

BUDGET BILL 2023

NATIONAL PUBLIC SECTOR TAX REVENUES

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Executive Summary

In accordance with the 2023 Budget Bill (PP2023) Message, revenue from national taxes and Social Security would reach ARS34,978.541 billion. In the absence of detailed information on the components of revenue and its distribution, the exercise of reconstructing the apportionment of revenues by jurisdiction was conducted. The OPC found a difference of ARS125.960 billion between the amount to be collected and the amount to be distributed.

This difference could arise from certain inconsistencies in the treatment of some revenues that are considered tax in one case and non-tax in others. This raises the need to review the information historically submitted to Congress on revenue and distribution.

On the other hand, a Separate Note was added to the Message about the concept of Tax Expenditure, resources that the Treasury ceases to receive due to treatments that deviate from the general rule of the different laws governing taxes, as a way of encouraging parliamentary discussion on them.

Estimates of the Ministry of Economy indicate that the total of these Tax Expenditures would amount to ARS3,664.818 billion next year (2.49% of the GDP), which are broken down into ARS2,669,761.4 million for treatments included in the tax rules and ARS995.057 billion generated under economic promotion regimes.

As for the content of the Bill, there are 8 sections that set the tax shares for the year for a total of ARS112.952 billion, and 20 other sections on tax matters that imply a total of 204 tax measures, which are not explicitly measured in terms of their fiscal impact.

Analysis of budgeted tax revenues

The tax revenue estimates contained in the PP2023 Message project a revenue of ARS19,580.596 billion for 2022, which represents an increase in nominal terms of 77.9% with respect to 2021 and ARS34,978.541 billion for 2023, with an expected growth of 78.6% YoY.

In terms of GDP, a drop in the tax burden of 0.18 percentage points is expected, composed of an increase in Social Security contributions (+0.08% of GDP) and a drop in tax revenues of 0.27% of GDP (mainly PAIS tax -0.12%, and Export Duties -0.1%). This drop in the tax burden would not be consistent with either the proposed macroeconomic scenario or the explanation provided in the revenue estimate. It should be noted that the Bill includes many tax benefits that, although not quantified, could have an impact on this drop.

In this sense, an increase in economic activity, foreign trade volumes, taxable wages, jobs, prices and the exchange rate are expected, with the additional factor that some of these assumptions are not explicit in the Budget Bill Message, and therefore do not allow projecting with the same base variables the values estimated for the preparation of PP2023.

Likewise, the Message states that a higher degree of compliance with tax obligations is expected, due to improvements in tax audits and control, and revenues from payment facilities schemes.

The Budget Bill Message (p. 51) states that the estimated tax burden for 2022 is 23.95% of GDP and that it will fall to 23.77% during 2023. On the same page, the Message discloses the distribution of national taxes revenues and social security contributions, which will be 61.6% to the National Government, 5.6% to Trust Funds and Other Non-Financial Public Sector Entities and 32.7% to the provinces, through Federal Tax Sharing.

Table 1: Primary distribution of tax revenues budgeted for 2023 by institutional sector

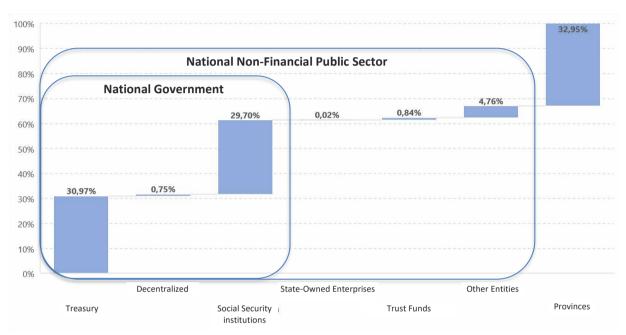
	Institutional Sector —			PP 2023		Sauras	
				GDP%	Share%	Source	
		Treasury	10,129,357	6.88%	28.85%	Chapter I - Schedule No. 11	
		Rest of Central Administration	743.684	0.51%	2.12%	Chapter I - Schedule No. 11	
	N:	Central Administration	10,873,041	7.39%	30.97%	Chapter I - Schedule No. 11	
	National Government	Decentralized Agencies	264.381	0.18%	0.75%	Title III - Schedule 1	
National Non-Financial Public Sector		Social Security Institutions	10,425,977	7.08%	29.70%	Title III - Schedule 1	
		Total National Government	21,563,398	14.65%	61.43%	Message p. 77	
	State-owned Enter and Other Entities	1,677,269	1.14%	4.78%	Message p. 152, p. 155		
	Trust Funds	296,132	0.20%	0.84%	Message p. 148		
	Total National Pub	23,536,799	15.99%	67.05%	Message p. 163		
	Federal Tax Sharin	10,386,808	7.06%	29.59%	Message p.76		
Provinces	Others	1,180,894	0.80%	3.36%	Message p.76		
	Total Provinces	11,567,702	7.86%	32.95%	Message p.76		
Total			35,104,501	23.85%	100.00%		
Total Estimated tax revenue			34,978,541			Message p. 51	
Difference			125,960				

SOURCE: OPC, based on 2023 Budget Bill.

An analysis of the information contained in the Budget Bill reveals certain discrepancies between the projected amount of revenue and the amounts distributed. Comparing the previously mentioned data, total revenue of the National Government amounts to ARS21,563.398 billion, which represents 61.6% of the ARS34,978.541 billion projected for 2023 (61.43% of the total amount distributed, ARS35,105.501 billion). Likewise, if tax revenues and social security contributions from State-owned enterprises and corporations, Other Entities and Trust Funds (ARS1,973.901 billion) are added, they represent 5.64% of the projected revenue and 5.62% of the distributed revenue. For the provinces, the amount distributed represents 33.07% of the projected revenue and 32.95% of distributed revenue. The difference refers to tax revenues and is equal to ARS 125.960 billion, which represents 0.4% of total tax revenue.

Figure 1: Distribution of tax and social security revenues. PP 2023

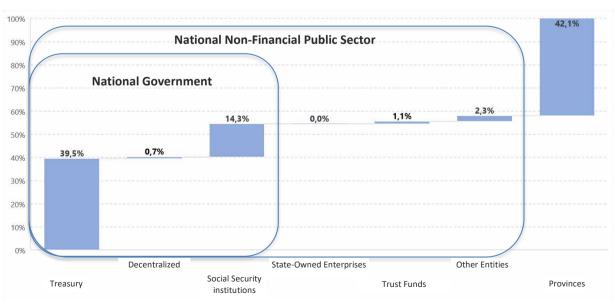
As a %



SOURCE: OPC, based on 2023 Budget Bill

Figure 2: Distribution of contributions. PP 2023

As a %



SOURCE: OPC, based on 2023 Budget Bill.

If we only analyze the distribution of tax revenues, excluding revenues from social security contributions, 54.5% are allocated to the National Government, and this percentage increases to 57.9% for the National Non-Financial Public Sector. The provinces receive 42.1% of these resources (Figure 2).

