Sun, sea and tax avoidance: Corporations and Finance

Alice Dauriach PhD candidate

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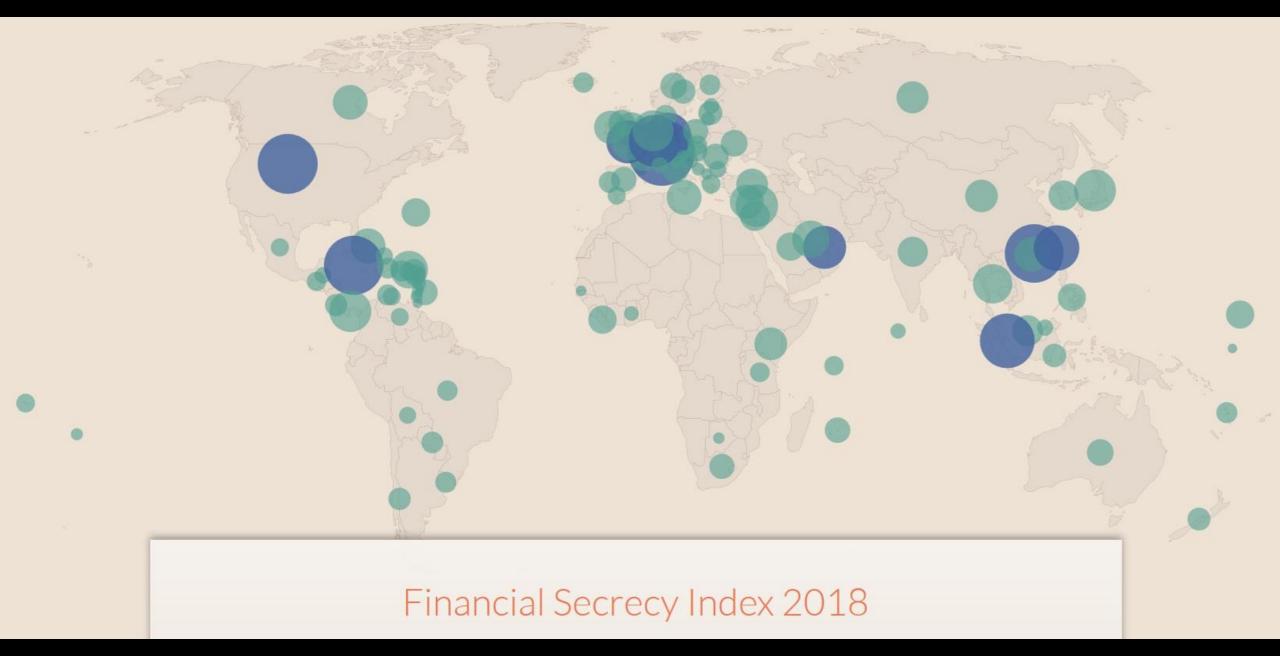
What is a tax haven?

- no or low taxes
- lack of effective exchange of information
- lack of transparency
- no requirement of substantial activity









2018 Secrecy Ranking

See full index here

- 1. Switzerland
- 2. USA
- Cayman Islands*
- 4. Hong Kong
- 5. Singapore
- 6. Luxembourg
- Germany
- 8. Taiwan
- 9. United Arab Emirates (Dubai)
- 10. Guernsey*
- 11. Lebanon
- Panama
- 13. Japan
- 14. Netherlands
- 15. Thailand

