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РОЛЬ МІСЦЕВИХ ПОДАТКІВ В СТИМУЛЮВАННІ ЕКОНОМІЧНОГО СПІВРОБІТНИЦТВА ТЕРИТОРІАЛЬНИХ ГРОМАД

Актуальність. Місцеві податки і збори являють собою засіб наповнення бюджетів базового рівня не лише в прямому сенсі, коли виконується фіскальна функція таких податків, але і в тому випадку, коли активізується регуляторна функція таких податків і органи місцевої влади отримують можливість покращувати стан ділового клімату власної економічної мезосистеми та змінювати її структуру, надаючи перевагу найбільш перспективним видам економічної діяльності. Наразі в Україні прийнято загальну інституціональну рамку, яка робить можливим провадження економічного співробітництва територіальних громад, але положення законодавчого, методичного, рекомендаційного характеру щодо використання місцевих податків як стимуляторів розвитку міжрегіональної кооперації і активаторів укладання договорів про співпрацю на основі збільшення доданої вартості і ефективного залучення місцевих ресурсів в процес екзогенного економічного обміну ще не розроблені. Тому вирішення такої науково-прикладної задачі як розробка методичних положень щодо використання місцевих податків як інструментів стимулювання економічного співробітництва громад і збільшення доданої вартості, що утворюється в їхніх територіально-господарських системах, є актуальною темою досліджень в національному та міжнародному масштабах, стосовно регіональних систем країн, що розвиваються або для розвинених країн, де роль ініціатив локальних органів економічного та адміністративного управління реалізована неповною мірою.

Мета та завдання. Метою даної наукової статті є визначення науково-методичних положень щодо використання місцевих податків як регуляторів ділової активності та активізаторів процесів економічного співробітництва і створення збільшеної доданої вартості, встановлення переліку ключових місцевих податків, за допомогою яких можливим є здійснення регуляторних заходів, а також визначення типів і груп податків, які є найбільш ефективними засобами впливу на ділову активність, з позицій стимулювання економічного співробітництва та утворення горизонтальних зв'язків між учасниками кооперації та поділу праці в територіальних громадах.

Результати. Розглянуто теоретичні, інституціональні та науково-прикладні засади провадження економічного співробітництва територіально-господарських систем в Україні та в інших країнах світу. Встановлено, що провадження міжрегіонального, внутрішньорегіонального та міжнародного співробітництва громад позитивно впливає на рівень економічного розвитку країн, оскільки завдяки формуванню точок концентрації капіталу та ділової активності збільшуються темпи економічного зростання, ефективніше використовуються локальні ресурси, збільшуються додана вартість і глибина переробки сировини, розвиваються горизонтальні зв'язки та відбувається активне включення території до процесів міжнародного розподілу праці. Завдяки сформованим на засадах економічного співробітництва точкам економічного зростання у вигляді агломерацій, кластерів, субрегіонів та інших форм територіально-господарських об'єднань для розвинених країн світу (Австрії, Іспанії, Німеччини, Великобританії) стало

характерним переважне створення валового продукту (від 50% до 70%) саме в таких територіально-господарських об'єднаннях. На основі проведеного аналізу нормативної бази та інших складових інституціонального забезпечення провадження економічного співробітництва в розвинених країнах світу визначено, що загальної інституціональної рамки і легалізації інструменту співпраці для ефективного економічного розвитку є замало, оскільки мають бути запроваджені важелі державного регулювання та стимулювання, зокрема у вигляді заходів податкової підтримки. В даному аспекті місцевим податкам і зборам приділено особливу увагу, тому що ініціативи місцевих органів влади мають підкріплюватись певними повноваженнями щодо регулювання економічного розвитку громад. Найбільш ефективно на сучасному етапі розвитку вітчизняних територіально-господарських систем в Україні в якості регуляторів можна використовувати такі місцеві податки як: єдиний податок з підприємців, плата за землю та податок на нерухомість. Також визначено і запропоновано механізм стимулювання економічного співробітництва в громадах з використанням податку на доходи фізичних осіб, який є загальнодержавним, але забезпечує виконання дохідної частини місцевих бюджетів майже на 60%. Запропоновано підхід до провадження спрощеного і зменшеного оподаткування рядом місцевих податків в перспективних інвестиційних проєктах за умови, що рівень виплачуваної заробітної плати в проєктах буде в 2,5-3 рази вищим за середній рівень заробітної плати в регіоні, що дозволить підвищити рівень добробуту населення і наповнення місцевих бюджетів завдяки збільшенню бази для нарахування податку на доходи фізичних осіб.

Висновки. Науково-методичні рекомендації щодо провадження податкового стимулювання економічного співробітництва територіальних громад в Україні знаходяться ще в стадії розробки і формування, але вирішення даної задачі є перспективним напрямом досліджень. Визначений в даній статті перелік основних місцевих податків, які можуть бути задіяними для активізації співробітництва територіальних громад, ключові стимулюючі заходи по застосуванню цільових пільг з місцевих податків, в подальших дослідженнях з даної тематики повинні бути доповнені положеннями регуляторної політики.

