

Agricultural Taxation and Rural Development in Developing Countries

Besteuerung der Landwirtschaft und ländliche Entwicklung in Entwicklungsländern

By Winfried Manig*)

1. Introduction

The financing of economic growth and development in developing countries requires considerable financial means. Some of the necessary investments for economic growth are made by private investors. Other investments, by no means a small amount, have to be made by the government according to the development goals. Furthermore, the government also has to secure the financing of its administrative activities, of improvements in the infrastructure, and of social and institutional change. These extended government activities are necessary on account of the considerable infrastructural, social, personal, and institutional limitations in developing countries which assign to the government an active role for initiating and implementing development.

The financing of these multiple development tasks makes it necessary for the government to supply considerable means. The most important source of obtaining these means is TAXATION.

Tax policy, in addition, influences economic growth and development directly in their direction and intensity, beginning with the volume of capital formation, factor utilization, factor transfer between the sectors, and income distribution.

In the following, the effects which a few selected tax measures have in the agricultural sector will be analysed in view of their effects on rural development. On the other hand, those financial instruments should be examined which can be, and have been, used to achieve specific objectives in several developing countries. However, before the analysis is dealt with, the actual importance of agricultural taxation in developing countries and the factors influencing the extent of tax revenues will be described.

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2. The Importance of Agricultural Taxation in Developing Countries

Considering the scope and importance of the agricultural sector in most of the developing countries, agriculture ought to be the most important source of funds for financing development. If the importance of the agricultural sector is evaluated by the share of revenue from the export of agricultural products in the total export revenue and/or by the share of population dependent on agriculture, the agricultural sector is effectively the most important economic sector in many developing countries. But if the share of value added by agriculture in the total value added of the national economy is referred to, the importance of agriculture is considerably less in many countries than it would seem to be according to the above figures.

In the various theories of economic development which deal with the aspects of capital formation, high priority is generally accorded, in the scope of development financing, to agricultural taxation (see, e.g., 4, pp. 3 ff.; 6, pp. 453 ff.; 7, pp. 115 ff.; 8, pp. 225 ff.).

The great importance of agricultural taxation for development is mainly substantiated by three arguments.

- a) Agriculture is the most important sector at the initial stage of economic development.
- b) In the agricultural sector, landed property – that factor of production which cannot be increased – is the basis for the total income achieved. This is why that income can be utilized more intensively than another factor income for financing development.
- c) According to the most important theories of economic development based on the modernization approach, industrialization was given priority until the end of the 1960s. The expansion of industry ought not to be charged with taxes. This is why the funds for industrialization had to be provided by other sectors, especially by agriculture.

Based on the volume of agricultural production and the high capital productivity in agriculture (particularly when utilizing new forms of productive inputs like fertilizer), there are also considerable theoretical objections to an overproportionate mobilization of funds from agriculture for financing development. According to this, capital should be used primarily to increase productivity in the agrarian sector itself and, at a later stage of development, investments in other sectors.

With some reservations however, it should be observed that a more intensive use of capital in agriculture generally requires the improvement of investment conditions, such as the establishment of promoting institutions for credit, input supply, marketing, and extension, and an adequate infrastructure for development. The funds should be raised and allotted by the government.

Moreover, agriculture cannot be developed separately. The other sectors must be developed simultaneously. That means that it is especially necessary

to expand the industrial sector, which likewise has to be financed. Here, the supply of agricultural inputs and the processing of agricultural products should be considered in particular. The simultaneous growth of all economic fields creates, at the same time, the necessary purchasing power for consumers.

All these activities surpass direct investments in the agrarian sector and have to be financed mainly by domestic capital sources, whereby agriculture should also make a contribution, e.g., by the levying of taxes.