2019 Haven Ranking

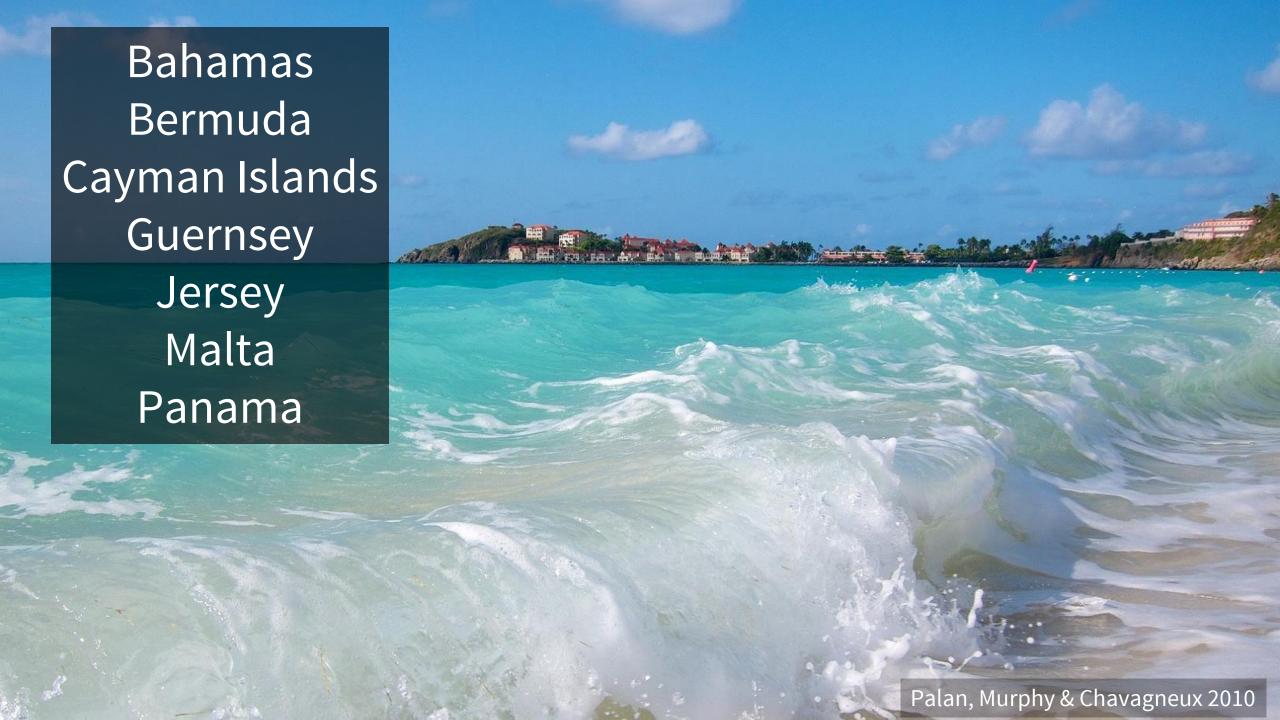
See full index here

- BVI*
- Bermuda*
- Cayman Islands*
- 4. Netherlands
- 5. Switzerland
- 6. Luxembourg
- Jersey*
- 8. Singapore
- 9. Bahamas
- 10. Hong Kong

Tax Justice Network

^{*} British overseas territory or crown dependency. If Britain's network were assessed together, it would be at the top.

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Tax havens are at the heart of the global finance system

- 50% of all international banking lending is done in tax havens
- 30% of the world's stock of Foreign Direct Investment are registered in tax havens
- 40% of multinational profits are shifted to tax havens each year