Ключові слова: місцеві податки, економічне співробітництво, податкові інструменти, стимулювання розвитку громад

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THE ROLE OF LOCAL TAXES IN STIMULATING ECONOMIC COOPERATION OF TERRITORIAL COMMUNITIES

Topicality. Local taxes and fees are a means of filling basic budgets not only in the direct sense, when the fiscal function of such taxes is performed but also when the regulatory function of such taxes is activated and local authorities have the opportunity to improve the business climate of their economic mesosystem and change its structure, giving preference to the most promising types of economic activity. Currently, Ukraine has adopted a general institutional

framework that makes it possible to conduct economic cooperation of territorial communities, but the provisions of legislative, methodological, advisory nature on the use of local taxes as stimulators of interregional cooperation and activators of cooperation agreements that are based on added value and effective involvement of local resources in the process of exogenous economic exchange have not yet been developed. Therefore, solving such scientific and applied problem as the development of guidelines for the use of local taxes as tools of stimulation of economic cooperation of communities and increase the added value generated in their territorial and economic systems is actual topic of national and international research on regional systems for developing or developed countries, where the role of local economic and administrative initiatives is incompletely realized.

Aim and tasks. The purpose of this paper is to identify the scientific and methodological basis on the use of local taxes as regulators of business activity and activators of economic cooperation and means of increase of added value, establishing of the list of key local taxes through which it is possible to implement regulatory measures and identify types and groups of taxes, which are the most effective means of influencing business activity, from the standpoint of stimulating economic cooperation and the formation of horizontal ties between the participants of cooperation and division of labor in territorial communities.

Research results. Theoretical, institutional and scientific-applied bases of economic cooperation of territorial-economic systems in Ukraine and other countries of the world are considered. It is established that the implementation of interregional, intraregional and international cooperation of communities has a positive effect on the level of economic development, as the formation of points of concentration of capital and business activity increases economic growth, uses local resources more efficiently, increases added value and depth of raw materials processing and there is the active involvement of territories in the processes of the international division of labor. Due to the points of economic growth formed based on economic cooperation in the form of agglomerations, clusters, subregions and other forms of territorial economic associations for the developed countries of the world (Austria, Spain, Germany, Great Britain) the predominant of gross product creation (from 50% to 70 %) became characteristic in such territorial and economic associations. Based on the analysis of the regulatory framework and other components of institutional support for economic cooperation in the developed world, it is determined that the general institutional framework and legalization of the instrument of cooperation for effective economic development is not enough, as levers of state regulation and realization the supporting means should be introduced. In this aspect, special attention is paid to local taxes and fees, because the initiatives of local authorities must be supported by certain powers to regulate the economic development of communities. The most effective at the present stage of development of domestic territorial and economic systems in Ukraine as regulators can be used such local taxes as a single tax on entrepreneurs, land fees and real estate tax. A mechanism for stimulating economic cooperation in communities with the use of personal income tax, which is national, but ensures the incomes collection of local budgets by almost 60%, has also been identified and proposed. An approach to the implementation of simplified and reduced taxation of a number of local taxes in promising investment projects is proposed. But such means are provided only for the projects that keep the level of wages 2.5-3 times higher than the average wage in the region, which will increase the welfare of the population and will provide filling local budgets by increasing the base for personal income tax.

Conclusion. Scientific and methodological recommendations for tax incentives for economic cooperation of territorial communities in Ukraine are still under development and formation, but the solution to this problem is a promising area of research. The list of basic local taxes that can be used to enhance cooperation between local communities, the key incentives for the application of targeted benefits from local taxes, should be supplemented by regulatory policy means in further research on this topic.

Key words: local taxes, economic cooperation, tax instruments, stimulating of community development

Problem statement and its connection with important scientific and practical tasks. An effective tool for reviving the economic development of territorial economic systems in the form of cooperation, collaboration and other forms of division of labor has not yet been properly disseminated in Ukraine. As the experience of neighboring developed countries shows, local taxes and fees are a means of filling basic budgets not only in the literal sense, when the fiscal function of such taxes is performed, but also when the regulatory function of such taxes is activated and local authorities have the opportunity to improve the state of the business climate of its own economic mesosystem and change its structure, giving preference to the most promising types of economic activity. At present, Ukraine has adopted a general institutional framework that makes it possible to conduct economic cooperation of territorial communities, but the provisions of legislative, methodological, advisory nature on the use of local taxes as stimulators of interregional cooperation and activators of cooperation agreements based on increasing added value and effective involvement of local resources in the process of exogenous economic exchange have not yet been developed. Therefore, solving such a scientific and applied problem as the development of guidelines for the use of local taxes as tools to stimulate economic cooperation of communities and increase the added value generated in their territorial and economic systems is a topical topic of national and international research on regional systems of developing or for developed countries, where the role of local economic and administrative initiatives is not fully realized.