As an analysis of the taxation systems in developing countries shows, the actual incidence of taxes on the agricultural sector is often far less significant than the overall importance of the sector. In many cases, agriculture is taxed only marginally. This is due to several reasons.

a) Levying of taxes in the agricultural sector:

- It is extremely difficult for a central administration to approach subsistence farmers.
- Farmers can only be reached at irregular intervals, and then with difficulty, because of insufficient transportation systems.
- Particularly under the conditions prevailing in developing countries, the administrative infrastructure (especially tax administration) dealing with the classification of tax-payers and the assessment and levying of taxes ought to be well organized. However, the opposite is the case.

b) Political enforcement of taxation:

In many cases, the prevailing power structures do not allow a central government to enforce tax legislation indiscriminately. This is why the right to collect taxes was auctioned off to the highest bidding tax collector. These conditions led to the fact that the wealthy paid relatively less taxes than the poor (regressive taxation system).

c) Tax morale:

The necessity of paying taxes is not recognized in the rural regions of many developing countries since the decisions regarding the levying and utilization of taxes are made in a distant, unfamiliar capital by officials who possibly belong to another tribe. Thus, tax evasion is not considered as morally objectionable and is, therefore, very widespread.

d) Dominance of indirect taxes:

On account of the above-mentioned difficulties in levying taxes, a wide scope is left to indirect taxes in all developing countries. The marginal integration of farms in the market and monetary cycle is one of the reasons why the agricultural sector – as a whole – hardly pays any indirect taxes (excepting export taxes on agricultural products).

The following tables give an outline of the tax burden on development economies and their agricultural sectors in selected countries.

Table 1: Total Tax Revenue as a Percentage of the Gross Domestic Product in Selected Developing Countries, 1963—1965

Country	Percentage	Country	Percentage
Uruguay	28	Thailand	13
Brazil	22	Chad	13
Tunesia	22	Sudan	13
Zambia	21	Niger	12
Malaysia	19	India	11
Kenya	17	Tanzania	10
Turkey	15	Ethiopia	8
Burma	14	Afghanistan	6

Sources: 11, p.201; 9, p.37.

The tax rates listed in Table 1 show the total tax burden in selected developing countries. The tax rates in the listed countries vary between 28 percent (Uruguay) and 6 percent (Afghanistan). In the Federal Republic of Germany, the tax rate for 1975 was 23.3 percent.

In most of the developing countries, the major share of the tax revenue came from indirect taxes because they are easier to levy as well as not readily noticeable. The extremes are shown in Table 2.

Table 2: Revenue from Indirect Taxes as a Percentage of the Total Tax Revenue, 1965—1969

Country	Percentage	Country	Percentage
Gambia	88	Guatemala	80
Togo	85	Congo, Braz.	80
Dahomey (Benin)	84	Somalia	79
Uruguay	83	Dominican.Rep.	79
Pakistan	81	Malagasy Rep.	76

Source : 3, pp.194 ff.

Usually, insignificant shares of the total tax revenue come from agriculture (Table 3). The table shows, on the other hand, the differences in the taxation system in the various countries which are partly attributed to their colonial past and the predominance of a specific basis for tax assessment. In African countries, personal taxes and export taxes are predominant, on the one hand, as remnants of the colonial tax systems and, on the other, because the land in African sub-Saharan countries does not constitute individual, but rather communal property with individual rights of utilization. In countries where, historically, feudal structures were predominant, land tax is more important on account of individual property (Nepal, The People's Republic of China, Taiwan, Ethiopia, etc.), although the volume of land tax receipts is not very significant in most of those countries.