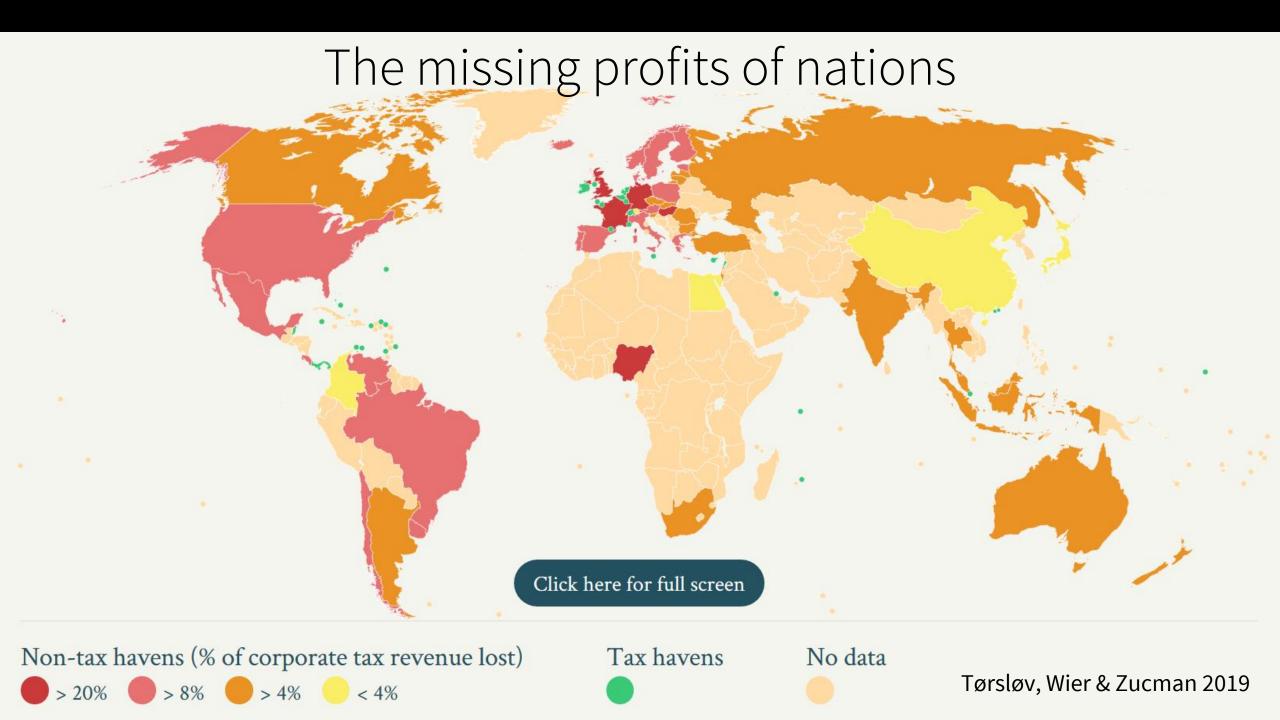


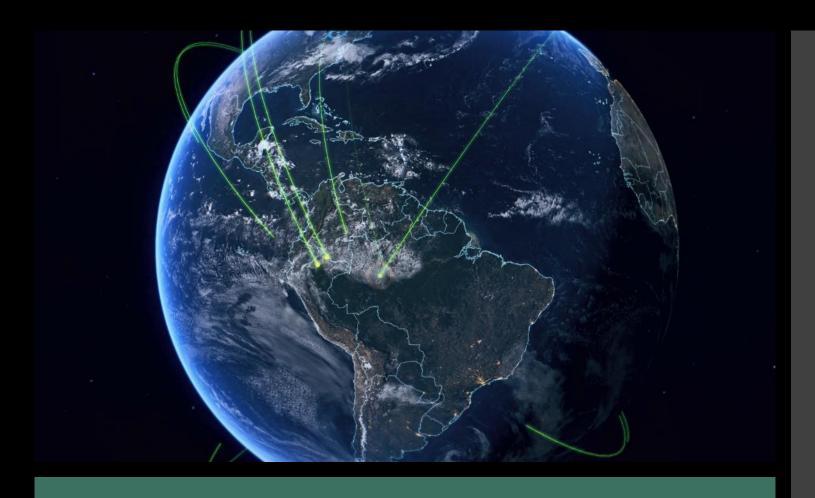
Palan, Murphy & Chavagneux 2010; Tørsløv, Wier & Zucman 2019

The hidden wealth of nations

- 8% of households' financial wealth is held in tax havens, i.e. USD 7.6 trillion
- This costs USD 190 billion every year to governments, i.e. 1% of global government revenue
- 18% of US corporate profits are 'made' in tax havens
- This reduces US corporate tax liabilities by \$130 billion a year







Global Wealth Chains

transacted forms of capital operating multi-jurisdictionally for the purposes of wealth creation and protection

Seabrooke and Wigan 2017

What are some uses of tax havens? Are they legitimate or illegitimate?



All of the above crimes are enabled by anonymous companies.