If social security contributions are added to the distribution, 30.97% of the total resources distributed are allocated to the Central Administration, 0.75% to Decentralized Agencies and 29.7% to Social Security Institutions. On the other hand, 4.78% are allocated to state-owned enterprises and corporations and other entities and 0.84% to trust funds, making a total of 67.05% allocated to the National Non-Financial Public Sector (Table 1 and Figure 1).

Table 2: Distribution by tax and institutional sector

In millions of ARS

		N	lational Governn	nent		Other NFPS	entities		Provi	nces	
Tax	Central Adı	ministration	Decentralized	Social Security	Total Central	State- owned enterprises and	Trust	Total National Public Sector	Federal Tax	Other	Total
	Treasury	Funds earmarked	Entities	Contributions	Adm.	corporations and other entities	Funds		Sharing	automatic transfers	
Income Tax	2,767,769	246,291			3,014,060	151,266		3,165,326	4,589,067	206,964	7,961,357
Wealth Tax	257,636	6,402	3		264,042	13,230		277,272		419,039	696,311
VAT Net of refunds	3,206,655	285,346		1,048,238	4,540,239	196,912		4,737,151	5,316,758	309,904	10,363,813
Internal Taxes	254,661	22,661			277,322	13,918		291,240	422,238	19,043	732,521
Import duties	735,903		110,426		846,329	16,392		862,721			862,721
Export Duties	2,632,921				2,632,921	50,994		2,683,916			2,683,916
Statistical rate on import operations	54,228	69,010	56,148		179,386	3,474		182,860			182,860
Fuels and carbon dioxide	94,079	19,363		194,117	307,559	14,400	222,534	544,493	39,316	174,103	757,912
Simplified regime for small taxpayers (monotributo)				48,964	48,964	1,355		50,319		20,985	71,304
Tax on Credits and Debits				2,399,767	2,399,767	46,479		2,446,245			2,446,245
PAIS Tax		83,601		167,203	250,804	119,179	35,829	405,812			405,812
Other taxes	25,495	27,523	31,031	38,935	122,983	12,691	56,097	191,771	20,683	933	213,387
Social Security Contributions		827	69,529	6,504,362	6,574,718	1,025,664		7,600,382			7,600,382
Total	10,029,347	761,026	267,136	10,401,585	21,459,095	1,665,954	314,460	23,439,508	10,388,062	1,150,971	34,978,541

SOURCE: OPC, based on 2023 Budget Bill Message.

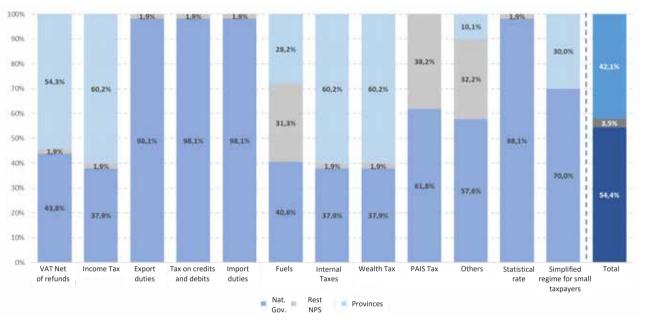
The Budget Bill Message does not include detailed information on the distribution of the total amount of revenues from national taxes and Social Security resources between the National Public Sector and the provinces, nor does it include a breakdown by tax based on the existing distributions. Consequently, to arrive at an approximation of the data presented in the Message, the information available in the Budget Bill and the attached schedules was reconstructed and assumptions and estimates were made with respect to the missing items at the time of preparing a distribution scenario consistent with the information presented (Table 2 and Figure 3).

The treatment of amounts collected and allocated to Trust Funds (particularly the surcharge on natural gas consumption that is allocated to the Trust Fund for Residential Gas Consumption),

generate discrepancies and it would be advisable to clarify them in the text of the Message, or to adopt a unified criterion among the different agencies involved to provide greater clarity to the information received by the Legislative Branch.

Figure 3: Distribution of tax revenues. PP 2023





SOURCE: OPC, based on 2023 Budget Bill Message.

Table 3 shows the main observations that should be considered in terms of revenue and distribution and the consequences generated at the time of disaggregating tax revenues for distributions.

Table 3: Observations on revenue and distribution

Concept	Observation	Source	Consequence
Total Tax Revenue	Insufficient information to perform an exact analysis of distribution. The grouping of taxes with different purposes makes this task difficult. As noted, the total amount shown in the Budget Bill Message differs from the total amount of resources distributed.	M p. 51	The collection of the grouped items must be reconstructed from the distribution information in the attached schedules or estimated.
Taxes on Liquid Fuels and Carbon Dioxide	Reconstruction of tax collection based on revenues from the Transportation Infrastructure System (FFSIT) and Water Infrastructure (FFIH) trust funds.	M p. 149	The same approximate collection amount is obtained (ARS748.715 billion). The estimated difference between the budgeted amount M p. 55 Fuels and Carbon Dioxide (ARS757.911,6 billion) should be treated as "Co2 (Fuel Oil, Coke and Mineral Coal)" for items j, k, I that are distributed through Federal Tax Sharing
Tax on Audiovisual Communication Services	Reconstruction of tax collection based on revenues from INCAA, ENACOM, Radio y Televisión Argentina Sociedad del Estado, Office of the Public Defender of Audiovisual Communication Services, National Theater Institute and National Music Institute.	AS No. 11 Title III AS No. 1 M p. 153 y 158	Different amounts are obtained depending on the allocation of revenues to be considered for the calculation. The amount obtained from the Office of the Public Defender of Audiovisual Communication Services, ENACOM and the National Institute of Music is similar (approximately ARS24.684 billion). The revenues resulting from reconstructing the amount of this tax through the amount budgeted to INCAA are higher.
Surcharge on Gas Consumption	The Fiduciary Fund for Residential Natural Gas Consumption is shown under Non-Tax Revenues but is included as revenues under the Undersecretariat of Public Revenues.	M p.149	The collection for this concept is estimated, but when added to the amount obtained for the rest of the fuels, it exceeds the total specified in the Message for all fuels, generating differences in the distribution.

Special Contribution on the Capital of Cooperatives	Reconstruction of tax collection from INAES revenues.	Title III AS No. 1	The figure obtained in this case (ARS13.278,93 billion) is higher but approximate to that estimated by the OPC.
Tax on airline tickets abroad	Reconstruction of tax collection based on revenues from the decentralized agency of the Ministry of Tourism and Sports	AS No. 11	The reconstructed revenue differs when comparing what was distributed. From the amount allocated to INPROTUR, it can be inferred that the collection for this concept amounts to ARS40.904 billion.
Indirect Tax on Online Gambling	Reconstruction of tax collection based on revenues from the State-owned company AR-SAT.	M p. 156	The figure obtained (ARS12 billion) is not estimated by the OPC, nor is it disaggregated within the national tax revenues.
Revenue Distribution	There is no unified detail and it had to be reconstructed from the Budget Bill Message and the attached Schedules.	M p. 51, 76, 149-151, 153- 154, 156-158 AS p. 73-74, 77-80, 677- 678, 681-687, 693, 698	The total distributed does not match total tax revenues.

