### TAXATION AND THE PEER-TO-PEER (P2P) ECONOMY

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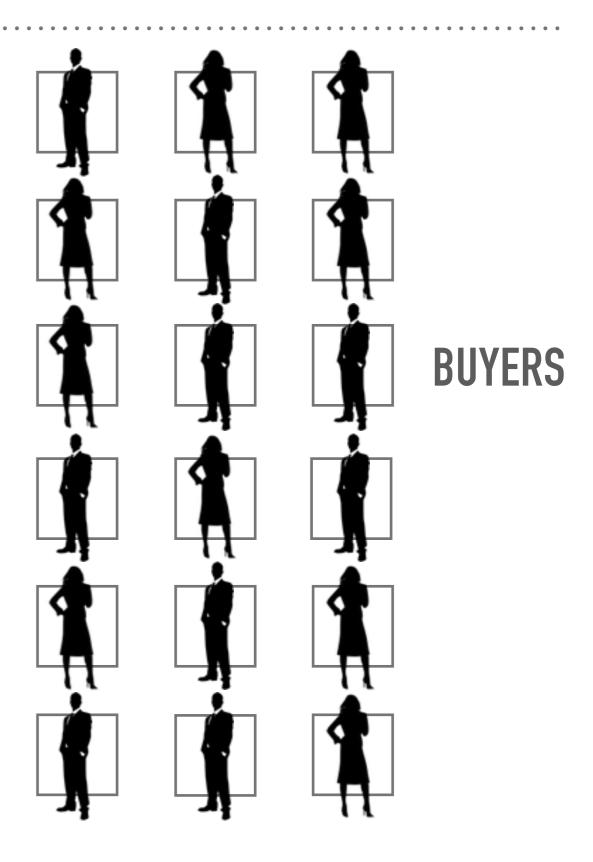
Digital Revolutions in Public Finance April 22, 2017