Table 3: Tax Revenue from the Agricultural Sector as a Percentage of the Total Tax Revenue in Selected Developing Countries, 1965—1969

Country	T y p e s o f T a x e s			
	Personal	Export	Land	Products
Niger	34	7	.	.
Mali	21	2	.	.
Upper Volta	15	1	1	.
Uganda	14	41	.	.
Malagasy Rep.	12	6	5	.
Malawi	12	.	.	.
Sudan	.	24	.	.
Ivory Coast	.	20	1	.
Nigeria	6	18	.	3
Paraguay	.	18	6	.
Afghanistan	.	18	2	.
Haiti	.	17	0	.
Ghana	.	17	.	.
Nepal	.	6	18	.
China, Peoples' Rep.	.	.	16	.
Taiwan	.	3	11	.
Ecuador	.	10	10	.
Egypt	.	2	8	.
Ethiopia	.	9	8	.
Colombia	14	14	8	.
Mexico	.	7	0	1

Source : 1, pp.299 ff.

3. Influence of Taxation on Rural Development

If taxation is used as a development instrument, desired effects can be reached in specific fields. Thereby, however, there are always indirect effects which have to be considered. These indirect effects have to be carefully regarded, precisely under the conditions prevailing in developing countries. The tax policy can support (or hinder) development activities which go beyond the promotion of economic growth in the rural regions of developing countries. However, taxation itself cannot replace the necessary structural change.

3.1. Increasing Agricultural Production

3.1.1. Factor Proportion and Factor Transfer

Tax measures have the tendency of influencing the optimal combination of resources for production. Within the framework of political, institutional, and social limitations, taxation stimulates or hinders the application of the factors in the production process as it causes an immediate change in the price-cost ratios. But tax measures cannot be used exclusively as an instrument for economic policy in the agricultural sector of developing countries as they

are too difficult to administer and too slow in causing a response. Above all, not all farmers are immediately affected (subsistence farmers).

On the other hand, the factor costs in the developing countries often do not correspond to their social costs, which are also partly affected by certain tax measures (customs duties). In these cases, the fiscal policy aims at correcting these differences. In Pakistan, for example, mechanization of the agricultural sector, using imported machines, is profitable on a private economic level because of the subventioning of these imported capital goods (overvaluation of the domestic currency) and the relatively high wages of the labour force which are partly controlled by law (minimum wages, social benefits, etc.). From a general economic point of view, however, the over-mechanization of the agricultural sector is too expensive. Already in 1969, a correction in this policy was suggested by means of a sales tax amounting to 200% on the current prices of tractors. It was, however, not put into effect (2, pp. 273 ff.).

If an increased employment of labour force (and use of capital) should be the result of tax incentives, then the marginal tax rates must be, *ceteris paribus*, relatively low so that the income gains are only marginally taxed. The incentive to intensify the production is all the higher, all the lower the marginal tax rates are. However, from a general economic and socio-political point of view, high marginal tax rates should be built into the tax system so that a large part of the gains of economic growth is introduced via the government in correspondence with the development goals. On the other hand, it is questionable whether, considering the present social structures in rural areas in developing countries and the prevalent value systems, those tax measures which operate as incentives really bring about an intensification in the employment of labour.

Therefore, taxation is often used as a penalty for not employing the production factors in the desired way. This method has proven effective in several countries over an extended period of time. For example, collecting taxes in the form of money forces the subsistence farmers to sell part of their produce on the market in order to obtain the necessary cash. If taxes are high enough so that they cannot be met by abstention from consumption, then production must be increased, especially by means of an intensified employment of labour. If, in addition, the institutional prerequisites for raising the productivity are created through the increased use of capital (e.g., providing inputs, agricultural extension, marketing) then the volume of production can be relatively easily raised by this sanction. There are, indeed, in reality more substantial restrictions limiting an increase in production than mentioned in this presentation.

In the East African countries, personal taxes (poll and hut taxes) were already levied around the turn of the century in order to force the subsistence farmers to begin production for the market. Furthermore, this measure had the additionally desired effect that Africans applied for work on the European owned farms and railroad construction (13, p. 73).

The utilization of the factor land can likewise be influenced by taxes in its extent and intensity. The greater the market integration of the farmers and

the less the possibilities of variations in production are limited by natural factors, the greater the effect and the quicker the reaction.