^{*:} M = Budget Message; PA= Annexed Schedule

SOURCE: OPC, based on 2023 Budget Bill.

Estimated tax expenditures 2022 and 2023

The National Executive Branch presents the estimates of tax expenditures annually in each Budget Bill Message, describing certain methodological considerations that allow putting into context the scope of the figures and the manner in which to consider possible amendments to the legal framework that governs them.

Thus, the Executive Branch calls Tax Expenditure the amount of revenue that the Treasury ceases to receive when granting a tax treatment that deviates from that established in general tax legislation with the purpose of benefiting or favoring the development of certain activities, areas, classes of taxpayers, or consumptions. It refers to an implicit transfer of public resources implemented through a reduction of tax obligations in relation to a reference tax instead of a direct expenditure.

In addition, a long-term approach is used, so that only those treatments that meet the above definitions and represent definitive tax losses are considered tax expenditures, excluding from the calculation "the deferral of tax payments, accelerated amortization in Income Tax and the early refund of tax credits in Value Added Tax; these measures are mainly contained in different promotion regimes, because the loss of tax revenues in the years in which these benefits are used is offset by higher tax payments in subsequent years".

For its part, it is also made explicit the "legal approach" of the reference framework with respect to which the differential treatments mentioned are contrasted. "The structure of each tax established in the respective legislation (its object, rates, general deductions, exemptions) is taken as a reference and the cases that, within said framework, are benefited by a special treatment are identified." This approach allows considering the revenue foregone with respect to the legislation in force so that, in the absence of changes in taxpayer behavior in the face of changes in tax policy, it provides a measure of the loss of revenue with respect to the general treatment for the time at which the estimate is made. However, each legislation amendment will consitute a new frame of reference, not allowing a comparison of tax expenditure levels over time².

General Budget of the National Government 2023. Message. P. 53.

² OPC (2021) Tax Expenditures vs Fiscal Costs. Alternative Estimates in Income Tax. The Need for a Complementary Approach. December 2021. HTTPS://WWW.OPC.GOB.AR/POLITICA-TRIBUTARIA/GASTOS-TRIBUTARIOS-VS-COSTOS-FISCALES-ESTIMACIONES-ALTERNATIVAS-EN-EL-IMPUESTO-A-LAS-GANANCIAS-LA-NECESIDAD-DE-UN-ENFOQUE-COMPLEMENTARIO-DICIEMBRE-2021/

Finally, it is mentioned that an ex post calculation is made of the benefit to taxpayers at the time of estimation (Method of Income foregone (MIG3) which, as the Bill states "...assumes the inexistence of any change in the behavior of the agents and, therefore, tries to measure the benefit granted to the taxpayers favored by each differential tax treatment". Consequently, it warns that "... if the Tax Expenditure report is to be used as a tool to evaluate changes in the tax structure (such as eliminating or including exemptions), the necessary adjustments must be made to measure the reaction of the agents involved to quantify the impact of the changes on tax collection. Therefore, in these cases, additional information must be available, such as supply and demand elasticities, behavior in relation to evasion, among other aspects..."4

In summary, section 4.4 of the Message presents the tax expenditure estimates for 2023 and those referring to the year 2022. However, these are repeated in a different chapter in the form of a Separate note (see next section).

It may be concluded with respect to the presentation of tax expenditures and the Separte note that the adoption of the reference framework of the legislation in force and the long-term resource assignment approach allow conceptually associating the benefits granted with the possible revenue recovered in the event of the elimination of the tax concessions, although with the express caveat that the respective amount will only coincide for those cases in which taxpayers are not expected to change their behavior when the benefit received is modified.

"9. SEPARATE NOTE - Impact of Tax Expenditures on Public Accounts"

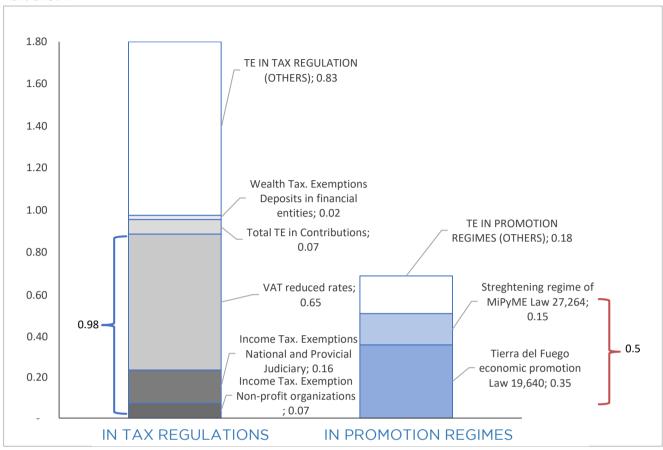
In this chapter, the Message makes explicit the purpose "to highlight the tax benefits that specific sectors of society receive at the expense of the sustainability of the public accounts." "... to facilitate their analysis by the legislators.", setting forth again the estimated tax expenditures for 2022 and 2023, extracting certain benefits totaling 60% of the total (1.48%) for the year 2023, on which valuation considerations from the Executive Branch are set forth, which are reproduced in the ANNEX within the total Tax Expenditures expressed in such structure (See ANNEX TAX EXPENDITURE STRUCTURE AND NATIONAL EXECUTIVE BRANCH CONSIDERATIONS)

³ OPC (2019) "Tax Expenditure Calculation Methodology." October 2019, p. 28. https://www.opc.gob.ar/politicatributaria/metodologia-del-calculo-del-gasto-tributario/

General Budget of the National Government 2023. Message. P. 52.

Figure 4: Tax expenditures (TE) with National Executive Branch considerations in the structure of the total

As % of GDP



SOURCE: 2023 Budget Message, pages 172 an 173

Finally, there is a Table "C. ESTIMATION OF OTHER BENEFITS NOT INCLUDED IN TAX EXPENDITURES" which would expose a series of benefits granted through resource reductions, both in the tax legislation and in promotion regimes, and others through direct subsidies, referring to said Table as follows: "... Likewise, there are other benefits not included in tax expenditures:", which lacks references of units of monetary measures and reference years that make its quantitative interpretation impossible, and for such reason is set forth verbatim⁵.

Said Table C contains a series of items on certain existing treatments which, in the interpretation of the OPC, refer both to tax items (items 1 to 12⁶; 14 to 17, and for which no data are estimated for 1, 2, 3, 5, 8, 14, 15 and 17) and to explicit subsidies (items 12, 13 and 18).

Within the tax items, there are items that do not represent tax expenditures because they are not included in the definitions explained above.

