

The (Non-)Neutrality of Value-Added Taxation¹

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Abstract

This paper employs a structural gravity model and novel value-added tax (VAT) regime data to investigate the impact of VAT rate changes on imports and domestic production of final goods. We find that the VAT is both non-neutral and *de facto* discriminatory. A one percentage point VAT increase reduces aggregate imports and internal trade by 3.1 % and implies a 1.8 to 5.4 % reduction of foreign imports relative to internal trade. Based on these results we conduct a counterfactual equilibrium analysis and illustrate that VAT rate changes imply substantial welfare effects for an average country in the European Union.

JEL-Classification: F10, F14, H22.

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1 Introduction

Throughout the past decades value-added taxes (VATs) have become the most commonly applied form of commodity taxation around the globe. One reason for this development is that the VAT is commonly regarded as neutral and non-discriminatory in international trade. Neutrality implies that consumer and firm behavior is by and large unaffected by VAT rate changes. Non-discrimination warrants that domestic production and imports should not be affected differently by the VAT. Contrary to these presumptions, we show that the VAT is both non-neutral and *de facto* discriminatory, and that its welfare effects are substantial. This holds true even though – in line with WTO guidelines of non-discrimination – the VAT follows the destination principle. This principle implies that imported goods are subject to a border-adjustment process where the VAT is levied, while exports are exempt via rebates in most countries. Consequently, the same rate applies to both imports and domestic production of goods and services in the domestic market. Furthermore, a buyer of intermediate goods can reclaim the taxes already paid, and thus the VAT affects final consumption only, but not intermediate inputs.

In order to investigate neutrality and non-discrimination, we employ a structural gravity model and build on recent innovations in modeling the effects of non-discriminatory trade policies. We use a novel data set containing VAT regime information for more than 150 countries from 2003 to 2020. Additionally, we analyze a panel of 28 EU countries from 1967 to 2020. We begin by extending the structural gravity model to accommodate for the existence of a VAT to guide the empirical analysis of our research questions. In deriving this model we build on the seminal contribution of Anderson and van Wincoop (2003) who have set up the structural gravity model in a way that is consistent with general equilibrium constraints.¹ This model is very flexible (see Allen et al., 2020, and Carrère et al., 2020) and accommodates many trade models like Armington, Ricardo, Heckscher-Ohlin, monopolistic competition and models of heterogeneous firms.²

To analyze the question of neutrality we first employ a two-stage approach following Yotov et al. (2016). In the first stage we estimate the multilateral resistance terms using

¹See also Anderson (1979) and Eaton and Kortum (2002).

²See Anderson and Yotov (2016), Arkolakis et al. (2012), Bergstrand (1985), Caliendo and Parro (2015), Chaney (2008), Chor (2010), Costinot et al. (2012), Deardorff (1998) and Helpman et al. (2008).

the standard gravity model. In the second stage we regress the estimated import-related resistances on current VAT rates. Using variation between standard and reduced VAT rates applying to different product groups, we are able to account for any importer-time-specific characteristics that might influence both the tax setting and the inward resistance term. We find that a VAT rate increase will lower both domestic production and aggregate imports of final goods. The size of this effect is economically significant and robust.

Regarding the question of non-discrimination we build on recent empirical advancements in studying non-discriminatory trade policies (see Beverelli et al., 2018; Heid et al., 2021) and employ a border indicator to distinguish between internal and international trade flows. The differential impact of the VAT on inter- and intra-national trade is analyzed by interacting this border indicator with the VAT rate. This is necessary as the VAT is applied equally to domestic production and imports from all trading partners. We illustrate that the VAT is in fact discriminatory in the European Union. VAT rate increases lead on average to a larger decrease in aggregate imports compared to local production of final goods and therefore to a rise in relative trade of domestically produced goods. While our model is agnostic towards market structures, we show that this result could be due to the exit of some importing firms in response to a VAT increase.

Following Arkolakis et al. (2012) and using the estimates from our structural gravity model, we illustrate that the welfare implications of VAT changes are considerable. If the tax revenue increase is completely unproductive, a one percentage point increase in the VAT rate leads to a welfare decrease of between 2.59 and 4.37 % for an average country in the European Union. While this effect is mainly due to a reduction in expenditures, the negative welfare effects remains substantial also under the assumption of unchanged expenditures. Allowing for productivity changes, we show that a welfare neutral VAT change would require substantial productivity gains from public good provision. When the VAT increase is used to compensate for another tax reform, the income effects of this reform would also need to be substantial.

To the best of our knowledge, this is the first paper that investigates neutrality and non-discrimination of the VAT in a structural gravity general equilibrium model. Usually, the VAT is not considered to be a (distortive) trade policy instrument. In fact, early theoretical contributions by Grossman (1980) and Feldstein and Krugman (1990) have developed conditions under which any border adjustment is neutral, meaning that it will

not affect c.i.f. values of imports and the value of internal trade. Other papers, however, have demonstrated that commodity taxation can be an imperfect substitute for tariffs when markets are not perfectly competitive and that rates will depend on the taxation principle (see, for example, Haufler et al., 2005, and Keen and Lahiri, 1998). Thus, the VAT may not necessarily be neutral and/or non-discriminatory and could, consequently, serve implicitly or explicitly as a trade policy instrument. This is especially relevant since the global tariff level has steadily declined while VAT rates around the globe experienced a distinct increase.³

This paper is not the first to evaluate the effect of VAT on trade, but the first to do so in a structural gravity model, and it contributes to several strands of the international trade and public finance literature. First, we add to the empirical trade literature analyzing VAT neutrality. Desai and Hines (2003) conduct a cross-sectional country-level analysis, finding a negative relation between VAT revenue and exports as well as imports. Keen and Syed (2006), also looking at the country-level but using panel data, find no VAT effect. In an industry-level panel analysis Nicholson (2010) finds negative effects on both exports and imports. Furthermore, the author reports moderate offsetting effects of consumption taxes on trade balances, with one-for-one responses of exchange rates to VAT rate increases. Sharma (2020) analyzes an industry-level panel of more than 100 countries to investigate how the VAT affects exports. The author finds that industries with a high intermediate goods share of output decrease exports substantially. This effect is driven by developing countries and most likely attributable to imperfect refunding for exporters. Most recently, Benzarti and Tazhitdinova (2021) employ a generalized difference-in-differences approach following Fuest et al. (2018), regressing bilateral trade (exports and imports) on the reporting country's tax rate, a rich set of fixed effects, dynamic country-level controls as well as a full set of lags and leads of VAT rates to capture anticipatory or delayed responses. Their analysis focuses on EU countries, and they find a VAT elasticity of trade close to zero, with no significant anticipatory or delayed effects.

Compared to this literature, our paper demonstrates clear-cut effects of the VAT on trade. On the one hand, we use a structural gravity model and the Poisson Pseudo Maximum Likelihood (PPML) estimator following Santos Silva and Tenreyro (2006). Compared to papers that use a logarithmic transformation of trade flows, PPML allows us to prop-

³Loretz (2008) and Thuncke (2022) provide illustrative evidence for the development of the VAT.

erly account for zero trade flows and heteroskedasticity. Since the structural gravity model is a micro-founded general equilibrium model of trade, it has been extremely successful in trade policy analysis, and it has developed well-recognized best practice standards, see for example Anderson (2011), Head and Mayer (2014) and Yotov et al. (2016). On the other hand, our study is not restricted to the EU context as we employ a balanced panel of trade data for the first part of our analysis. We do not focus exclusively on trade flows from and to EU members, but include both trade flows of a large number of non-EU members as well as internal trade. Furthermore, the use of a structural gravity model allows us to derive general equilibrium welfare effects of VAT reforms for a broad set of assumptions.

Second, we contribute to the empirical trade literature that analyzes non-discriminatory trade policies. To the best of our knowledge, no paper has so far empirically investigated the question of trade discrimination in the context of the VAT. While the structural gravity model has allowed researchers to estimate the effect of bilateral trade policies with relative ease, estimating the effects of non-discriminatory policies such as behind-the-border measures or most-favored-nation (MFN) tariffs is more difficult. Heid et al. (2021) develop a methodological extension of the structural gravity model that allows for the quantification of the impact of unilateral policies and country-specific characteristics on trade. They exploit intra-national trade flows and a cross-border trade indicator to estimate the impact of MFNs on international trade flows relative to internal trade flows. Beverelli et al. (2018) employ a similar methodology to estimate the effect of institutional quality on trade. The authors find that stronger institutions foster trade and that changes in institutional quality have a substantial impact on real GDP. Our paper utilizes these novel estimation techniques from the structural gravity literature to analyze the effects of the VAT rate changes on international trade. We focus on the relative response of imports vis-a-vis internal trade, i.e., non-discrimination of the VAT. Including internal trade data allows us to go beyond the analysis of recent papers, for example Benzarti and Tazhitdinova (2021), who only consider international trade flows.