## A QUICK INTRODUCTION TO THE P2P ECONOMY WHAT IS IT? WHO IS IT?

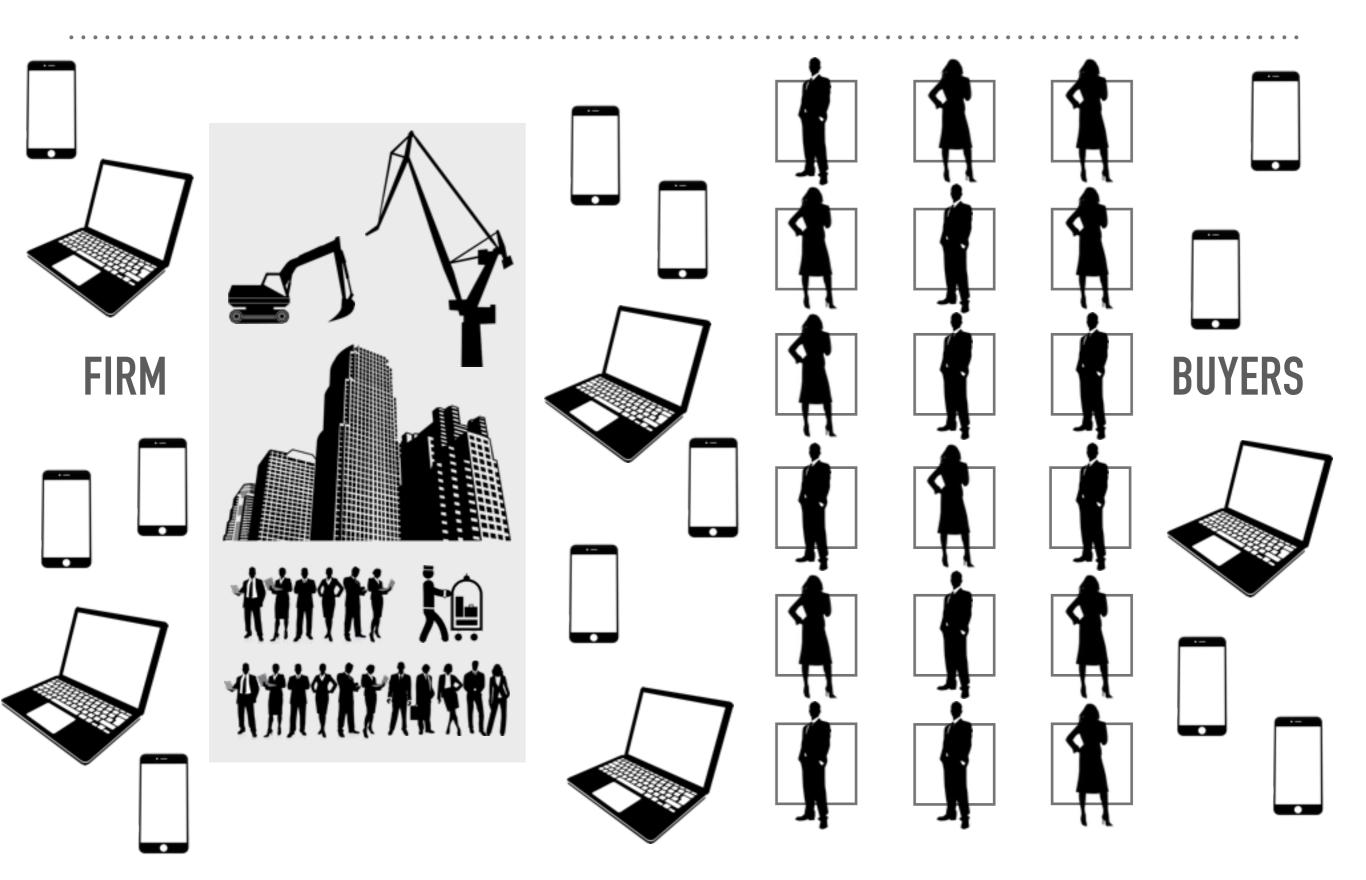
#### "TRADITIONAL" BUSINESS LANDSCAPE

**FIRM** 



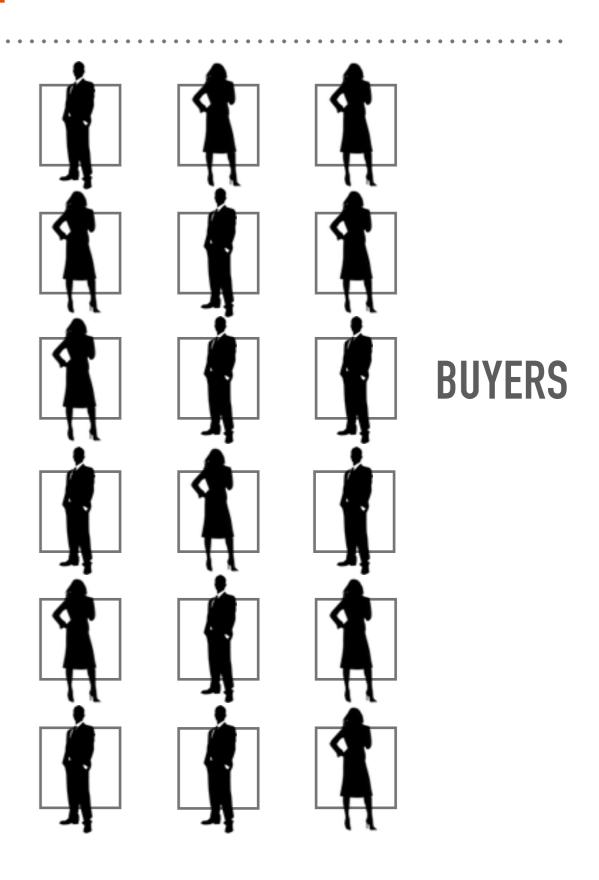


#### TECHNOLOGY REDUCES TRANSACTIONS COSTS



#### **EMERGENCE OF THE P2P ECONOMY**





#### PLATFORM: SEARCH, MATCH, RATE, INTERMEDIATE

**PLATFORM SELLERS BUYERS** VISA

#### WHO IS IN THE PEER-TO-PEER ECONOMY?



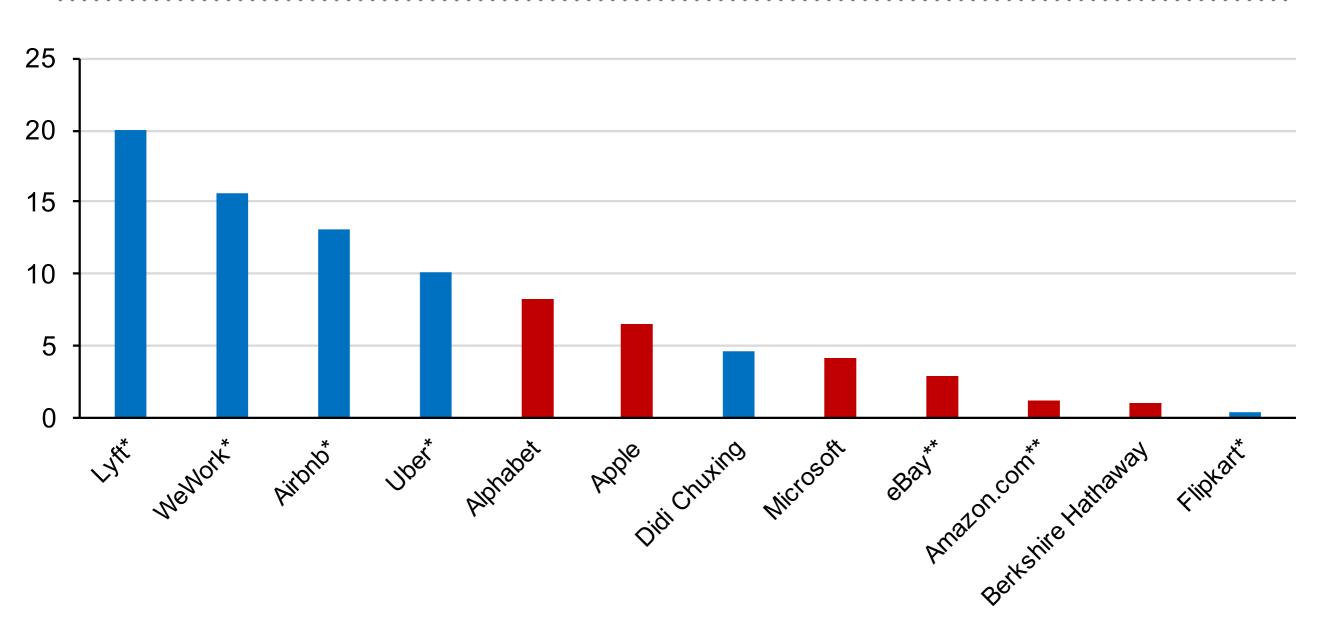
#### **WORLDWIDE PHENOMENON**



#### NUMBER OF USERS ON SOME OF THE LARGEST P2P PLATFORMS

Headquarters	Service	Reported Users (millions)
United States	Tourism	100
China	Commercial Marketplaces	440
United States	Commercial Marketplaces	300
France	Ridesharing	40
China	Ridesharing	400
United States	Commercial Marketplaces	170
United States	Ridesharing	40
United States	Ridesharing	40
	United States China United States France China United States United States	United States Tourism China Commercial Marketplaces United States Commercial Marketplaces France Ridesharing

#### STRIKING VALUATIONS PER EMPLOYEE



Sources: Dow Jones VentureSource, Orbis, Wall Street Journal, and IMF staff calculations. Note: (\*) denotes closely-held, venture-backed P2P businesses. (\*\*) denotes listed P2P businesses. Red bars denote listed businesses; yellow bars are for listed P2P businesses.

