or asked for ranking of the choices. According to the number of alternatives where the first choice was the most important. For the purpose of analysis, most important choices were assigned according to the number of alternatives. If the number of alternatives were four, the first preferred choice would get four points and last preferred choice would get one point. Any alternatives which were not ranked didn't get any point. The total points available to each choice were converted into percent with reference to the total points available for all choices. The choice with the highest percent score was

ranked as the most important choice and then on with the percent score was ranked as the last choice. The following table shows the group of respondents.

**Table 4.1**

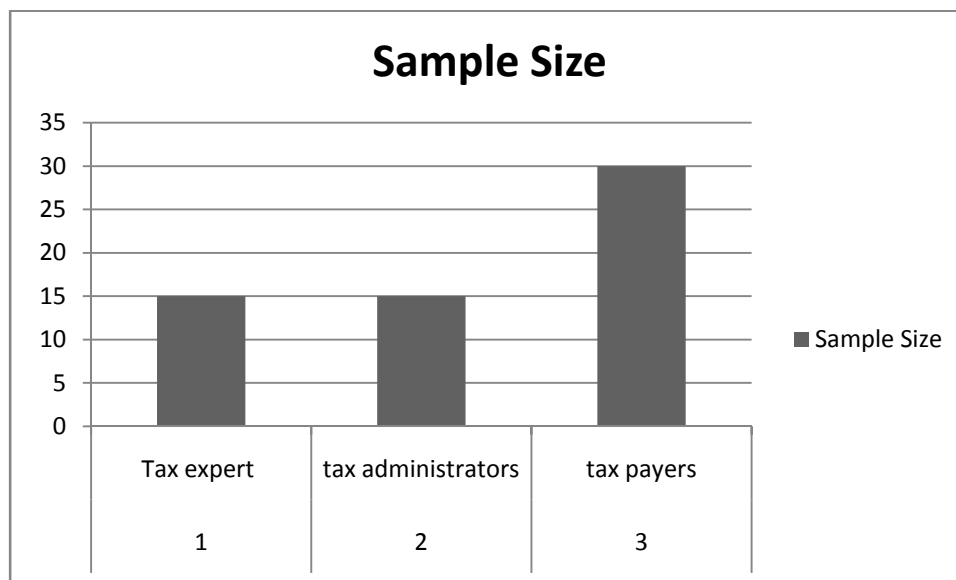
**Groups of the Respondents**

<b>S.N</b>	<b>Groups of Respondents</b>	<b>Sample Size</b>
1.	Tax expert	15
2.	tax administrators	15
3.	tax payers	30
	Total	60

Source: Opinion Survey, 2010.

Figure:1

**Groups of the Respondents**



#### 4.1.2 People are well informed about the Tax System

To know the respondents opinion about the people are well informed about the tax system. The question “Do you think that people of Nepal are well informed about the tax system? Was asked the responses received from the respondents are tabulated as follows.

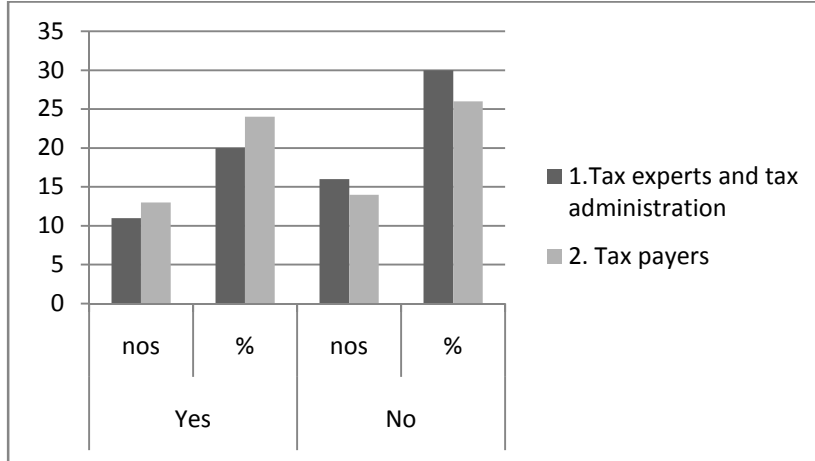
**Table 4.2: People are well Informed About the Tax System**

Responses Respondents	Yes		No		Total	
	No. s	%	No. s	%	No. s	%
1. Tax experts and tax administration	11	20	16	30	27	50
2. Tax payers	13	24	14	26	27	50
Total	24	44	30	56	54	100

*Source: Opinion Survey, 2010.*

Figure: 2

People are Well Informed about the Tax System



Above table and figure showed that about 56% of the respondents responded that people are not well informed about tax system and only 44% of the respondents accepted that people are well informed about tax system.

In conclusion, it can be said that the most of the respondents opined that people are not well informed about tax system.

**Test of Hypothesis:**

<b>Respondents</b>	<b>Yes</b>	<b>No</b>	<b>Row Total</b>
Tax experts/tax administrators	11	16	27
Tax payers	13	14	27
Column Total	24	30	54

Null hypothesis  $H_0$ : There is no significant difference in the view of Tax experts/administrators and tax payers regarding people are well informed about the tax system of Nepal.

Alternative hypothesis  $H_1$ : There is significant difference in the views of tax experts and tax administrators and tax payers regarding people are well informed about tax System of Nepal.

Test statistic: Under  $H_0$ , the test statistic is

$$\chi^2 = \sum \frac{(f_o - f_e)^2}{f_e}$$

Where,  $f_o$  = Observed frequency

$f_e$  = Expected frequency =  $\frac{\text{Row total} \times \text{column total}}{\text{Grand Total}}$

Grand Total

Calculation of  $\chi^2$

Row, column	$f_o$	$f_e$	$f_o - f_e$	$(f_o - f_e)^2$	$\frac{(f_o - f_e)^2}{f_e}$
1,1	11	$(27 \times 24) / 54 = 12$	-1	1	0.083
1,2	16	$(27 \times 30) / 54 = 15$	1	1	0.067
2,1	13	$(27 \times 24) / 54 = 12$	1	1	0.083
2,2	14	$(27 \times 30) / 54 = 15$	-1	1	0.067
					$\sum \frac{(f_o - f_e)^2}{f_e} = 0.3$

					$F_e$
--	--	--	--	--	-------

Calculated  $F = 0.3$

Degree of freedom =  $(r-1)(c-1) = (2-1)(2-1) = 1 \times 1 = 1$

Level of significance =  $5\% = 0.05$

Tabulated  $F_{0.05} = 3.841$

Conclusion: Since calculated  $F <$  tabulated  $F$ , it is not significant and  $H_0$  is accepted which means that there is no significant difference in tax experts/ tax administrators and tax payers views regarding the people are well informed about tax system of Nepal.

**Table 4.3**

**Opinion towards More Appropriate Method for Assessing of Income Tax**

S. N.	Alternatives	Tax expert and Tax Administrators	Tax Payers	Overall Points	%	Rank
1	Self-assessment	93	72	165	31.55	1
2	Assessment on the best judgment	75	56	131	25.05	2
3	Assessment on the basis of account submitted by the tax	55	49	101	19.88	4

	payers					
4	Tax settlement commission	56	67	123	23.52	3
				523	100	

Source: Opinion Survey, 2010

While ranking together the opinion of both groups the corresponding prioritized reasons for more appropriate methods for tax assessment are as follows:

- ) Self- assessment
- ) Assessment on the best judgment
- ) Tax settlement commission
- ) Assessment on the basis of accounts submitted by the tax payers.

From the above table it is concluded that the self- assessment is the more appropriate method for tax assessing of income tax.

### Calculation of Rank Correlation Coefficient

S.N	Alternatives	Total Points (X)	Total Points (Y)	Ran for X( $R_1$ )	Rank for Y ( $R_2$ )	$d=R_1-$ $R_2$	$d^2$
1	Self-assessment	93	72	1	1	0	0
2	Assessment on	75	56	2	3	-1	1

	the basis of best judgment						
3	Assessment on the basis of account submitted by the tax payers	55	49	4	4	0	0
4	Tax settlement commission	56	67	3	2	1	1
							$d^2$ $= 2$

Source: *Opinion Survey, 2010.*

Where, X = tax experts and tax administrators

Y = tax payers

We have,

$$r = \frac{1 - 6 \frac{d^2}{n(n^2-1)}}{4(4^2-1)} = \frac{1 - 6 \times 2}{4(4^2-1)} = 0.8$$

The correlation indicates that there is high degree of positive correlation between tax experts and tax administrators and tax payers ranking regarding the more appropriate method for assessing of income tax.

#### 4.1.3 Specific Objectives of Income Tax in Nepal



In order to know the specific objective of income tax respondents were requested to rank the responses on given choices. The question was “ in your opinion what should be the specific objective of income tax in Nepal?” The following table shows the rank wise responses received from the respondents.

**Table 4.4**

**Specific Objective of Income Tax in Nepal**

<b>S. N</b>	<b>Objectives</b>	<b>Tax expert (Total Point)</b>	<b>Tax Payers</b>	<b>Overall I Point</b>	<b>%</b>	<b>Rank</b>
1	To enhance the government revenue	81	84	165	30.56	1
2	To meet the government expenditure	76	80	156	28.89	2
3	To achieve national economic development	61	60	121	22.41	3
4	To check inflation	52	46	98	18.14	4
				540	100	

*Source: Opinion Survey, 2010*

From the above table it is addressed that the specific objective of income tax in Nepal should be enhance the government revenue and other objectives are ranked follows.

- ) To enhance the government revenue
- ) To meet the government expenditure
- ) To achieve National economic development
- ) To check inflation

#### **4.1.4 Opinion towards Problems Facing by the Tax Administration of Nepal**

To know the respondent’s opinion regarding the problems faced by the tax administration of Nepal, a question was asked “In Nepal what are the major problems facing by the tax administration?” The responses received from the respondents are tabulated below;

**Table 4.5**

#### **Opinion towards Problems Facing by the Tax Administration of Nepal**

<b>S. N.</b>	<b>Problems</b>	<b>Tax Expert and Tax Administrators</b>	<b>Tax Payers</b>	<b>Overall Point</b>	<b>%</b>	<b>Rank</b>
1	Lack of trained & competent tax personnel	85	90	175	15.38	5
2	Lack of proper	84	93	177	15.55	4

	direction					
3	Complicated tax laws	102	99	201	17.66	2
4	Undue delay in making assessment	120	112	232	20.38	1
5	Unnecessary outside pressure	94	80	174	15.29	6
6	Lack of co-ordination	88	91	179	15.74	3
	Total			1138	100	

*Source: Opinion Survey, 2010.*

From the above table in making assessment problems faced by tax administration is undue delay in making assessment and other important factors are ranked, while ranking together the options of both the groups. The corresponding prioritized problems are as follows:

- ) Undue delay in making assessment
- ) Complicated tax laws
- ) Lack of co-ordination
- ) Lack of proper direction
- ) Lack of trained and competent tax personnel
- ) Unnecessary outside pressure

### Calculation of Rank Correlation Coefficient

<b>S. N</b>	<b>Alternatives</b>	<b>Total Points (X)</b>	<b>Total Points (Y)</b>	<b>Rank for X (R<sub>1</sub>)</b>	<b>Rank for Y (R<sub>2</sub>)</b>	<b>d= R<sub>1</sub>- R<sub>2</sub></b>	<b>d<sup>2</sup></b>
1	Lack of trained and competent tax personnel	86	90	5	5	0	0
2	Lack of proper direction	84	93	6	3	3	9
3	Complicated tax laws	102	99	2	2	0	0
4	Undue delay in making assessment	100	112	1	1	0	0
5	Unnecessary outside pressure	94	80	3	6	-3	9
6	Lack of co-ordination	88	91	4	4	0	0
	Total						d <sup>2</sup> =18

Where, X= Tax expert and tax administrators

Y= Tax payers

We have,

$$r = \frac{1 - \frac{6d^2}{n(n^2-1)}}{1 - \frac{6 \times 18}{1-6-1}} = 0.49$$

The correlation indicate that there is positive correlation between tax experts and tax administration and tax payers ranking regarding the problem facing by the tax administration in Nepal.

From the analysis, it can be concluded that there are so many problems facing by administration out of them undue delay in making assessment is the main problem. So this problem should be minimized as soon as possible.

#### 4.5 Opinion Regarding the Tax Evasion is Most Often Practice in Tax System

To know the views of respondent about the opinion towards the practice of income tax evasion in tax system, a question was asked, it is said that the tax evasion is most often practice, do you agree this statement? The responses received from respondents are tabulated as follows.