Third, we contribute to the public economics literature analyzing the effects of consumption tax reforms on demand. Doyle Jr. and Samphantharak (2008) illustrate that a substantial part of sales tax suspensions and reinstatements in Illinois and Indiana are passed on to consumers through price changes. Chetty et al. (2009) document that excise tax changes have considerable effects on the price and demand for alcoholic beverages. Similarly, Kosonen (2015) exploits a VAT reform for hairdressing services in Finland and

demonstrates a significant pass-through due to reduced consumer prices, while demanded quantities do not change. Benzarti et al. (2020) exploit several European VAT reforms and illustrate that the pass-through of VAT increases is disproportionately larger compared to VAT reductions. Gaarder (2019) finds an almost full pass-through to consumer prices of a VAT change on food in Norway. Benzarti and Carloni (2019) exploit a temporary VAT reduction in France on restaurant visits and find that firm owners benefit most while consumers benefit least due to an incomplete pass-through. Both Bachmann et al. (2021) and Fuest et al. (2020) find a sizable pass-through of a temporary VAT cut in Germany. Thus, the public finance literature illustrates that VAT rate changes should not be expected to be neutral as consumer prices change significantly. In contrast to most of this literature we are not exploiting a particular VAT reform in a distinct national setting but analyze the effect of VAT changes in a structural cross-country setting. This allows for the generalization of our results in the context of international trade. Additionally, the use of a structural model allows us to quantify welfare effects of a VAT reform for the average European country.

The remainder of this paper is organized as follows. The theoretical model that will guide our empirical analysis is presented in section 2. Section 3 provides an overview of the data and descriptive statistics. Section 4 discusses our empirical results and develops theory-consistent explanations for discriminatory effects. Section 5 presents the welfare results, and section 6 concludes.

2 The model

We consider a general equilibrium model of trade with n countries. Our empirical analysis focuses on trade in final goods so we have to distinguish between trade in final and intermediate goods. In our model, each country is endowed with a (composite) factor of production (labor) that is internationally immobile and denoted by L_i for country i .⁴ Each country produces two goods, an intermediate good m_i (materials) that is produced by a linear production technology using labor only such that $m_i = L_i^M$ where L_i^M de-

⁴Our model extends easily to endogenous labor supply, multi-stage production and many factors of production but we prefer to keep it as simple as possible and thus follow the standard assumptions of the structural gravity literature. Due to the well-documented modularity of structural gravity models, any extension in this sense does not change our results.

notes labor input in the intermediate goods sector, and a consumption (final) good. The intermediate goods and local labor are used in two production processes. First, the final good is produced with a linear-homogeneous production function $A_i F(m_{1i}^C, \dots, m_{ni}^C, L_i^C)$ where m_{ji}^C denotes the inputs sourced from country j and L_i^C is the local labor input in final good production. Second, the government uses intermediate inputs to provide the public good A_i that improves the efficiency of production, and the production function is given by $A_i = \Phi(m_{1i}^G, \dots, m_{ni}^G, L_i^G)$ where m_{ji}^G denotes the vector of inputs sourced from country j and L_i^G is the labor input in public good provision. Intermediate imports from country j thus add up to $m_{ji}^C + m_{ji}^G$.

Within country i , total labor demand is given by $L_i^C + L_i^G + L_i^M$, and local labor markets are cleared by the wage w_i . Intermediate goods are sourced for a c.i.f. price r_{ji} from country j . Cost minimization of $\sum_n r_{ji} m_{ji}^C + w_i L_i^C$ s.t. $A_i F(m_{1i}^C, \dots, m_{ni}^C, L_i^C) = 1$ yields the unit cost c_i of final good production. Furthermore, country i spends $G_i = \sum_n r_{ji} m_{ji}^G + w_i L_i^G$ for public good provision. Note that G_i and A_i are not set by the producers who take total efficiency as given, but by the government through tax policies. Production decisions imply trade flows of intermediate goods which are given by $M_{ji} = r_{ji}(m_{ji}^C + m_{ji}^G)$. An exporter of an intermediate good receives a full rebate of its home country's VAT and has to pay the importer's VAT upon entry. The producer acquiring the intermediate input is then allowed to deduct the VAT from its VAT liability of the final goods sale. Thus, intermediate goods trade is not affected by value-added taxation and therefore not part of our analysis. We will thus focus on trade in (final) consumption goods which each country produces with a constant unit cost of c_i .

As for consumption of the final good, we follow the literature and Armington (1969) and assume that each country produces one consumption good such that goods are differentiated by country of origin. In particular, the utility function of the representative consumer in country j is given by

$$U_j(q_{ij}) = \left(\sum_{i=1}^n \alpha_i^{\frac{1-\sigma}{\sigma}} q_{ij}^{\frac{\sigma-1}{\sigma}} \right)^{\frac{\sigma}{\sigma-1}} \quad (1)$$

where q_{ij} denotes consumption of good i in country j , that is, country j 's imports from country i , $\sigma, \sigma > 1$, denotes the elasticity of substitution, and α_i is a preference parameter

for goods produced in country i . Note that q_{jj} is country j 's internal trade.

Trade costs for consumption goods have the form of iceberg costs and are denoted by t_{ij} for trade from country i to country j . Note that we consider t_{ij} not only as a trade friction in the narrow sense, but this friction could also include markups which may differ across locations. Thus, while our paper is agnostic towards market structures, it can also accommodate oligopolistic market structures as in Heid and Stähler (2020).⁵ Consumer good prices are given by $p_{ij}\tau_j = c_i t_{ij}\tau_j$, where p_{ij} is the c.i.f. producer price, and $\tau_j = 1 + \psi_j$ denotes country j 's VAT rate, defined as one plus the statutory commodity tax rate ψ_t .⁶ Furthermore, as usual in the literature, we normalize the internal trade friction to $t_{ii} = 1$ such that all frictions are relative to the internal one.

The representative consumer maximizes (1) s.t. the budget constraint $E_j = \sum_{i=1}^n p_{ij}\tau_j q_{ij} = \sum_{i=1}^n c_i t_{ij}\tau_j q_{ij}$, where E_j denotes expenditures. Expenditures are equal to the after tax income of the representative consumer that is given by $E_j = w_j L_j + \phi_j T_j + \Pi_j - \mathcal{T}_j$ where $w_j L_j$ is the factor income of the local factor of production. T_j denotes the VAT revenues of which a share ϕ_j , $0 \leq \phi_j \leq 1$, is redistributed to consumers, and Π_j denotes the after-tax profits accruing to residents in country j . These could originate from all local production of intermediate and final goods if all local production has local ownership only. Alternatively, these could be due to a diversified ownership across local and foreign firms. Finally, \mathcal{T}_j collects all other taxes such that $G_j = (1 - \phi_j)T_j + \mathcal{T}_j$ gives the governmental budget constraint.

The representative consumer takes E_j as given, and utility maximization implies final good demands

$$q_{ij}^* = \frac{E_j (\alpha_i p_{ij})^{-\sigma}}{\sum_{i=1}^n (\alpha_i p_{ij})^{1-\sigma}} = \frac{E_j (\alpha_i c_i t_{ij}\tau_j)^{-\sigma}}{\sum_{i=1}^n (\alpha_i c_i t_{ij}\tau_j)^{1-\sigma}} = \frac{E_j (\alpha_i c_i t_{ij}\tau_j)^{-\sigma}}{P_j^{1-\sigma}}, \quad (2)$$

where

⁵The role of market power and markups has been emphasized recently in the literature, see for example Amiti et al. (2019), Asprilla et al. (2019), Bernard et al. (2003), De Loecker et al. (2016), De Loecker and Eeckhout (2018), Feenstra and Weinstein (2017), Holmes et al. (2014) and Hsu et al. (2020).

⁶The VAT is applied on the sales price, and thus we do not have to distinguish between taxation of cost or revenue as Felbermayr et al. (2015) do for import tariffs.

$$P_j = \left[\sum_{i=1}^n (\alpha_i c_i t_{ij} \tau_j)^{1-\sigma} \right]^{\frac{1}{1-\sigma}}$$

is the CES price index. Let X_{ij} denote the c.i.f. value of exports from country i to country j before VAT. Then,

$$X_{ij} = c_i t_{ij} q_{ij}^* = \left(\frac{\alpha_i c_i t_{ij}}{P_j} \right)^{1-\sigma} E_j \tau_j^{-\sigma}, \quad (3)$$

and the VAT revenues are given by

$$T_i = (\tau_i - 1) \sum_{j=1}^n X_{ji} = (\tau_i - 1) \sum_{j=1}^n c_j t_{ji} q_{ji}^*. \quad (4)$$