Analysis of recent publications on the problem. Such researchers as Laffer A., Hsing J. [1], Harberger A. [2] Burkinsky B.V. [3], Geets V.M. [4], Varnaliy Z.S. [5] Yefimenko T.I. [6] and others paid much attention to the problem of using taxes as a tool to intensify economic activity. Storonyanska I.Z. and Melnyk M.I. devoted their works to the issue of reviving the economic development of regional (territorial) systems in the spatial dimension. However, in modern conditions of ambiguous in its effectiveness and rapid process of decentralization of power in Ukraine, new challenges and tasks are constantly emerging. Activation of economic development of territorial communities with the help of local taxes is one of the key and urgent issues, for now, the scientific basis and systemic solutions for which have not yet been determined.

Allocation of previously unsolved parts of the general problem. Despite the significant degree of research on the impact of taxes on the economic development of economic systems, the aspect of regulating regional and subregional economies through local taxes is still a fairly new topic in terms of research of regional economic systems in developing countries. The scientific problem of determining the methodological basis for establishing a list of key local taxes, through which it is possible to implement regulatory measures, as well as identifying the types and groups of taxes that are the most effective means of influencing business activity, from the standpoint of stimulating economic cooperation and horizontal links between participants in cooperation and division of labor in territorial communities.

Formulation of research objectives (problem statement). The purpose of this article is to determine the methodological framework for the use of local taxes as regulators of business activity and activators of economic cooperation and creation of increased added value, establish a list of key local taxes through which it is possible to regulate the activities of participants in cooperation.

An outline of the main results and their justification. The cooperation of territorial communities in world practice has proved its effectiveness as a tool to ensure the effective implementation of not only management functions and ensuring the capacity of public authorities, but also the functions of economic development, stimulating the formation of economic ties. Thanks to the instrument of economic cooperation of territorial communities, territorial and economic complexes have been formed in almost all EU countries, many enterprises have been established to perform certain social functions and in the format of their active participation in interregional and cross-border chains of the division of labor and value-added. But in most cases, the creation of such associations, the development of horizontal ties, and the intensification of cooperation did not arise by themselves, but as a result of effective state regulatory policy. Through incentives, among which taxes play a significant role, national governments and the EU leadership have managed to build an effective system of economic cooperation with developed horizontal ties and separation of powers, using special economic conditions and priority investment modes.

It is known [7,8] that successful foreign practices to stimulate economic cooperation of territorial communities include examples of tax support, and in most cases – based on local taxes and fees. As the power to set rates and bases for local taxes is usually vested in local governments, it is appropriate to provide, in addition to the power, tools, and incentives to regulate the development of local economic systems.

The conceptual foundations of economic cooperation in Ukraine and abroad are formed through an institutional framework based on the norms of relevant laws or directives that create the basis for the development of local, regional, and subregional economic systems. Thus, in Ukraine, the basis for the organization of cooperation of territorial communities are the norms of the Constitution of Ukraine [9] and the Law of Ukraine "On Cooperation of Territorial Communities" [9, 10]. Provisions of the Constitution of Ukraine, namely part 3 of Art. 142 even before the adoption of the Law of Ukraine "On Cooperation of Territorial Communities" determined the possibility of cooperation of different territorial communities: from villages, cities, various settlements to regions on a contractual basis, with the creation of communal property, using the budget and other funds to implement joint projects or for joint financing, organization, maintenance of utilities, organizations, and institutions, for organizing the work of bodies, services, institutions, etc. However, in reality, and officially the instrument of economic cooperation in Ukraine was rarely used.

The main purpose of economic cooperation is to involve in cooperation functional territories, ie administrative units or their parts connected by economic, social, ecological, infrastructural points of interaction, interests or participation in cooperation, logistical and other chains, this is stated in one of analytical OECD reports. Functional territories are territories around large centers (cities), urban or rural, which can be territorially divided, but are connected by close and stable relations and are part of a common economic chain of cooperation. It is the functional areas as locomotives and points of economic growth in the modern economy that play the greatest role. Thus, the results of the OECD [11] study confirm the fact

that a significant share (and sometimes - almost the largest) of the gross product of developed countries is created within the territorial economic associations (in clusters, metropolises, agglomerations, subregions, etc.) 1). The key factor of success, in this case, is the presence of developed economic relations and well-established cooperation between the participants of a single subsystem. It is the division of labor and specialization that allows us to obtain the greatest economic benefits - cost savings, finding a rational option for the organization of production, and placement of productive forces.