#### MAKING HEADLINES

L Inside the Hotel Industry's Plan to Combat Airbnb approaches \$7bn valuation
Uber faces legal challenge on paying VAT

### The Gig Economy: A Ticking Tax Bomb?

kept in UK 40% amounty

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When Will Labor Laws
Catch Up With the Gig
Economy?

TAXIS AND CUL NEW YORK LEAFTC

The Downside of Ride-Hailing: More New York City Gridlock

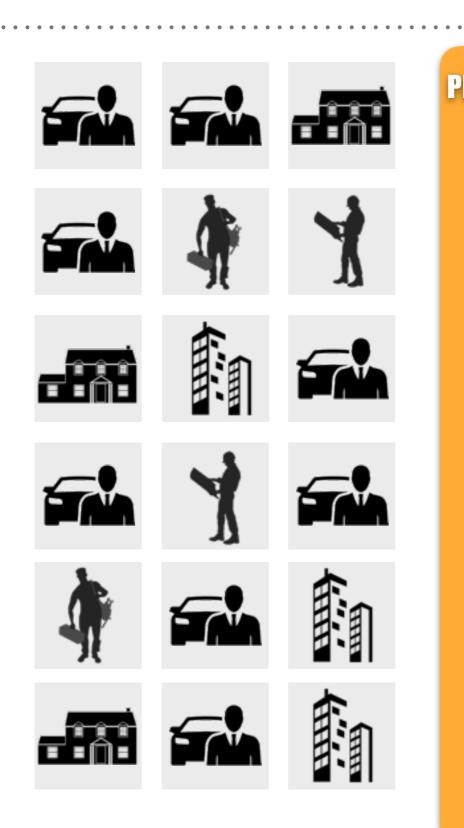
#### QUESTIONS

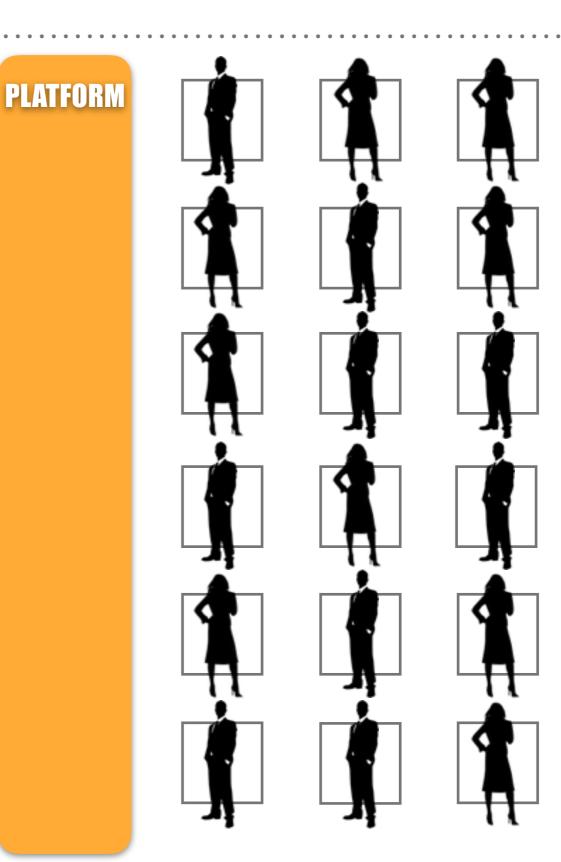
➤ What are implications of the structure and development of the P2P economy for current tax policy and administration?

➤ Does the P2P business model suggest an alternative system of taxation or simplification of existing taxes?