Aggregate sales in the final good sector of country i , denoted by Y_i^C , are equal to the sum of all final goods exports and domestic sales: $Y_i^C = \sum_{j=1}^n X_{ij}$. Thus,

$$Y_i^C = \sum_{j=1}^n X_{ij} = \sum_{j=1}^n \left(\frac{\alpha_i c_i t_{ij}}{P_j} \right)^{1-\sigma} E_j \tau_j^{-\sigma} = (\alpha_i c_i)^{1-\sigma} \sum_{j=1}^n \left(\frac{t_{ij}}{P_j} \right)^{1-\sigma} E_j \tau_j^{-\sigma},$$

which can be rewritten as

$$\begin{aligned} (\alpha_i c_i)^{1-\sigma} &= \frac{Y_i^C}{\sum_{j=1}^n \left(\frac{t_{ij}}{P_j} \right)^{1-\sigma} E_j \tau_j^{-\sigma}} = \frac{\frac{Y_i^C}{Y^C}}{\sum_{j=1}^n \left(\frac{t_{ij}}{P_j} \right)^{1-\sigma} \frac{E_j}{Y^C} \tau_j^{-\sigma}} \\ &= \frac{Y_i^C / Y^C}{Q_i^{1-\sigma}} \text{ where } Q_i = \left[\sum_{j=1}^n \left(\frac{t_{ij}}{P_j} \right)^{1-\sigma} \frac{E_j}{Y^C} \tau_j^{-\sigma} \right]^{\frac{1}{1-\sigma}} \end{aligned}$$

is the outward resistance term and $Y^C = \sum_{j=1}^n Y_j^C$ are the aggregate sales of the final goods industry in the world. Replacing $(\alpha_i c_i)^{1-\sigma}$ in (3) yields the gravity equation for final goods under commodity taxation as

$$X_{ij} = \frac{Y_i^C E_j}{Y^C} \left(\frac{t_{ij}}{Q_i P_j} \right)^{1-\sigma} \tau_j^{-\sigma}, \quad (5)$$

where P_j is the CES price index which can be rewritten as the inward resistance term because

$$P_j = \left[\sum_{i=1}^n (\alpha_i c_i t_{ij} \tau_j)^{1-\sigma} \right]^{\frac{1}{1-\sigma}} = \left[\sum_{i=1}^n \left(\frac{t_{ij} \tau_j}{Q_i} \right)^{1-\sigma} \frac{Y_i^C}{Y^C} \right]^{\frac{1}{1-\sigma}}$$

since $(\alpha_i p_i)^{1-\sigma} = (Y_i^C / Y^C) / Q_i^{1-\sigma}$. The derived gravity equation looks very similar to the one in the seminal paper by Anderson and van Wincoop (2003) and generalizes the structural gravity model to commodity taxation.⁷

How the VAT affects expenditures, imports and internal trade will also depend on the response of the c.i.f. producer price p_{ij} to a change in τ_j . In a perfect competition environment, p_{ij} will not change, but in an imperfect competition environment, firms will carry part of the VAT increase. In our welfare analysis in section 5, we therefore compute welfare effects from complete absorption to complete pass-through. For the behavior of tax revenues, let $Y_j^D = \sum_{i=1}^n X_{ji}$ denote aggregate final good consumption in country j . The tax revenues change with the VAT rate according to

$$\frac{dT_j}{d\tau_j} = Y_j^D + (\tau_j - 1) \frac{dY_j^D}{d\tau_j} \geq 0, \quad (6)$$

for which we assume Laffer efficiency such that an increase in τ_j will unambiguously increase T_j .⁸ We observe two effects: first, an increase in the VAT rate increases tax revenues for given aggregate final good consumption Y_j^D ; second, it changes final goods consumption and thus the tax base. The representative consumer takes any expenditure change as given such that $dE_j/dT_j = \phi_j$. How do VAT rate changes affect final good

⁷For a similar derivation used to include import tariffs and tariff revenues, see Appendix B in Yotov et al. (2016) and Online Appendix A.1 of Heid and Larch (2016).

⁸Thuncke (2022) illustrates that the consumption tax rate-revenue relationship is positive and linear.

imports? Let $\epsilon(z, \tau_j)$ denote the elasticity of the variable z w.r.t the VAT rate τ_j . We find that imports from country i change according to

$$\frac{dX_{ij}}{d\tau_j} = \frac{X_{ij}}{\tau_j} \left[(1 - \sigma) (\epsilon(p_{ij}, \tau_j) - \epsilon(P_j, \tau_j)) + \frac{\tau_j}{E_j} \underbrace{\frac{dE_j}{dT_j} \frac{dT_j}{d\tau_j}}_{=\phi_j} - \sigma \right],$$

where

$$\epsilon(P_j, \tau_j) = \frac{\tau_j}{E_j} \sum_{i=1}^n X_{ij} [\epsilon(p_{ij}, \tau_j) + 1]$$

is the elasticity of the CES price index w.r.t to the VAT. We can now determine a benchmark for the neutrality of the VAT rate.

Lemma 1. *If all $\epsilon(p_{ij}, \tau_j) = 0$ and $\phi_j = 1$, the c.i.f. value of imports will not change with the VAT.*

Proof. If $\epsilon(p_{ij}, \tau_j) = 0$,

$$\epsilon(P_j, \tau_j) = \frac{\tau_j}{E_j} \sum_{i=1}^n X_{ij} = \frac{\tau_j}{E_j} Y_j^D = 1$$

and

$$\frac{dX_{ij}}{d\tau_j} = \frac{X_{ij}}{\tau_j} \left[(\sigma - 1) + \frac{\tau_j}{E_j} \phi_j \frac{dT_j}{d\tau_j} - \sigma \right].$$

If $dX_{ij}/d\tau_j = 0$ holds for all imports, it also follows for the aggregate change in consumption that

$$\frac{dY_j^D}{d\tau_j} = \sum_{i=1}^n \frac{dX_{ij}}{d\tau_j} = 0,$$

which implies that $dT_j/d\tau_j = Y_j^D$. In this case,

$$\frac{\tau_j}{E_j} \phi_j \frac{dT_j}{d\tau_j} = \phi_j \text{ because } \tau_j Y_j^D = E_j.$$

This is consistent if $\phi_j = 1$ as $\sigma - 1 + \phi_j - \sigma = 0$ for $\phi_j = 1$, implying $dX_{ij}/d\tau_j = 0$.

□

Lemma 1 shows that the c.i.f. value of imports does not change if the c.i.f. producer prices do not change and if the increased tax revenue is completely returned to the representative consumer as a lump-sum transfer, that is, if $\phi_j = 1$. The intuition is that – if c.i.f. producer prices do not change – relative prices do not change with the VAT, and since demand is homothetic, also relative demands do not change. Furthermore, a complete return of tax revenues fully compensates consumers for the increase in consumer prices such that imports and internal trade do not change.

All in all, the structural gravity model developed above is very flexible in the sense that it relies on less restrictive assumptions than previous theoretical contributions on the relationship between VAT rates and international trade. The standard theoretical literature often relies on restrictive assumptions including constant prices over time and full pass-through of taxes to consumers (see e.g. Feldstein and Krugman, 1990; Benzarti and Tazhitdinova, 2021). Furthermore, revenues must be returned to consumers via a lump sum transfer and countries are assumed to be small open economies. As Benzarti and Tazhitdinova (2021) outline, these assumptions are unlikely to hold, which would violate trade neutrality. In contrast, our structural gravity model accommodates a wide range of trade models as it is agnostic towards the nature of firm competition, the formation of prices and the size of the economy. As outlined by Lemma 1, it can produce the result of trade neutrality of the VAT under similarly restrictive assumptions as the previous literature. However, by allowing for both relative price changes and an incomplete return of tax revenues to consumers we are able to fully rationalize potential non-neutrality and *de facto* discrimination of the VAT. If firms change prices, their responses are not symmetric, and/or tax revenues are not completely returned to the representative consumer, Lemma 1 will not hold and the VAT affects imports and internal trade. Ultimately the question whether the VAT is neutral and non-discriminatory must be answered empirically.

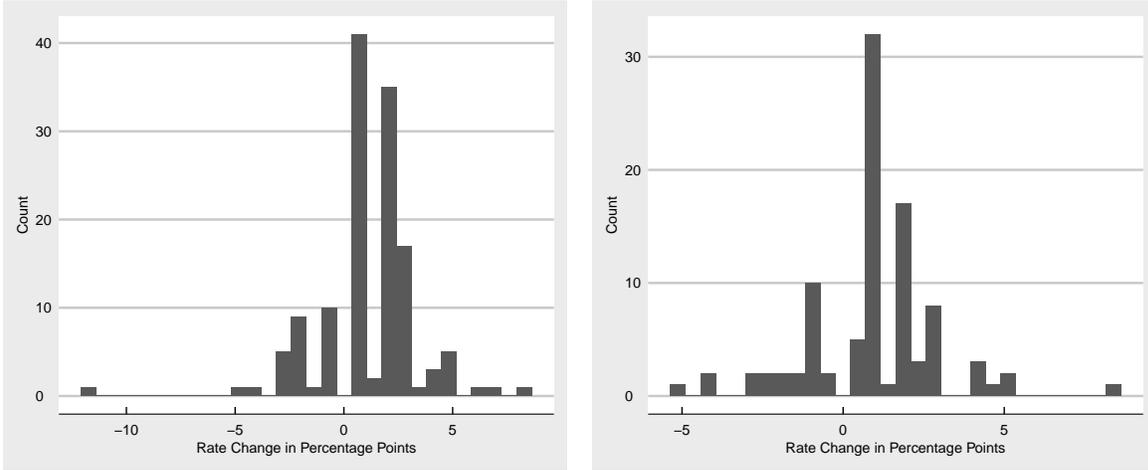
3 Data

The empirical analysis of the research questions requires data on VAT regimes, trade flows and control variables. Regarding the information on VAT regimes, we employ two panel data sets which differ in their length and broadness. The first source for VAT rate data is a novel global panel of consumption tax regimes covering 228 countries from 2003 to 2020. The data is part of the RSIT International Tax Institutions Database and was hand-collected from different sources including the EY *Worldwide VAT, GST and Sales Tax Guides* and reports by the *International Bureau for Fiscal Documentation*. The data includes information on the standard and reduced consumption tax rates, the type of consumption tax regime, the year of introduction and the number of different rates applied. Since the data set also contains consumption taxes other than the VAT, such as sales taxes and goods and services taxes, the analysis in this paper is confined to countries that apply a European style VAT. Out of the 228 countries, 159 impose VAT type consumption taxes. The second VAT data set, used in the analysis, contains a panel of the 28 (eventual) EU member countries from 1967 to 2020. Information on standard and reduced consumption tax rates was collected from a European Commission report also used in Benzarti and Tazhitdinova (2021). The report also gives current (2020) information on the rate applicable to foodstuffs, though no historical information on that matter. Since the period of study ends 2019 the United Kingdom is still included in the EU rates data set and will be considered an EU country in the analyses below.