Land taxes are especially suitable for influencing the utilization of land in the production process. With the present price-cost ratios, those land taxes which tax the production potential rather than actual production are especially predestined for creating an optimal utilization of land. The farmers are forced to make use of land in the best possible way if they are to pay the tax out of their produce without an ensuing reduction in their living standard. An improvement in the utilization of land (e.g., double cropping) and the introduction of new forms of inputs are, on the contrary, not penalized by taxation. Such land taxes exist in many variations in the Federal Republic of Germany, Egypt, parts of India, Iran, Pakistan, South Korea, and Taiwan (10, pp. 169 ff.).

The existence of an appropriate land tenure system is a prerequisite for the above-sketched reaction. Farmers operating their own land will certainly sooner undertake an intensification of land use provided the corresponding development institutions for the provision of capital, credit, extension, and marketing are available. Heavy land taxes are, therefore, along with the predominance of privately owned farms especially appropriate in densely populated areas for reaching, via an intensification of land use, an improvement in the supply of food products.

Other land tenure systems imply the possibility of a different reaction. In feudal structures in which the relationship between landlords and tenants is not only of an economic nature, but rather determined by custom, a slight increase in the land tax which the lessor has to pay causes hardly any reaction and results. In many cases, the landowners do not even shift the added tax burden to the lessees. Only a massive increase in taxes which has a definite influence on the division of the marginal product of land will force landlords to change their relationships to their tenants. In these cases, the added tax burden will be passed on to the lessees. This reaction, brought about by tax measures, can lead to the creation of a real exploitation of the tenants. A similar reaction can, indeed, already result from slight tax increases under a tenancy system dominated by the new agrarian middle class which arose in many developing countries during the modernization process of the last twenty years.

In order to reach a certain effect by taxation, heavy penalty taxes in the case of undesired land utilization have been introduced with great success in many countries (14, pp. 219 ff.).

- Penalty taxes levied on fallow or pastures if agricultural utilization is desired can be found in Brazil, Chile, Panama, Thailand, and Guatemala.
- Penalty taxes for absenteeism exist in some South American countries and Taiwan.
- Penalty taxes in the form of progressive tax rates dependent upon the size of the landed property exist, for example, in Brazil, India, Korea, and Thailand, among other countries.

All these forms of penalty taxes are mainly important in countries in which landed property is predominant and intensification of land utilization is strived for, at least according to the official development plans. The levying of such punitive taxes is, admittedly, successful in only a few cases as there are a number of methods for evading them, e.g., the power structures in rural areas hamper the assessment of property.

Influencing the factor capital through taxation is, on the one hand, possible by way of compulsory saving on the part of the government. On the other hand, private capital formation and use can be steered by the fiscal policy. Those tax measures which either do not tax additional profit or investments at all, or only to a small extent, are especially appropriate for this purpose. This promotion is, however, again contradictory to the financial needs of the governments in developing countries. Because of this, such tax measures should only be used correctively or be introduced for short periods of time if capital formation and investment need additional incentives. All measures which encourage capital investments are capital intensifying, i.e., capital will be invested to a greater extent than the corresponding price-cost ratios would allow. In accordance with shortages of resources in developing countries, this would, in many cases, not be desired (higher technologies than appropriate would be, thus, promoted). In the agricultural sector of developing countries, particularly those capital investments which are long-term and which raise the productive capacity of the land are, thus, promoted by means of taxation, e.g., ameliorations, the construction of irrigation facilities, erosion control, and land clearing. With that type of investments, the tax potential of the agricultural sector grows in the long run. A short-term tax loss results in a long-term increase in revenues. In addition, the implementation of these investments is usually labour intensive and creates jobs in rural areas.

All the above-mentioned effects of taxation are, however, mainly of relevance to the landowners. Tenants will hardly be able to participate directly, at least not under the prevailing conditions of the developing countries. As long as a country already has the desired land tenure system, such tax measures are quite advantageous. In countries with large estates and lease systems, the promotion through tax measures strengthens the position of landowners and impedes, as a result, land reform.