Thus, items 1, 2, 3, 6, 10, 11, 14, 15, 16 and 17 are included in the general definition of the tax in relation to the treatment of the taxpayers subject to the tax rates provided by law. For item 16: "VAT. Fees to the Board of Directors exempted from the Tax" (it is interpreted as referring to item 18 of subsection h. of section 7 of the tax), it does not represent a loss of resources within the general treatment of the tax because VAT, insofar as the tax amount can be taken as a tax credit by the company, unless a modification in the tax gives them treatment as "not computable".

⁵ General Budget of the National Government 2023. Message. P. 174.

⁶ The reference law grants both tax benefits (in the form of payment deferrals and income tax exemption for farms sold in a context of need) and subsidies, for which reason said item coincides in various classifications.

Table 4: Other benefits not included in tax expenditures

C. ESTIMATION OF OTHER BENEFITS NOT INCLUDED IN TAX EXPENDITURES	Amount	GDP %	Amount/ 2023 GDF
1. Income. ADRs are taxed at 7% instead of the general scale that reaches 35%	n/a		
2. Income. Dividends	n/a		
3. Income. Digital platforms without establishment in the country exempt	n/a		
4. Income. No deferral of inflation adjustment	237	0.39	315.55
5. VAT. Exemption for the lease of rural properties	n/a		
6. VAT refund exporters	112.32	0.19	153.73
7. VAT 60-day deferral for MIPYME	162.85	0.27	218.46
8. VAT IT equipment. Imported equipment at 10.5%	n/a		
9 Wealth Tax. Exemption rural properties	292	0.48	388.37
10. Employer contributions. Withholdings Sec. 22 Law 27,541	111.8	0.19	
11. Foreign trade. Refunds	240	0.4	323.64
12. Law 26.509 on Agricultural Emergency	6	0.01	8.09
13. Livestock Plan rate subsidies, and Min. of Productive Development programs	90	0.16	129.46
14. Wealth Tax. Substitute liable party. Assets and shares. For 0.50% on the difference	n/a		
15. Income. Livestock. Valuation at historical price. Could be valued at replacement/market price	n/a		
16. VAT. Exempt Board of Directors fees	162	0.29	233.02
17. Income. Foreign source income from the purchase and sale of securities and shares in hard currency	n/a		
18. REPRO General Subsidy	11.5	0.02	16.18
TOTAL OTHER BENEFITS	1,425.47	2.4	

SOURCE: 2023 Budget Message, page 174

9. Wealth Tax. Exemption rural properties

Items 4, 7, and 12 involve deferrals in the payment of various taxes, so that in the long-term approach used, they would not represent a change in revenues.

Finally, there are tax treatments that have not been included in the Tax Expenditure Schedule but could be included if estimated. These are the VAT exemptions on rural property leasing (item 5); the reduced 10.5% tax rate applied to imported computers sold as final goods (item 8); and the Wealth tax exemption applied to rural property (item 9).

Table 5: Classification of the items in Table "C" based on the estimated tax expenditures approach

These are not Tax Expenditures since they are part of the general tax framework. (Frame of Reference: Legal)
1. Income. ADRs are taxed at 7% instead of the general scale that reaches 35%
2. Income. Dividends
3. Income. Digital platforms without establishment in the country exempt
6. VAT refund exporters
10. Employer contributions. Withholdings Sec. 22 Law 27,541
11. Foreign trade. Refunds
14. Wealth Tax. Substitute liable party. Assets and shares. For 0.50% on the Asset/Liability
difference
15. Income. Livestock. Valuation at historical price. Could be valued at replacement/market price
16. VAT. Exempt Board of Directors fees
17. Income. Foreign source income from the purchase and sale of securities and shares in hard
currency
They are not tax expenditures because they do not represent a permanent loss of revenue.
(Long-Term Approach)
4. Income. No deferral of inflation adjustment
7. VAT 60-day deferral for MIPYME
12. Law 26,509 on Agricultural Emergency (for the deferral portion)
These could be included as Tax Expenditures
(because they generate a permanent loss of revenue and deviate from the general treatment)
5. VAT. Exemption for the lease of rural properties
8. VAT IT equipment. Imported equipment at 10.5%

Direct subsidies
13. Livestock Plan rate subsidies, and Min. of Productive Development programs
18. REPRO General Subsidy

SOURCE: OPC, based on the tax expenditure methodology outlined in PP2023 Message

Tax Shares

Tax shares for fiscal year 2023 are set forth in Chapter IV of the Bill and are comprised from Section 23 to Section 30, inclusive.

With respect to Law 27,591, tax shares show a total increase of 73.7%. Among the most outstanding increases are those allocated to the National Institute of Technological Education (+200% YoY), the promotional benefits provided for in Sections 8 and 9 of Law No. 27,506, as amended, on the Promotion of the Knowledge Economy (+191.7% YoY), and the promotional benefits provided for in Sections 6 and 7 of Law 26,270, as amended, on the Promotion of the Development and Production of Modern Biotechnology (+150% YoY).

Likewise, there were decreases in those allocated to the Ministry of Labor, Employment and Social Security for labor training actions (-38.5% YoY) and the promotional benefits provided for in Section 9 of Law 26,190, as amended, on the National Promotion of the Use of Renewable Energy Sources to produce Electric Energy (-3.5% YoY).

Table 6: Tax shares under the Budget Bill

	RE (in ons)	YoY	ALLOCATION	SECT	ΓΙΟΝ	OBSERVATIONS
2023	Law 27,591 (2021)	var.	ALLOCATION	2023	2021	OBSERVATIONS
17,862	18,500	-3.5%	Promotional benefits provided for in Section 9 of Law 26,190, as amended, on the Promotion of the Use of Renewable Energy Sources for the Production of Electric Energy	23	29	Accelerated income tax amortization and early VAT refund in accordance with Law 26,360.
500	300	66.7%	Promotional benefits provided for in Section 28 of Law 27,424, as amended, on the Promotion Regime for the Distributed Generation of Renewable Energy Integrated to the Public Electricity Grid	24	30	Tax credit certificates to be applied to the payment of national taxes.
1,500	500	200.0%	National Institute of Technological Education	25	31	
490	300	63.3%	Secretariat of Industry and Productive Development (Ministry of Economy)	25	31	Changes the name of the recipient (before: Secretariat of Small and Medium Enterprises and Entrepreneurs of the Ministry of Productive Development)
400	650	-38.5%	Ministry of Labor, Employment and Social Security (training actions).	25	31	
2,390	1,450	64.8%	Section 3, Law 22,317	25	31	Tax credit certificates to be applied to the payment of national taxes
3,000	2,000	50.0%	Annual share established in section 9, subsection b) Law 23,877, as amended, on the Promotion and Encouragement of Technological Innovation	26	32	Tax credit certificates to be applied to the payment of national taxes
700	280	150.0%	Promotional benefits provided for in Sections 6 and 7 of the Law 26,270, as amended, on the Promotion of the Development and Production of Modern Biotechnology.	27	33	Accelerated amortization of income tax. Early VAT refund. Tax credit certificate to be applied to the payment of national taxes
3,500	3,500	0.0%	Tax benefits provided for in Section 97 of Law 27,467	28	34	VAT exemption for beneficiaries of the social housing program