Not including initial introductions, the EU records 135 VAT rate changes, 107 of which are positive and 28 of which are negative. The average rate change was an increase of 1.16 percentage points, with a median value of 1 percentage point. The distribution is displayed in Figure 1 (a). Most changes were smaller than five percentage points. At the global level there is also considerable variation in rates. Even though we are looking at a shorter time period and regional averages appear relatively invariant over time, a closer look illustrates that there is sufficient variation for the purposes of our analysis. We observe 96 rate changes (23 negative, 73 positive) for the 77 countries in our main analysis and in the 17 years covered by the data set. The average rate change was an increase by 0.98 percentage points, with a median increase of 1 percentage point. The distribution is shown in Figure 1 (a).

For the analysis two sources of trade data are used; the UN's *Comtrade database* and

Figure 1: Variation of VAT Rates



(a) Std. Rate Changes of Eventual EU Members

(b) Std. Rate Changes Global

CEPII’s *TradeProd database*. As the VAT can be fully rebated for intermediate goods and our analysis focuses on final goods consumption, both data sets are filtered for trade in consumption goods based on the BEC classification system. The UN’s Comtrade database used in our analysis covers the period from 1995 to 2019 and includes the 28 (eventual) EU countries and 49 non-EU countries.^{9 10} The data used is aggregated to the one-digit BEC level and includes category 1 – food – and category 6 – consumption goods. CEPII’s *TradeProd database* contains bilateral trade flows for 75 countries over the period 1980 to 2006.¹¹ The key advantage of the *TradeProd data* is the inclusion of internal trade flows based on gross production figures. The data are only available at the three-digit ISIC level, which are converted to the two-digit BEC level to filter for food and consumption

⁹Comtrade data in the BEC format are missing for many countries in the years 1996 and 1997. In the main analysis, these observations are not removed, but results remain unchanged if the panel is reduced to the period 1998-2019. The results are available upon request.

¹⁰The non-EU countries are Argentina, Australia, Bolivia, Brazil, Canada, Switzerland, Chile, China, Cameroon, Colombia, Costa Rica, Ecuador, Egypt, Hong Kong, Indonesia, India, Iran, Iceland, Israel, Jordan, Japan, Kenya, South Korea, Kuwait, Sri Lanka, Macao, Morocco, Mexico, Myanmar, Mauritius, Malawi, Malaysia, Niger, Nigeria, Nepal, Panama, Philippines, Qatar, Senegal, Singapore, Thailand, Trinidad & Tobago, Tunisia, Turkey, Tanzania, Uruguay, USA and South Africa. Other countries are aggregated to a Rest of World (ROW) observation. The countries were chosen according to the data provided in Yotov et al. (2016) with missing EU countries added.

¹¹The countries are the same except for Belgium and Luxembourg which *TradeProd* aggregates to one country.

goods. For both data sets the ROW aggregation of trade flows was done by excluding the non-ROW partners and summing over individual partners. The panels were balanced by adding zero trade flows for any missing dyadic observation. In both cases trade flows are reported net of VAT, just as they are reported net of tariffs. Unfortunately there is little overlap in the time periods covered by the two data sets. Therefore, the method of combining the two trade data sources, as discussed in Yotov et al. (2016), was not feasible.

For our empirical analysis we will combine the two trade data sets and two VAT rate data sets resulting in four pair-wise combinations. These combinations differ substantially in their temporal and geographical coverage. Generally, combining the EU VAT rates with either trade data set allows for inference on a longer time period but less geographical coverage while the opposite is true for the global VAT panel. While both the TradeProd and Comtrade data cover time periods of similar length, the EU-TradeProd combination includes a smaller number of observations since fewer countries had introduced the VAT at that earlier time. The Global-Comtrade combination contains by far the most observations due to the broadness of the panel and the large temporal overlap. Unfortunately, we only have a limited overlap of four years between the global VAT data and the TradeProd database. This results in a small number of observations with little variation in the VAT rate (13 changes). Due to this limited variation we exclude the results for the TradeProd database and the global VAT panel from the main part of the analysis.¹² Information on regional trade agreements are taken from Egger and Larch (2008). Bilateral geo-spatial information including distance and indicators for common language, colonial ties and border contiguity are taken from the CEPII GeoDist database.

4 Empirical results

We now turn to the question whether the VAT is neutral and/or non-discriminatory. In subsection 4.1, we focus on Lemma 1 and demonstrate that aggregate final goods imports, including internal trade, decline with the VAT. Furthermore, we illustrate that the decline in aggregate trade cannot solely be attributed to a decline in internal trade. Thus, the VAT is not neutral and reduces aggregate imports. In subsection 4.2, we explore how

¹²Results based on the Global-TradeProd combination are, however, still consistent with our main findings and available upon request.

internal trade changes compared to aggregate imports, and we find that a VAT increase leads to a substantial increase in internal trade compared to imports in the European Union. Consequently, the VAT is discriminatory in the European context.

4.1 The effect of the VAT on overall trade flows

To estimate the effect of the VAT on overall trade flows, both internally and internationally, we proceed in two steps. First, we estimate the unobserved resistance terms P_j and Q_i . Following Santos Silva and Tenreyro (2006) we estimate the gravity model in the multiplicative form of equation (5) using the PPML estimator:

$$X_{ijt} = \exp(\delta RTA_{ijt} + \eta_{it} + \nu_{jt} + \xi_{ij} + u_{ijt}), \quad (7)$$

where η_{it} is the exporter-time, ν_{jt} the importer-time and ξ_{ij} the (symmetric) pair fixed effect. The latter replaces the commonly added dyadic gravity variables of (the log of) distance, common languages, contiguous borders, and past colonial ties. Additionally, it captures unobserved time-invariant determinants of bilateral trade. Time-varying bilateral trade costs should be captured by the RTA indicator. In combination they allow us to estimate unbiased and consistent importer-time fixed effects (see Fally, 2015). In what follows, we focus on imports and internal trade, since exports are exempt from the VAT.¹³

Second, the estimated importer-time fixed effects are regressed on the current VAT rate in the respective country:

$$\hat{\nu}_{jt} = \beta \times VAT_{jt} + \psi_j + \chi_t + \epsilon_{jt}. \quad (8)$$

VAT_{jt} represents the standard VAT rate in country j in year t . ψ_j and χ_t denote country and year fixed effects. These control for time-invariant country-specific characteristics as well as common time trends across countries influencing the inward multilateral resistance

¹³Some research has hinted at imperfect rebating of the VAT for exports for Chinese exports; see Chandra and Long (2013), but since this effect is confined to China, we do not expect any variation of aggregate exports with the VAT for a representative country in our samples. See also Fan et al. (2020) for a firm model of tax avoidance with domestic and foreign sales and an application to China.

term.¹⁴ By controlling for the effects of size (E_j, Y_i^C) and the resistances ($\sum_{i=1}^n (\frac{t_{ij}}{Q_i})^{1-\sigma}$ and $\sum_{j=1}^n (\frac{t_{ij}}{P_j})^{1-\sigma}$) it is possible to estimate the effect of the VAT from variation in countries over time. If the VAT were neutral, the coefficient of interest β should not be statistically significant.

Table 1: Gravity Importer-FE and VAT

VAT Data	EU		Global
Trade Data	Cmtrd ('95-'19)	TrdPrd ('80-'06)	Cmtrd ('03-'19)
	(1)	(2)	(3)
VAT %	-0.052** (0.020)	-0.039** (0.016)	-0.081*** (0.016)
Num.Obs.	631	490	1103

Note: Standard errors are clustered at the country level and are reported in parentheses. All models were estimated with country and year fixed effects. Significance levels: * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Table 1 depicts the results for the baseline specification of model (8). Only second stage results are presented, since we are interested in the influence of VAT rate changes on the importer-time fixed effect. Columns (1)-(3) indicate a statistically significant negative coefficient of β implying that the VAT is not neutral.

While Table 1 shows significant (and sizable) effects, its fixed effect structure implicitly assumes that economic size and average trade costs vary uniformly over all countries. Countries may, however, be hit by idiosyncratic productivity shocks or may change non-discriminatory trade policies (such as MFN tariffs). Furthermore, the dependent variable in equation (8) may also be driven by (un-)observable country-time specific confounders for which we cannot control in a one-sector model.

To obtain a dependent variable that varies at the country-year level, we estimate a

¹⁴Note that these fixed effects also control for productivity changes. They also control for common globalization effects.

two-sector model by exploiting the fact that reduced VAT rates apply to foodstuffs in most countries, in particular in the EU. Therefore we extend the two-stage procedure to include two sectors: a consumption good (non-food) and a food sector. The gravity model is estimated with importer-sector-time, exporter-sector-time and sector-pair fixed effects. In the second stage, the importer-sector-time fixed effects are regressed on the sector’s applicable rate, as well as on sector-year, sector-country and country-year fixed effects.¹⁵ This model is only estimated for EU countries, since the applicable reduced rates for food can be clearly identified from the EC report.¹⁶ Results are shown in Table 2, column (1). Standard errors are clustered at the country-sector, sector-year and country-year level.¹⁷

Table 2: Two-Sector Model

	TrdPrd & EU VAT, '80-'06 w/o internal trade	
	Import FE (1)	Import FE (2)
appl. VAT %	-0.031*** (0.009)	-0.016** (0.006)
Num.Obs.	888	866

Note: Shown are results from a linear fixed effects model. Standard errors are clustered using three-way clustering at the country-sector, sector-year and country-year levels. Standard errors are reported in parentheses. All models were estimated with country-sector, sector-year and country-year fixed effects. The dependent variable are importer-sector-time fixed effects from a two-sector gravity model estimated with PPML.