Capital transfer from agriculture into other sectors should, for one, be extended by direct tax incentives for the preferred capital investment. All tax measures, or measures producing a similar effect, however, which influence the intersectoral terms of trade to the disadvantage of agriculture are much more important. They have the characteristic of being invisible. A classical example is the levying of an export tax on rice (rice premium) in Thailand. This tax does not only reduce the price of exported rice, but also the domestic prices. The entire price level is, therewith, reduced. That means low living expenses for the urban population. This works as an incentive for capital formation in the industrial sector as a result of the ensuing low

wages. Agriculture finances, therefore, the industrialization in the main economic centre of Thailand, Bangkok, and, above all, the luxury consumption of certain classes.

3.1.2. Composition of Production

The composition of production in agriculture can also be directed by taxation. This is especially important for export crop cultivation in which not only certain crops and varieties, but also quality standards can be promoted. This influence is not only possible by means of incentives, but also by the levying of penalty taxes on undesired specialization. Examples of this can be found in many underdeveloped countries, although these taxes were introduced with varying success. Precisely here, in the export sector, are additionally a number of effective, indirect measures which produce similar effects to those of taxes, e.g., multiple exchange rates, differentiated export tax rates, and price controls administered by Marketing Boards, and so forth.

An example of that type of manipulation which was, and is, practised in varying degrees by nearly all exporting countries is Venezuela where coffee cultivation for the world market was supported by undervaluation of the domestic currency (10, p. 176). In other countries, the quality of exported coffee was increased by means of levying heavier taxes on low quality grades than on higher ones.

To change the composition of production on agricultural plantations the taxes must be levied over a longer period of time so that the desired reaction will take place. It is also necessary that a certain threshold be crossed in each case before the desired response is brought about. The thresholds differ individually in each country and are difficult to stipulate due to the complexity of agricultural production and the different socio-economic conditions.

Until now, it has been argued as if the optimal factor mix were adhered to and the most favourable composition of production were practised. This production pattern and the factor proportion must be steered in the desired direction by means of tax measures. In many cases, the potential of the agricultural production is, for various reasons, not fully utilized under the existing price-cost ratios and natural conditions — a so-called "slack" exists. How is an underutilization of factors to be judged from the viewpoint of taxation under the premise of tax capacity? On the other hand, it should be considered which tax measures would be necessary to bring about an improvement in the employment and utilization of the existing potential.

Increasing the tax burden of the agrarian sector or certain groups can have, even with the presence of an unutilized potential, very different effects:

- An increase in taxes is met by a decrease in consumption. The additional tax burden can be paid out of the existing earnings. In many cases, this reaction is intended. If the living standard lies already nearly at the subsistence level and an increase in taxes hampers the labour potential

of the farmers, then the volume of production may be regressive over a long period of time.

- Another reaction could be a decline in the saving ratio and investments of private persons which, on the other hand, reduces the productivity of the labour force and land. The tax potential is, thus, negatively influenced.
- A tax increase can, however, also initiate processes which lead to an increase in production and productivity. This process depends upon an improvement in the input proportion. To achieve these objectives, the "correct" taxes must be introduced. The decision as to which tax is the right one is difficult as the question is extremely complex and the reaction is not generally predictable.
- The classical example – which, indeed, goes much beyond the improvement of the utilization of the potential to its full capacity – is the mobilization of resources by means of an extremely high increase of land tax at the end of the 19th century in Japan's agricultural sector which stimulated the industrialization process and financed it as well. The direct incidence of tax amounted for Japan's agriculture to more than 20 percent of the net income, and the tax revenues came to 86 percent from land tax (1, pp. 133 ff.; 12, pp. 43 ff.).

This example also shows, however, the socio-economic framework that has to be present before that type of a process can take place (a transportation system, an administration, and a market for agricultural products along with consumers with purchasing power).