**Table 4.6**

#### **Practice of Tax Evasion IN Tax System**

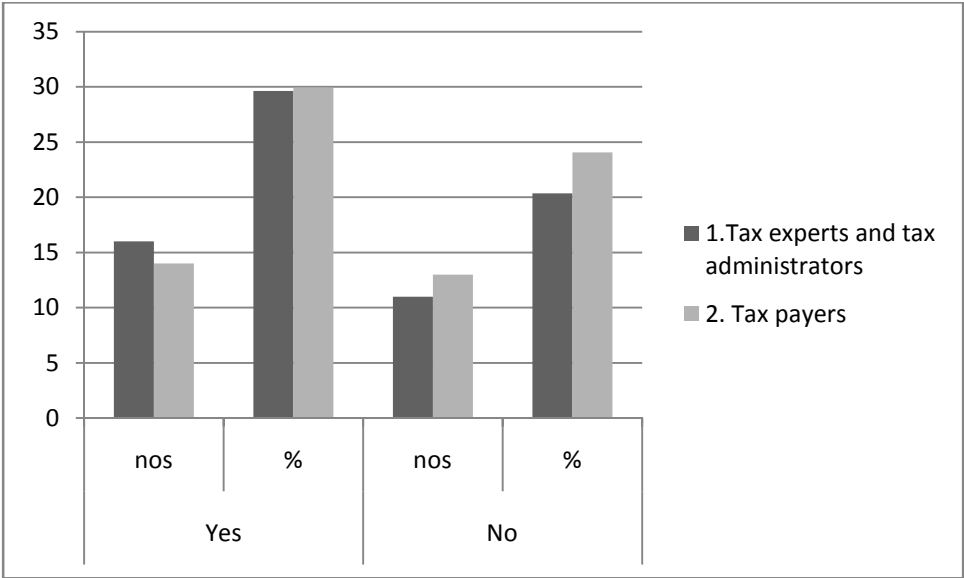
<b>Responses</b>	<b>Yes</b>		<b>No</b>		<b>Total</b>	
	<b>No s</b>	<b>%</b>	<b>No s</b>	<b>%</b>	<b>No s</b>	<b>%</b>
1.Tax experts and tax	16	29.63	11	20.37	27	50

administrators						
2. Tax payers	14	29.93	13	24.07	27	50
Total	30	55.56	24	44.44	54	100

Source: Opinion Survey, 2010.

Figure: 3

**Practice of Tax Evasion IN Tax System**



Above table and figure clear that about only 44% of the respondent responded that tax evasion is not practical in tax system and about 56% of the respondents responded that, tax evasion practice is most often in tax system.

In conclusion it can conclude that most of the respondents agree with the tax evasion is most often practice in tax system. And tax evasion should be

discouraged by the tax payers' tax officers, tax administrators and other related person.

**Test of Hypothesis:**

<b>Respondents</b>	<b>Yes</b>	<b>No</b>	<b>Row Total</b>
Tax experts/ administrators	16	11	27
Tax payers	14	13	27
Column total	30	24	54

Null hypothesis,  $H_0$ : There is no significant difference in the views of the tax experts and tax administrators and tax payers regarding the tax evasion practice in the tax system.

Alternative hypothesis,  $H_1$ : There is significant difference in the views of tax experts and tax administrators and tax payers regarding tax evasion practice in the tax system.

Calculation of  $\chi^2$

Row, column	$f_o$	$f_e$	$f_o - f_e$	$(f_o - f_e)^2$	$(f_o - f_e)^2 / f_e$	$(f_o - f_e)^2 / f_e$
1,1	16	$(27 \times 30) / 54 = 15$	1	1	0.067	0.067
1,2	11	$(27 \times 24) / 54 = 12$	- 1	1		0.083
2,1	14	$(27 \times 30) / 54 = 15$	-1	1		0.067
2,2	13	$(27 \times 24) / 54 = 12$	1	1		0.083
					$(f_o - f_e)^2 / f_e = 0.3$	

Test statistics under Ho, the test statistics is

$$\chi^2 = \frac{(f_o - f_e)^2}{f_e}$$

Where,  $f_o$  = Observed frequency

$$f_e = \text{Expected frequency} = \frac{\text{Row total} \times \text{column total}}{\text{Grand total}}$$

Now,

$$\text{Calculated } \chi^2 = 0.3$$

$$\text{Degree of freedom} = (r-1)(c-1) = (2-1)(2-1) = 1 \times 1 = 1$$

$$\text{Level of significance} = 5\% = 0.05$$

$$\text{Tabulated } \chi^2_{0.05} = 3.841$$

Conclusion, since calculated  $\chi^2$  is less than tabulated  $\chi^2$ . It is not significant and Ho is accepted which means that there is no significant difference in tax expert and tax administrators views and tax payers views regarding the tax evasion is the most often practice in tax system.

#### **4.1.6 Opinion towards Factors Responsible for Income Tax Evasion**

In order to know the opinion towards the factors responsible for income tax evasion, the question was asked to the respondents, “In your opinion, what are the factors responsible for income tax evasion?” the response received from the respondents are listed below:



**Table 4.7**

**Opinion towards Factors Responsible for Income Tax Evasion**

<b>S. N.</b>	<b>Alternatives</b>	<b>Tax Experts</b>	<b>Tax Payers</b>	<b>Overall Points</b>	<b>%</b>	<b>Rank</b>
1	Defective tax administration	109	112	221	18.95	1
2	Inappropriate income tax	974	109	206	17.67	3
3	Loopholes in income tax act	115	86	201	17.24	4
4	Lack of consciousness in tax payers	96	67	163	13.98	6
5	Corruption in tax authority	71	96	167	14.32	5
6	Lack of political commitment	107	101	208	17.84	2
	Total			1166	100	

Source: Opinion Survey, 2010.

From the table it is clear that the main factors responsible for income tax evasion is defective tax administration and other factors are ranked below in order of preference:

- ) Defective tax administration
- ) Lack of political commitment
- ) Inappropriate income tax policy
- ) Loopholes in income tax act
- ) Corruption in tax authority
- ) Lack of consciousness is tax payers

From the above analysis, we can conclude that tax administration should make more effective and provide political commitment to reduce tax evasion.

**Table 4.8**

**Opinion towards Ways of Controlling Tax Evasion**

<b>S.N</b>	<b>Alternatives</b>	<b>Tax Experts &amp; Tax Adms.</b>	<b>Tax Payers</b>	<b>Overall Points</b>	<b>%</b>	<b>Rank</b>
1	Educating tax payers	49	40	89	8.83	8
2	Simplifying tax laws	65	56	121	12	4
3	Timely assessment of tax	59	38	97	9.62	7

4	Incentives of regular tax payers	94	49	143	14.19	3
5	Fines and penalties to tax evasion	75	41	116	11.51	5
6	Compulsory maintenance of accounts	107	59	166	16.47	1
7	Heavy punishment for the corrupter personnel	92	64	156	15.48	2
8	Rewards to the information giver about tax evasion	63	57	120	11.9	6
				1008	100	

*Source: Opinion Survey, 2010*

From the table it is clear that the main factor is control income tax evasion in Nepal is compulsory maintenance of accounts. The other different factors suggested by the respondents are ranked below in order of preference:

- ) Compulsory maintenance of accounts
- ) Heavy punishment to corrupt personnel
- ) Incentives of regular tax payers
- ) Simplifying tax laws
- ) Rewards to the tax evasion finders

- ) Fines and penalties to tax evaders
- ) Timely assessment of tax
- ) Educating tax payers

So it can be concluded that there are so many ways to control income tax evasion out of them, compulsory maintenance of account is first order. It should be think by all tax expert, tax administrator and tax payers and related person.

#### **4.1.7 Opinions towards Problem Faced by Employee while Income Tax**

To know the respondents opinion regarding the problems faced by employees while paying income tax the question was asked, the question was “What types of problem that employee faced while paying income tax?” The responses received from the respondents are tabulated below:

**Table 4.9**

#### **Opinion towards Problem Faced by Employee while Paying Income Tax**

<b>S. N</b>	<b>Problems</b>	<b>Total Points</b>	<b>%</b>	<b>Rank</b>
1	Lack of knowledge about taxation (how to return file)	135	25.71	2
2	Procedural complication	180	34.29	1
3	Weak and immature treatment by tax administration	97	18.47	4
4	Hesitation to pay income due to low income	113	21.53	3
	Total	525	100	

Source: Opinion Survey, 2010

From the above table, it is known that the most important problem faced by employees while paying income tax is procedural complications. While ranking together the opinions of both the groups, the corresponding prioritised problems are as follows:

- ) Procedural complications
- ) Lack of knowledge of taxation
- ) Hesitation to pay income tax due to low income
- ) Weak and immature treatment by tax administrators

#### **4.1.8 Opinion towards the Provision of Fines and Penalties under Income Tax System**

To know the respondents' opinion regarding the provision of fines/ fees and penalties under income tax system, a question was asked, "The provision of fines, fees and penalties under income tax system is reasonable?" The responses received from the respondents are tabulated below:

**Table 4.10**

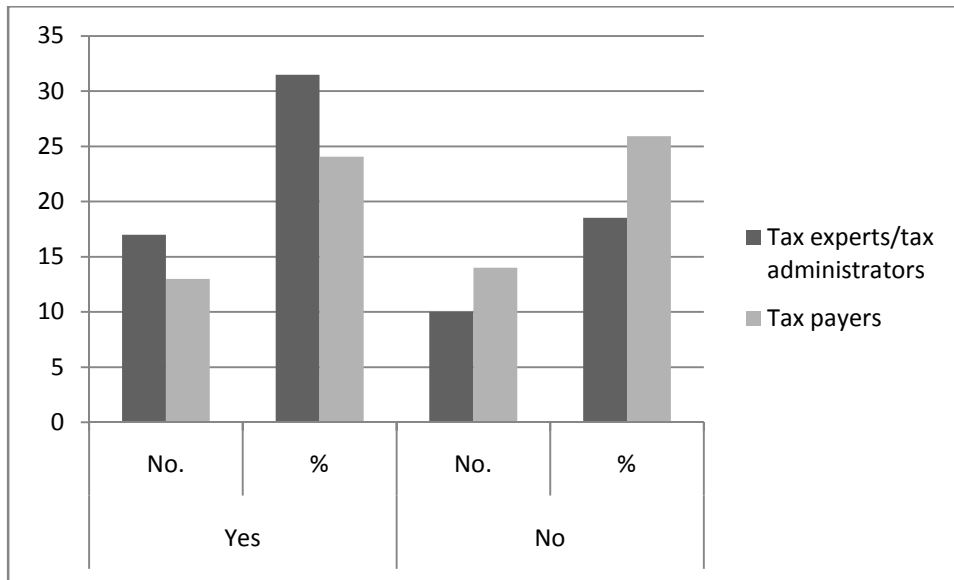
**Provision of Fines, Fees and Penalties under Income Tax System**

<b>Responses</b> <b>Respondents</b>	<b>Yes</b>		<b>No</b>		<b>Total</b>	
	<b>No.</b>	<b>%</b>	<b>N o.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
Tax experts/tax administrators	17	31.48	10	18.52	27	50
Tax payers	13	24.07	14	25.93	27	50
Total	30	55.55	24	44.45	54	100

*Source: Opinion Survey, 2010.*

Figure: 4

### Provision of Fines, Fees and Penalties under Income Tax System



From the above table and figure make clear that about 56% age of the respondents responded that the fines, fees and penalties under income tax is reasonable and about 44% respondents responded fines fees and penalties is not reasonable.

In conclusion, it can be said that provision of fines, fees and penalties under income tax system is reasonable.

### Test of Hypothesis:

<b>Respondents</b>	<b>Yes</b>	<b>No</b>	<b>Row Total</b>
Tax experts/ administrators	17	10	27
Tax payers	13	14	27
Column total	30	24	54

*Source: Field Survey, 2010*

Null hypothesis,  $H_0$ : There is no significant difference in the views of the tax experts and tax administrators and taxpayers regarding the provision of fees, fines and penalties

Alternative hypothesis,  $H_1$ : There is significant difference in the views of tax experts and tax administrators and taxpayers regarding the provision of fees, fines and penalties

Test statistics under  $H_0$ , the test statistics is

$$\chi^2 = \sum \frac{(f_o - f_e)^2}{f_e}$$

Where,  $f_o$  = Observed frequency

$f_e$  = Expected frequency =  $\frac{\text{Row total} \times \text{column total}}{\text{Grand total}}$

Grand total



Calculation of  $\chi^2$

Row, Column	$f_o$	$f_e$	$f_o - f_e$	$(f_o - f_e)^2$	$(f_o - f_e)^2 / f_e$
1,1	17	$(27 \times 30) / 54 = 15$	15	4	0.27
1,2	10	$(27 \times 24) / 54 = 12$	- 2	4	0.33
2,1	13	$(27 \times 30) / 54 = 15$	-2	4	0.27
2,2	14	$(27 \times 24) / 54 = 12$	2	4	0.33

$$(f_e - f_o)^2 / f_e = 1.2$$

Now,

$$\text{Calculated } \chi^2 = 1.2$$

$$\text{Degree of freedom} = (r-1)(c-1) = (2-1)(2-1) = 1 \times 1 = 1$$

$$\text{Level of significance} = 5\% = 0.05$$

$$\text{Tabulated } \chi^2_{0.05, 1} = 3.841$$

Conclusion, since tabulated  $\chi^2$  is greater than calculated  $\chi^2$  i.e. 3.841 > 1.2 so it is not significant and  $H_0$  is accepted. This means there is no significant difference in the view of tax experts and tax administrator and taxpayers regarding the provision of fines, fees and penalties under income tax system.