# TAX-RELEVANT CHARACTERISTICS OF P2P BUSINESSES

#### P2P BUSINESS MODEL

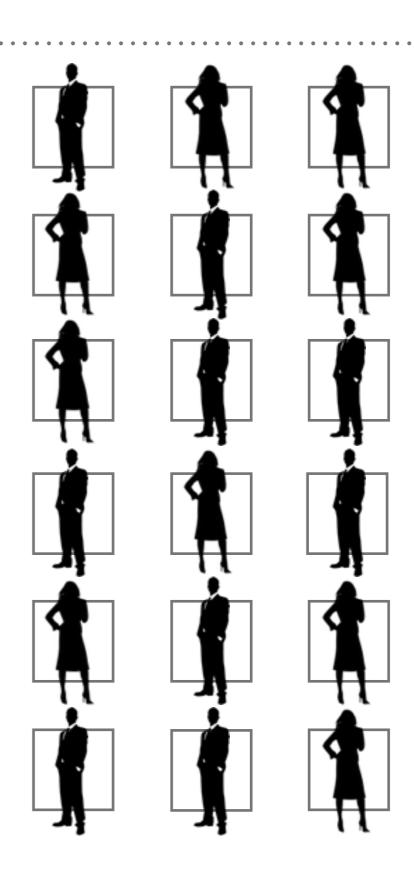




#### **CURRENT BUSINESS LANDSCAPE**

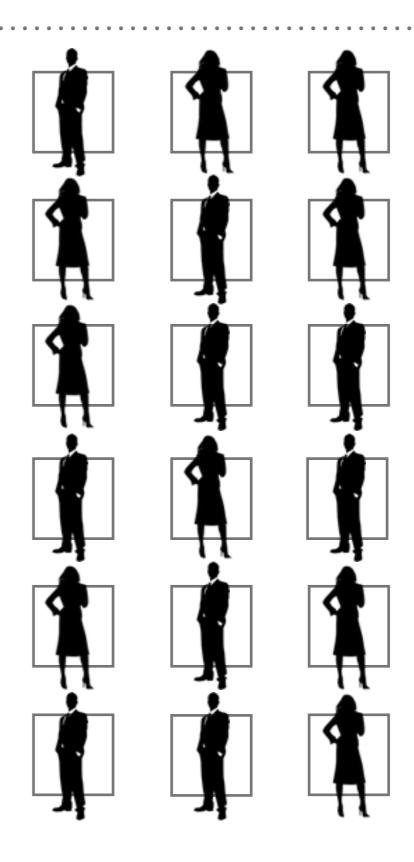


PLATFORM



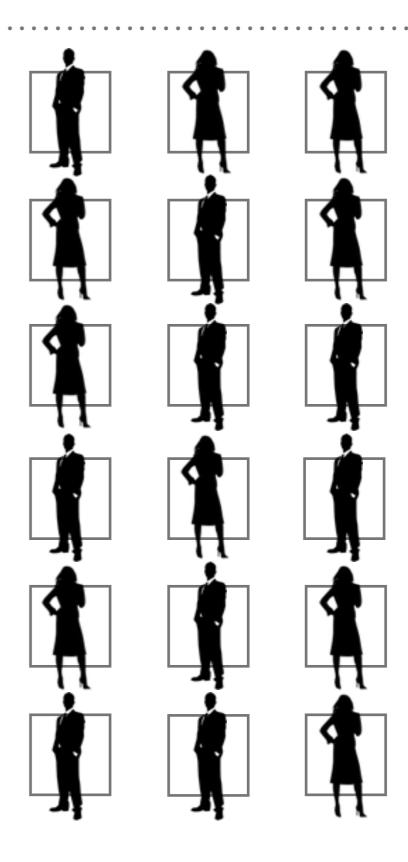
#### 1) COMPETITION, LOW PRICES, DISPLACEMENT