Significance levels: * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

We find a statistically significant negative effect of VAT rate changes on the import-

¹⁵We also estimate equation (8) using additional control variables, and results hardly change; these results are available upon request. In any case, the use of country-year fixed effects is more comprehensive than including a selective number of control variables.

¹⁶Some countries apply the standard rate or a zero rate to food, reducing available variation over time.

¹⁷Results are robust to one-way clustering at the country-sector level and available upon request.

sector-time fixed effect. Thus, the VAT is non-neutral even when exploiting only between-type variations in VAT rates while controlling for any factor impacting the inward multilateral resistance terms at the country-year level. The coefficient is smaller than the coefficient reported in Table 1, yet still in the same order of magnitude and still economically significant. Even at this smaller coefficient, the increase in imports (including from domestic producers) for a one percentage reduction in VAT rates would be 3.1 %.¹⁸

The non-neutrality of the VAT could be driven by internal trade rather than international trade flows. It is possible that only internal trade responds strongly to VAT changes while external trade is neutral in the sense that it stays constant and unaffected by VAT changes. To rule out this possibility we re-estimate the two-sector model of Table 2, column (1), on the TradeProd data that includes only international trade flows and report the result in Table 2, column (2). Again, we find that the effect of the VAT on importer-sector-time fixed effect does not disappear. The coefficient estimate is reduced by half and now only significant at the 5 percent level. This result is not surprising as internal trade makes up a substantial portion of overall trade reducing the size and variation in the importer-time and importer-sector-time fixed effects.¹⁹

All in all, these results lead to the conclusion that the VAT is not neutral. In our structural gravity framework Lemma 1 implies that some $\epsilon_{ij,\tau_j} \neq 0$ and/or that $\phi_j < 1$, i.e. that c.i.f. producer prices change and/or revenues are not completely returned to consumers. If producer prices were to change not only in absolute but also in relative terms, consumers would substitute between goods and the VAT would potentially be discriminatory. If not all revenues were returned to consumers but relative prices remained unchanged, the VAT would be non-neutral due to income effects but non-discriminatory in the sense that relative trade flows would be unchanged. The analysis so far provides no direct evidence that relative prices change. Nevertheless, the results from excluding internal trade flows indicate that the VAT may also be discriminatory, a question which will be more thoroughly analyzed in the following subsection.

¹⁸Note that β is the semi-elasticity of trade flows w.r.t. marginal VAT rate changes; using equation (8) in equation (7) and differentiation w.r.t. the VAT yields $\beta = \frac{\partial X_{ijt}/X_{ijt}}{\partial VAT_{jt}}$.

¹⁹For the average European country internal trade makes up roughly 33 percent of overall trade.

4.2 The differential effect of the VAT on international trade

So far we have illustrated that both international and internal trade decline with an increase in the (importing) country’s VAT rate. While this result implies non-neutrality of the VAT, it speaks little to the question of non-discrimination. To answer this question, we are interested in the effects on imports relative to internal trade: do imports react more, less or proportionately to VAT rate changes compared to internal trade? First we must distinguish between internal and international trade flows in the data and examine the relative changes between the two types of flows. Empirically, this is done within an estimated gravity model using the methodology of Beverelli et al. (2018) and Heid et al. (2021). It includes a border indicator distinguishing between international and internal trade flows and an interaction with the VAT rate of the importing country.²⁰ Though the method was originally devised to analyze non-discriminatory trade policies which do not affect internal trade, it is applicable to policy instruments that affect both internal and international trade. In particular, it is necessary to directly include the VAT rate in the gravity estimation. Additionally, to ensure unbiased estimates in the presence of globalization effects, a border-year fixed effect ζ_{ijt} should be added. The latter captures the reduced costs of international trade relative to domestic trade due to changed economic interdependence and integration. We thus estimate the following model with border-year fixed effects using a PPML estimator:

$$X_{ijt} = \exp(\beta_1 RTA_{ijt} + \beta_2 BORDER_{ij} * VAT_{jt} + \eta_{it} + \nu_{jt} + \xi_{ij} + \zeta_{ijt} + u_{ijt}), \quad (9)$$

where the coefficient β_2 measures the *differential* impact of the VAT on imports from a foreign country compared to internal trade.²¹ That is, a positive (negative) coefficient will indicate that international trade responds less (more) to VAT changes than internal trade, while a null result would indicate non-discrimination. The absolute trade costs – i.e. how much internal consumption and international imports combined are reduced for a given increase in the VAT rate – are still captured by the importer-time fixed effect.

²⁰The border indicator is one for each national border, irrespective of whether countries are both members of the same RTA.

²¹In particular, differentiation of equation (9) yields $\beta_2 = \frac{\partial X_{ijt}/X_{ijt}}{\partial VAT_{jt}}$ if $BORDER_{ij} = 1$. Thus, β_2 is the semi-elasticity of international trade flows relative to internal trade w.r.t. marginal VAT rate changes.

Furthermore, we also estimate model (9) using observable gravity variables such as the log of distance, contiguous border, common language and former colonial ties instead of the pair fixed effect ξ_{ij} .

Both models are estimated only for the TradeProd data set as we require information on internal trade for this estimation strategy. Given the limited overlap of three years for the global VAT and TradeProd data set, we only focus on the EU. Using the EU data comes at the cost of dropping all trade flows where the importer is not an eventual EU country applying a VAT in that year, but the resulting coefficient estimate can still be usefully interpreted as a local average treatment effect for EU countries. We estimate equation (9) both for a pooled sample including Food and Non-Food products as well as for each product category separately.

The results are shown in Table 3. We see sizable negative coefficients for the interaction with EU VAT rates that are statistically significant at the 5 and 1 percent level, respectively.²² This indicates that, as EU countries increased their VAT rates, imports decreased relative to internal trade. Results for the pooled sample imply that on average a one percentage point increase in the applied VAT rate of the importing country leads to a decrease in imports from a foreign country relative to internal trade between 3.4 % to 11.1 %. Looking at the results in column (3) we find that this effect is even larger when restricting the sample to non-food products. Turning to Column (5) we find a smaller and statistically less significant effect compared to Columns (1) and (3). However, the discriminatory effects of the VAT are not only limited to non-food products but also appear to affect trade in foodstuffs. All results are robust to using the standard gravity controls. Generally, coefficients are substantially larger when using these controls especially in case of foodstuffs underlining the importance of employing pair fixed effects. Although these estimates are EU-specific, they suggest that the VAT discriminates against international trade even though it is applied uniformly to all final goods sales.²³

²²We have also checked whether the incidental parameter problem applies to our estimate and have conducted the bias test of Weidner and Zyklin (2021). Our results remain robust and in the range of Table 3. Details are available upon request.

²³We have also estimated model (9) using global VAT rates in the interaction term, and unsurprisingly results are less clear. While we do see negative coefficients in the same order of magnitude as those for the EU rate models, they are smaller and only partially statistically significant at conventional levels due to the much smaller sample size and observational period. Details are available upon request.

Table 3: Discriminatory VAT

	(1)	(2)	(3)	(4)	(5)	(6)
	Pooled Sample		Non-Foods		Foodstuffs	
RTA	0.624*** (0.094)	0.532*** (0.057)	0.882*** (0.132)	0.578*** (0.086)	0.318*** (0.039)	0.444*** (0.063)
Border X VAT (EU)	-0.034*** (0.009)	-0.111*** (0.005)	-0.054*** (0.017)	-0.079*** (0.009)	-0.018** (0.009)	-0.152*** (0.007)
Log Distance		-0.583*** (0.018)		-0.361*** (0.020)		-0.802*** (0.019)
Contiguous Border		0.232*** (0.019)		0.232*** (0.023)		0.198*** (0.028)
Common Language		0.766*** (0.028)		0.762*** (0.033)		0.841*** (0.048)
Colony		0.133*** (0.028)		0.222*** (0.032)		0.050 (0.048)
Num.Obs.	67124	66762	37550	37295	29574	29467

Note: Shown are results from a gravity model estimated using PPML. Standard errors are clustered at the country-pair level and shown in parentheses. Both models are estimated with importer-time and exporter-time fixed effects. Model (1), (3), and (5) also includes symmetric pair fixed effects. Both models also include border-year fixed effects.