Compliance Planning Avoidance Evasion

2 main tax cheating strategies used by multinational corporations

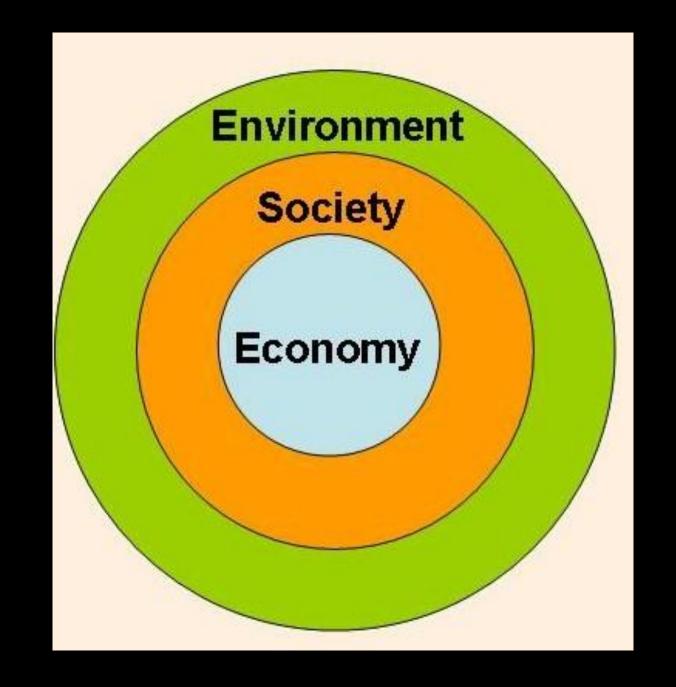
Transfer (mis)pricing

Earnings stripping, thin capitalization

Sources of data

- International organisations
- Tax havens themselves
- Banks and accounting firms
- Company reports
- National accounts, tax authorities and central banks
- Civil society organisations
- Leaks

Why are tax cheating and financial secrecy a problem?



Addressing tax avoidance globally



Information exchange between countries



Registration of ultimate owners



Country-by-country reporting



Unitary taxation

Financial secrecy and the biosphere

Politics and Society | Iceland Monitor | Wed 27

Panama P Vast hidden profits: from Asia's palm oil

giants to a tiny British tax haven

to hit Iceland

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nature ecology & evolution

PERSPECTIVE

https://doi.org/10.1038/s41559-018-0497-3

Tax havens and global environmental degradation

Victor Galaz 1,2*, Beatrice Crona, Alice Dauriach, Jean-Baptiste Jouffray 1,2, Henrik Österblom and Jan Fichtner 03

Recent releases of classified documents in the past years have offered a rare glimpse into the opaque world of tax havens and their role in the global economy. Although the political, economic and social implications related to these financial secrecy jurisdictions are known, their role in supporting corporate activities with potentially detrimental environmental consequences have until now been largely ignored. Here, we combine quantitative analysis with case descriptions to elaborate and quantify the connections between tax havens and resource degradation both in global fisheries and the Brazilian Amazon. We show that while only 4% of all registered fishing vessels are currently flagged in a tax haven, 70% of the known vessels implicated in illegal, unreported and unregulated fishing are, or have been, flagged under a tax haven jurisdiction. We also find that on average 70% of all investigated foreign capital to focal companies in the soy and beef sector directly impacting the Brazilian Amazon was transferred via known tax havens, representing as much as 90-100% of foreign loans for some companies. We highlight key research challenges for the academic community that emerge from our findings and present a set of proposed actions for policy that would put tax havens on the global sustainability agenda.