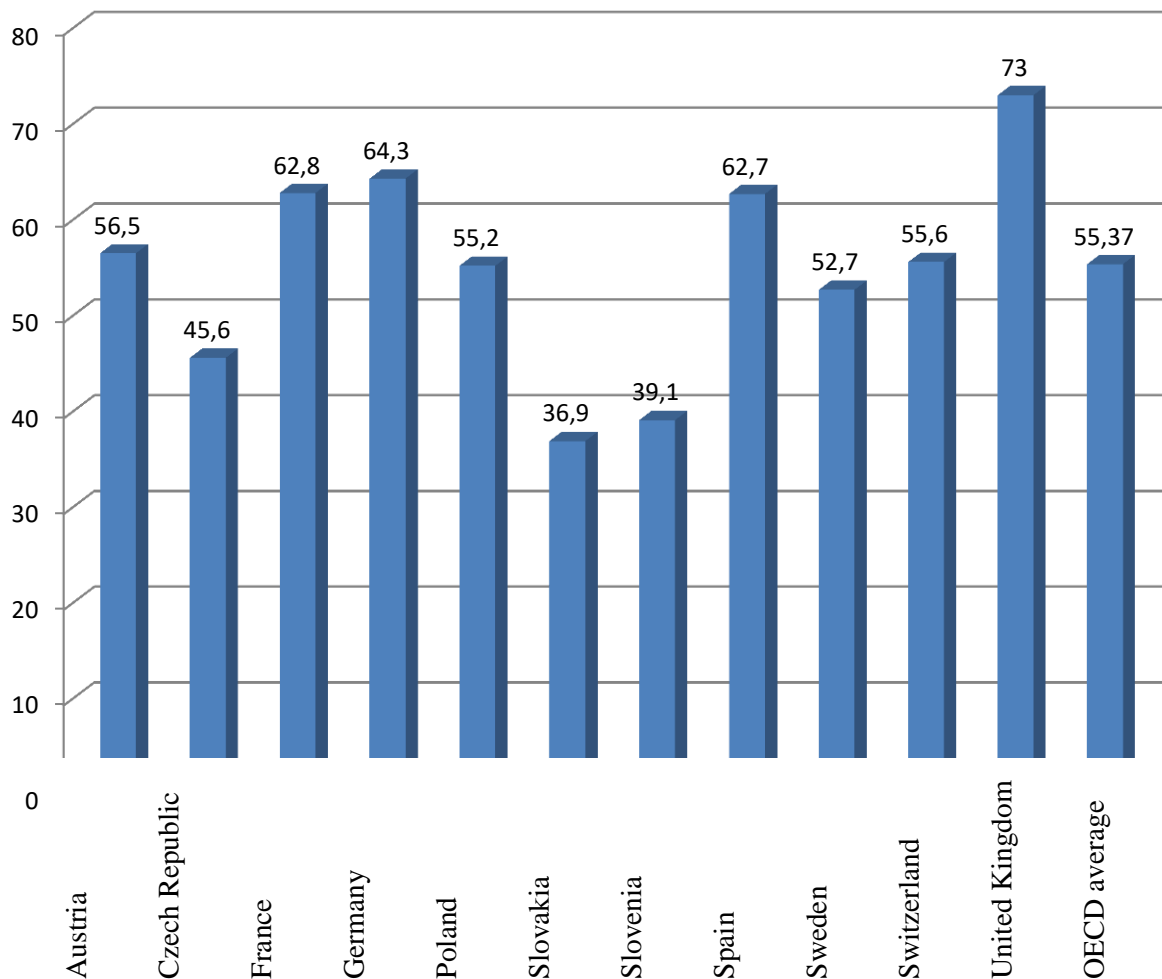


Fig. 1. The share of gross product created in functional areas with the instrument of economic cooperation in the EU and OECD, % [11]

To transform subregional economic entities into points of economic growth, the leadership of developed countries has taken stimulating measures, and in most cases, the local initiative to implement economic incentives for community cooperation was supported. Thus, in Poland, Slovakia, France, the USA, and other developed countries [12] free (special) economic zones were created, in which taxes were used as a means of attracting investment resources. A particularly important role is given to taxes coming to local budgets in Poland and France, where the municipal budget is a source of financial promotion for investors not only in the form of direct or incentive investments but also in the form of incentive discounts on local taxes in exchange for strict compliance of investment agreement and making large payments on wages (significantly higher than average) in the framework of an investment project that has received preferential status. That is, one legal legalization of the instrument of economic cooperation was not enough in developed countries if we are talking not only about solving social and managerial problems through cooperation agreements but also about implementing investment projects with production activities based on high added value.

The possibility of conducting cooperation of communities, legally defined in the Constitution of Ukraine, did not bring real results in the form of organization of economic cooperation and stimulation of social and economic development. As well as the adoption of the relevant profile law [9, 10] without proper financial and economic, organizational incentives does not contribute to the revival of economic development and cooperation, but remains a formal tool. However, the formality of such tools should be stopped and turned into the application of real measures to support economic cooperation of territorial communities, as accelerating the completion of decentralization reform (According to the Law of Ukraine "On Amendments to the Law of Ukraine "On Local Self-Government in Ukraine"[13]).

The main idea in the organization of economic cooperation is the involvement in cooperation of functional territories, ie administrative units or their parts, connected by economic, social, ecological, infrastructural points of interaction, interests or participation in cooperation, logistics, and other chains, as it is stated in one of analytical OECD reports [11, 14] and the same idea is emphasized in the State Strategy for Regional Development of Ukraine [15]. That is, an important factor is to improve the welfare and functionality of the territories in the organization of cooperation between them, which is consistent with the provisions of modern European regional policy. That is, the main thing is not the fact of cooperation, although it is important because it builds horizontal relationships and improves communications, it is necessary to ensure economic development based on territorial and economic networks with extensive functional links, which will stimulate improved specialization and increase in value-added.