70,000	24,000	191.7%	Promotional benefits provided for in sections 8 and 9 of Law 27,506, as amended, on the Promotion of the Knowledge Economy	30	105	Share for 2021 includes promotional benefits for 2020 with respect to the beneficiaries whose inclusion in the regime has been retroactively provided for in the second paragraph
70,000	24,000	191.7%		30	105	
112.952	65.030	73.7%		TOTAL		

SOURCE: 2023 Budget Bill and Law 27,591

Tax Policy and Administration. Revenues, concepts, and beneficiaries involved

The Budget Bill for 2023 has 20 sections related to tax policy or administration, which together involve 204 specific measures on the national tax system. To provide a summary of the tax policy and administration measures, the sections were transcribed with the database imprint. The fields identified for each section were:

- Year: Fiscal year
- Chapter
- Section
- Type of policy
- Revenue type: tax, non-tax
- Concept: detail of tax, rate, or other resource allocated
- Beneficiary (group)
- Beneficiary (detail)
- Activity involved
- Observations

In general terms, the way the sections are drafted is a conditioning aspect for the development of this task since it is not always possible to identify assigned revenues. Such is the case when benefits are established that affect the collection of "national revenues" instead of detailing the specific concept that will be involved. However, compared to the sections included in the Budget Bill for the current fiscal year -which was not approved-, PP2023 presents a more exhaustive definition of assigned revenues.

Description of the Tax Policy

The 2023 Budget Bill addresses tax policy and administration decisions from Section 54 to Section 72, inclusive. Unlike Law 27,591, which only contained 7 sections referring to this subject, for fiscal year 2023 this number was increased to 18.

The policies to be applied in 2023 are:

- Exemptions and exclusions: certain economic agents will be relieved from the payment of tax and non-tax items
- Refunds: part of the amount paid to the tax authorities for certain taxes will be refunded
- **Remission**: past obligations pending compliance will be forgiven
- **Laundering**: the possibility of regularizing the tax situation of taxpayers who have omitted information to the tax authorities will be offered
- **Tax assessment**: aspects related to the setting of tax rates.

- **Delegation of powers**: the Legislative Branch will delegate to the Executive Branch powers duly granted by Law.
- Actions related to the tax procedure

Table 7 shows the detail of the referred policies by section, the concepts -tax and non-tax- that will be impacted during 2023 and their comparison with those detailed in Law 27,591.

A significant increase in exemptions and exclusions is forecast for 2023 (sections 54 to 63, 69 and 70).

Table 7: Exemptions and exclusions by assigned revenue

TYPE OF POLICY	2023	2021
EXEMPTION		
IMPORT DUTIES	15	
INTERNAL TAXES	8	
VAT	14	1
STATISTICAL RATE	15	
VERIFICATION RATE	15	
AIRPORT SERVICES FEES	15	
PORT SERVICES FEES	15	
EXCLUSION		
IMPORT DUTIES	13	2
INCOME TAX	1	
INTERNAL TAXES	3	
NATIONAL TAXES	1	2
LIQUID FUELS TAX AND CARBON DIOXIDE TAX	1	1
VAT	20	2
STATISTICAL RATE	13	
VERIFICATION RATE	13	
AIRPORT SERVICES FEES	13	
PORT SERVICES TAXES	13	
CUSTOMS FEES OR TARIFFS		2
PORT FEES OR TARIFFS		2
TOTAL	188	12

SOURCE: 2023 Budget Bill and Law 27,591

In addition to these policies, measures such as VAT refunds for the company *Energía Argentina S.A.*, (Section 64), the remission of obligations related to the President Néstor Kirchner Natural Gas Pipeline (Section 65), actions related to the tax procedure in tax foreclosure proceedings for bank accounts and institutions (Section 66), delegation of powers related to Income Tax (Section 67), aspects related to the assessment of Social Security contributions (Section 68) and a disclosure regime (laundering) of foreign currency holdings (Sections 71 and 72).

Table 8: Delegated powers

TAX	2023	2021
INCOME TAX	Х	
EXPORT DUTIES	Х	
STATISTICAL RATE		X

SOURCE: 2023 Budget Bill and Law 27,591

These measures exceed those established in Law 27,591, which consisted mainly of exemptions and exclusions (Sections 59 to 63), in the assessment of non-tax rates and the Statistical Rate (Sections 64 and 65, respectively).

Table 9: Other tax measures

POLICY TYPE	2023	2021
LAUNDERING	X	
REMISSION	Х	
REFUNDS	Х	
ASSESSMENT OF TAXES AND RATES	Х	X
ACTIONS RELATED TO TAX PROCEDURE	X	

SOURCE: 2023 Budget Bill and Law 27,591

As for the number of items impacted by tax policy and administration decisions, it is worth noting the increase that will take place in 2023 with respect to those mentioned in Law 27,591. Whereas in 2021 the main benefits were mainly related to VAT and Import Duties, in 2023 the number of tax and non-tax revenues that will be impacted by a measure will be increased.

Table 10: Assigned revenues by type of policy

Table 10: Assig													
	POLICY TYPE												
REVENUE TYPE AND		2023 2021											
CONCEPT	EXCLUS ION	EXEMPT ION	REMISS ION	TAX PROCED URE	DELEGA TION OF POWERS	TAX ASSESSM ENT	LANDER ING	REFU ND	TOT AL	EXCLUS ION	EXEMPT ION	RATE ASSESSM ENT	TOT AL
NON-TAX	45	39	3						87		4	4	8
ACCESSORIES			1						1				
COMPENSATION												1	1
REFUNDS												1	1
INTEREST			1						1			1	1
FINES			1						1				
REIMBURSEMENTS												1	1
VERIFICATION RATE	15	13							28				
AIRPORT SERVICES FEES	15	13							28				
PORT SERVICES FEES	15	13							28				
CUSTOMS FEES OR TARIFFS											2		2
PORT FEES OR TARIFFS											2		2
TAX	52	52	2		2	2	1	1	112	1	7	1	9
EMPLOYEE CONTRIBUTIONS						1			1				
EMPLOYER CONTRIBUTIONS						1			1				
EXPORT DUTIES					1				1				
IMPORT DUTIES	15	13							28		2		2
INCOME TAX		1			1				2				
EXCISE TAX							1		1				
INTERNAL TAXES	8	3							11				
NATIONAL TAXES		1	1						2		2		2
LIQUID FUELS TAX AND CARBON DIOXIDE TAX		1							1		1		1
VAT	14	20						1	35	1	2		3
STATISTICAL RATE	15	13							28			1	1
CUSTOMS TAXES			1						1				
OTHER CONCEPTS				3					5				

EMBARGOES				1					1				
INTERIM RELIEF MEASURES				1					1				
PRECAUTIONARY MEASURES				1					1				
UNDECLARED FUNDS							2		2				
TOTAL	97	91	5	3	2	2	3	1	204	1	11	5	17

SOURCE: 2023 Budget Bill and Law 27,591

Another characteristic feature of PP2023 is the increase in the number of beneficiaries on which the tax policy and administration provisions will fall.