Tax havens and environmental sustainability

Two complementary case-studies representing Global Environmental Commons

Financial fraud and evasion of regulation



Aggressive tax planning as 'hidden subsidies'



Data

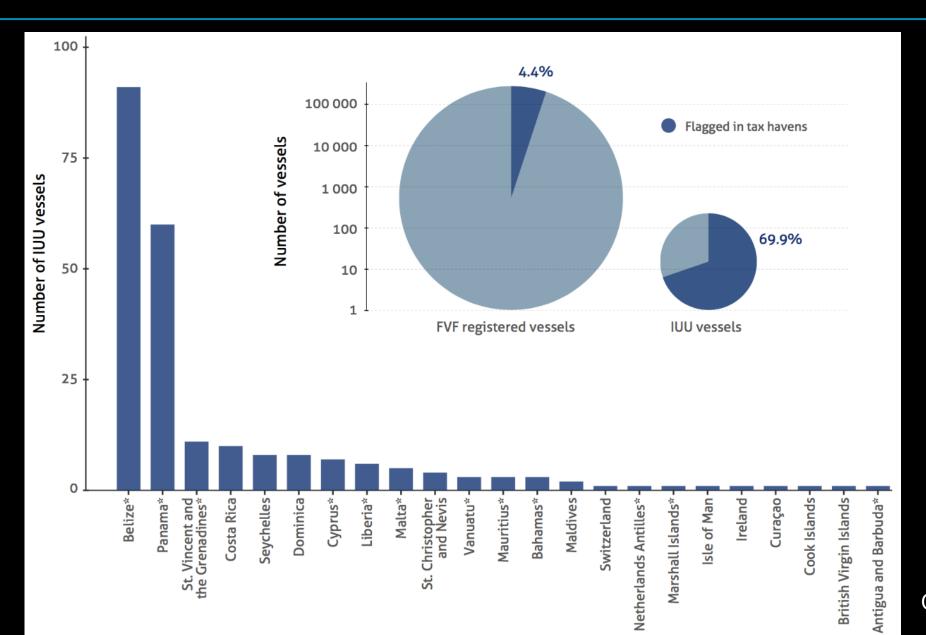
Fishing vessels convicted for illegal, unreported and unregulated fishing



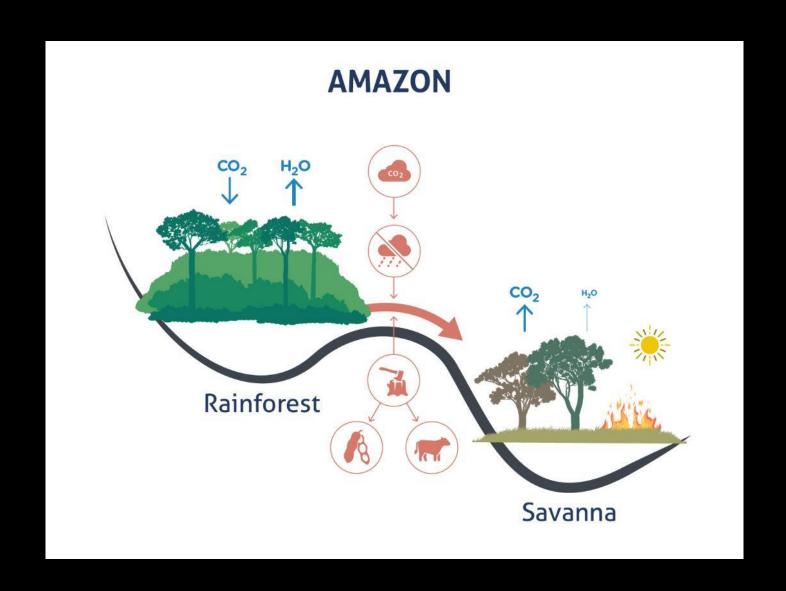
Flows of foreign capital to selected companies in the soy and cattle sectors