Stimulating the economic development of territorial communities is a priority measure, it was from it that the reform process in the EU countries began, and only after that administrative and territorial reforms took place. In Ukraine, there is no such time reserve to establish an institution of interregional economic cooperation as it was in the EU and therefore the three reforms (administrative-territorial, economic, and decentralization reform) are not consistent, but parallel and not always coordinated (Fig. 2). In such conditions, stimulating the processes of economic development using tax and other rapid and at the same time, systemic regulation is necessary.

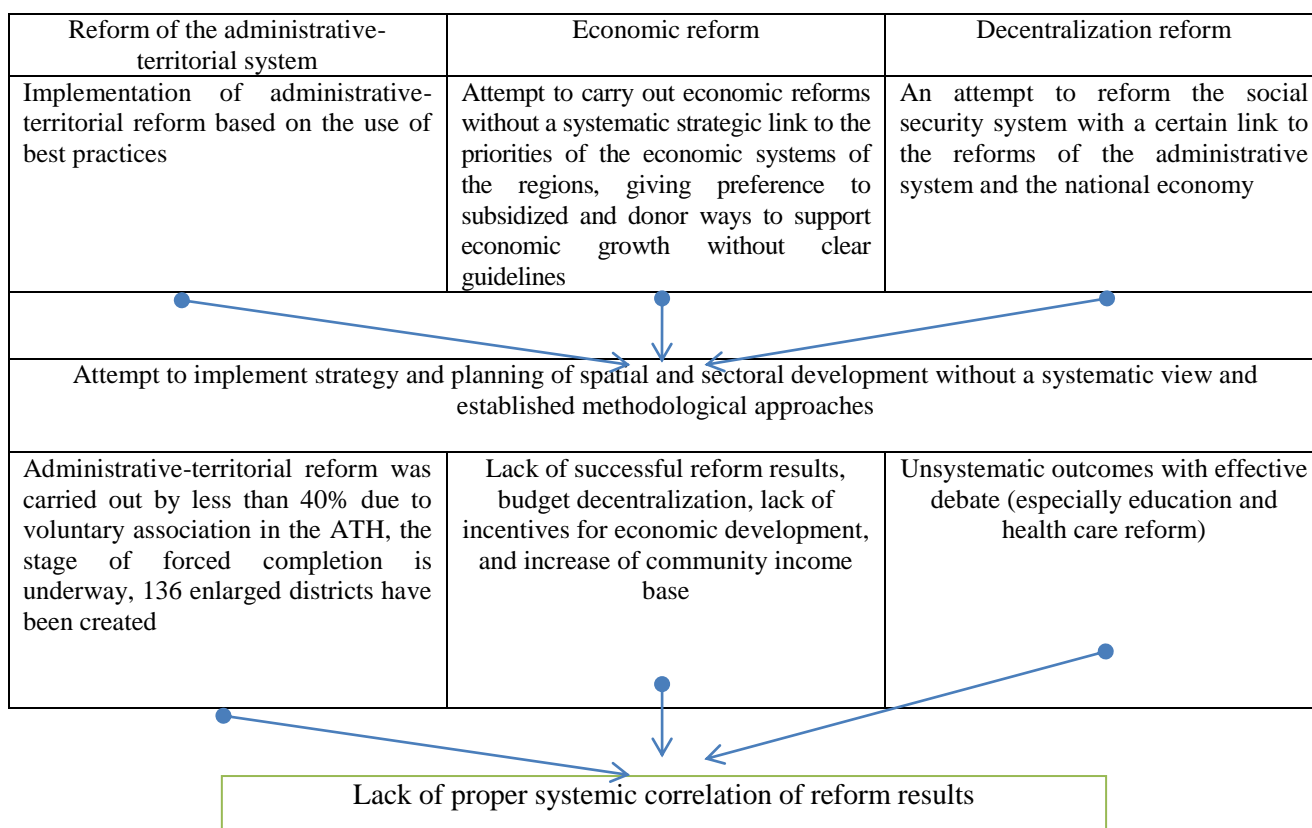


Fig.2. Algorithm of formation of functionally and economically capable territorial-administrative units in Ukraine (2014-2020)

* designed according to data [15, 16, 17]

The sequence of economic reform in the EU is characterized by the following key stages [16, 17]:

- Carrying out economic reforms by stimulating points of economic growth and the formation of sustainable economic ties with maximizing value-added;
- Strategizing and planning of spatial and sectoral sustainable development of territorial economic systems;
- Formation of sustainable economic ties with maximization of added value and involvement in the processes of the division of labor of territorial communities;
- Formation of a network of economically efficient territorial and economic units with signs of sustainability and with minimal divergences;
- Carrying out administrative-territorial reform as a measure of regulatory assistance to sustainable development (economic, social, environmental);
- Formation of a network of affluent communities with economic base + social unity + effective management system and good governance + budget capacity and sufficiency, compliance of powers and obligations with financial capabilities + system of effective regulation and solution of social and environmental problems + compliance of administrative-territorial division structure with established economic connections.