During 2023, companies will be the main beneficiaries of exemptions and exclusions; in general, the benefit falls on imports that will not pay Import Duties, Statistics Rate, Internal Taxes, VAT and several non-tax rates. Next in importance are government institutions, for the same concepts. The policies other than exemptions and exclusions are limited in scope, generally falling on a single beneficiary.

In comparison with Law 27,591, it is worth mentioning that the main beneficiaries of the policies at that time were government institutions. Such was the case of the exemptions granted on various concepts associated with the importation of vaccines and disposables in the context of the COVID-19 pandemic.

Table 11: Type of Beneficiaries by Section

Type of beneficiary	Sect	ion	Observations
	2023	Law 27,591	
Companies	54, 56, 57, 58, 60, 62, 63, 64, 66, 68, 69, 70	63	The company name and CUIT number are mentioned. These may be state-owned or privately held.
Economic activities	55	59	Such is the case of the import of fuels.
Infrastructure works	65		A special treatment is identified for the Néstor Kirchner Natural Gas Pipeline.
Promotion regime beneficiaries	71 and 72		Such is the case of the beneficiaries of the incentive regime for the Argentine investment, construction, and production and of the incentive regime for the Argentine investment and production.
Government	59, 60, 61, 62, 67, 69	60, 61, 64 and 65	Includes the National Government, the Provinces, the Autonomous City of Buenos Aires, and certain entities of the NFPS.
International organizations		60 and 61	Such is the case of the Pan American Health Organization Revolving Fund.

SOURCE: 2023 Budget Bill and Law 27,591

October, 2022

Table 12: Tax Policy Benefits by Recipient and Type of Activity

Tax Policy Benefits by Recipient and Type of Activity	2023	2021
<i>ADMINISTRACIÓN DE INFRAESTRUCTURAS FERROVIARIAS SOCIEDAD DEL ESTADO</i> (C.U.I.T. No. 30-71069599-3)	7	
IMPORTS	6	
PROVISION OF SERVICES ABROAD	1	
NATIONAL ADMINISTRATION OF CIVIL AVIATION (C.U.I.T. 30-71088474-5)	7	
IMPORTS	7	
DOCKYARDS REGISTERED IN THE NATIONAL PORT REGISTRY	6	
IMPORTS	6	
PUBLIC PORTS LOCAL AUTHORITIES	13	
IMPORTS	13	
BELGRANO CARGAS Y LOGÍSTICA SOCIEDAD ANÓNIMA (C.U.I.T. No. 30-71410144-3)	7	
IMPORTS	6	
PROVISION OF SERVICES ABROAD	1	
BENEFICIARIES OF THE INCENTIVE REGIME FOR ARGENTINE INVESTMENT AND PRODUCTION	2	
GENERAL	2	
BENEFICIARIES OF THE INCENTIVE REGIME FOR ARGENTINE INVESTMENT, CONSTRUCTION AND PRODUCTION	1	
GENERAL	1	
COMPAÑÍA ADMINISTRADORA DEL MERCADO MAYORISTA ELÉCTRICO SOCIEDAD ANÓNIMA (C.U.I.T. No. 30-65537309-4)	1	
IMPORTS	1	
ACCOUNTS AND BANKS	3	
TAX ENFORCEMENT PROCEDURES	3	
<i>DESARROLLO DEL CAPITAL HUMANO FERROVIARIO SOCIEDAD ANÓNIMA</i> MAJORITY STATE- OWNED (C.U.I.T. No. 30-66350282-0)	7	
IMPORTS	6	
PROVISION OF SERVICES ABROAD	1	
EMPRESA ARGENTINA DE NAVEGACIÓN AÉREA SOCIEDAD DEL ESTADO (C.U.I.T. No. 30- 71515195-9)	12	
IMPORTS	7	
REIMPORT	5	
STATE-OWNED ENTREPRISES	7	
PRODUCTION LA PLATA FREE TRADE ZONE	7	
ENERGÍA ARGENTINA SOCIEDAD ANÓNIMA (C.U.I.T No. 30-70909972-4)	10	
ACQUISITIONS FOR INFRASTRUCTURE WORKS FOR THE SUPPLY OF NATURAL GAS	1	
GENERAL	1	
IMPORTS	7	
SALES OF IMPORTED NATURAL GAS TO SUPPLY THE ELECTRICITY GENERATION MARKET.	1	
GOVERNMENT ENTITIES	7	
PRODUCTION LA PLATA FREE TRADE ZONE	7	
NATIONAL GOVERNMENT	20	1
IMPORTS	19	1
PROVISION OF SERVICES ABROAD	1	
FERROCARRILES ARGENTINOS SOCIEDAD DEL ESTADO (C.U.I.T. No. 30-71525570-3)	7	
IMPORTS	6	
PROVISION OF SERVICES ABROAD	1	
	12	

IMPORTS	7	
"PRESIDENT NÉSTOR KIRCHNER NATURAL GAS PIPELINE" WORKS	5	
IMPORTS	1	1
IMPORTS	1	1
IMPSA S.A. (CUIT No. 30-50146646-4)	7	
IMPORTS	7	
INTERCARGO S.A.U. (C.U.I.T. No. 30-53827483-2)	12	
IMPORTS	7	
REIMPORTACIÓN	5	
OPERADORA FERROVIARIA SOCIEDAD DEL ESTADO (C.U.I.T. No. 30-71068177-1)	7	
IMPORTS	6	
PROVISION OF SERVICES ABROAD	1	
REGULATORY AGENCY OF THE NATIONAL AIRPORT SYSTEM (C.U.I.T. No. 30-69349421-0)	11	
IMPORTS	6	
REIMPORT	5	
NATIONAL EXECUTIVE BRANCH	2	
GENERAL	1	
EXPORTS	1	
PROVINCES AND AUTONOMOUS CITY OF BUENOS AIRES	20	
IMPORTS	19	
PROVISION OF SERVICES ABROAD	1	
STATE CORPORATIONS	13	
IMPORTS	6	
PRODUCTION LA PLATA FREE TRADE ZONE	7	
MINISTRY OF HEALTH		5
IMPORTS		5
PAN AMERICAN HEALTH ORGANIZATION REVOLVING FUND		5
IMPORTS		5
ROAMING SERVICE PROVIDERS		1
INTERNATIONAL ROAMING SERVICE		1
MINISTRY OF ECONOMY		4
TAX AND CUSTOMS PROCEDURES		4
BENEFICIARIES OF THE "PUENTE AL EMPELO" PROGRAM	2	
GENERAL	2	