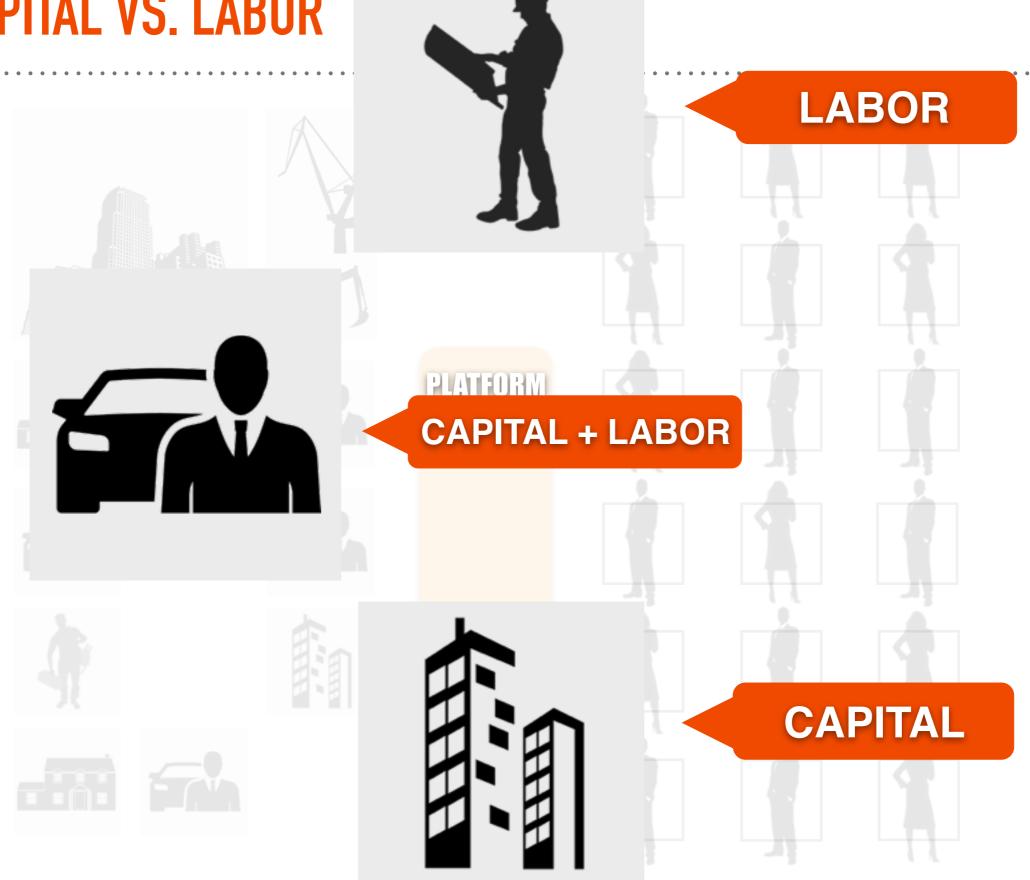


#### 2) FLEXIBLE, LOW FREQUENCY, CASUAL PARTICIPATION



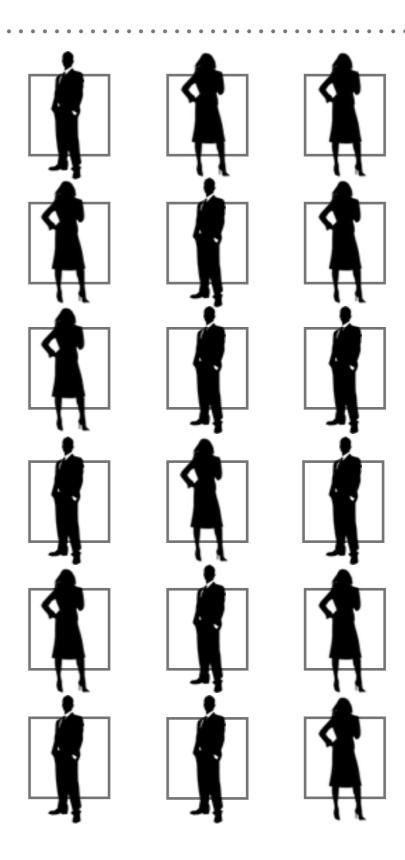


#### 3) CAPITAL VS. LABOR

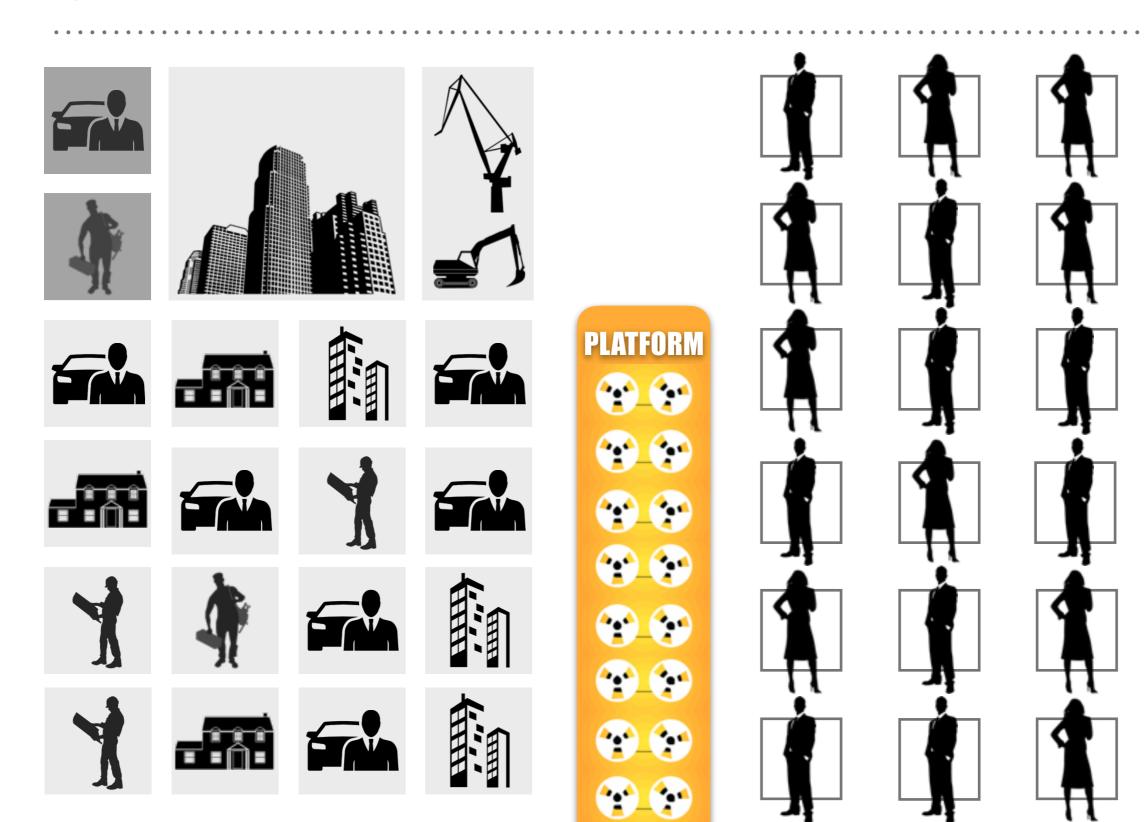


#### 4) FORMALIZATION OF ACTIVITY (EXTERNALITIES)



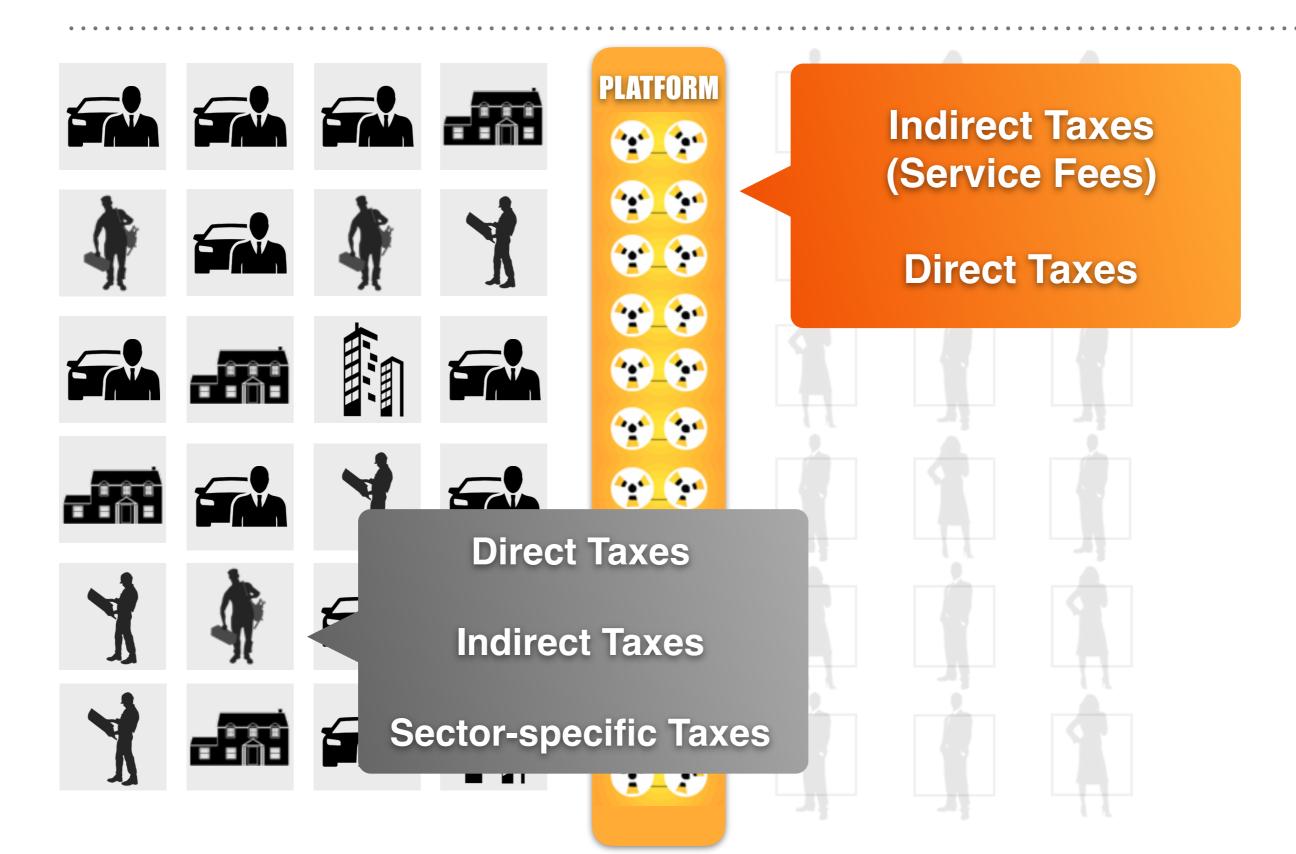


#### 5) ROLE OF THE PLATFORM: RECORDING TRANSACTIONS

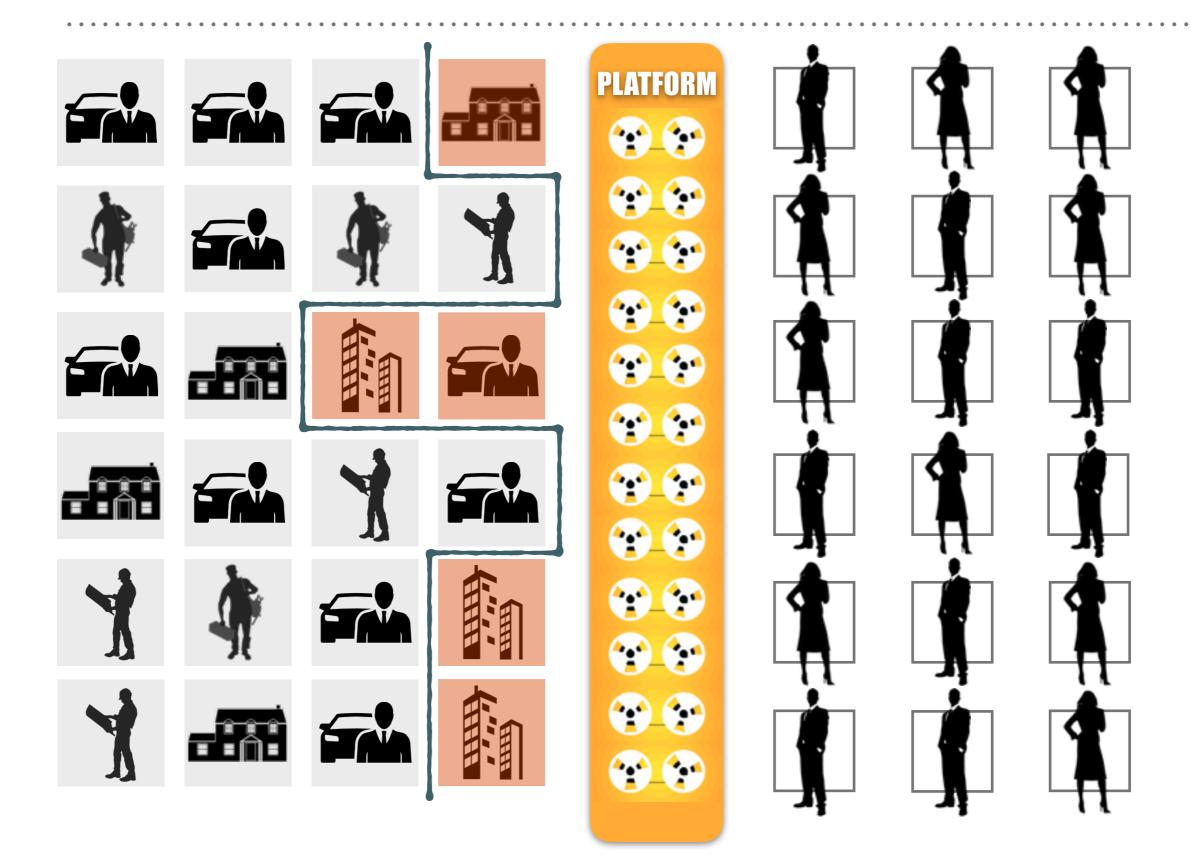


# CURRENT TAX TREATMENT OF P2P BUSINESSES

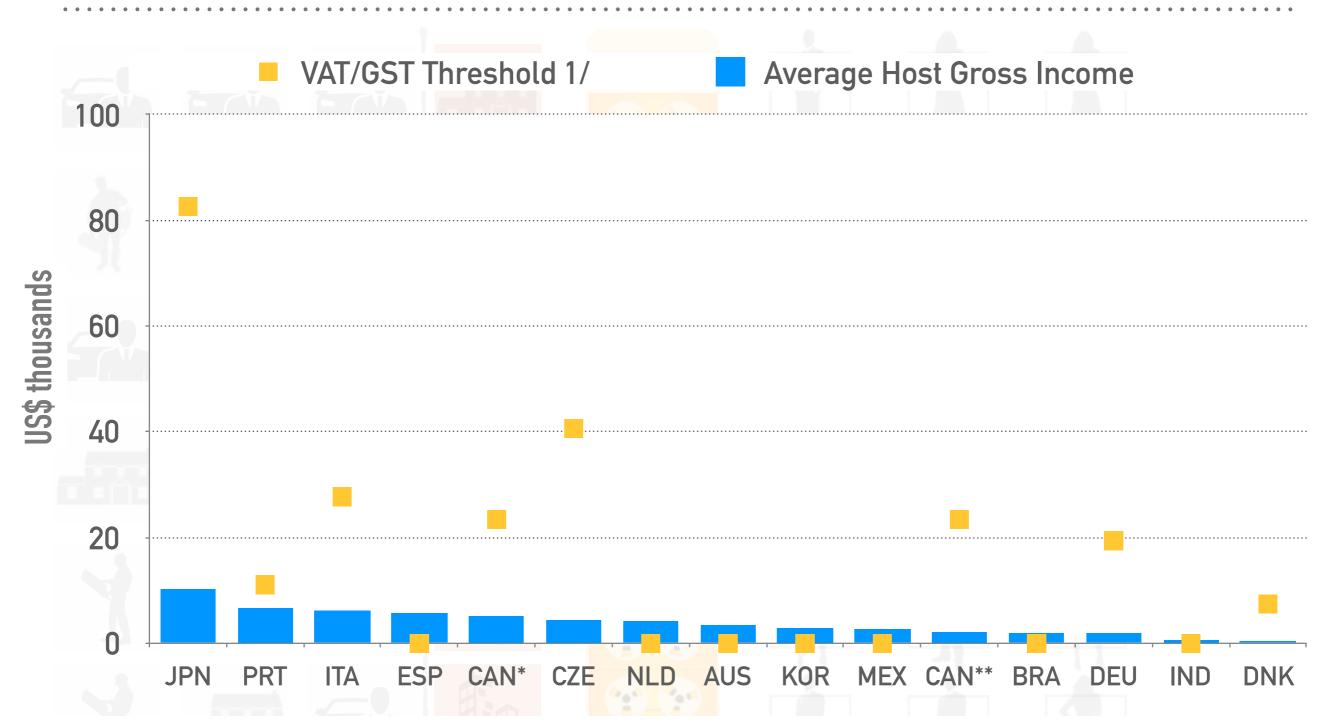
#### **P2P TAX TREATMENT**



#### **THRESHOLDS**



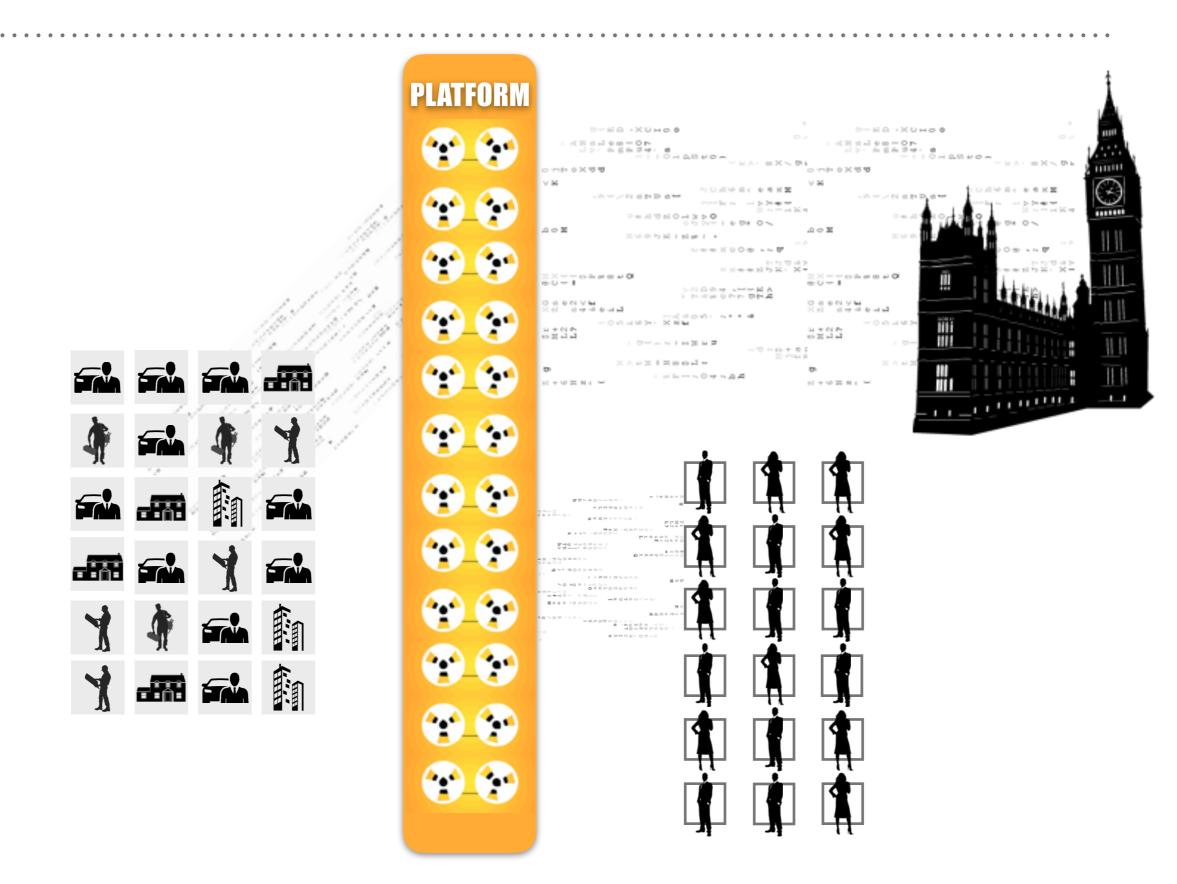
#### THRESHOLDS VS. AVERAGE HOST GROSS INCOME



Sources: Airbnb Citizen and International Bureau of Fiscal Documentation.

Note: (\*) Vancouver; (\*\*) Montreal. Data for each country can be either a national average or for a major city. 1/VAT = value-added tax; GST = goods and services tax.