The process of developing interregional cooperation in the EU was facilitated by financial support programs and common policy instruments, as well as tax support measures were taken. Thanks to the strong financial support of economic development initiatives in the EU for the last 30 years (from 1990 to 2020) only in the form of direct financial support under the interregional development program (European interregional program) to solve various pressing economic problems of EU and partner countries EUR 29.5 billion was spent, in the form of financing of regulatory policy measures (Table 1).

Table 1

Evolution of programs to support interregional economic cooperation in EU countries

Periods of evolution and stages of the program of European interregional cooperation	1990-1993 Interreg 1	1994-1999 Interreg 2	2000-2006 Interreg 3	2007-2013 Interreg 4	2014-2020 Interreg 5
Financing volume	1,1	3,8	5,8	8,7	10,1
Legal status and initiative	Local initiative of countries and their regions	Local initiative of countries and their regions with a common EU legislative framework	Local initiative with general regulation by structural pan-European funds		Own regulation by local authorities with overall financial and institutional support from the EU and structural funds
Number of participating countries	11	11 to 15	15 to 25	27 to 28	28

For the current EU strategy, European Cohesion Policy for 2014-2020, 2021-2027 European territorial cooperation is one of the two goals of Cohesion Policy besides investment for Growth and Job.

The interests of European local and regional authorities and their offices in more than 40 countries, which are concentrated and grouped in a single document "Europe 2030: local leaders speak out" [18], also include provisions to stimulate economic development and cooperation. The document states that in Europe in 2030 spatial planning will be carried out on a large scale, and also the organization of economic cooperation is provided based on effective use of regional advantages and preconditions. To support the development of regional specializations and benefits, it is envisaged to provide certain freedoms for local authorities, including the establishment of special conditions for local taxation to create favorable conditions for attracting investment and improving the business climate in regional economic systems at the initiative of local authorities.

The rate of economic growth and the state of socio-economic development of the regions significantly depends on the availability of points of economic growth and the right policy to regulate and promote the revival of business activity. The realities of decentralization, administrative-territorial organization, and local self-government reforms indicate the need to stimulate economic cooperation at all levels of the administrative-territorial hierarchy to effectively use local potential, obtain economic benefits from business

development, which will contribute to social uplift and increase welfare, and will increase the economic base to fill the revenue side of the budgets of all levels. The most active and successful process of forming united communities takes place in those territorial units where there is an economic basis for further development, ie industrial complexes, production facilities, or business centers that allow communities to achieve economic, and financial and budgetary capacity.

Currently, the activity of territorial communities in Ukraine remains quite low, there is no stable dynamics of growth in the number of cooperation agreements, there is no awareness of communities about the prospects of using cooperation agreements as a tool to involve territories in economic exchange and inclusion in labor distribution chains.

Table 2

The activity of participation in regional economic cooperation of regions of Ukraine

Region (oblast)	The total number of cooperation projects		Number of communities that used the instrument of inter-municipal cooperation		Class of the region according to the level of cooperation activity
	2019	2020	2019	2020	
Poltavska	97	109	505	283	The most active
Vinnyska	64	95	192	169	
Sumska	36	50	81	60	Highly active
Cherkaska	23	33	116	91	
Kharkivska	22	25	94	80	
Zhytomyrska	16	38	43	77	
Volynska	11	27	31	37	Moderately active
Ivano-Frankivska	11	12	78	39	
Chernihivska	11	14	45	56	
Rivnenska	10	16	30	27	
Kirovohradska	10	11	20	17	
Dnipropetrovska	9	12	24	29	
Zaporizka	8	9	16	27	
Kyivska	7	8	9	9	
Ternopil'ska	5	12	13	21	
Chernivetska	4	6	10	14	
Zakarpatska	3	4	8	10	Low-active
Lvivska	3	23	7	78	
Khersonska	3	4	7	11	
Khmelnyska	3	11	12	25	
Donetska	2	2	5	5	
Odeska	2	2	9	9	
Luhanska	0	4	0	9	
Mykolaivska	0	3	0	5	
Kyiv	0	-	0	-	

* - complied according to data [19]

Economic cooperation should take place at different administrative-territorial levels, but the key will be the regional level as one that can address large-scale issues that are not available to the local level, and take into account local specifics, advantages, and capabilities of individual territorial units, which is difficult to do at the national level. The institutional basis for multilevel cooperation is defined by the Laws of

Ukraine "On Voluntary Association of Territorial Communities", "On Cooperation of Territorial Communities", the Resolution of the Cabinet of Ministers "On Approval of the Procedure for Preparation, Conclusion, and Implementation of Regional Development Agreement and Relevant Model Agreement". international agreements and EU policy provisions "European Cohesion Policy 2021-2027" [12, 13, 15, 17].