Significance levels: * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Given the empirical finding that the VAT has discriminatory effects, the question remains which factors drive this result. In line with the theoretical model derived in section 2, we find that the relative trade flow from countries i and k to country j , that is,

$$\frac{X_{kj}}{X_{ij}} = \left(\frac{p_{kj}}{p_{ij}} \right)^{1-\sigma} = \left(\frac{\alpha_k c_k t_{kj}}{\alpha_i c_i t_{ij}} \right)^{1-\sigma}$$

does not directly depend on the VAT rate. Hence, if c.i.f. prices do not respond to VAT rate changes, or respond proportionately, also internal trade does not change relative to external trade which would imply that the VAT rate is neither discriminatory nor import-promoting. As this result does not obtain in our empirical analysis, we now scrutinize the

effect of price changes in more detail. For this purpose, we define

$$\zeta_j = \frac{X_{jj}}{\sum_{i \neq j} X_{ij}} = \frac{(\alpha_j p_{jj})^{1-\sigma}}{\sum_{i \neq j} (\alpha_i p_{ij})^{1-\sigma}} \quad (10)$$

as the ratio of internal trade in final goods to the aggregate imports of final goods. Let $s_{ij} = X_{ij} / \sum_{i \neq j} X_{ij}$ denote the share of country i 's final goods exports to country j to all imports of country j . We find:

Proposition 1. *Internal trade in final goods increases relative to aggregate imports of final goods if the relative price change of p_{jj} is smaller than the sum of relative price changes of $p_{ij}, i \neq j$, weighted by the import shares s_{ij} .*

Proof. Total differentiation of (10) yields

$$\frac{d\zeta_j}{\zeta_j} = (\sigma - 1) \left[\sum_{i \neq j} s_{ij} \frac{dp_{ij}}{p_{ij}} - \frac{dp_{jj}}{p_{jj}} \right].$$

□

Suppose country j experiences an increase of the VAT rate and domestic and foreign firms bear part of the tax burden. Proposition 1 reads such that internal trade relative to imports increases if and only if the producer price of the home final good decreases more than the weighted average producer price of all imported final goods ($0 > \sum_{i \neq j} s_{ij} \frac{dp_{ij}}{p_{ij}} > \frac{dp_{jj}}{p_{jj}}$). This implies that the pass-through of the VAT to consumers needs to be smaller for home firms than for foreign firms. The result of the non-neutrality of the VAT as illustrated in subsection 4.1 is thus driven by changes in relative prices and might be further intensified by an incomplete return of the tax revenue to consumers.

Based on our model, we can suggest three potential channels that can explain our results. First, changes in the VAT may also result in changes in absolute trade cost, i.e., increased customs scrutiny and/or higher administrative cost. These changes in absolute trade cost affect only international trade and result in a price increase of all foreign varieties compared to the home variety. However, it seems unlikely that mostly small rate changes should have outsized influence on absolute trade costs in a way that is not accounted for by the rich fixed effects structure of equation (9). The border-year fixed

effect captures potential changes in border enforcement, while the importer-year fixed effect controls for average changes in the administrative workload of all trading partners.

Second, different price responses could be the result of a productivity increase from public goods provision. This would imply that both domestic and importing firms as well as consumers share the economic burden of the VAT and that part of the revenues will be invested into (local) public good provision. While importing firms share some of the burden of the tax, public good provision and the subsequent productivity increases benefit only domestic firms. Passing a share of these productivity gains on to consumers in the form of price reductions leads to a differential price response and effectively a lower pass-through of the VAT for domestic firms.²⁴ While we empirically control for average annual productivity changes across importers and exporters, the importer-year and exporter-year fixed effects do not capture productivity changes between importers and domestic producers. Consequently, the coefficient of interest may reflect differential productivity responses and thus price changes. However, this explanation would require that the productivity gains from increased public goods provision materializes instantaneously with the rate increase which also seems unlikely.

Third, relative prices may adjust due to changes at the extensive margin from importers leaving the market. Bearing some of the burden of a VAT change through imperfect pass-through, importers may no longer find it profitable to serve the market and exit while domestic firms stay active. When some importers exit, the overall market composition changes such that the share of domestic firms increases. Domestic firms charge lower markups causing relative prices to decrease.²⁵ Empirically, the average change in market composition is also absorbed by the importer-year fixed effect. However, domestic and importing firms may be affected differently by changes in market shares and average productivity of importers. This deviation from the mean would then be captured by the coefficient of interest and can rationalize our empirical finding of *de facto* discrimination. Using Eurostat data on the total number of importing firms into European countries for 2012 to 2019, we find a substantial extensive margin response to VAT rate changes. The

²⁴Note that this channel could also be an explanation for the distinct global increase in the VAT. Governments have an incentive to increase the VAT as non-residents bear some of the tax burden, but revenues benefit only residents.

²⁵Appendix A.1 offers a simple model of firm entry and exit to illustrate the extensive margin effect.

number of importing firms decreases on average by 2.75 percent for a one percentage point increase in the standard consumption tax rate. This effects appears to be entirely driven by EU firms exporting to other EU countries. These firms face lower customs barriers and thus incur less fixed cost of exporting and are therefore potentially more responsive to VAT rate changes.²⁶

5 Welfare effects of the VAT

What are the welfare effects of changes in value-added taxation? In general, a number of model components are affected by the VAT including relative consumption, public spending, the efficiency of final good production, final goods trade and factor prices as well as firm profits. We follow Arkolakis et al. (2012) in order to accommodate these effects in the theoretical model developed in section 2. For this purpose, we have to distinguish between the value of imports which is given before VAT in c.i.f. terms and expenditures which include the VAT.

Let $e_{ij} = \tau_j X_{ij}$ denote the expenditures of consumers in country j on goods produced in country i , and let $\lambda_{ij} = e_{ij}/E_j$ denote the respective expenditure share. The change of any variable z from its level z^0 before to the level z^1 after the VAT change is denoted by $\widehat{z} \equiv z^1/z^0$. Furthermore, welfare is determined by the representative consumer and given by $W_j = U(q_{ij}^*)$. We find:

Proposition 2. *The welfare change due to a change in the VAT rate is given by*

$$\widehat{W}_j = \widehat{E}_j \frac{\widehat{\lambda}_{jj}^{\frac{1}{1-\sigma}}}{\widehat{p}_{jj} \widehat{\tau}_j} = \left(\frac{\widehat{E}_j}{\widehat{\tau}_j} \right)^{\frac{\sigma}{\sigma-1}} \frac{\widehat{X}_{jj}^{\frac{1}{1-\sigma}}}{\widehat{p}_{jj}}.$$

Proof. See Appendix A.3. □

Proposition 2 shows that – as in Arkolakis et al. (2012) – that the welfare changes can be measured by changes in domestic variables of country j only. An increase in the expenditure share on domestically produced final goods ($\widehat{\lambda}_{jj}$), e.g. due to larger protectionism,

²⁶For a more detailed description of the estimation, results, and data see Appendix A.2.

results in welfare losses. Furthermore, welfare decreases as local firms charge higher prices for domestic consumers and/or the VAT rate increases. Additionally, overall welfare will be affected by changes in expenditures stemming from varying factor rewards, a larger income from the redistribution of tax revenues and a change in profits. The welfare change calculated in Proposition 2 is also expressed in terms of the relative change in internal trade (\hat{X}_{jj}) rather than the change in the expenditure share of domestically produced final goods. We can compute the former, while the latter is not observed. In the following we quantify the welfare effects of VAT rate changes by combining the empirical results from subsections 4.1 and 4.2 with Proposition 2. Given the geographical scope of our empirical results, the welfare analysis is confined to the EU context.

To calculate the welfare effects from a VAT rate change we need to make several assumptions. For the elasticity of substitution, we use $\sigma_1 = 3.8$, the median value result of the meta-study by Bajzik et al. (2020), and $\sigma_2 = 5.03$, the preferred estimate of the literature survey of Head and Mayer (2014).²⁷ Furthermore, we normalize the consumer price to unity prior to the VAT change. All welfare changes are calculated for an increase in the VAT rate by one percentage point for an average country in the EU. In our data set, the average VAT rate is given by $\bar{\tau} = 1.1963$, so a one percentage point increase implies $\hat{\tau} = 1.2063/1.1963 = 1.0084$. Table 2 in subsection 4.1 indicates that a conservative estimate implies a decrease in aggregate trade of at least 3.1 % due to an increase in the VAT rate by 1 percentage point. Given this result and Proposition 2, a one percentage point VAT increase implies $\hat{E}_j = 1.0084 \times 0.969 = 0.977$ if all other income remains unchanged. We do not observe \hat{X}_{jj} directly, but we know that aggregate trade declines by 3.1 % while external trade with a foreign country declines by an *additional* 1.8 to 5.4 % on average for our fixed effect regressions according to Table 3.

Let γ denote the ratio of external trade to aggregate trade; if $\gamma = 0$, the respective country is in autarky; if $\gamma = 1$, the respective country has no own final good production for its own market. In any case, $\gamma\hat{X}_{ij} + (1 - \gamma)\hat{X}_{jj} = \gamma(1 + \beta_2)\hat{X}_{jj} + (1 - \gamma)\hat{X}_{jj} = \hat{X}_{jj}[1 + \gamma\beta_2] = 1 - 0.03 = 0.969$ must hold for the average European country which implies $\hat{X}_{jj} = 0.969/(1 + \gamma\beta_2)$. From Table 3, we see that β_2 ranges from -1.8 % to

²⁷ $\sigma_2 = 5.03$ is also close to the value of 4.927 estimated by Gaubert and Itskhoki (2021) and the value of 5.39 estimated by Breinlich et al. (2020); both papers estimate σ using a structural, oligopolistic trade model.

−5.4 % in our fixed effect regression, and we are going to use these two values in our welfare computations. Furthermore, we employ the average ratio of external trade to aggregate trade in our data set which is given by $\bar{\gamma} = 0.6735$. Welfare effects are calculated for a spectrum of price responses ranging from complete absorption of the VAT ($\widehat{p}_{jj}\widehat{\tau}_j = 1$) to complete pass-through ($\widehat{p}_{jj} = 1$). Given these prerequisites, we conduct the counterfactual analysis for three different policy scenarios to shed light on different policy-relevant aspects of a VAT reform.