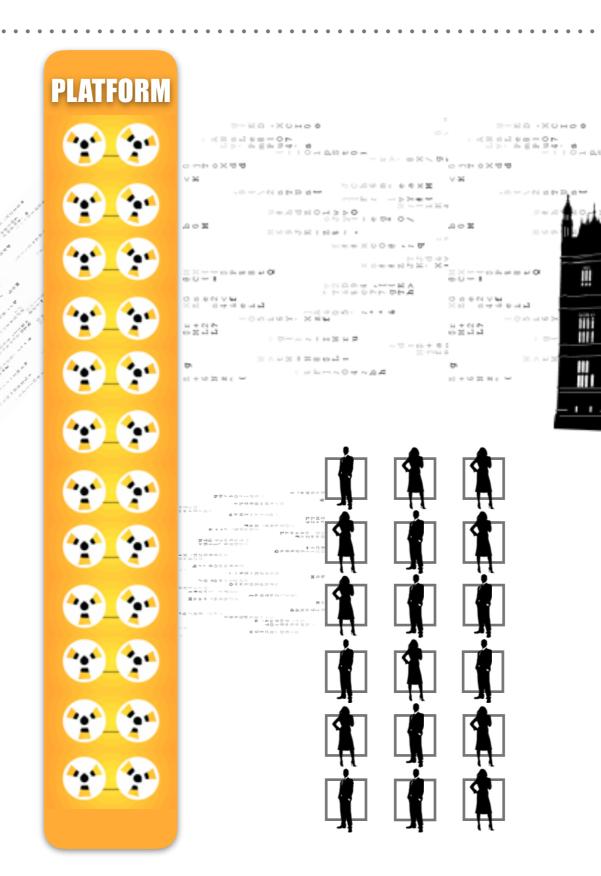
#### ROLE OF PLATFORM: THIRD PARTY REPORTER



#### ROLE OF PLATFORM: WITHHOLDING AGENT

Voluntary or Involuntary?





#### HOW TO TAX P2P BUSINESSES

#### TAX-RELEVANT P2P CHARACTERISTICS

- ➤ Increase in number of small businesses.
  - ➤ Small %GDP; Large %GDP?
  - ➤ Low incomes (low frequency, irregularity, casual) ; Rents.
  - ➤ Competition (low prices, displacement).
- > Combination of both capital and labor income.
  - ➤ Personal capital used (e.g., cars, houses).
  - ➤ K/L ratio.
- > Platforms record information.
- ➤ Externalities; Formalization.

#### **POLICY OPTIONS**

#### MO CHANGE

Small %GDP

Large %GDP

Competition

Rents

**Formalization** 

Low incomes

**Externalities** 

**K/L** ratio

#### **POLICY OPTIONS**

#### NO CHANGE LEVEL THE PLAYING FIELD

Small %GDP

Large %GDP

Competition

Rents

Formalization

Low incomes