It is assumed that the cooperation of the regions with the central government on issues of solving common problems in the field of improving the economic development of the regions is carried out through regional development agreements; cooperation at the local level between cities, communities, villages is carried out with the help of five forms of agreements defined by the Law "On Cooperation of Territorial Communities"; cross-border and international economic cooperation should be carried out through certain forms of international agreements and treaties. At the same time, the issues of regulation and stimulation of the processes of cooperation of territorial economic systems on the principles of mutual benefit are not regulated institutionally and are not properly substantiated in the scientific aspect. Therefore, the legally proposed methods of economic cooperation are not effective enough, and regional development agreements are not really valid at all. The features and provisions on the identification of functional territories - a key economic category that defines a set of territorial and economic subcomplexes capable of functioning together as a single system suitable for common tasks of socio-economic development in the sectoral dimension - are also not substantiated. In developed countries, and especially in the European Union, approaches to regulated and effective economic cooperation of regions and communities based on the allocation of functional areas in the form of informal subregional, local, regional, cross-border entities are quite common and developed, take into account local specifics and contribute to the social development of national economies.

Educational activities on the dissemination of knowledge about the application of the tool of cooperation in local communities are actively conducted by experts of the decentralization project in Ukraine [18, 19], but information and communication support in this sense is not enough for successful implementation of this project in the national economy. The experience of EU countries shows the need to stimulate and support the processes of cooperation of territorial communities in Ukraine with economic incentives. State aid, competitive financing, and tax benefits for investment projects were provided in Poland, the Czech Republic, Slovenia, Romania [7, 12, 19], and others. In the EU countries of the last turn, tax incentives for regional economic cooperation have been used mainly in the form of targeted benefits, for example, in Romania, a reduced land tax rate has been proposed for the formation of large-scale agricultural holdings engaged in environmentally friendly agricultural production. In Poland and the Czech Republic - reduced income tax for new projects to create network production complexes with maximum added value, which is created in the country [7]. Even in Germany, local taxation is used as a tool to support the implementation of priority investment projects [12].

Stimulating the processes of economic cooperation in Ukraine can be done through tax measures, the application of which becomes more real and relevant in the context of decentralization, which leads to progressive changes in a number of laws, including tax legislation, in terms of local taxes.

Local taxes and fees play the most important role in the formation of local budget revenues, including the formation of ATH budget revenues. Despite the fact that the personal income tax, which occupies the largest share among budget revenues (Fig. 3), is a national tax, some opportunities, and powers to manage it can be delegated to the basic level. Particularly indirect measures related to increasing the tax base.

The existing provisions of the Tax Code of Ukraine on local taxes and fees (according to Article 10 of the Tax Code of Ukraine [20] and the Budget Code of Ukraine [21]) provide for the possibility of local regulation of business activity through such taxes as property tax; single tax for small and medium enterprises; the fee for parking spaces for vehicles; tourist tax. But in practice, local communities have not yet learned to actually use such a tool as a regulator of investment activity.

Influencing the business environment in order to intensify the implementation of investment projects in the framework of cooperation through the tax lever - a single tax on individual entrepreneurs is a very real and legal measure, which is not applied by local communities. Thus, for the border regions of Ukraine, it would be possible to support the formation of business networks with efficient logistics and value-added chains, which would allow local entrepreneurs to participate in cross-border cooperation on an economically beneficial basis for themselves and the national economy.

It is also possible to regulate cooperation in territorial communities with the help of other taxes, namely: personal income tax and corporate income tax. But such taxes are characterized by greater risks and there is a need to introduce legislative changes to implement such regulators.

With regard to personal income tax, in the existing legislative field, there are some contradictions on tax support for the financial development of local communities, which relate to the delegation of powers to administer and collect taxes with the actual receipt of tax payments to certain budgets. Personal income tax, which according to the legal classification is national, actually serves as the main source of financial support for the economic development of territorial communities, cities, districts, as 60% of the total collection of this tax goes to local budgets of these administrative-territorial entities. This tax is one of the main for local territorial and economic systems and provides financial nutrition for local development by 80-90%.