First, we compute the welfare losses for a case where the tax revenue increase is completely unproductive, that is, that it is neither returned to consumers in any way nor used to increase productivity nor used to compensate for any other potentially income-increasing tax reform. Table 4 summarizes the results. Given the above assumptions, welfare losses range from 2.59 to 4.37 % for the average country if the additional tax revenue is completely wasted. These results suggest that non-neutrality and discrimination of the VAT translate into substantial welfare losses if the tax revenue increase has no significant benefit.

Table 4: Welfare effects (in %) for unproductive revenue

	β_2	
	-0.018	-0.054
$\sigma_1 = 3.8$	2.71 - 3.52	3.57 - 4.37
$\sigma_2 = 5.03$	2.59 - 3.39	3.18 - 3.99

$1 - \widehat{W}_j$ for complete absorption ($\widehat{p}_{jj}\widehat{\tau}_j = 1$) to complete pass-through ($\widehat{p}_{jj} = 1$)

To distinguish how much of these welfare losses are driven by the change in aggregate imports, we run the same welfare analysis under the assumption that expenditures do not change. $\widehat{E}_j = 1$ implies a substantially lower decrease of 0.82 % in aggregate trade. Nevertheless, the VAT remains discriminatory with internal trade decreasing compared to external trade resulting in welfare losses. Table 5 illustrates that the welfare changes are smaller, indicating that most of the welfare effect originates from lower expenditures. But even with the assumption of unchanged expenditures, the welfare effects are not negligible. Since expenditures cannot be expected to increase with the VAT, these results constitute a lower bound for our counterfactual welfare analysis. Tables 4 and 5 establish a benchmark of what the increase in tax revenue has to achieve in order to make the VAT increase at least welfare-neutral.

Table 5: Welfare effects (in %) for unproductive revenue without expenditure change

	β_2	
	-0.018	-0.054
$\sigma_1 = 3.8$	0.435 - 1.26	1.31 - 2.13
$\sigma_2 = 5.03$	0.302 - 1.13	0.915 - 1.74

$1 - \widehat{W}_j$ in for complete absorption ($\widehat{p}_{jj}\widehat{\tau}_j = 1$) to complete pass-through ($\widehat{p}_{jj} = 1$) and for $\widehat{E}_j = 1$

Second, we assume that the revenue raised from a one percentage point VAT increase is entirely used for public good provision G_j to raise total factor productivity A_j . Thus, the efficiency of local production is increased which translates into a lower unit cost and potentially lower prices. Remember that the domestic welfare effect depends only on the price change of domestically produced final goods for domestic consumers. Given these assumptions, we can compute by how much the domestic price must decrease in order to keep welfare constant. We do a similar exercise as above and report the results for $\widehat{E}_j < 1$ as in Table 4 (the results for $\widehat{E}_j = 1$ are available upon request). Table 6 illustrates that these price reductions have to be substantial and should not fall short of 3.39 % in the average country. Consequently, productivity gains from the additional public good need to be large and at least partially passed on to consumers through substantial domestic price reductions.

Table 6: Required price reduction (in %) for welfare neutrality

	β_2	
	-0.018	-0.054
$\sigma_1 = 3.8$	3.52	4.37
$\sigma_2 = 5.03$	3.39	3.99

$1 - \widehat{p}_{jj}$ for $\widehat{W}_j = 1$

Third, we consider the case where the VAT is increased to compensate for a potentially income-increasing personal or corporate income tax reform. The question is how much income a reduction in the personal or corporate income tax must generate to make up for the welfare losses from a VAT increase. Table 7 illustrates that income should at least increase by 2.05 % for the tax reforms to be welfare-neutral.

The above welfare implications are calculated for a representative consumer and are

Table 7: Required income increase (in %) for welfare neutrality

	β_2	
	-0.018	-0.054
$\sigma_1 = 3.8$	2.05 - 2.68	2.72 - 3.35
$\sigma_2 = 5.03$	2.12 - 2.8	2.63 - 3.31

\widehat{E}_{jj} for complete absorption ($\widehat{p}_{jj}\widehat{\tau}_j = 1$) to complete pass-through ($\widehat{p}_{jj} = 1$) and for $\widehat{W}_j = 1$

therefore not driven by any income distribution effects of heterogeneous consumers. It is thus noteworthy that the (negative) welfare effects of potential VAT reforms are substantial even in this environment that is completely agnostic towards distributional effects.

6 Concluding remarks

This paper has shown empirically that the VAT is neither neutral nor non-discriminatory in the context of international trade. Using a structural gravity model and novel global VAT regime information, we derive two key findings. First, a one percentage point increase in the VAT results on average in a 3.1 % reduction in aggregate trade implying that the VAT is non-neutral. This result is derived using a two-stage approach following Yotov et al. (2016) and exploiting variation between standard and reduced rates allowing us to control for country-year fixed effects. Second, a one percentage point increase in the standard VAT leads to a 1.8 to 5.4 % reduction of foreign imports relative to domestic trade. Thus, the VAT is neither neutral nor non-discriminatory. The question of non-discrimination is analyzed by explicitly distinguishing between inter- and intranational trade using recent advancements in the estimation of non-discriminatory trade policies in the structural gravity framework (see Beverelli et al., 2018; Heid et al., 2021).

To the best of our knowledge, this paper is the first to empirically investigate the question of trade discrimination in the context of the VAT. For the analysis we develop a comprehensive structural gravity model that relies on less restrictive assumptions than the previous literature, can fully rationalize our empirical results and also allows us to conduct a welfare analysis. We illustrate that the welfare losses of a one percentage point increase in the VAT rate lie between 2.59 and 4.37 % for an average EU country if the additional VAT revenue is completely unproductive. These results challenge the conventional perception

that the VAT is a policy instrument with little to no economic distortions. If the VAT increase improves public good provision, a welfare-neutral VAT change requires substantial productivity gains; if it is part of a larger tax reform, it has to imply substantial income increases.

Given our results, policy-makers should be aware that VAT rate changes have substantial effects on trade patterns and welfare implications even when distributional effects are disregarded. While the VAT is *de jure* a non-discriminatory policy instrument, its effect is *de facto* discriminatory and non-neutral and thus distortionary. Consequently, increasing the VAT to provide additional public goods or as a compensation for other tax reductions should be carefully reconsidered. Our paper illustrates that the reason for these welfare effects must originate from differential price responses of importers and local producers. Thus, our results point at substantial differences in the pass-through of the VAT between local and international final good producers. Furthermore, we find evidence that this differential price response is driven by market exit of importing firms.

The result that internal trade increases relative to aggregate imports indicates that governments could (un-)intentionally use the VAT not only for revenue generation but also a trade policy tool. Given the substantial global rise in VAT rates, governments may have already engaged in this new type of discriminatory trade policy by compensating falling tariff levels through VAT increases. Exploring the details of these responses requires a model which can explain the differential pricing behavior of firms and/or different market entry behavior of domestic and foreign firms. There is an emerging literature that deals with differential markup behavior in imperfectly competitive markets in a trade context which should prove to be very useful for such an analysis.²⁸ Future research could also focus on the question whether these developments are particularly relevant in common markets like the EU or if they also generalize to RTAs. We leave such an analysis to future research.

²⁸See, for example, Arkolakis et al. (2019), Atkeson and Burstein (2008), Behrens et al. (2014), Behrens et al. (2020), Breinlich et al. (2020), Edmond et al. (2015), Heid and Stähler (2020), Gaubert and Itskhoki (2021).

Appendix

A.1 A simple model of firm entry

We consider a perfect competition model of trade with n countries. Each country i hosts N_i firms, and each firm is able to sell one unit (or none) in each country. Each firm draws its unit cost realization from a distribution $F(\cdot)$ that has positive support between 0 and \bar{c} . We focus on sales in country j , and each foreign firm located in country i has to carry an iceberg trade cost of size t_{ij} when serving country j ; we normalize internal trade costs such that $t_{jj} = 1$. Consequently, a firm located in country i sells a unit in country j if its cost realization is less or equal to $p_{ij}/(\tau_j t_{ij})$.