#### **4.1.9 Opinion towards Most Important Factors for Effectiveness of Income Tax in Nepal**

In order to know the most important factors for effectiveness of income tax, respondents were requested to rank the responses on given choice. The question was “what are the most important factors for effectiveness of income tax in

Nepal?” The following table shows the rank wise responses received from the respondents.

**Table 4.11: Opinion towards Most Important Factors for Effectiveness of Income Tax**

<b>S. N.</b>	<i>Factors</i>	<b>Tax Experts &amp; Tax Adms.</b>	<b>Tax Payers</b>	<b>Overall Points</b>	<b>%</b>	<b>Rank</b>
1	Honest tax payers	73	84	157	19.5 5	3
2	Honest tax officer	90	53	143	17.8 1	4
3	Clear and simple act, rules and regulation	109	95	204	25.4 0	2
4	Effective income tax administration	103	108	211	26.2 8	1
5	Other	41	47	88	10.9 6	5
	Total			803	100	

*Source: Opinion Survey, 2010.*

From the above ranking on the basis of prioritized given by respondents, it can be concluded that the effective income tax administration is the most important factor for effective of income tax revenue in Nepal and other factor are ranked below:

- ) Effective income tax administration
- ) Clear and simple act rules and regulation
- ) Honest tax payers
- ) Honest tax officers
- ) Others

**Table 4.12: Calculation of Rank Correlation Coefficient**

S. N.	Alternatives	Total Points (X)	Total Points (Y)	Rank for X (R <sub>1</sub> )	Rank for Y (R <sub>2</sub> )	d= R <sub>1</sub> - R <sub>2</sub>	d <sup>2</sup>
1	Honest tax payers	73	84	4	3	1	1
2	Honest tax officer	90	53	3	4	-1	1
3	Clear act rules and regulation	109	95	1	2	-1	1
4	Effective income tax administration	103	108	2	1	1	1
5	Other	41	47	5	5	0	0
	Total						d <sup>2</sup> =18

*Source: Opinion Survey, 2010*

Where, X= Total expert and tax administrators

Y= tax payers

We have,

$$r = \frac{1 - 6d^2}{n(n^2 - 1)} = \frac{1 - 6 \cdot 4}{5(5^2 - 1)} = 0.8$$

The correlation indicates that there is a high degree of positive correlation between tax experts and tax administration and tax payers ranking regarding the most important factor for effectiveness of income tax in Nepal.

#### 4.1.10 Opinion towards Increase the Income Tax Revenue

In order to know the opinion towards increase the income tax revenue a question was asked to the respondents: "How can we increase the income tax revenue in Nepal?" The responses received from the respondents are listed below:

**Table 4.13: Opinion towards the Reasons to Increase Tax Revenue in Nepal**

S.N.	Alternatives	Tax Experts & Tax Adms.	Tax Payers	Overall Points	%	Rank
1	Educating tax payers	115	100	215	26.71	1
2	Simplifying tax laws	37	85	182	22.61	2
3	Incentives of regular tax payers	78	69	147	18.26	4

4	Timely assessment to tax	73	82	155	19.25	3
5	Imposing fines and penalties	50	56	106	13.17	5
	Total			805	100	

*Source: Opinion Survey, 2010.*

From the table it is clear that the main factor to increase the tax revenue from corporation is education and other preferences are ranked below in order.

1. Educating tax payers
2. Simplifying tax laws
3. Timely assessment of tax
4. Incentives to regular tax payers
5. Fines and penalties

From the above analysis, we can conclude that each tax payers have to be given knowledge about tax. Tax payers should have conclusion regarding about tax system. Simplifying tax laws is also important factors for increasing income tax revenue of Nepal.

#### **4.1.11 Opinion towards Major Problems in Income Tax System**

In order to know the major problems in income tax system of Nepal, respondents were requested to rank the responses on given choices. The question was” Which are the major problems in income tax system of Nepal?” The responses received from respondents are tabulated below:

**Table 4.14****Opinion towards Major Problems in Income Tax System**

<b>S. N.</b>	<b>Alternatives</b>	<b>Tax Experts</b>	<b>Tax Payers</b>	<b>Overall Points</b>	<b>%</b>	<b>Rank</b>
1	Inadequate economic policy	105	109	214	13.72	2
2	Inefficient income tax administration	112	125	237	15.19	1
3	Complicated income tax act	99	102	201	12.89	3
4	Lack of education to tax payers	75	67	142	9.10	8
5	Lack of training & incentives to employee	87	95	182	11.67	4
6	Difficulties in maintaining account for tax purpose	73	89	162	10.38	5
7	Lack of expert in tax management	55	94	149	9.55	6
8	Practice of tax evasion	82	64	146	9.36	7
9	Inappropriate rate and	43	84	127	8.14	9

	exemption limit					
	Total			1560	100	

Source: *Opinion Survey, 2010.*

From the above table it is clear that the major problem of income tax system is inefficient income tax administration and other problems are ranked below in order of preference.

- ) Inefficient income tax administration
- ) Inadequate economic policy
- ) Complicated income tax act
- ) lack of training to incentives to employee
- ) lack of tax expert in tax management
- ) Difficulties in maintaining account for tax purpose
- ) Practice of tax evasion
- ) Lack of education to tax payers
- ) Inappropriate rate and exemption limit

**Table 4.15: Calculation of Rank Correlation Co-efficient**

S. N.	Alternatives	Total Points (X)	Total Points (Y)	Rank for X ( $R_1$ )	Rank for Y ( $R_2$ )	$d = R_1 - R_2$	$d^2$
1	Inadequate economic policy	105	109	2	2	0	0
2	Inefficient income	112	125	1	1	0	0

	tax administration						
3	Complicated income tax act	99	102	3	3	0	0
4	Lack of education to tax payers	75	67	6	8	-2	4
5	Lack of training & incentive to employee	87	95	4	4	0	0
6	Difficulties in maintaining accounts for tax purpose	73	89	7	6	1	1
7	Lack of expert in tax management	55	94	8	5	3	9
8	Practice of tax evasion	82	64	5	9	-4	16
9	Inappropriate rate and exemption limit	43	84	9	7	2	4
							d 2=3 4

Source: Opinion Survey, 2010

Where, X= Total expert and tax administrators



Y= tax payers

We have,

$$r = \frac{1 - \frac{6}{n^2}}{n(n^2-1)} = \frac{1 - \frac{6 \times 34}{9(9^2-1)}}{9(9^2-1)} = 0.72$$

The correlation indicates that there is high degree of positive correlation between tax experts and tax administrators' views and taxpayers' views ranking regarding the major problems in income tax system in Nepal. So, for effectiveness income tax system we should make efficient income tax administration.

#### **4.1.12 Comments and Suggestions Regarding to Achieving Effectiveness of Income Tax**

An open question was asked to the respondents to know their comments and suggestions regarding achieving effectiveness of income tax. The responses received from the respondents are given below:

- ) To carry all taxpayers in mainstream, the government must conduct public awareness programs and should be done transparent tax collection procedure.
- ) Tax personnel should be trained and motivated
- ) Proper monitoring by tax authorities is needed
- ) Revenue administration should be made flexible
- ) Simplified tax system and lower rate of tax is effective tool to recover more tax revenue.
- ) Taxpayers should be made aware of the provision of taxation.
- ) Need of changing the behavior of them.

- ) Government should provided sufficient remuneration to collect more tax revenue.
- ) Simplification in the procedure.
- ) Tight tax policy should be applied on equitable basis.
- ) Discourage tax evasion through fine and penalties
- ) Government should reward to regular taxpayers.

## **4.2 Analysis of Secondary Data**

This chapter focuses on the presentation and analysis of secondary data. The secondary data have been obtained from economic survey, budget speech and other related newspapers. The available data related to the study have been tabulated, presented, analyzed, and interpreted to reach at some findings. The data collected from economic survey and other related newspapers have been analyzed by dividing into various sub-headings. Structure of government revenue of Nepal, structure of income tax revenue of Nepal, contribution of income tax in total revenue, total tax revenue and direct tax revenue of Nepal tax and non tax revenue of Nepal, structure of direct tax revenue in Nepal, resources gaps of Nepal for the ten period i.e. 1999/2000to 2008/09.

## 4.2.1 Structure of Government Revenue of Nepal

Government revenue of Nepal is comprised of tax revenues and non-tax revenues. Tax revenue consists of customs, tax on consumption and production of goods and services, land revenue and registration and tax on property, profit and income. Similarly, non-tax revenue includes charges, fees, fines and forfeiture receipts from sales of commodities and services, dividend royalty and sales of fixed assets, principal and interest payment and miscellaneous items. The structure of government revenue in Nepal has been presented in table 4.1 for 10 years period from 1999/2000 to 2008/09.

**Table 4.16**

### **Structure of Government Revenue in Nepal**

(Rs. in millions)

<b>FY</b>	<b>Custo ms</b>	<b>Tax on Consumpt ion &amp; Product of Good &amp; Services</b>	<b>Land Revenue and Registratio n</b>	<b>Tax on Propert y Profit &amp; Income</b>	<b>Total Tax Revenu e</b>	<b>Non Tax Revenu e</b>	<b>Total Revenu e</b>
1999/00	8502.2	11249.7	1004.2	5183.7	25939.8	6998.1	32937.9
2001/2	9517.7	11719.1	1003.2	6512.9	28752.9	8498.4	37251.3
2001/02	10813. 3	13387.3	1015.9	7935.6	33152.9	9741.6	42893.7

2002/03	12552. 1	16153.6	612.9	9546.5	38865.1 1	10028.6	48893.7
2003/04	12658. 8	16074.3	1131.8	9465.7	39330.6	11114.9	50445.5
2004/05	14236. 4	18244.8	1414.3	8691.5	42856.9	13642.9	56229.8
2005/06	15554. 8	20705.6	1697.5	10215.1	48173.0	14158.0	62331
2006/07	15701. 6	25331.3	1799.2	11272.6	54104.7	160180	70122.7
2007/08	15344. 0	28118.3	2181.8	11787.6	57430.4	14851.7	72281.7
2008/09	16707. 6	35438.8	2253.5	16726.8	71126.7	16585.5	87712.2
Average	13158. 85	19642.28	1411.43	9733.75	43946.2 3	12163.7 7	56110

*Source: Economic Survey, 2008/09.*

**Table 4.17****Structure of Government Revenue in Nepal**

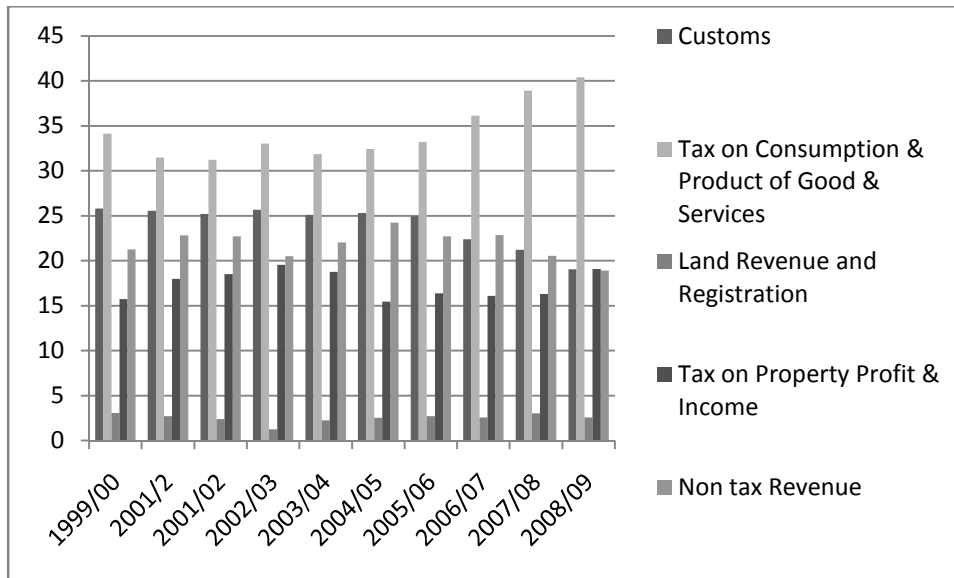
(In %)