3.2. Redistribution of Income and Property

In most developing countries, agricultural income is mainly earned by controlling property, that means, income is always associated with property. A tax policy which aims at redistributing income must also, therefore, at the same time undertake a redistribution of private property. A redistribution of property probably has, however, absolutely no short-term effects towards improving the situation of the lower income groups. The effects are in this case more of an indirect nature resulting from a reduction of the power potential of a few groups.

A redistribution of income can only be obtained by means of taxation if the taxpayers have no possibility whatsoever of shifting the added tax burden. In reality, this situation is hardly ever to be met in underdeveloped countries since the high income classes usually have the possibility and the power to shift the incidence of tax to other groups.

A redistribution of private property in the agricultural sector demands a redistribution of the land, in other words, a land reform. Whether taxation is suitable for this purpose is doubtful. For this, governments would need the authoritative means of enforcing such strict taxation measures. The same authoritative power would be sufficient to enforce a direct land reform.

In detail, a partial redistribution of income could be brought about by means of progressive income taxes, corporation income taxes, and a controlled inflation. Especially the last method is, politically, relatively easy to carry out (e.g., in Chile under President Allende, a monetary devaluation of up to 300 percent took place. At the same time, however, the wages of the lower urban income groups rose by up to 500 percent per annum).

There are several arguments, however, against the usage of taxation to bring about a redistribution of income and property. If those portions of income that are invested are heavily taxed, it has a negative effect on output and employment. The effect is at least questionable.

If the government, though, partly takes over the role of the investor, then these measures can be definitely justified, all the more so since the concentration of property and power would be thus reduced. Concerning the agricultural sector of developing countries, the argument that a decline in investments would be the result of taxation is of much less importance than it would be concerning the industrial sector. Subsistence agriculture can hardly be effected by these measures.

3.3. Changing the Agrarian Structure

Only a few aspects of influencing the conditions of land tenure by means of the financial policy will be discussed in connection with changing the agrarian structure.

By means of tax instruments, a land tenure reform can be supported or a change that has already been carried out can be consolidated by the proper taxation system. Taxation could, however, replace neither a land reform nor an agrarian reform because the enforcement of such strict tax measures which could, themselves, replace a reform would need such a strong governmental power system, including the necessary administration, that it could enforce a direct reform itself. Taxation can only accompany, therefore, a change in the tenure system. In Colombia, for example, an attempt was made to redistribute the land with the help of land taxes. The results were, however, extremely negative (5, quoted by 1, p. 263).

Since the tax system has a very strong influence on land tenure (e.g., the Zamindari system in India), the agricultural tax system has to be changed and adapted to the new conditions following a change in the conditions of land tenure.

The following tax measures were carried out, at least that was the intention, within the framework of a change in the agrarian structure in a few developing countries. The success varied.

3.3.1. Breaking up the Large Estates

Any results in this direction can only be brought about by the levying of a penalty tax, i.e., an exorbitantly heavy tax must be levied for the undesired possession of property, with a progressive tax rate graduated by the size of

the landed property. Land taxes levied with this intention were, and still are, to be found in Egypt, Brazil, India, South Korea, and Thailand (1, pp. 96 ff.). As the enforcement of this tax measure is, however, extremely difficult, the taxes have hardly been able to meet with success in the desired direction, especially since it is relatively easy to evade them by means of a formal division of the land among relatives and other people.

In a few countries with large-scale landownership and leasing of land, a penalty tax is levied if the owner does not live on his land (absentee tax). This can be found in some South American countries and Taiwan. It is possible to evade this type of tax as well, and the possibilities are often built into the tax system itself. For it is always exactly those groups which take part in the making of the laws who are affected by them.

3.3.2. Promotion of Certain Types of Landed Property and Farm Sizes

In most of the underdeveloped countries, certain types of landed property in the agricultural sector as well as the size of farms and patterns of labour regulations are promoted by taxation in the form of tax reliefs or subsidies. The following measures should be mentioned.