In equilibrium, each firm correctly anticipates demand and supply for each variety i sold in country j to clear such that

$$q_{ij} = \frac{E_j p_{ij}^{-\sigma}}{\sum_{k=1}^n p_{kj}^{1-\sigma}} = \min \left[F \left(\frac{p_{ij}}{\tau_j t_{ij}} \right), 1 \right] N_i \quad (\text{A.1})$$

holds where we have set $\alpha_i = 1$ w.l.o.g. The LHS is the demand for variety i in country j , and the RHS is the supply that is the fraction of firms serving country j times the number of firms located in country i . We find for $k \neq i$ that

$$\begin{aligned} \frac{\partial q_{ij}}{\partial p_{ij}} &= -\frac{q_{ij}}{p_{ij}} \left(\sigma - (\sigma - 1) \frac{p_{ij} q_{ij}}{E_j} \right) = -\frac{q_{ij}}{p_{ij}} (\sigma - (\sigma - 1) s_{ij}) < 0 \text{ and} \\ \frac{\partial q_{ij}}{\partial p_{ik}} &= \frac{q_{ij}}{p_{ij}} (\sigma - 1) \frac{p_{kj} q_{kj}}{E_j} = \frac{q_{ij}}{p_{ij}} (\sigma - 1) s_{kj} > 0, \end{aligned}$$

where s_{ij} denotes the market share of country i in country j . Let

$$z_{ij} = F \left(\frac{p_{ij}}{\tau_j t_{ij}} \right) N_i$$

denote supply in case that $\min[F(p_{ij}/(\tau_j t_{ij})), 1] < 1$. We find that

$$\begin{aligned} \frac{\partial z_{ij}}{\partial p_{ij}} &= \frac{f(p_{ij}/(\tau_j t_{ij}))}{\tau_j t_{ij}} N_i > 0, \quad \frac{\partial z_{ij}}{\partial p_{ik}} = 0 \text{ and} \\ \frac{\partial z_{ij}}{\partial \tau_j} &= -\frac{f(p_{ij}/(\tau_j t_{ij})) p_{ij}}{\tau_j^2 t_{ij}} N_i < 0. \end{aligned}$$

We now consider the case that all producers in the domestic country j serve their own country because $p_{jj}/\tau_j < \bar{c}$, that is, $F(p_{jj}/\tau_j) = 1$ holds before and after the VAT change. All foreign producers, however, select themselves into exporters and non-exporters because $F(p_{ij}/(\tau_j t_{ij})) < 1$. In order to keep the model analytically tractable, we assume that all foreign countries are symmetric, and we use p_j, q_j, s_j now to denote the equilibrium price, demand and market share, respectively, of domestic producers, and p_i, q_i, s_i to denote the symmetric foreign prices, demands and market shares, respectively. We now scrutinize how the relative c.i.f. price p_j/p_i is affected by a marginal increase in the VAT rate τ_j . Total differentiation yields

$$\underbrace{\frac{\partial q_i}{\partial p_j}}_{a_{ij}} \frac{dp_j}{d\tau_j} + \underbrace{\left((n-1) \frac{\partial q_i}{\partial p_i} - \frac{\partial z_i}{\partial p_i} \right)}_{a_{ii}} \frac{dp_i}{d\tau_j} = - \underbrace{\frac{\partial z_i}{\partial \tau_j}}_{a_\tau},$$

$$\underbrace{\frac{\partial q_j}{\partial p_j}}_{a_{jj}} \frac{dp_j}{d\tau_j} + \underbrace{(n-1) \frac{\partial q_j}{\partial p_i}}_{a_{ji}} \frac{dp_i}{d\tau_j} = 0,$$

where $a_\tau < 0$ and

$$\begin{aligned} a_{jj} &= -\frac{q_j}{p_j} (\sigma - (\sigma - 1)s_j) < 0, \\ a_{ji} &= (n-1) \left(\frac{q_j}{p_j} (\sigma - 1)s_i \right) > 0, \\ a_{ij} &= \frac{q_i}{p_i} (\sigma - 1)s_j > 0, \\ a_{ii} &= (n-1) \left(-\frac{q_i}{p_i} \left(\sigma - (\sigma - 1)s_i - \frac{f(p_i/(\tau_j t_{ij}))}{\tau_j t_{ij}} N_i \right) \right) \\ &< -(n-1) \left(\frac{q_i}{p_i} (\sigma - (\sigma - 1)s_i) \right) < 0. \end{aligned}$$

The changes are given by $dp_j/d\tau_j = a_{ji}a_\tau/\det(A)$ and $dp_i/d\tau_j = -a_{jj}a_\tau/\det(A)$ where

$$\det(A) = a_{jj}a_{ii} - a_{ji}a_{ij} > \frac{(n-1)\sigma q_i q_j (\sigma - (\sigma - 1)s_i - (\sigma - 1)s_j)}{p_i p_j} > 0$$

because $g(\sigma) \equiv \sigma - (\sigma - 1)s_i - (\sigma - 1)s_j$ implies $g(1) = 1$ and $g'(\sigma)1 - s_i - s_j \geq 0$ as $s_i + s_j \leq 1$. The relative c.i.f. price change is given by

$$\frac{dp_j}{dp_i} = -\frac{a_{ji}}{a_{jj}} = \frac{(n-1)(\sigma-1)s_i}{\sigma - (\sigma-1)s_j} = \frac{(\sigma-1)(1-s_j)}{\sigma - (\sigma-1)s_j} = 1 - \frac{1}{\sigma - (\sigma-1)s_j} < 1 \quad (\text{A.2})$$

because $(n-1)s_i = 1 - s_j$. Equation (A.2) shows that the c.i.f. price change is smaller for domestic producers than for foreign producers, implying an increase in relative demand for the domestically produced good.

A.2 Extensive Margin Response

The *Eurostat International Trade in Goods* database contains detailed information on the number of firms exporting from or importing to any European country. This data includes information on the number of EU and Non-EU importer and exporters for an unbalanced panel of 35 countries from 2012 to 2020. To test whether VAT rate changes result in an extensive margin response - firms leaving the market - we focus on the number of importers. Furthermore, we disregard 2020 due to the limited data coverage across countries. We estimate the following model:

$$\log(NFirms_{jt}) = \alpha + \beta VAT_{jt} + \delta Growth_{jt} + \psi_j + \chi_t + \epsilon_{jt},$$

where $NFirms_{jt}$ represents the log number of importing firms into country j in year t . ψ_j and χ_t represent country and year fixed effects. To account for changes in the underlying economic circumstances we also control for GDP growth in percent ($Growth_{jt}$). Looking at Column (1) of Table 8, we observe that a one percentage point increase in the VAT rate results on average in a 2.7 percent reduction in the number of importing firms into country j . For the average European country this implies an exit of 2,825 importing firms. Columns (2) and (3) indicate that this effect is almost entirely driven by European firms exporting to other European countries. Given these results, it is likely that the non-neutrality and discrimination of the VAT is driven by extensive margin response of European firms.

A.3 Proof of Proposition 2

Totally differentiating the price index yields

$$d \ln P_j = \sum_{i=1}^n \lambda_{ij} d \ln p_{ij} + d \ln \tau_j.$$

Since $\lambda_{ij} = (p_{ij}\tau_j/P_j)^{1-\sigma}$, $\lambda_{kj}/\lambda_{ij} = (p_{kj}/p_{ij})^{1-\sigma}$. Taking logs and differentiating allow us to write any price change as a function of the change in the domestic price and the

Table 8: Extensive Margin Response

	(1)	(2)	(3)
	All Importers	EU Importers	Non-EU Importers
VAT %	-2.759*** (0.692)	-2.795** (1.253)	-1.450 (0.871)
GDP growth (annual %)	0.002 (0.004)	-0.001 (0.007)	0.002 (0.003)
Constant	11.511*** (0.144)	11.420*** (0.268)	10.174*** (0.185)
Observations	243	213	215

Standard errors are clustered at the county level and shown in parantheses. All models include country and year fixed effects. Significance levels: * $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

respective expenditure changes as

$$d \ln p_{ij} = d \ln p_{jj} + \frac{d \ln \lambda_{ij} - d \ln \lambda_{jj}}{1 - \sigma},$$

which also allows us to rewrite the change in the price index as

$$\begin{aligned} d \ln P_j &= \sum_{i=1}^n \lambda_{ij} \left[d \ln p_{jj} + \frac{d \ln \lambda_{ij} - d \ln \lambda_{jj}}{1 - \sigma} \right] + d \ln \tau_j \\ &= \frac{d \ln \lambda_{jj}}{\sigma - 1} + d \ln p_{jj} + d \ln \tau_j. \end{aligned} \quad (\text{A.3})$$

The last line follows from $\sum_{i=1}^n \lambda_{ij} d \ln \lambda_{ij} = \sum_{i=1}^n d \lambda_{ij} = 0$ and $\sum_{i=1}^n \lambda_{ij} = 1$. Define $d \ln \Lambda_j = d \ln \lambda_{jj} + (\sigma - 1)[d \ln p_{jj} + d \ln \tau_j]$ such that we can write (A.3) as a differential equation

$$\frac{dP_j}{P_j} = \frac{d\Lambda_j}{(\sigma - 1)\Lambda_j} \Leftrightarrow \frac{dP_j}{d\Lambda_j} = \frac{P_j}{(\sigma - 1)\Lambda_j}$$

which has the solution $P_j = C\Lambda_j^{\frac{1}{\sigma-1}}$ with $C > 0$ as a constant. Let us denote the change in welfare as a transition from period 0 to period 1, denoted by superscripts, such that

$$\widehat{W}_j = \frac{W_j^1}{W_j^0} = \frac{E_j^1 P_j^0}{E_j^0 P_j^1} = \widehat{E}_j \widehat{\Lambda}_j^{\frac{1}{1-\sigma}}. \quad (\text{A.4})$$

where $\Lambda_j = \lambda_{jj}(p_{jj}\tau_j)^{\sigma-1}$ which – together with (A.4) – implies the first part of Proposition 2. Since $\lambda_{jj} = \tau_j X_{jj}/E_j$, we can also write the relative change in Λ_j as

$$d \ln \Lambda_j = d \ln X_{jj} - d \ln E_j + (\sigma - 1)d \ln p_{jj} + \sigma d \ln \tau_j$$

which implies

$$\Lambda_j = \frac{X_{jj}}{E_j} p_{jj}^{\sigma-1} \tau_j^\sigma$$

which – together with (A.4) – implies the second part of Proposition 2.

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