<b>FY</b>	<b>Customs</b>	<b>Tax on Consumption &amp; Product of Good &amp; Services</b>	<b>Land Revenue and Registration</b>	<b>Tax on Property Profit &amp; Income</b>	<b>Non tax Revenue</b>	<b>Total Revenue</b>
1999/00	25.81	34.15	3.05	15.74	21.25	100
2001/2	25.55	31.46	2.69	17.98	22.82	100
2001/02	25.21	31.21	2.37	18.5	22.71	100
2002/03	25.67	33.03	1.25	19.53	20.52	100
2003/04	25.09	31.86	2.24	18.76	22.03	100
2004/05	25.32	32.44	2.52	15.46	24.26	100
2005/06	24.96	33.22	2.72	16.39	22.71	100
2006/07	22.39	36.12	2.57	16.08	22.84	100
2007/08	21.22	38.90	3.01	16.30	20.54	100
2008/09	19.05	40.40	2.57	19.07	18.91	100
Average	24.03	34.28	2.50	17.33	21.86	100

*Source: Economic Survey, 2008/09.*

**Figure: 5**

**Structure of Government Revenue in Nepal**



From above table and figure, it is observed various tax and non-tax revenues, tax on consumption and product of goods and services has the highest percent of contribution towards total revenue of Nepal. Its contribution in millions of rupees has been increasing per year except 2003/04. In fiscal year 1999/200, total revenue was 32937.9 million and tax on consumption and product of goods and services was Rs 11249.7 millions which indicates 34.15% tax on consumption and product of goods and product of services to total revenue. In fiscal year 2008/09, out of total revenue Rs 87712.2 millions, tax on consumption and product of goods and services has the share Rs35438.8 millions, which means 40.40% contributions. The average contribution of tax on consumption and product of goods and services over

nine years is 34.28% of the total revenue of Nepal, which indicates that its contribution was over the average and its goods.

The contribution of customs has been showing increasing trend. In the fiscal year 1999/2000, out of the total revenue of Rs 32937.9 millions, Rs 8502.2 millions has raised from customs. It means 25.81% contribution made to the total revenue by customs. In fiscal year 2008/09, Rs 16707.6 has been raised from customs out of total revenue of Rs 87712.2 millions. In this year, it is decreasing trend. The mean contribution of customs over the 10 years period is 24.03%. It shows that customs is also highest revenue source in the total revenue of Nepal. In 2008/09, it is below the average because of government gives subsidy.

Non-tax revenue occupies the third place of its contribution to total revenue of Nepal. Its contribution has 6998.1 millions in fiscal year 1999/2000 and Rs 16585.5 millions in fiscal year 2008/09. It has been increasing trend per year but in 2008/09, it has decreased with compare to previous year and it again increase in 2008/09. The mean contribution of non-tax revenue over the ten years period is 21.86%. It shows that the contribution of tax revenue is increasing trend and non-tax is decreasing.

Tax on property, profit and income occupied the fourth placed regarding its contribution to the total revenue of Nepal. Tax on property, profit and income consists of income tax. From public enterprises, income tax from semi-public enterprises, income tax from private corporate bodies, income tax from individuals, income tax from employment, urban house and land tax, vehicle tax on interest and other taxes. It has share of Rs 518307millions and Rs 16726.8 millions in fiscal year 1999/2000 and 2008/09 respectively i.e. 15.74% contribution in fiscal year 1999/2000 and 19.07% contribution in fiscal year 2008/09. Land revenue and

registration has the lowest average contribution of 2.49% in total revenue of Nepal. Its contribution in fiscal year 1999/2000 was Rs 1004.2 millions i.e. 2.57% in total revenue of Nepal. The percent contribution has been fluctuation but amount contribution in total revenue has been increasing per year except certain years.

#### 4.2.2 Tax and Non-tax Revenue of Nepal

**Table 4.18**

**Composition of Tax and Non-tax Revenue in Nepal**

(Rs. in Millions)

Fiscal Year	Total Revenue		Tax Revenue		Non-tax Revenue	
	Rs.	%	Rs.	%	Rs.	%
1999/00	32937.9	100	25939.8	78.75	6998.1	21.25
2001/2	37251.3	100	28752.9	77.19	8498.4	22.81
2001/02	42893.7	100	33152.2	77.29	9741.6	22.71
2002/03	48893.6	100	38865.0	79.49	10028.6	20.51
2003/04	50445.6	100	39332.0	77.97	11114.9	22.03
2004/05	56229.8	100	42587.0	75.74	13642.9	24.26



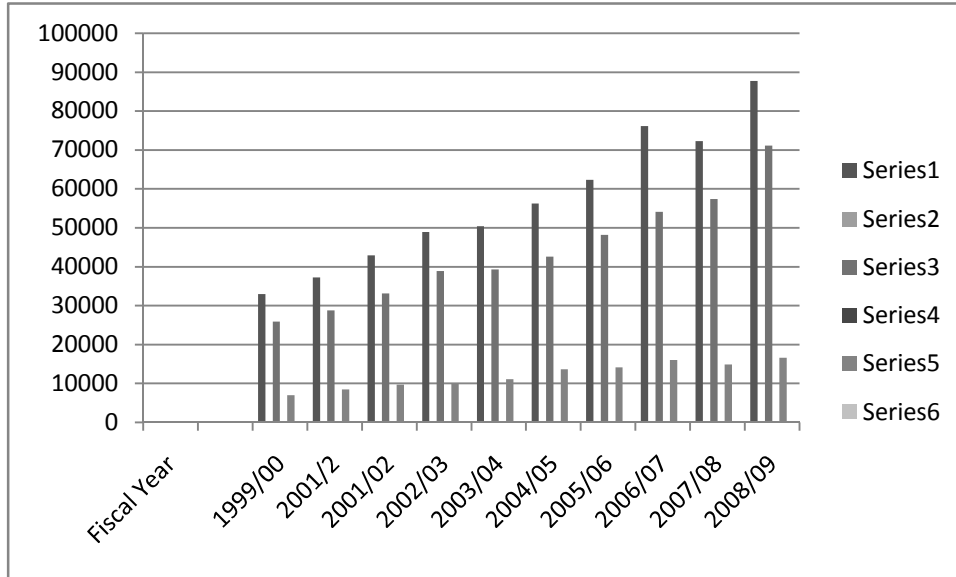
2005/06	62331. 0	100	48175.7	77.30	14158.0	22.72
2006/07	76122. 7	100	54104.7	77.16	16018.0	22.84
2007/08	72282. 1	100	57430.5	79.45	14851.7	20.55
2008/09	87712. 2	100	71126.7	81.09	16585.5	18.91
Average	56110	100	43946.2	78.14	12163.7 7	21.86

*Source: Economic Survey, 2008/09.*

Total revenue of Nepal consists of tax revenue and non-tax revenue. Tax revenue comprise of customs, excise, sales tax (VAT), income tax, vehicle tax, land and house registration, Non-tax revenue includes duties, fees sale of government properties commodities and services, dividends on share, interest on loans, donation and gifts. In Nepalese revenue, structure from fiscal year 1999/2000 to 2008/09 tax revenue has always been greater than three times of non-tax revenue. This means heavy contribution of tax revenue always been increasing per year.

**Figure 4.6**

**Composition of Tax and Non-tax Revenue in Nepal**



From above table and figure, it is addressed that percent contribution has always been fluctuating within the lower limit of about 75.74% to the upper limit of about 81.09%. Non-tax revenue has the lowest contribution as compared to tax revenue. Its contribution to total revenue has remained below 25%. In 1999/2000 Rs 6998.1 million was collected as non-tax revenue which was about 21.25% of total revenue. Its contribution over the tenth year's period has been fluctuating within 19% to 25%. In 2008/09 out of total revenue of Rs 87712.2 millions, Rs 16585.5 million was contributed from non-tax revenue. It was about 18.91% of total revenue.

From the above table and figure, clearly shows that tax revenue has been significantly contributed in total revenue and non-tax revenue has been poor contributed. In conclusion, we can say that tax is the most important source of government revenue. It is suitable source of collecting revenue internally.

### 4.2.3 Structure of Income Tax in Nepal

Nepalese income tax structure is formed by contribution of income tax from public enterprise, semi-public enterprises, private corporate bodies, individuals, and employment tax on interest. This has been presented in table 4.4. (a) and 4.4.(b). Here, public enterprise consists of 100% government ownership and semi-public enterprise includes 51% government ownership. Private corporate bodies mean individuals denote Sole traders, partnership and private limited companies. Remuneration/employment refers to salaries earned from the services provided to the government and non-government sectors.

**Table 4.19 (a): Composition of Income Tax in Nepal**

<b>FY</b>	<b>Public Enterprises</b>	<b>Semi-Public Enterprises</b>	<b>Private Corporate Bodies</b>	<b>Individuals</b>	<b>Remuneration</b>	<b>Tax on Interest</b>	<b>Total Income Tax</b>
1999/00	1317.8	-	925.1	2120.8	322.2	212.2	4898.1
2001/2	1526.5	-	1155.0	2772.7	396.5	315.5	6166.2
2001/02	2198.8	-	1339.5	3016.4	451.5	414.4	7420.6
2002/03	2928.0	-	1924.3	3200.5	597.3	463.9	9114.0
2003/04	1769.3	-	1412.0	4419.1	835.6	467.7	8903.7

2004/05	1251.0	-	1236.3	3362.3	1252.6	864.0	7966.2
2005/06	2056.6	-	1531.3	3533.4	1391.2	733.4	9245.9
2006/07	1332.4	-	2467.8	3926.3	1675.9	757.0	10159.4
2007/08	195.7	-	3404.3	4234.7	1764.1	774.9	10373.7
2008/09	1019.7	-	5717.1	5234.4	2007.9	1054.9	15034.0
Average	1559.58		2111.27	3582	1069.48	605.79	8928.18

Source: Economic Survey, 2008/09.

**Table 4.19(b): Structure of Income Tax in Nepal from 1997/98 to 2006/07 in Percent**

<b>FY</b>	<b>Public Enterprises</b>	<b>Semi-Public Enterprises</b>	<b>Private Corporate Bodies</b>	<b>Individuals</b>	<b>Remuneration</b>	<b>Tax on Interest</b>	<b>Total Income Tax</b>
1999/00	26.90	-	18.89	43.30	6.58	4.33	100
2001/2	24.74	-	18.72	44.94	6.43	5.17	100

2001/02	29.63	-	18.05	40.65	6.08	5.59	100
2002/03	32.13	-	21.11	35.12	6.55	5.09	100
2003/04	19.87	-	15.96	49.50	9.38	5.26	100
2004/05	15.70	-	15.52	42.21	15.72	10.85	100
2005/06	22.24	-	16.56	38.22	15.05	7.93	100
2006/07	13.11	-	24.29	38.65	16.49	7.45	100
2007/08	1.89	-	32.82	40.82	17.00	7.47	100
2008/09	6.78	-	38.02	34.82	13.39	7.02	100
Average	19.3		22.00	40.82	11.26	6.62	100

Figure 4.7

Structure of Income Tax in Nepal from 1999/2000 to 2008/09  
in Percent

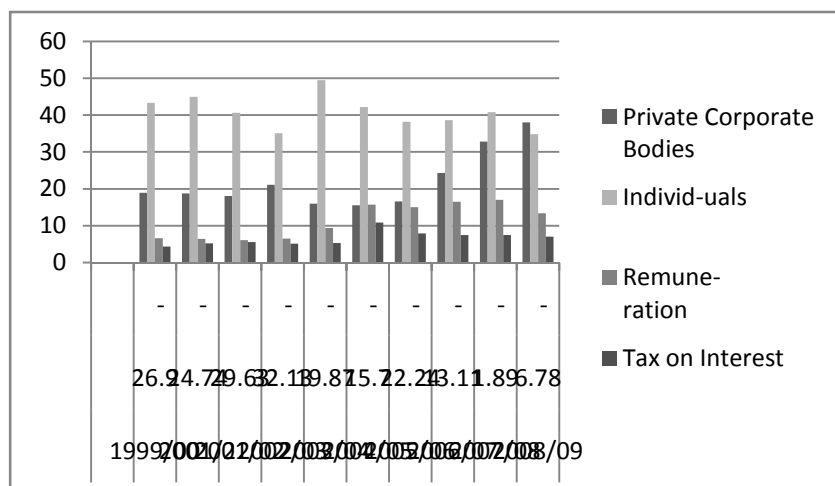


Table 4.4 presents the structure of income tax in Nepal which shows that the total income tax has increased in every fiscal year except in the year 2001/02 and 2002/03. It has increased from Rs 4898.1 million to 15340.1 million in fiscal year 2008/08.