- Tax exemption or reductions for small farms (Brazil and India) and newly settled farmers (South Korea).
- Tax reductions for co-operative agriculture (the most recent example is Ethiopia).
- High income tax rates on income derived from rent. In countries with heavy pressure on the land, this tax can easily be shifted to the lessee. Thus exactly the opposite effect of that intended will be brought about.

All of the above-mentioned tax measures can have, according to the type of tax system and the political and administrative ability to enforce them, a positive effect on rural development in developing countries. They have, however, at least concerning necessary structural changes, only a supporting function and cannot replace the changes themselves.

4. Conclusion

An important source for financing development is taxation. As to the extent of the incidence of tax in the agricultural sector, there are, indeed, considerable differences in opinion from a theoretical point of view. In reality, the tax burden on the agricultural sector in developing countries is less than its importance within the economies of these countries otherwise. This has a number of causes among which is the administrative inability to enforce the existing tax laws in rural areas. Taxation emits, however, multiple direct effects to direct economic growth and development. A few of these effects have been discussed in connection with the factor proportion within agriculture, the factor transfer between the sectors, the direct influence of the agricultural production pattern, and the agrarian structure.

Zusammenfassung

Zur Finanzierung der vielfältigen Entwicklungsaufgaben in den Entwicklungsländern werden erhebliche finanzielle Mittel benötigt. Eine der wichtigsten Finanzquellen des Staates ist die Erhebung von Steuern.

Bedingt durch den Umfang und die Bedeutung des Agrarsektors müßte die Landwirtschaft dieser Länder einen erheblichen Teil des Steueraufkommens erbringen. Über das Ausmaß der Steuerbelastung des landwirtschaftlichen Sektors und bestimmter Gruppen bestehen allerdings auch aus theoretischer Sicht erhebliche Meinungsverschiedenheiten. In der Realität ist die Steuerbelastung der Landwirtschaft in den Entwicklungsländern meistens wesentlich geringer, als es der sonstigen Bedeutung dieses Sektors innerhalb der Volkswirtschaft entspricht. Das hat eine Reihe von Gründen, wobei die mangelnde administrative Durchsetzung bestehender Gesetze in den ruralen Gebieten, die Schwierigkeiten der Feststellung der Steuerzahler und ihrer Veranlagung, das Vorhandensein vielfältiger Möglichkeiten der Steuerhinterziehung und die Dominanz der indirekten Steuern im Steuersystem dieser Länder besonders hervorzuheben sind.

Von der Besteuerung des Agrarsektors gehen vielfältige direkte und indirekte Wirkungen aus, die das wirtschaftliche Wachstum und den sozialen Wandel in den ruralen Gebieten der Entwicklungsländer beeinflussen. Einige dieser Auswirkungen hinsichtlich der Erhöhung der landwirtschaftlichen Produktion durch Verbesserung der Faktorkombination und der Beeinflussung der Produktionsrichtung, der Einkommens- und Vermögensumverteilung in ruralen Gebieten und der Veränderung der Agrarstruktur wurden diskutiert.

Alle steuerlichen Maßnahmen wirken tendenziell auf die Zusammensetzung der Faktoren im Produktionsprozeß ein, da die Preis-Kosten-Verhältnisse verändert werden.

Der Einsatz von Arbeitskräften in der Landwirtschaft kann durch gezielte Erhebung zwar beeinflußt werden, bei den bestehenden Sozialstrukturen und den Werthaltungen der Menschen in den ruralen Gebieten ist die Anreizfunktion der Steuern zum verbesserten Einsatz der Arbeitskräfte jedoch fraglich. Größere Erfolge wurden in einigen Ländern mit einer steuerlichen Bestrafung für den nicht erwünschten Einsatz der Arbeitskräfte erzielt.