Illegal Unreported and Unregulated (IUU) fishing

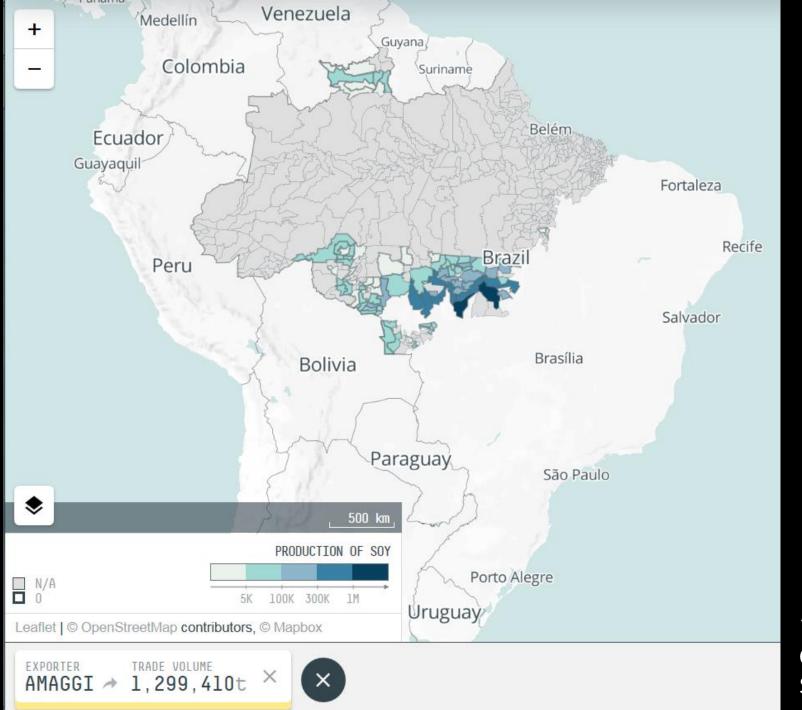


Tax havens and deforestation in the Amazon



Credit availability linked to increased deforestation

Nepstad et al. 2014 Dalla-Nora et al. 2014



Trase platform, Global Canopy and SEI, 2018



Departamento de Monitoramento do Sistema Financeiro e de Gestão da Informação Divisão de Capitais Internacionais e Câmbio

Registros Efetuados

Objeto: Registros de Capitais Estrangeiros Emitidos ou Cancelados/Encerrados, Referência: Maio/2010 Base Legal: Decreto nº 55.762, de 17.02.1965 Artigo 66, Com a Redação Dada Pelo Decreto nº 4.842, de 18.09.2003.