SOURCE: 2023 Budget Bill and Law 27,591

ANNEX 1: TAX EXPENDITURE STRUCTURE AND NATIONAL EXECUTIVE BRANCH CONSIDERATIONS

Table 13: Summary of Tax Expenditures

TAX EXPENDITURE	2022				
	Millions of ARS	GDP %	Millions of ARS	GDP %	Structure %
TOTAL TAX EXPENDITURE	2,185,415.7	2.68	3,664,818.4	2.48	100.00
IN TAX REGULATIONS	1,571,289.7	1.93	2,669,761.3	1.81	72.85
IN PROMOTION REGIMES	614,126.0	0.75	995,057.1	0.68	27.15
Exec. Branch valuation considerations	1,340,080.4	1.65	2,181,032.3	1.48	59.51

Table 14: Tax Expenditures in Tax Policy

TAX EXPENDITURE	2022 Millions of	GDP	Millions of	2023 GDP	Structure	EXECUTIVE BRANCH CONSIDERATIONS
TOTAL IN TAX REGULATIONS	ARS 1,571,289.7	% 1.93	ARS 2,669,761.3	% 1.81	% 72.85	EXECUTIVE BRANCH CONSIDERATIONS
	, ,					
INCOME TAX - Exemption	230,445.9 230,445.9	0.28	401,127.7 401,127.7	0.27 0.27	10.95 10.95	
1. Income of partnerships, foundations, mutual and cooperatives.	82,732.4	0.10	107,281.6	0.07	2.93	"Benefit review evaluating economic impact, optimization of the benefited universe and improvement of traceability. Part of the benefited universe comprises banks and insurance companies."
2. Special deduction for workers in an employment relationship who develop their activity in Patagonia	18,608.3	0.02	55,995.9	0.04	1.53	
3. Income derived from the exploitation of copyrights and all other income from rights protected by Law No. 11,723					-	
 Income obtained by individuals residing in the country from the purchase and sale of shares and other securities traded on stock exchanges 					-	
5. Exemption of income of judges and officials of the national and provincial Judicial Branches	129,105.2	0.16	237,850.2	0.16	6.49	" It would not consider a public policy associated with this benefit. It has a negative influence on the equity, equality, and progressivity of the tax in relation to the rest of the salaried taxpayers."
VALUE ADDED TAX Exemptions	999,700.2 444,518.4	1.22 0.54	1,737,193.9 776,230.2	1.18 0.53	47.40 21.18	
 Medical benefits to union-run health insurances and INSSJyP Educational services 	177,995.3 88,097.9	0.22 0.11	307,978.5 158,588.9	0.21 0.11	8.40 4.33	
3. Interest on loans from banks to national, provincial, and municipal governments	6,995.1	0.01	9,306.9	0.01	0.25	
Interest on housing loans Medicines for human use. Wholesale and retail sales	10,660.2 69,193.4	0.01 0.08	12,374.3 123,426.0	0.01 0.08	0.34 3.37	
6. Sales to final consumers, State, and non-profit associations of: Fluid or powdered milk, whole or skimmed without additives	4,888.9	0.01	8,505.5	0.01	0.23	
7. Sports associations and amateur sporting events 8. Books, brochures, and printed matter	3,040.1 30,699.1	0.04	5,472.6 55,262.7	0.04	O.15 1.51	
Publishing and sale of newspapers, magazines, and periodicals	52,948.4	0.06	95,314.8	0.06	2.60	
11. Tickets to theatre performances, concerts and musical recitals, and personal services of theater employees 12. Services of lottery agencies and others operated by the government					-	
- Reduced rates	555,181.8	0.68	960,963.7	0.65	26.22	"Evaluate the impact and result of the measure granted to each sector involved, considering the incidence of the tax at eac stage of the commercial chain. It increases the regressivity of the tax that reduced tar rate is applied both to works of art, prepain medicine, bakery products and housing
1 Haveing acceptanting	150.077.0	0.00	275.645.0	0.19	7.52	construction."
1. Housing construction 2. Meat, fruits, pulses and produce	159,973.6 265,701.7	0.20 0.32	275,645.9 445,674.9	0.30	12.16	
3. Prepaid health care and its providers 4. Bakery products	53,742.9 75,763.6	0.07	103,257.5 136,385.4	0.07	2.82 3.72	
5. Works of art	73,703.0	0.09	130,363.4	0.09	-	
TAXES ON FUELS	169,776.1	0,21	380,406.8	0.26	10.38	
Difference between the rates applied to gasoline and diesel oil	107,869.1	0.13	261,349.6	0.18	7.13	
The 45% tax on liquid fuels contained in purchases of gas oil for the respective activities is computed as payment on account of Value Added Tax (Transportation Services) and ncome Tax (Agricultural and Mining Activity).	24,072.6	0.03	27,476.4	0.02	0.75	
Exemption of liquid fuels to be used in the southern region of the country	29,436.0	0.04	69,505.6	0.05	1.90	
Reduction of the Tax on Fuels, Law 23,966, for the inclusion of non-taxed biodiesel.	8,398.0	0.01	22,074.3	0.01	0.60	
Exemption from Fuel Tax for biodiesel used in the generation of electric energy	0.4	-	0.9	-	0.00	

					-	
SOCIAL SECURITY CONTRIBUTIONS	103,774.8	0.13	105,275.1	0.07	2.87	"The associated public policy must have a time limit or with a gradual reduction, with the measurement of the related impact."
1. Reduction of employer contributions by geographical area (difference with respect to that in force in the City of Buenos Aires). E.O. 814/2001 as amended.	44,980.9	0.06	51,945.0	0.04	1.42	
2. Textile sector and regional economies. Amount of the deduction at 100%, equivalent to the maximum amount. E.O. 814/2001 as amended.	3,815.7	-	3,871.9	-	0.11	
3. Audiovisual Media Services. Employer's contributions as VAT tax credit (Law 27467, Sec. 91).	15,882.2	0.02	28,126.8	0.02	0.77	
4. REPRO II. E.O. 232/2021	8,921.8	0.01	-	-	-	
5. Health Sector. E.O. 34/2021	29,472.6	0.04	20,056.1	0.01	0.55	
6. Norte Grande. E.O. 191/2021	300.2	-	601.3	-	0.02	
7. Youth Employment 493/21 and 711/21	332.8	-	530.7	-	0.01	
8. Actors. Maximum taxable base. E.O. 830/2021	68.6	-	143.3	-	0.00	
INTERNAL TAXES	4,270.4	0.01	5,596.4	-	0.15	
Difference in the tax rate on non-alcoholic beverages and syrups, depending on whether they include a minimum content of fruit juice.	4,270.4	0,01	5,596.4	-	0.15	
WEALTH TAX	25,928.5	0.03	33,729.0	0.02	0.92	
WEALIN IAX	25,526.5	0.03	33,729.0	0.02	0.52	"The eventual loss of collection due to the
1. Exemption of deposits in financial entities	25,928.5	0.03	33,729.0	0.02	0.92	tax exemption in relation to rural property both in the country and abroad should be added."
2. Exemption of cooperative membership fees					-	
TAX ON CREDITS AND DEBITS ON BANK ACCOUNTS	37,393.8	0.05	6,432.4	_	0.18	
1. Health Care Activities Employers. Rate reduction. E.O. 300/2020	37,393.8	0.05	6,432.4	-	0.18	