Die Verwendung des Bodens im landwirtschaftlichen Produktionsprozeß nach Umfang und Intensität kann gezielt durch eine entsprechende Grundsteuererhebung beeinflußt werden, die den potentiellen und nicht den aktuellen Bodenertrag besteuert. Als Voraussetzung der Reaktion in der gewünschten Richtung ist das Vorhandensein einer geeigneten Grundbesitzverfassung (z. B. Eigenbewirtschaftung) anzusehen, welche keine Abwälzung der Steuerlast zuläßt. Außer dieser Anreizbildung zur Produktionserhöhung ist ebenfalls die Erhebung einer Strafsteuer für die nicht erwünschte Verwendung des Bodens möglich und in vielen Ländern mit Erfolg eingesetzt worden. Der Einsatz des Kapitals wird einmal durch das Zwangssparen des Staates durch Steuererhebung beeinflußt, und zum anderen wird die privatwirtschaftliche

Kapitalbildung und -verwendung durch die Fiskalpolitik gelenkt. Alle steuerlichen Maßnahmen, welche die Verwendung der Kapitalgüter in der Landwirtschaft fördern, sind jedoch kapitalintensivierend, so daß höhere Technologiestufen als die angepaßten gefördert werden.

Wie die Hinweise über die Verwendung der Produktionsfaktoren zeigen, kann das Instrumentarium der Besteuerung nicht ausschließlich zur Lenkung ihres Einsatzumfangs benutzt werden. Dazu ist die Steuerpolitik im Agrarsektor der Entwicklungsländer zu langsam wirkend, und vor allem werden nicht alle Landbewirtschafter gleichermaßen erreicht (z. B. Subsistenzbetriebe).

Die Besteuerung ermöglicht außerdem auch eine direkte Einflußnahme auf die Produktionsrichtung der Landwirtschaft. Insbesondere beim Anbau von Exportfrüchten ist eine Intervention in vielen Ländern verbreitet, wie die steuerliche Förderung bestimmter Kulturen, Sorten und Qualitätsstufen. Außer einer Anreizbildung durch steuerliche Entlastung und einer Bestrafung durch eine Belastung der nicht gewünschten Produktionsrichtung sind im Exportfruchtanbau insbesondere steuerähnlich wirkende Maßnahmen, wie multiple Wechselkurse, Überbewertung der einheimischen Währung und Preisfestsetzungen, von größter Bedeutung.

Eine Einkommens- und Vermögensumverteilung im landwirtschaftlichen Sektor erfordert eine Umverteilung des Bodens und damit eine Bodenreform. Das Instrumentarium der Besteuerung ist aber, wie Beispiele in einer Reihe von Entwicklungsländern zeigen, nicht in der Lage, eine Umverteilung des Bodens vorzunehmen. Denn dieses verlangt Machtmittel des Staates zur Durchsetzung einer derart rigiden Besteuerung, die ausreichen würde, eine direkte Landreform zu erzwingen. Eine entsprechende Ausgestaltung des Steuersystems kann jedoch eine Bodenreform unterstützen und konsolidieren.

Die Aufteilung des Großgrundbesitzes durch die Erhebung einer Strafsteuer ist in verschiedenen Ländern mit meist negativem Erfolg versucht worden. Die Förderung bestimmter Besitzformen, Betriebsgrößen und Arbeitsverfassungen durch Steuerentlastungen bis zur Zahlung von Subventionen ist in einer Anzahl von Ländern mit wechselndem Erfolg angewandt worden (Brasilien, Indien, Südkorea).

Alle steuerlichen Maßnahmen können bei entsprechender Ausgestaltung der Steuersysteme und im Rahmen der politischen und sozio-ökonomischen Rahmenbedingungen einen positiven Effekt auf die rurale Entwicklung der Entwicklungsländer haben. Die Besteuerung kann jedoch in den meisten Fällen nicht die notwendigen Strukturveränderungen im ländlichen Raum erzwingen oder ersetzen.

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