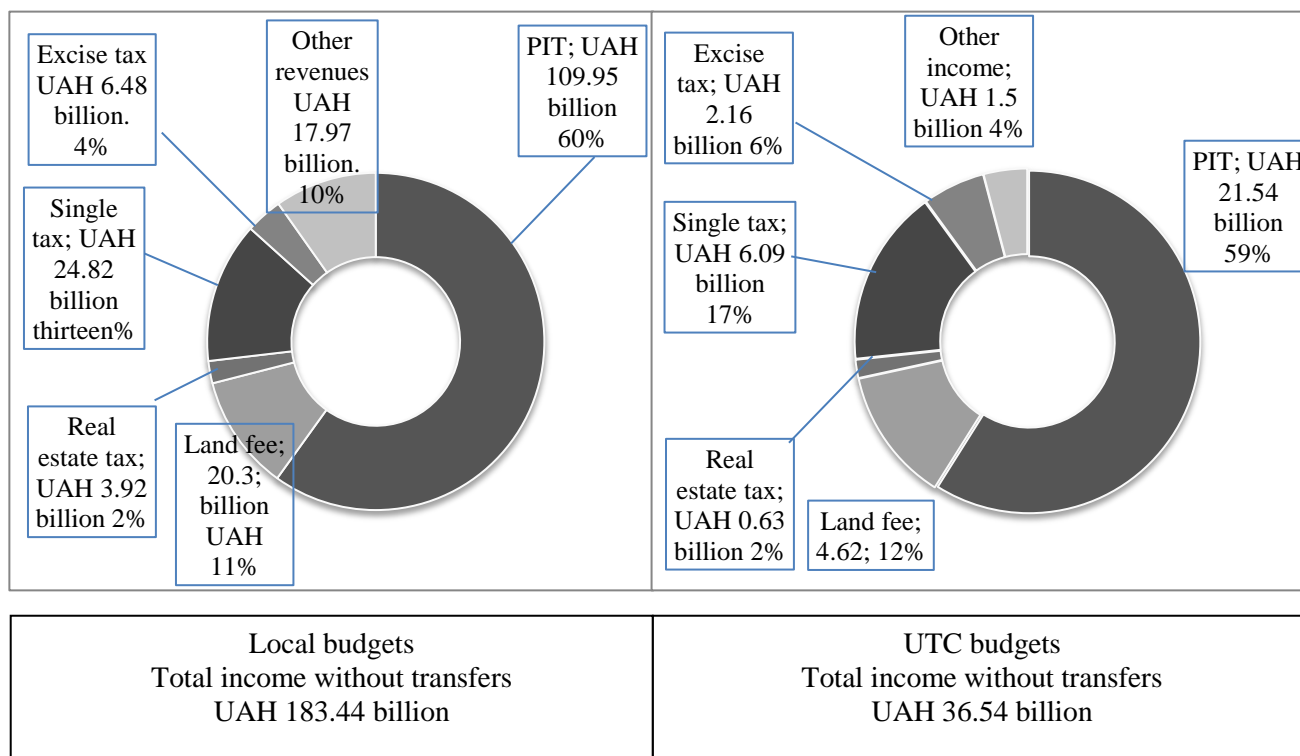


Fig. 3. The structure of local budget revenues, including OTG budgets in terms of basic taxes for January-August 2020, is based on [19]

However, for local communities at the local level, only tools for the indirect management of their own budget base in terms of personal income tax are available, namely: it is possible to stimulate employers with administrative, information and consulting, educational and advisory means of accruals and payments for relatively high wages, which will provide for the accrual of more personal income tax. At the same time, the use of stimulants of socio-economic development of territorial communities through most direct taxes, as it is done in most developed countries, is not possible without the introduction of special changes to existing tax legislation. A possible way to apply tax incentives for economic activity, encourage the implementation of investment projects and the implementation of cooperation is the use of the conditions of Art. 11 of the Tax Code of Ukraine [20] on special tax regimes. Special tax regimes are established and applied in cases and in the manner specified exclusively by the Tax Code of Ukraine and provide for the establishment of a special system of measures that determines the special procedure for taxation of certain categories of economic entities [36]. The special tax regime may provide for a special procedure for determining the elements of the tax and fee, exemption from paying certain taxes and fees.

Provisions of Art. 11 of the Tax Code of Ukraine should be implemented in the form of an economic experiment to support investment in depressed, border regions, which should increase the level of socio-economic development and promote the local benefits of territories with their participation in global economic exchange.

The use of tax regulators to stimulate the economic development of local communities should be targeted, for example, on such criteria as: mandatory investment of at least \$ 5,000 per job, accrual and payment of high wages (two to three times higher than the average wage in the region), doing business on a project in a direction that is promising for the region, the priority, mostly innovative, activities. Experience shows that the availability of programs adopted at the state and regional levels does not ensure the receipt of appropriate financial and organizational resources without activating the endogenous resources of the region.

The inertial development of the subregion, which is at the level of the second and third technological modes and is based on outdated low-tech means of production, will only exacerbate the depressed state of the subregion's economy. Achieving new levels of technology and increasing the competitiveness of the subregion is possible only with the innovative development of key industries. Therefore, the regulatory approach should be based on an innovative factor that is to ensure the economic security of Ukrainian regions and territories of basic level, which also determines its novelty.

Conclusions and perspectives of further research. Tax instruments as acting, rapid, and systemic measures to influence economic activity can be an effective stimulator of cooperation between local communities and the restructuring of their economic systems. Since one of the main principles of domestic and European decentralization reform is to support local initiatives and strengthen the role of local self-government in economic management, regulatory measures to enhance interregional cooperation should be applied in such a way as to strengthen the role of local authorities. In this aspect, local taxes are a promising tool for influencing the business environment in order to improve and adapt to the social needs of the community, taking into account local preferences and available resources. Currently, scientific and methodological recommendations for tax incentives for economic cooperation of territorial communities in Ukraine are still under development and formation, but solving this problem is a promising area of research. The list of basic local taxes that can be used to enhance cooperation between local communities, key incentives for the application of targeted benefits from local taxes, defined in this article, should be supplemented by regulatory policy provisions in further research on this topic.

The main prospects of future development and practical realization of approach to tax regulation of economic activities, including economical systems of united territorial communities in Ukraine, lies in the field of institutional support of imlementayion of special conditions for realization of new business projects with newly attracted and obtained investments. The scientific justifications of efficiency of such mean and necessecary calculations of implementation of special conditions of taxation for strategically important investment projects are provided.

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