The income tax contribution of individuals has occupied first position in total income tax revenue of Nepal up to 2005/06. In fiscal year 1999/2000, 2120.8 million was raised from individuals as income tax, from then it has been increasing trend up to 2001/02 then it is significantly decreasing in fiscal year 2002/03 amount Rs 1056.90 millions i.e. 23.91%. In 202/03, out of total income tax revenue of Rs 7966.2 millions, Rs 3362.3 million has been raised from individuals. It is about 42.21% contribution by individuals. In 2003/04, it is slightly increased from the year 2002/03 to Rs 3533.4 million. Similarly 2008/09, contribution from individuals in total revenue has increase to Rs 5234.4; this is 34.82% of total tax revenue. Its contribution was highest Rupees in the fiscal year 2006/07 and highest in percentage in fiscal year 2001/02.

Income tax from public enterprise has occupied second position regarding its contribution in total income tax revenue of Nepal. In fiscal year 1999/2000 out of total income tax revenue of Rs 4898.1 millions, Rs 1317.8 million has been contributed by public enterprises. Its contribution has been increasing trends up to 2000/01. Then it is in decreasing trends in 2001/02, 2002/03, 2003/2004, 2004/05, 2005/06, in 2006/07 it is increase from 195.7 to 1019.7 millions. In fiscal year 2008/09 out of total income tax revenue of Rs 15034 millions, Rs 1019.7 million has been contributed by public enterprises.

Private corporate bodies occupied third position out of total income tax revenue of Nepal. In 1999/2000, private corporate bodies paid Rs 925.1 million out of Rs

4898.1 million total income tax revenue, i.e. private corporate bodies contributed 18.89% of total income tax revenue. This was very much insignificant contribution. Its contribution has been increasing trend up to 2000/01 and then it decreased by Rs 175.5 million i.e. 12.44% while in 2001/02, it was decreased by Rs 512.3 million i.e. 26.62% and in 2003/04, its contribution has increased to Rs 1531.3 millions i.e. 16.09% of total tax revenue. Similarly, in 2004/05, it has also increasing trend. In 2008/09, it was Rs 5717.1 millions which was 38.02% of total tax revenue. It is highest contribution among the other sources.

Income tax from remuneration has occupied fourth position in total income tax revenue of Nepal. In 1999/2000, total income tax revenue was Rs 4898.1 millions and Rs 322.2 million was contributed by employment income tax i.e. 6.58% of total income tax revenue. Income tax from remuneration has been increasing in all the years. In 2004/05, total income tax revenue was Rs 10159.4 millions included Rs 1675.9 millions as income tax from remuneration. Similarly, in 2008/09 out of total income tax revenue of Rs 15034 million, 2007.9 million was contributed by remuneration. It was about 13.36% of total tax revenue. It shows that the remuneration tax has been contributed significantly in total tax revenue from this analysis, we can include that remuneration tax is suitable means of collecting income tax revenue.

Tax on interest has occupied fifth position in total income tax revenue. In fiscal year 1999/2000, Rs 212.2 million was collected as tax on interest out of Rs 1898.1 millions of total income tax revenue. Interest tax was in increasing trend in all the fiscal year except 2003/04. In fiscal year 2006/07 out of total income tax revenue of Rs 15034.0 millions Rs 1054.9 million has been collected as interest tax. It was 7.02% of total tax revenue. The share of semi-public enterprises was nil in each

year from 1999/2000 to till because the source of revenue was restricted and share of semi-public enterprises was not calculated separately also.

#### 4.2.4 Tax/GDP Ratio

Here, this analysis has been made to know about analysis of the share of taxation in total Gross Domestic Product (GDP) of Nepal. It is to be noted here that the Tenth plan has targeted to increase the share of tax revenue in GDP.

Nepal is one of the least developed countries in the world. Nepalese economic activity is very slow and does not show any drastic positive change. The moderate Tax/GDP ratio ranged from 15%-18% is other developing countries ( WB1991) but in Nepal, it is obvious from the fact that Tax/DGP ration never exceeded 10% and it was never around 9% throughout the fiscal year.

**Table: 4.20**

#### **Contribution of Tax Revenue and Income Tax Revenue in GDP of Nepal**

(Rs. in millions)

<b>FY</b>	<b>GDP</b>	<b>Tax Revenue</b>	<b>Tax Revenue as %of GDP</b>	<b>Income Tax Revenue</b>	<b>Income Tax Revenue as % of GDP</b>
1999/00	289798	25939.8	8.95	4898.1	1.69
2001/2	330018	28752.9	8.71	6166.2	1.87



2001/02	366251	33152. 1	9.05	7420.6	2.03
2002/03	413429	38865. 1	9.40	9114.0	2.20
2003/04	4430397	39933 0.6	9.13	8903.7	2.07
2004/05	460325	42587. 0	9.25	7966.2	1.73
2005/06	500699	48173. 0	9.62	9245.9	1.85
2006/07	548485	54104. 7	9.86	10159.4	1.85
2007/08	611089	57430. 4	9.39	10373.7	1.7
2008/09	675484	71126. 7	10.53	15034.0	2.23
Mean/ average	462597. 5	43946. 22	9.33	8928.58	1.92

*Source: Economic Survey, 2008/09.*

Note: GDP is taken in current price.

From above table, it is addressed that Tax/GDP ratio is not satisfactory. It is fluctuate time to time. A maximum of 10.53% Tax/GDP ratio was achieved in

2008/09. The mean Tax/GDP ratio for the ten years has been computed to be 9.39%. Income tax revenue is also fluctuating time to time.

#### **4.1.5 Composition of Direct Tax and Indirect Tax Revenue in Total Revenue of Nepal**

Total revenue consists of tax revenue and non-tax revenue. Total tax revenue consists of direct tax revenue and indirect tax revenue. Direct tax includes income tax, land revenue and registration, urban house and land tax property tax, vehicle tax etc. Indirect tax includes customs, excise, VAT, entertainment tax, hotel tax, air flight tax, contract tax and road & bridge maintenance tax. Table 4.6 shows the composition of direct tax and indirect tax revenue in total tax revenue of the country from fiscal year 1999/00 to 2008/09.

**Table 4.21 Composition of Direct Tax and Indirect Tax in Total Tax Revenue of Nepal**

(Rs in millions)

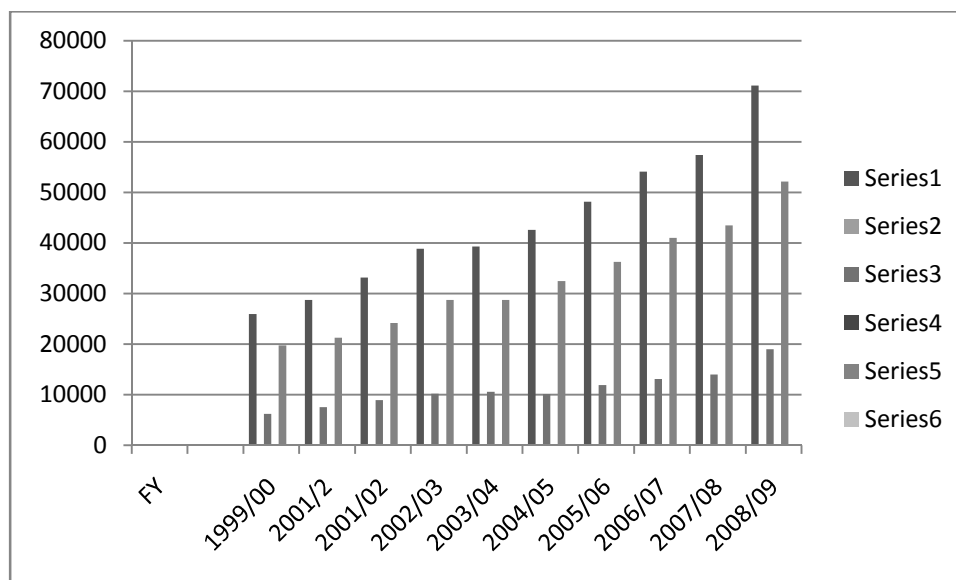
FY	Total Tax Revenue		Direct Tax Revenue		Indirect Tax Revenue	
	Rs.	%	Rs.	%	Rs.	%
1999/00	25939.8	100	6187.9	23.85	19751.9	76.15
2001/2	28752.9	100	7516.1	26.14	21236.8	73.86
2001/02	33152.2	100	8951.5	27.00	24200.6	73.00
2002/03	38865.0	100	10159.	26.14	28705.7	73.86

			4			
2003/04	39330.6	100	10597.5	26.94	28733.1	73.06
2004/05	42586.9	100	10105.8	23.73	32481.2	76.27
2005/06	48173.0	100	11912.6	24.73	36260.5	75.27
2006/07	54101.7	100	13071.8	24.16	41032.8	75.84
2007/08	57430.4	100	13968.1	24.32	43462.3	75.68
2008/09	71126.7	100	18980.3	26.69	52146.4	73.31
Average	439446.2	100	11145.1	25.37	32801.1	74.63

*Source: Economic Survey, 2008/09*

**Figure:8**

**Composition of Direct Tax and Indirect Tax in Total Tax Revenue of Nepal**



The above table and figure shows that the total Tax revenue was dominated by indirect tax revenue. The share of direct tax revenue in total tax revenue for the period 1999/2000 period was 76.15% of total revenue. The amount of direct tax is increasing every year except 2004/05. It increased by 6187.9 millions in 1999/2000 to Rs 18980.3 millions in 2008/09. The percent of direct tax revenue to total tax revenue is fluctuating trend. The contribution of direct tax to total tax revenue was minimum in 2004/05 i.e. 23.73% and maximum in 1999/2000 i.e. 23.85%. It was 26.69% in fiscal year 2008/09. It is noted that the contribution of direct tax in total tax revenue was increased in first 3 years in percentage but after it was in fluctuating trend in percentage, even if increasing trend in total amount.

#### 4.2.6 Composition of Direct tax/ Structure of Direct tax in Nepal

The structure of direct tax is the composition of income tax, land revenue and registration, vehicle tax, interest tax and other tax. Direct tax has been divided into three sub-heads for the analysis i.e. income tax, land and house registration, and miscellaneous tax, among various direct tax revenue income tax has occupied the supreme position. It has been presented in table 4.7.

**Table 4.22****Contribution of Various Taxes in Direct Tax Revenue in Nepal**

(Rs in millions)

FY	Direct Tax Revenue		Income Tax Revenue		Land Revenue		Miscellaneous Taxes	
	Rs.	%	Rs.	%	Rs.	%	Rs.	%
1999/00	6187.9	100	4898.1	79.16	1004.2	16.23	285.6	4.61
2001/2	7516.1	100	6170.2	82.09	1003.2	13.35	342.7	4.56
2001/02	8951.5	100	7420.6	82.90	1015.9	11.35	515.0	5.75
2002/03	10159.4	100	9114.0	89.71	612.9	6.03	432.5	4.26
2003/04	10597.5	100	8903.7	84.02	1131.8	10.68	562.0	5.3
2004/05	10105.7	100	7966.2	78.83	1414.3	14.0	725.3	7.18
2005/06	11912.5	100	9245.9	77.62	1697.5	14.25	969.2	8.13
2006/07	13071.9	100	10159.4	77.72	1799.2	13.76	1113.2	8.51
2007/08	13968.1	100	10373.7	74.27	2181.1	15.61	1413.3	10.12
2008/09	18980.3	100	15034.0	79.21	2253.5	11.85	1692.3	8.92
Average	11145	100	8928.58	80.55	14111.3	12.17	805.11	6.73

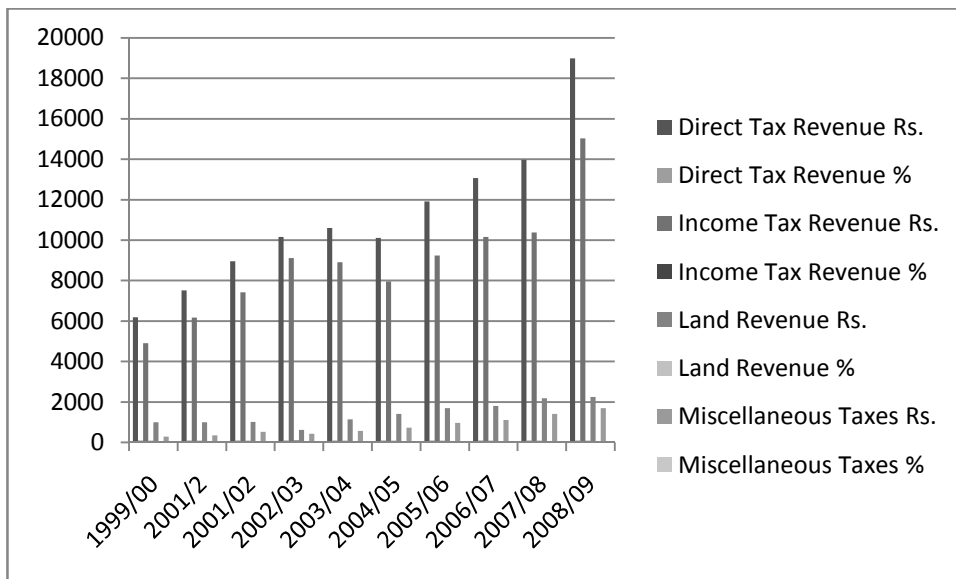
Source: Economic Survey, 2008/09.