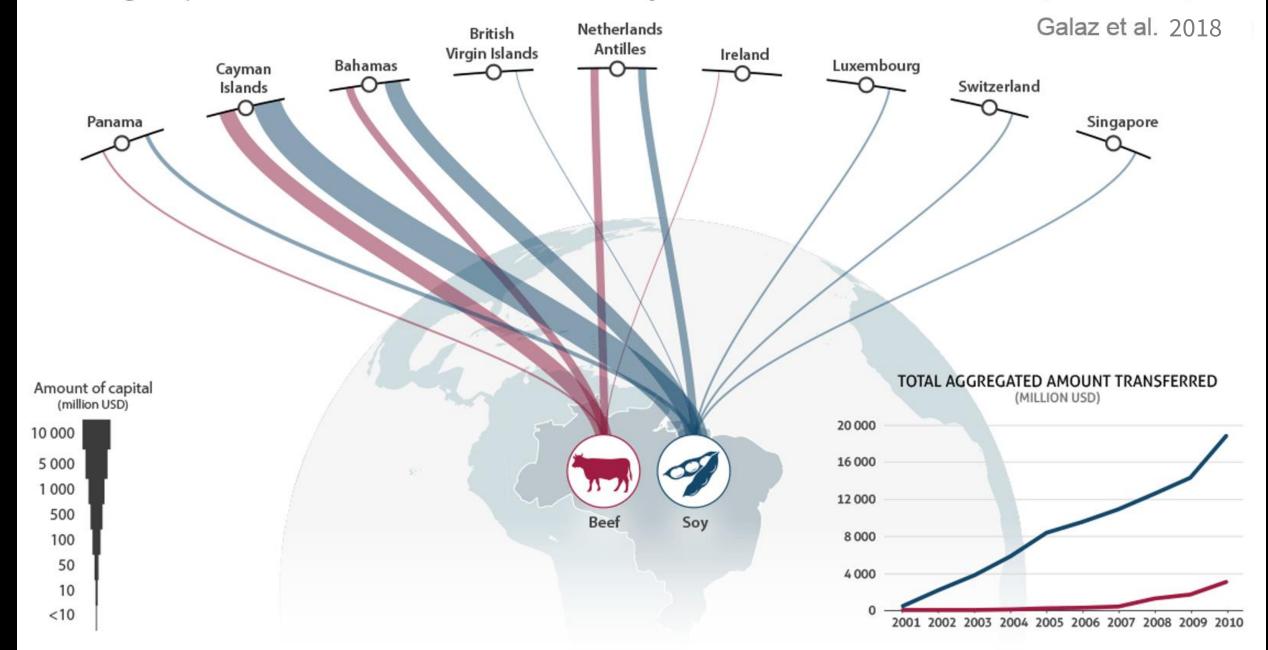
ROF - REGISTROS APROVADOS EM: MAIO/2010

IMPORTACAO FINANCIADA

REGISTRO EMPRESA NACIONAL EMPRESA ESTRANGEIRA PAIS	MOE	UF VALOR
TA520319 JOSE PUPIN		TM
HENCORP BECSTONE CA EUA	USD	5.637.951,00
TA520565 BANCO DO BRASIL S.A.		SP
BANCO DO BRASIL S/A FRANCA	USD	164.414,65
TA521365 TRAUMINAS DISTD. DE MAT.	CIRURG.	HOSPITALARES MG
ZIMMER, INC. EUA	USD	164.966,05
TA521501 VANGUARDA DO BRASIL S.A.		MT
AIR TRACTOR INC. EUA	USD	763.340,00
TA521708 BANCO DO BRASIL S.A.		SP
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Central Bank of Brazil, 2010

Foreign capital from tax havens to the beef and soy sectors in the Brazilian Amazon (2000–2011)

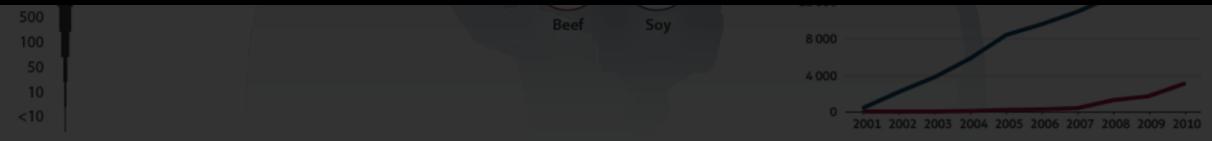




68% of all analysed foreign capital is transferred through tax havens



Amount of capital



TOTAL AGGREGATED AMOUNT TRANSFERRED

Focal company	Loans received (million USD)	Loans from subsidiary in a tax haven (% total loans)	Cash in advance received (million USD)	Cash in advance from subsidiary in a tax haven (% total cash in advance)
Amaggi	162	0	272	0
Archer Daniels Midland	1,666	100	0	NA
Bertin	1,032	33.9	844	0
Bunge	307	54.1	6,830	100
Cargill	4,321	91.6	2,734	82.7
JBS	1,776	63.4	1,628	54.9
Louis Dreyfus	0	NA	704	0
Marfrig	764	0	1,070	0
Minerva	3	0	504	49.6

So why is this a problem?

- Potentially large losses of tax revenues from extractive/natural resource intensive activities
- Hidden subsidies with detrimental ecological consequences on the ground
- Lack of transparency reduces accountability, ability for policy-makers to address problems, data gaps for researchers

Take-home messages

1

Financial secrecy jurisdictions are at the heart of 21st century capitalism. Global wealth chains are made opaque in order to create and protect wealth.

2

Multinational corporations use sophisticated strategies to pay less tax. This raises inequalities and erodes governments' tax revenue. Secrecy also facilitates corruption.

3

Financial secrecy allows companies to obfuscate their ownership, thus enabling illegal fishing. Tax avoidance also creates 'hidden subsidies' to resource exploitation.



Thank you!

alice@kva.se



Questions

- Can you think of examples of companies which are famous for evading tax? How do these examples relate to what you learned in this lecture?
- In a world of globalisation of capital, is it possible to effectively fight tax evasion?
- Should we worry about the sustainability impacts of financial secrecy? Why/why not?
- Should we rely on leaks as a data source?