Table 15: Tax Expenditures by Economic Promotion Regimes

TAX EXPENDITURE	2022 2023					
	Millions of ARS	GDP %	Millions of ARS	GDP %	Structure %	EXECUTIVE BRANCH CONSIDERATIONS
OTAL IN PROMOTION REGIMES	614,126.0	0.75	995,057.1	0.68	27.15	
- Industrial promotion. E.O. No. 2,054/92, 804/96,	38,972.3	0.05	24,199.9	0.02	0.66	
,553/98 and 2,334/06.	•		•			
VAT exemption on purchases and balance	38,078.0 894.2	0.05	23,563.0 636.9	0.02	0.64 0.02	
Income Tax Exemption I - Non-industrial promotion. Law No. 22,021 and E.O. No.		-		-		
35/06.	0.9	-	0.5	-	0.00	
Income Tax Exemption	0.9	-	0.5	-	0.00	
I - Promotion of mining activity. Law No. 24,196	22,329.3	0.03	58,074.3	0.04	1.58	
Income Tax. Various benefits	3,640.2	-	6,552.9	-	0.18	
Tax stability: various taxes	813.2	-	1,463.8	-	0.04	
Import duties exemption	17,875.9	0.02	50,057.5	0.03	1.37	
						"Regime in force since the 70's, with the
V - Economic promotion of Tierra del Fuego. Law No. 9,640	290,309.3	0.36	519,720.3	0.35	14.18	main objective of promoting the increase the population in the Island. Review of the associated current public policy, and possible gradual reduction of the benefit.
VAT exemption on purchases and sales	132,182.8	0.16	236,333.9	0.16	6.45	
Income Tax Exemption	37,143.7	0.05	88,571.7	0.06	2.42	
Import duties exemption	58,905.8	0.07	91,873.1	0.06	2.51	
Reduced Internal Tax rate on electronic products	62,077.0	0.08	102,941.6	0.07	2.81	
- Refund on sales of domestically manufactured capital oods. E.O.379/01	10,579.7	0.01	13,630.3	0.01	0.37	
- Payment of national taxes with tax credit bonds	10,579.7	0.01	13,630.3	0.01	0.37	
I - Promotion of Reciprocal-Guarantee Companies. Law No. 4,467.	20,156.4	0.02	23,011.9	0.02	0.63	
Deduction in Income Tax of capital contributions and those lestined to the risk fund, of the protecting partners and articipants in the reciprocal- guarantee companies.	18881.8	0.02	21,355.0	0.01	0.58	
Income Tax exemption for reciprocal-guarantee companies.	432.7	-	562.5	-	0.02	
Value Added Tax exemption on income of reciprocal- juarantee companies	841.8	-	1,094.4	-	0.03	
/II - Regime for the promotion and encouragement of cientific and technological research and development. Law (3,877. (*)	374.3	-	1,122.8	-	0.03	
Payment of income tax with tax credit certificates.	374.3	-	1,122.8	-	0.03	
'III - Regime for the Promotion of Technical Education. Law 2,317. (**)	2,210.0	-	2,390.0	-	0.07	
Payment of any national tax with tax credit certificates.	2,210.0	-	2,390.0	-	0.07	
K - Investment regime for cultivated forests. Law No. 5,080	116.5	-	135.4	-	0.00	
Tax stability. Exemption of Export Duties	103.0	-	116.6	-	0.00	
Tax stability. Exemption of Taxes on Credits and Debits in current Accounts	13.5	-	18.7	-	0.00	
(- Regime for the promotion of Knowledge Economy. Law 7,506 (***)	31,609.4	0.04	53,036.4	0.04	1.45	
Amount of the deduction at 100%, equivalent to the naximum amount (Section 8) and tax credit bonus, equivalent to 1.6 times the amount of employer contributions	21,303.5	0.03	38,146.5	0.03	1.04	

- Income Tax	10,305.9	0.01	14,889.9	0.01	0.41	
XI - Regime for the Promotion of the Argentine Naval Industry. Law 27,418	96.2	-	163.1	-	0.00	
- Exemption of Import Duties	96.2	-	163.1	-	0.00	
XII - Regime for the production and sustainable use of biofuels. Laws No. 26,093 and 26,334. Bioethanol.	21,179.0	0.03	46,679.2	0.03	1.27	
- Non-taxability of Fuel Tax. Law No. 23,966	21,179	0.03	46,679.2	0.03	1.27	
XIII - Regime for the Promotion of the Use of Renewable Energy Sources. Laws No. 26,190 and 27,191.	10,161.2	0.01	15,918.1	0.01	0.43	
- Payment of national taxes with tax credit certificates and exemption of Import Duties	10,161.2	0.01	15,918,1	0,01	0.43	
XIV - Regime for the strengthening of micro, small and medium-sized companies. Law No. 27,264.	153,048.4	0.19	216,212.4	0.15	5.90	"The traceability between bank perceptions effectively credited with those computed as payment on account of Income Tax should be considered. Since both taxes have different allocations of the revenue, it reduces the tax collection impact of a progressive tax part of the Federal Tax Sharing regime."
- Payment on account in income tax of 100% tax on credits and debits on current accounts	153,048.4	0.19	216,212.4	0.15	5.90	
XV- Argentine Auto parts Regime. Law No. 27,263. - Payment of national taxes with tax credit certificates - Exemption of Import Duties	12,218.0 6,600.0 5,618.0	0.01 0.01 0.01	19,815.9 7,881.6 11,934.3	0.01 0.01 0.01	0.54 0.22 0.33	
XVI - Regime to Support Entrepreneurial Capital. Law No. 27,349.	39.1	-	70.4	-	0.00	
- Deduction of investment contributions in Income Tax	39.1	-	70.4	-	0.00	
XVII - Regime for the promotion of distributed generation of renewable energy integrated to the public electric grid. Law 27,424 Sec. 28 (****)	726.0	-	876.2	-	0.02	
- Payment of national taxes with tax credit certificates	726.0	-	876.2	-	0.02	

^(*) Section 26 of the Bill establishes for the total amount of national taxes a share of ARS3 billion for 2023.

^(**) Section 25 of the Bill establishes a share of ARS2.39 billion for 2023.

^(***) Section 30 of the Bill establishes for Sections 8 and 9 of Law a share total of ARS70 billion for 2023.

^(****) Section 24 of the Bill establishes an annual share of AR500 million for 2023, allowing the allocation to subsequent periods of shares not allocated in the period in which they were determined.

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This report does not contain binding recommendations.

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