Note: 1. Income tax includes tax from public enterprises, semi-PES, private corporate bodies, individuals, remuneration and interests.

Note: 2. miscellaneous taxes include urban house and land tax, vehicle tax and other tax.

**Figure: 9**

**Contribution of Various Taxes in Direct Tax Revenue in Nepal**



The above table and figure shows that income tax occupied the first place among various direct tax revenues. The amount of income tax has been showing an increasing trend. Out of total direct tax revenue, Rs 4898.1 million has been contributed by income tax. This is about 79.16% of the total direct tax revenue. In Land and house registration, income occupied second position among various direct taxes. The amount of land and house registration increased from Rs 1004.2 million to 2253.5 million from the fiscal year 1999/2000 to 008/09. Trend of that was fluctuating over the period. The contribution of land and house registration had so much decreased in the fiscal year 2000/01. Miscellaneous taxes occupied third position among the various direct taxes. The trend of that revenue has been also fluctuating. In fiscal year 1999/2000, its contribution on the total direct tax was

Rs 285.6 million i.e. 4.61%. In 2008/09, its contribution out of total direct tax of Rs 18890.3 million was Rs 1692.3 million i.e. 8.92% on direct tax revenue.

It is conclude that in the position of direct tax income tax plays vital role from the beginning, its contribution around 75% to 85% in various years.

#### **4.2.7 Contribution of Income Tax in Total Revenue, Tax Revenue and Direct Tax Revenue of Nepal**

Nepal is facing serious and growing fiscal resources gap and her need for mobilizing additional financial resources from domestic resources through taxation has been urgent. The base for living taxes may be consumption, income and capital. Taxes on incomes, capital are known as indirect taxes. Tax structure of Nepal is composed of both direct and indirect taxes. Income tax has been a important element of direct tax and it is playing vital role to generate government revenue for the development of National economy.

**Table: 4.23**

#### **Contribution of Income Tax in Total Revenue, Total Tax Revenue and Direct Tax Revenue of Nepal**

(In %)

<b>FY</b>	<b>Inco me Tax Reve nue</b>	<b>Total Revenue</b>	<b>% of Incom e Tax in TR</b>	<b>Total tax Revenue</b>	<b>% of Income in TTR</b>	<b>Direct tax Revenue</b>	<b>% of Incom e Tax in DTR</b>

1999/00	4898. 1	32937.9	14.87	25939.8	18.88	6187.9	79.16
2001/2	6170. 2	37251.3	16.56	28752.9	21.46	7516.1	82.09
2001/02	7420. 6	42893.7	17.30	33152.2	22.38	8951.5	82.90
2002/03	9114. 0	48893.7	18.64	38865.1	23.45	10159.4	89.71
2003/04	8903. 7	50445.6	17.65	39330.6	22.64	10597.5	84.02
2004/05	7966. 2	56229.7	14.17	42587.0	18.71	10105.7	78.83
2005/06	9245. 9	62331.0	14.83	48173.0	19.19	11912.5	77.62
2006/07	1015 9.4	70124.7	14.49	54104.7	18.78	13071.9	77.72
2007/08	10.73 .7	72282.1	14.35	57430.4	18.06	13968.1	74.24
2008/09	1503 4.0	87712.2	17.14	71126.7	21.14	18980.3	79.21

Source: Economic Survey, 2008/09.



Above table shows the percentage contribution of income tax to total revenue. It was increased 14.87% to 18.64% from fiscal year 1999/2000 to 2002/03. It was fluctuating till the fiscal years 2001/02 to 2005/06. We see that in the recent years there was decreasing trend of percentage of income tax to total revenue but in 2008/09 it was going to increase.

Above table shows that the contribution of income tax in Nepalese tax revenue from 1999/2000 to 2008/09.

Similarly above table shows that there is substantial contribution of income tax in the composition of direct tax revenue in Nepal for the 10 years period i.e. 1999/2000 to 2008/09. The contribution of income tax has never been less than 70% and it was in fluctuating trend.

So it is clear that there is significant contribution of income tax in Nepal to increase total revenue, total tax revenue and direct tax revenue. There seems to be highly positive correlation of income tax revenue with total revenue, tax revenue and direct tax revenue. It means if the income tax revenue is increase total revenue, tax revenue and direct tax revenue also increase.

#### **4.1.8 Resources Gap in Nepal**

A resources gap is the serious problems of Nepal in the beginning of the economic development. Like other developing countries in the world, Nepal has been suffering from resource constraint, mass poverty, rapid growth of population, aggressive dependence on agriculture income, subsistence living standard etc.

Source mobilization of Nepal is still poor and that doesn't cover the growing expenditure. Fiscal deficit is due to continuously growing expenditure of the

government instead of the low revenue performance in Nepal. So, the country is facing the increasing burden of foreign loan.

**Table 4.23**

**Resource Gap of Nepal**

<b>FY</b>	<b>Total Expenditure (A)</b>	<b>Total Revenue (B)</b>	<b>Resources Gap</b>
1999/00	56118.3	32937.9	23180.4
2001/2	59579	37251.3	23328.0
2001/02	66272.5	42893.7	23378.8
2002/03	79835.1	48893.6	30941.5
2003/04	80072.2	50445.5	29629.7
2004/05	84006.1	56229.8	27776.3
2005/06	89442.6	62331	27111.6
2006/07	102560.4	70122.7	32437.7
2007/08	110889.2	72282.1	38607.1
2008/09	133604.6	87712.10	45892.5

*Source: Economic Survey, 2008/09.*

From the above table it is observed that the value of resource gap is increasing trend except year 2001/02, 2002/03 and 2003/04. Average resource gaps in the 10 year period was 302283.6 million, after 2003/04 it was more than average and

2008/09, it is maximum of 10 year period i.e. 45892.5 million. Political problem, development activities, inflation etc are the cause of increasing resource gap. Increasing trend of resource gap is not well for the country. To fulfill the resource gap country can increase internal revenue like taxes.

### **4.3 Major Findings of the Study**

Following findings have been drawn out from the secondary data analysis and primary data conducted with tax expert and tax administrator and tax payers, are as under:

#### **4.3.1 Findings from Secondary Data**

The major findings of the study are pointed out as follows.

- i. Nepalese revenue structure consists of tax and non-tax revenues. Tax on consumption and product of goods and service has occupied first place regarding its contribution to total revenue of Nepal. The average contribution of tax on consumption and product of goods and services over the ten years period is 34.28% of the total revenue of Nepal. The average contribution of custom, tax on property, profit and income and non-tax revenue has 24.03%, 17.33% 21.80% respectively. Land and revenue registration has the lowest average contribution percent in total revenue of Nepal.
- ii. Total revenue of Nepal consisted of tax revenue and non-tax revenue. Tax revenue comprises of customs, excise, sales tax (VAT) income tax, revenue, registration, and miscellaneous tax. In Nepalese revenue structure, tax revenue has always been greater than three times of non-tax revenue. In 1999/2000 out of total revenue of Rs. 32937.9 millions, 78.75 % i.e. 25939.8

millions has been contributed by tax revenue and rest has contributed by non-tax revenue. Similarly, in 2008/09, 81.09% i.e. 71126.7millions out of total revenue of Rs. 87712.2 million has been collected as tax revenue. The average contribution of tax and non-tax revenue during ten years period was 78.14 and 21.86% respectively.

- iii. Nepalese income tax structure is formed by contribution of income tax from public enterprises, semi-public enterprises, private corporate bodies, individuals, tax on employment, tax on interest and other taxes. Contribution of individuals has occupied first position in total income tax revenue. The mean contribution of income tax revenue from F.Y. 1999/2000 to F. Y. 2008/09 has been computed to be 40.82 % public enterprises, private corporate bodies, employment, interest and other taxes have occupied second, third, fourth, fifth and sixth position in the total income tax revenue of Nepal and it is in fluctuating trend.
- iv. Nepalese tax revenue is composition of direct and indirect tax revenue. Average contribution of direct and indirect tax revenue to total tax revenue is 25.37 % and 74.63 % respectively during the ten years period. The structure of direct tax revenue is the composition of income tax revenue, land and registration and miscellaneous taxes. Among direct tax revenues, income tax revenue has occupied the largest share. The mean contribution of income tax during ten years period was 80.55 % of direct tax revenue of Nepal. Average contribution of land and registration is second position of direct tax revenue.
- v. Contribution of income tax has been in increasing trend. The mean contribution of income tax during the ten years period was 80.55 %, 16%, 20.47% in direct tax revenue, total revenue and total tax revenue

respectively. From this it is clear that the income tax revenue is one of the important sources of government revenue.

- vi. Tax revenue /GDP ratio in F.Y.1999/2000 was 8.95 % and it was 10.53 % in 2008/09. It shows that the Tax/GDP ratio of Nepal is not satisfactory and Income tax/GDP ratio was 1.69 % in 1999/ 2000 and 2.23% in 2008/09. It is slowly in increasing trend. Resources gap of Nepal is in increasing trend except in 2002/03 and 2003/04 during the study period. Resources gap was highest in 2008/09 and average gap was 302283.6 million during the period.

#### **4.3.2 Findings from Primary Data**

The major findings of the opinion survey are pointed out as below:

- i. People of Nepal are not well informed about tax system and the more appropriate method for assessing income tax is self assessment
- ii. Defective tax administration is more responsible factors for being income tax evasion in Nepal and compulsory maintenance of account is the effective ways of controlling income tax evasion.
- iii. A specific objective of income tax in Nepal is still enhancing the government revenue.
- iv. Major problem faced by the tax administration is undue delay in making assessment. So it should be reduced as soon as possible and a complicated tax law is also the problem.
- v. Majority of the respondents opined that tax evasion is practiced while paying income tax.
- vi. In Nepal, major problem that employees faced while paying income tax is procedural complication.

- vii. It is clear that provision of fines and penalties under income tax system is reasonable way of collect more income tax.
- viii. Effective income tax administration is important factor for effectiveness of income tax etc.

## **CHAPTER: V**

### **SUMMARY, CONCLUSION AND RECOMMENDATIONS**

#### **5.1 Summary**

Nepal is an agriculture based under developed country. In Nepal has deficit budget and it has been making economic condition of the country very bad. Resources gap of the country has been winding from the beginning to recent years. To solve the resource gap of the country it can be obtained income from external and internal sources. External sources are uncertain and guided by socio-political motives of the donor country, so it is not good for the country. Internal source of fund is own sources derived with in the country. Internal source of fund includes both tax and non-tax revenue.

Among internal source, taxation is a prime factor. It is the pallor of the fiscal policy. Regarding the fact the present study entitled to “Contribution of Income Tax to National Revenue of Nepal” had been done. In this study contribution of income tax to national revenue has been analyzed, examination. Contribution of income tax to direct tax, tax /GDP ratio, composition of direct tax etc has been analyzed.

Various books, articles, discretions and other relevant materials are studied during the course of study. Almost dissertations have been found written on various aspects of income tax. Books are mainly based on the syllabus of universities, so they are descriptive than analytical. Various concepts of taxation have been discussed in the conceptual framework of study. Sources of government revenue, meaning of tax, classification of tax, historical background of income tax, heads of incomes etc has been taken in the consideration.

The researcher has discussed about various aspects of research methodology, such as research design, data collection procedure, size of population and samples, nature and sources of data, selection of the respondents, procedure of selection and analysis of data etc, in the third chapter.