**Externalities** 

**K/L** ratio

#### **POLICY OPTIONS**

LEVEL THE PLAYING FIELD ACTIVE POLICY



Small %GDP

Large %GDP

**Competition** 

Rents

**Formalization** 

Low incomes

**Externalities** 

**K/L** ratio

#### FAMILIAR SMALL BUSINESS PROBLEMS

- Already long-standing debate on how to deal with small businesses.
  - Policy: Administration.
  - Special schemes in many countries already.
    - Presumptive taxation systems (blunt instrument).
- P2P treatment could be more complicated, for example, treatment of capital.
  - Variation in capital treatment already broad-ranging: depends on different factors, e.g., organizational form, asset type, etc.
  - Added apportionment issue of increased personal asset use.
    - Standard business deduction?

#### WHAT'S DIFFERENT WITH THE P2P BUSINESS MODEL?

- > Platforms.
  - ➤ Intermediating and recording transaction information.
  - Overcome information asymmetry and simplify enforcement.
- ➤ Revenue-compliance trade-off behind thresholds could improve: lower thresholds? (just for P2P?)
  - ➤ More information, better/easier compliance.
  - ➤ Revenue gains unclear (Q11, P12); could be larger for economies (and sectors) where P2P businesses beginning to dominate, e.g., tourism in small economies.

POLICY AND ADMINISTRATION LANDSCAPE STILL DEVELOPING



- ➤ Third-party reporting: information on consumption (buyer), income (seller) but only partial (needs to be combined with all other data sources to present full taxpayer profile).
- > Withholding: only really useful for transactions (indirect taxes).
- ➤ As information improves...
  - ...can help overcome administrative issues...
  - ...and can then focus on policy options (which are functions of increasing information).





