Secondary data as well as primary data have been used in this study. Economic survey has been used as the major sources of the secondary data. An opinion survey technique has been used in this study to collect the reliable primary data for the study. Primary data have been collected from two respondents groups i.e. tax experts/tax administrators and tax payers. Tax experts consist of chartered accountants, lowers and government officers for tax administrators. Taxpayers consist of employee working in government offices, banks and private organization. A set of questionnaire was developed and 60 questionnaires have been distributed to the respondents 30 each for both groups, 27 each from both groups responses have been received. Statistical tools like

Simple, average, rank correlation coefficient and X<sup>2</sup> test for hypothesis have been used to analyze and interpret the data so as to obtain designed result. For the analysis of secondary data, data has been tabulated and present in figures. Percentage and average have been computed from 1999/99 to 2008/09. Major findings of the secondary data analysis have been put in the end of the chapter.

Data obtained from opinion survey with the respondents have been tabulated and analyzed to achieve design result. Hypothesis have been set out and tested in order to see the similarity or dis-similarity in the opinions of tax experts and taxpayers. Rank correlations co-efficient have been also calculated to find out correlation between tax experts/tax administrators view and taxpayers views. Major findings of the primary data have been put in the end of the chapter. Conclusions of the



study are in the last chapter. Some recommendations are also given in the end of the study to increase the contribution of income tax to national revenue of Nepal. In this way, this study has been completed with the achievement of the stated objectives.

## **5.2 Conclusion**

The conclusions of this study are mentioned below.

- i. Revenue structure of Nepal is composed of tax and non-tax revenues. Tax revenue has the largest share of contribution in total revenue i.e. in average, 78.32 percentage of total revenue. In F.Y 2008/09 its contribution has 81.09%, which has been highest during the study period. Similarly, From the F.Y. 1999/2000 to 2008/09 taxes on consumption and product of goods and services has occupied first position regarding its contribution in total revenue.
- ii. Tax revenue consists direct and indirect tax revenue has been heavily dominated by indirect tax from FY 1999/2000 to 2005/06 average contribution of indirect tax revenue has been found contribution of indirect tax revenue has been found 74.63% in tax revenue. Among direct taxes, contribution of income tax has the highest contribution.
- iii. Income tax has average contribution of 16% of total revenue 20.47% in Tax revenue and 80.54% in direct tax revenue from the F.Y. 1999/2000 to 2008/09. Contribution of individual sectors in income tax revenue has been highest in the study period and income tax from employment has very much insignificant contribution in total income. It was about 11.26% of total income tax revenue

- iv. Total income tax revenue consists of various sources i.e. public enterprises, semi-public enterprises, private corporate bodies, individuals, remuneration, tax on interest etc. Income tax from individuals has occupied first position i.e. 40.82% in average, private corporate bodies has occupied 2nd position i.e. 22.00% in total income tax revenue of Nepal. Similarly, Public enterprises, remuneration and tax on Interest have occupied 3rd, 4th and 5th position respectively.
- v. Direct tax revenue consists of income tax revenue, land and registration and miscellaneous taxes. Among direct tax revenue, income tax has occupied highest share during the study period, which was 79.16%, in 1999/2000 and 79.21% in 2008/09. The contribution of income tax revenue was in increasing trend in 2008/09.
- vi. Tax/GDP ratio of Nepal is not good. The study showed the lower contribution of tax/GDP ratio. So, tax revenue of Nepal is to be increased.
- vii. People are not well informed about tax system of Nepal.
- viii. The most appropriate method of tax assessment is self-assessment then after assessment as the best judgment tax settlement commission and account submitted by the taxpayers. Sill specific objective of income tax in Nepal is to enhance the government revenue. So the specific objectives of income tax need to be changed.
- ix. Tax administration is also facing various problems such problems are under delay in making assessment, complicated tax laws, lack of coordination, lack of practice direction etc.
- x. Tax evasion is a serious problem in the tax system, but there is less chance of tax evasion in employment income in which tax is already deducted as source, while receiving salaries.

- xi. In the viewpoint of respondents, the factor responsible for tax evasion is defective tax administration and other factors are lack of political commitment, inappropriate income tax policy, loopholes in income tax act, corruption in tax authority and lack of consciousness in the taxpayers.
- xii. To control tax evasion, the respondents suggested different factors, such as maintenance of compulsory account, nerval punishment to corrupt personnel, incentives of regular taxpayers. Simplifying tax laws, towards to the tax evasion finders etc.
- xiii. Major problem that employees faced while paying income tax is procedural completion and provision of fines and penalties under income tax system is reasonable.
- xiv. For effectiveness income tax system, effective income tax administration is the most important factor and to increase income tax revenue we should educate the taxpayers using different tools.
- xv. In order to know the opinion of respondents inefficient income tax administration is the major problems of income tax system. The rules and regulations of the income tax are also complicated and hence need to be simplified.

### **5.3 Recommendations**

On the basis of above analysis, the following recommendations are offered regarding income tax.

- i. Nepalese tax revenue is heavily dominated by indirect tax revenue. Only one fifth of tax revenue has been contributed by direct tax revenue. It is necessary to increase the share of direct tax revenue. So, as to direct the

economy towards the channel of development. Resources mobilization through direct taxation should be focused.

- ii. The contribution of income tax to total revenue, direct tax revenue and total tax revenue should be increased by making effective changes in income tax policy, rules and regulations bringing new tax payers into tax net, providing incentive programs with sound tax planning.
- iii. Income tax act 2058 is very vague in nature so, income tax act should be made effective for its implementation and employees should be provided with sufficient knowledge of taxation for to aware the existing income tax policy.
- iv. The standard tax GDP ratio is 15% to 18% but the tax/GDP ratio of Nepal did not exceeded 10.64% during the study period. So, the government should make appropriate measures to meet the standard.
- v. There are various types of problems that the taxpayers face while paying income tax. So, the problems and troubles should be minimized as far as possible. Tax administrator should be made more responsible, tax clearance certificates should be provide to the tax payers while paying income tax, taxation knowledge to the employee should be provided, refund of tax should be made immediately. Procedural complications in paying income tax should be made simplification etc.
- vi. There are some problems and troubles that the tax administration faced. So, they should be minimized as soon as possible tax offices should be recruit trained and competent tax personal, complicated tax laws should be simplified. It should not delay in making tax assessment etc.
- vii. There should be established coordination between tax policy transparent and careful enforcement of existing provision. So, efforts must be made in this regard.

- viii. The rate of fines and penalties should be increased for those taxpayers who submit false income statement and who do not submit income statement for tax purpose.
- ix. The provision of fines, penalties and punishment should be implemented effectively for income tax evaders.
- x. Effective public participation is necessary to minimize the income tax evasion. Continuous effort should be done tax authority to build the taxpayer's positive attitude towards taxation.
- xi. Tax personal should be encouraged, punished and transferred based on work and experience. Regular and effective training system, reward, prize, and punishment system should be established for effective personnel management.
- xii. Government should provide sufficient remuneration to collect more tax revenue; it should be transparent to collect more tax revenue and every sector.
- xiii. The staffs of tax office should develop working culture. When the taxpayer visits the office, they should be provided with respect and co-operation. Due respect should be given to the taxpayers when they visit the office.

## BIBLIOGRAPHY

- Adhikari, Chandra Mani (2060). *Modern Taxation in Nepal: Theory and Practice*. Kathmandu: Pairabi Prakashan.
- \_\_\_\_\_ (1992). *Laws and Practice of Income Tax in India*. Navaman Prakashan, Aligarh.
- \_\_\_\_\_ (1997). *Income Tax, Laws & Practice*. New Delhi: Konark Publishers Pvt. Ltd.
- Agarwal, G.R. (1984). *Direct Tax Reform in Nepal*, a report submitted to Ministry of finance.
- Agrawal G.R. (1980). *Resources Mobilization for Development: The Reform of Income Tax in Nepal*. Kathmandu: CEDA.
- Agrawal, Govinda Ram (1978). *Resource Mobilization for Development: The Reform of Income Tax in Nepal*. Kathmandu: CEDA.
- Amatya, Surendra et al. (2060). *Taxation In Nepal*. Kathmandu: M.K. Publisher and Distributors.
- Aryal, K.P. and Paudel, Surya Prasad (2060). *Taxation in Nepal*. Kathmandu: Bhoondipuran Prakashan.
- Bhattarai, I. and Koirala G.P. (2004). *Income Taxation in Nepal with Tax Laws and Tax Planning*, 2<sup>nd</sup> Edition, Kathmandu: Asmita Books Publishers and Distributors.
- Bhattarai, Ishwor and Koirala, Girija Prasad (2060). *Tax Laws and Tax Planning*. Kathmandu: Dhaulagiri Books and Stationeries.

- Dhakal, K.D. (2059). *Income Tax and House and Compound Tax Laws and Practice*, 1<sup>st</sup> edition, Kathmandu: Kamal Prakashan.
- Dhakal, Kamal Deep (2057). *Income Tax and House and Compound Tax: Law and Practice*. Kathmandu: Kamal Prakashan.
- Due, J.F.(1959). *Government Finance, an Economic Analysis*, Illinios Richard D. Irwin ,Inc.
- Gupta, S.C. (1999). *Fundamentals of Statistics*, New Delhi: Himalayan Publishing House.
- Gupta, S.P. (1995). *Statistical Methods*, New Delhi: Sultan Chand and Sons.
- Joshi, P.R., (2002). *Research Methodology*, 2<sup>nd</sup> Edition., Kathmandu: Buddha Academic Enterprises Pvt. Ltd.
- Joshi, Uttam Lal (1987). *Direct Tax System of Nepal*, Kathmandu: Bodhi Printing Press.
- Juneja, C.M.,R.C Chawla, and K.K. Seksena(1991). *Double Entry Book-Keeping*, New Dellhi: Kalyan Publisher.
- Kandel, P.R. (2003). *Tax Laws and Tax Planning in Nepal*, Kathmandu Buddha Academic Enterprises.
- Kandel, Puspa Raj (2001). *Kar Sudharko Sandharba Ra, Nepal Ko Kar Prashasan Rajashwa*, Vol.2. RATC. (In Nepali)

Kandel, Puspa Raj (2060). *Tax Laws and Tax Planning*. Kathmandu: Buddha Academic Publishers and Distributors Pvt. Ltd.

Khadka, Rup (1991). *Nepalko Kar Pranali Ko Shinhabalokan*, Kathmandu: Prativa Pratiyogita Prakashan.(in Nepali)

Khadka, Rup (1995). *An Evaluation of the Nepalese Income Tax System*, Economic Review, No.8. Nepal Rastra Bank.

Khadka, Rup (2001). *Income Tax in Nepal: Retrospect and Prospect*. Kathmandu: Ratna Pustak Bhandar.

Khadka, Rup (2001). *Income Taxation in Nepal: Retrospect and Prospect*, Kathmandu: Ratna Pustak Bhandar.

Lal, B.B (1984). *Income Tax Laws and Practice*,7<sup>th</sup> Reprinted Edition, New Delhi : Allied Publishers.

Mallik, Bidhayadhar (2060). *Nepal Ko Adhunik Aayakar Pranali*. Kathmandu: Mrs. Anita Mallik.

Mallik, Bidhyadhar (2060). *Nepalko Adhunik Ayakar Pranali*, 1<sup>st</sup> Edition, Kathmandu.

Michel,V.P. (2000),*Research Methodology in Management*, New Delhi: Himalayan Publishers House.

Ministry of Finance, *Economic Survey, 2003/04*, Kathmandu: Ministry of Finance, HMG, Nepal.

Ministry of Law and Justice (2019). *Income Tax Act 1962 (2019)*, Kathmandu:



- Ministry of Law and Justice,HMG, Nepal (In Nepali).
- Ministry of Law and Justice (2031). *Income Tax Act 1974 (2031)*, Kathmandu:
- Ministry of Law and Justice,HMG, Nepal (In Nepali).
- Ministry of Law and Justice (2039). *Income Tax Regulations 1982 (2039)*,  
Kathmandu: Ministry of Law and Justice, HMG, Nepal (In Nepali).
- Ministry of Law and Justice (2058). *Income Tax Act 2002 (2058)*, Kathmandu:
- Ministry of Law and Justice,HMG, Nepal (In Nepali).
- Nepal Rastra Bank, *Economic Report 2004/05*, Kathmandu.
- Nepal, Mani Kumar (1998). *Tax System of Nepal: Issues and Destinies*, The  
Economic Journal of Nepal, Vol.2, No. 3. Department of Economics, T.U.
- NRB (2059). *Banking Prabadhan*, Kathmandu: Banking Prabardhan Samiti.
- Paudel, Santosh Raj and Timalisina, Prem Prasad (1990). *Income Tax in Nepal*. Kathmandu: Aathraj Enterprises.
- Poudyal, S.R. and P.P. Timisina (1990). *Income Tax in Nepal*, Kathmandu: Atharai  
Enterprises.
- Poudyal, Santosh Raj (1993). *Income Tax Law and Practice*, Kathmandu: Atharai  
Enterprises.
- Pradhanang, Nagendra B. (1993). *Income Tax Law and Accounting*. 3<sup>rd</sup> Ed.,  
Kathmandu: Ratna Pustak Bhandar.
- Pradhananga, Nagendra Bahadur (1993). *Income Tax and Law and Accounting*,

- Kathmandu: Ratna Pustak Bhandar (In Nepali).
- Prasad, Bhagwati (1999). *Income Tax, Laws & Practice Including Central Sales Tax Act*. New Delhi: Wishwa Prakashan.
- Prest, A. R., (1985). *Public Finance in Underdeveloped Countries*, 3<sup>rd</sup> Edition, New Delhi: Publications of Nepal Rastra Bank.
- Rai, Ishwar Man and Baskota, Narayan Prasad (2060). *Taxation in Nepal*. Katmandu: Kumari Pustak Prakashan.
- Sharma, P.K. and Chaudhari, A.K. (2058). *Statistical Methods*. Kathmandu: Khanal Books Prakashan.
- Singh, S.K., (1985). *Fiscal System of Nepal*, Kathmandu: Ratnasri Printing Press.
- Tiwari, Narayan Raj (2050). *Income Tax System in Nepal*. Katmandu: Pairavi Prakashan.
- Vaish, M.C. and Agarwal, H.S. (1992). *Public Finance*. India: Wiley Eastern Limited.
- Weksgm, G.A., R.W. Hilton and P.N. Gordon (2000). *Budgeting Profit Planning and Control*, New Delhi: Prentice Hall of India, 5<sup>th</sup> Edition.
- Wolff, Howard K. and Prem Raj Pant,(1999). *A Handbook for Social Science Research and Thesis Writing*, Kathmandu: Buddha Academic Enterprises Pvt. Ltd.
- World Bank(2005), *World Development Report 2004/05*, New Work: Oxford University Press.

## **B. Government Publication:**

CBS (2005). *Statistical Abstract*, Nepal Government, Katmandu.

Nepal Government (2007). *Economic Survey*, Ministry of Finance, Katmandu

Nepal Government (2002). *Income Tax Regulation*, Ministry of Finance, Inland Revenue Department, Katmandu.

Nepal Government (2001). *Income Tax Act*, Ministry of Finance, Katmandu

Nepal Government, *Income Tax Act 1974*, Ministry of Laws, Justice, & Parliamentary Affairs, Katmandu.

Nepal Government, *Income Tax Act 1961*, Ministry of Laws, Justice, & Parliamentary Affairs, Katmandu.

Nepal Government, *Business Profit and Remuneration Act (1960)*. Ministry of Law, Justice, & Parliamentary Affairs, Katmandu.

Nepal Government, *NRB, Economic Bulletin (2004)*, Katmandu.

Nepal Government, *NRB, Economic Bulletin (2005)*, Katmandu.

Nepal Government, (2003/04). *Budget Speech*, Ministry of Finance, Katmandu.

Department of Auditor General, Annual Reports of Auditor General. Kathmandu, Nepal, 2004.

Ministry of Finance, Budget Speech Of Various Years, Government Of Nepal.

Ministry of Finance, Economic Survey of Various Years, Government of Nepal.

Ministry of Finance, *Income Tax Regulation 2006*, HMG/N.

Agrawal, G.R. (1978). *Resources Mobilization for Development:" The Reform of Income Tax in Nepal*. Kathmandu : CEDA, T.U.

Kandel, P.R. (2004), *Are Tax Incentives Useful? If so, which one? Rajaswa*, Vol. 1, April, RATC, Hariharbhawan, Pulchowk, Lalitpur.

Pant, D.B. (2004). *Problems in Taxation and their Remedies. Rajaswa*. Vol. 1, April, RATC, Hariharbhawan, Pulchowk, Lalitpur. (In Nepali)

**c. Unpublished Dissertation:**

Acharya.S. (1994). *Income Taxation in Nepal: A Study of its Structure, Productivity and Problems*, An Unpublished Master's Degree Dissertation, Submitted to Central Department Of Economics, T.U., Kirtipur.

Achrya, Kamal (2008). *Contribution of Income Tax Consideration with Income From Employment*, An Unpublished Masert's Degree Thesis, Submitted to SDC, T.U. Putalisadak.

Agrawal, Govinda Ram, (1978). *Resource Mobilizations for Development the Reform of Income Tax in Nepal*, CEDA, T.U. Kirtipur.

Agrawal, Govinda Ram, (1984). *Direct Tax Reform in Nepal*, Ministry of Finance.

Baral, Shanti (1998). *Income Tax and Tax Structure of Nepal*, An Unpublished Masert's Degree Thesis, Submitted to Central Department of Economics, T.U., Kirtipur.

Bhandari Bishwaraj.(2007). *Contribution of Income Tax on National Revenue of Nepal* An Unpublished Master's Degree Dissertation. Submitted to Central Department of Management, T.U., Kirtipur.

Bhandari, Hari Bahadur, (1994). *Contribution of Income Tax to Economic Development of Nepal*, An Unpublished Detestation Submitted to Central Department of Management, T.U., Kirtipur.

- Bhattarai, R.K.(1997). *Effectiveness of Corporate Income Tax in Nepal*, An Unpublished Master's Degree Dissertation, Submitted to Central Department of Management, T.U., Kirtipur.
- Dahal, M.K., (1995). *Review of Tax System*, Ministry of Finance.
- Gautam, Keshab Raj, (2004). *Contribution of Income Tax on National Revenue of Nepal*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Kayastha, Narendra Lal, (1993). "Problems and Prospects of Resource Mobilization through Direct Taxation in Nepal" *Rajaswa*, Revenue Administration Training Center, Vol.1
- Kharel, Shree Krishna, (1996). *Self-Assessment Under the Income Tax Act in Nepal*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Nepal, Naina (1983). *A Study on Problems and Prospects of Income Tax in Nepal*, An Unpublished Dissertation Submitted to Central Department of Economics, T.U., Kirtipur.
- Palli Magar, D.B.(2003). *Income Tax in Nepal: A Study of Exemption and Deduction*, An Unpublished Master's Degree Dissertation, Submitted to Central Department Of Management., T.U., Kirtipur.
- Palli Magar, Dan Bahadur (2003). *Income Tax in Nepal, A Study of Exemption and Deductions*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Pant, Damber Bahadur (2004). *Problems in Tax Administration and Their Remedies Rajaswa*, Revenue Administration Training Center, Vol.1

- Paudel, Jayanti (2002). *Income Taxation In Nepal, A Study of Its Structure and Productivity*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Pradhan, Bibha (2001). *Contribution of Income Tax from Public Enterprises to Public Revenue of Nepal with Reference to Nepal Telecommunication Corporation*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Shahu, Shiva Narayan (1995). *Contribution of Income Tax in National Revenue of Nepal*, An Unpublished Master's Degree Thesis, Submitted to Central Department of Management, T.U., Kirtipur.
- Shakya, Krishna Kumar (1995). *Income Tax and Tax Structure of Nepal*, An Unpublished Master's Degree Thesis, Submitted to Central Department of Economics, T.U., Kirtipur.
- Sharma, Shikha (2005). *Income Taxation in Nepal, With Special Reference to Taxation on Capital Gain*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Sherchan, Thaman (2003). *An Analysis of fines and Penalties Regarding Income Tax of Nepal*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.
- Sherchan.T.(2003). *An Analysis of Fines and Penalties Regarding to Income Tax System of Nepal*. An Unpublished Master's Degree Dissertation. Submitted to Central Department of Management, T.U., Kirtipur.
- Timilsina, Prem Prasad (1987), *Income Tax Evasion in Nepal*, An Unpublished Dissertation Submitted to Central Department of Management, T.U., Kirtipur.

Timilsina, Satyendra (2001). *Personal Income Taxation in Nepal: A Study of Exemptions and Deductions*, An Unpublished Dissertation Submitted to Central Department of Economics, T.U., Kirtipur.

K. C., Jit Bahadur (2007). *Tax Laws and Tax Planning: Theory and Practice*. Kathmandu: Khanal Books & Stationery.

Kandel, Puspa Raj (2000). *Corporate Tax System and Investment Behaviour in Nepal*; A Research Study for Ph. D.

**Websites:**

www.nrb.org.np

www.mof.gov.np

Brainy Encyclopedia. **Direct Tax**. Retrieved on October 12, 2008 from <http://www.braineyencyclopedia.com/>

## APPENDIX

"Questionnaire to Tax Experts/Tax Administrators and Tax Payers"

Dear Sir/ Madam

- i) Name:
- ii) Designation:
- iii) Office/ organization:
- iv) Occupation:

Please tick ( ) the answer of your choice or wherever appropriate put in order of preference from 1 to last number on the basis of alternatives. Number 1 stand for the most important and vice versa.

1. Do you think that people are well informed about tax system of Nepal?

a. Yes [ ]

b. No [ ]

2. Which method is more appropriate in Nepal while assessing income tax (please rank)

a. Self assessment [ ]

b. Assessment on the basis of best judgment [ ]

c. Assessment on the basis of account submitted by the tax payers [ ]

d. Assessment by the tax settlement committee [ ]

e. Others (please specify).....

3. In your opinion, what should be the specific objective of income tax in Nepal (please rank)

a. To enhance the government revenue [ ]

b. To meet government expenditure [ ]

c. To achieve national economic development [ ]



- d. To check inflation [   ]
- e. Others (please specify).....

4. In your opinion, what are the major problems facing by the tax administration in Nepal? (Please rank)

- a. Lack of trained and competent tax personnel[   ]
- b. Lack of proper direction [   ]
- c. Complicated tax laws [   ]
- d. Undue delay in making assessment [   ]
- e. Unnecessary outside pressure [   ]
- f. Lack of co-ordination [   ]

5. It is said that tax evasion is most often practice in tax system, do you agree this statement?

- a. Yes [   ]
- b. No [   ]

6. In your opinion, what are the factors responsible for income tax evasion (please rank)

- a. Defective tax administration [   ]
- b. Inappropriate income tax policy [   ]
- c. Loopholes in income tax policy [   ]
- d. Lack of conciseness in tax payers [   ]
- e. Corruption in tax authority [   ]
- f. Lack of political commitment [   ]
- g. Others (please specify).....

7. In your opinion, what are the ways of controlling income tax evasion in Nepal  
(please rank)

- a. Educating tax payers [    ]
- b. Simplifying tax laws [    ]
- c. Timely assessment of tax [    ]
- d. Incentives of regular tax payers [    ]
- e. Fines and penalties to tax evaders [    ]
- f. Compulsory maintenance of accounts [    ]
- g. Heavy punishment for the corrupter personnel [    ]
- h. Rewards to the information giver about tax evasion [    ]

8. What types of problem faced by employee while paying income tax? (Please rank)

- a. Lack of knowledge about taxation [    ]
- b. Procedural complication [    ]
- c. Weak and immature treatment by tax administrators [    ]
- d. Hesitation to pay tax due to low income [    ]
- e. Others (please specify).....

9. In your opinion, the provision of fines fees and penalties under income tax system is reasonable.

- a. Yes [    ]
- b. No [    ]

10. What are the most important factors for effectiveness of income tax in Nepal?  
(Please rank)

- a. Honest tax payers [    ]
- b. Honest tax officers [    ]

- c. Clear and simple act, rules and regulation [   ]
- d. Effective income tax administration [   ]
- e. Others (please specify).....

11. In your opinion, how can we increase the income tax revenue of Nepal? (Please rank)

- a. Educating tax payers [   ]
- b. Simplifying tax laws [   ]
- c. Incentives to regular tax payers [   ]
- d. Timely assessment of tax [   ]
- e. Imposing fines and penalties [   ]

12. What are the major problems in income tax system of Nepal (please rank)

- a. Inadequate economic policy [   ]
- b. Complicated income tax act, rules and regulation [   ]
- c. Inefficient income tax administration [   ]
- d. Lack of education to tax payers [   ]
- e. Lack of training and incentives to employee [   ]
- f. Difficulties to maintaining account for tax purpose [   ]
- g. Lack of experts in tax management [   ]
- h. Practice of tax evasion [   ]
- i. Inappropriate rate and exemption limit [   ]

13. Do you have any comment and suggestion for achieving effectiveness of income tax in Nepal? Please specify.....

**"Thank You for Your Kind Co-operation"**