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Social Security and Taxation

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Abstract
Some people who get Social Security must pay federal income taxes on their benefits. But, no one pays taxes on more than 85 percent of their Social Security benefits. Nearly 90% of individuals over age 65 rely on Social Security income to pay for a large portion of living expenses throughout their retirement years. The federal government makes this benefit available to those who have worked and contributed to the system for a certain number of years, but the total monthly benefit varies from person to person. In Europe, the competence for social security and the right to levy income tax lie with the country of employment in cross-border matters. This has two disadvantages. First, the Employment Principle distorts active persons' choice of place of work. Second, the employment-based regulation of state competencies cannot be applied to non-active persons. The Treaty of Maastricht, however, confers the right of free movement to all citizens of the Union. Against this background, this paper pleads for a reform in European policy coordination. The Employment Principle should be replaced with the Principle of Delayed Integration where cross-border matters are concerned.
Keywords: Social security and taxation , Employment Principle, Delayed Integration, Origin Principle, free movement etc.

1. Introduction

The European Union stands for the will to overcome the political and economical separation of its Member States. Europe should be a place where its citizens enjoy the freedom to move and to pursue their business wherever they wish. This goal was confirmed in the Treaty of Maastricht by the introduction of Union Citizenship. According to Article 18 *every* citizen of the Union shall have the right to move and reside freely. This was a confirmation of the policy of integration in as much as the right to free movement was and still is a privilege of active persons. Non-active persons such as the recipients of social assistance are effectively constrained in their choice of residence till this very day. Not least of all political integration and free movement are expected to enhance economic development. However, it is precisely this expectation that is being questioned in connection with Eastern Enlargement. Whether or not, and to what extent, there will be undesirable migration in addition to desirable migration is something that is stirring emotions. Even economists appear to be split as to how to judge Eastern Enlargement and what political measures to recommend. Some see the accession of new Member States as a welcome opportunity to break down rigid labor market structures with increased external competition (Burda, 2000). In their view, there is no such thing as undesirable migration. Others, on the other hand, are concerned about immigration that is driven simply by the desire to reap social benefits. They see testing times ahead for the welfare state (Sinn, 1994). Although European wide harmonization could certainly remove the basis for social tourism, such policy harmonization is in conflict with the principle of subsidiary, and due to the economic heterogeneity of the Member States it is not worth striving for, at least for the foreseeable future. Thus there seems to be a fundamental trade-off between the objective of free movement, on the one hand, and the objective of subsidiary, on the other hand. The object of this paper is to analyze this trade-off and to discuss possible solutions.What is being sought is a regulatory framework for European policy co-ordination that can do several things. First, it must put the Member States in a position in which they are able to pursue their own redistribution objectives in accordance with the subsidiary principle. Second, it must treat all citizens of the Union equally with respect to their right to free movement. In particular, this means that active and non-active persons must no longer be treated differently. Third, this regulatory framework must be designed in such a way that it impedes undesirable migration without impeding desirable migration. It is argued in this paper that the present EU framework fulfils such co-ordination requirements inadequately. It is employment-based, which means that the citizens of the Union are effectively subject to income taxation and social security in that Member State where they are employed ("lex loci laboris"). Such assignment of migrants is problematic for two major reasons. For one, an employment-based assignment cannot by nature be applied to non-active individuals and this makes a liberal application of the right to free movement difficult. For another, such a rule of assignment tends to distort decisions on migration due to the fact that the choice of place of work has an immediate effect on taxes and social benefits. From an empirical point of view it is not fully clear how important such distortions are. Still economic theory suggests not to play them down and rather to eliminate them if possible. That however requires to replace the Principle of (the Country of) Employment by something different. The alternative on which this paper focuses is the so-called Principle of

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Delayed Integration. Delayed Integration means that migrants - active persons and non-active ones alike- remain assigned to their country of origin for tax and social security purposes for an agreed period of time after emigrating. Only after this period has elapsed does the country of immigration take over the fiscal competence for these particular persons. This concept of Delayed Integration is not completely novel. It is already put into practice here and there in international tax and social security law. Its systematic application in international policy co-ordination however, has only recently attracted particular attention (Sakslin, 1997; Richter, 2001b; Weichenrieder, 2000). The Council of Economic Advisors to the German Ministry of Finance (Wissenschaftlicher Beirat, 2001) has looked into Delayed Integration in detail in its report on "Free Movement and Social Security in Europe". After weighing up the advantages and the disadvantages, the Council found a changeover from the Employment Principle to the Principle of Delayed Integration worthy of consideration. This paper is structured as follows. Section 2 presents some numbers on cross-border migration in Europe. Not only is the current situation of interest, but also the extent of migration that is expected to result from Eastern Enlargement of the EU. Section 3 outlines the present regulations concerning free movement in the EU. Section 4 explains how migrants are taxed and covered by social security.

2. Migration in Europe and Eastern Enlargement

In Germany and Austria there is much concern about excessive immigration as a result of Eastern Enlargement. For similar reasons, non-active citizens of the Union are denied an unrestricted right to free movement. There is a fear of social tourism. Such concerns about excessive migration could be allayed with the argument that they have no basis in reality: There is relatively little migration within Europe. This applies to both migration within

countries1 and cross-border migration. In 1993, there were approximately 17 million foreigners in the EU, corresponding to 4.6% of the total population. 12 million people (3.3%) were nationals of third countries and only 4.9 million (1.3%) were European citizens (Bauer and Zimmermann, 1999, p 3). There is considerable variation hidden behind such averages, however. The share of foreign nationals varies considerably across countries (OECD, 1999). It is below 2% in Finland and Spain, whereas it reaches 19% in Switzerland and 35% in Luxembourg. With values in the order of 9% it is moderately high in Austria, Belgium and Germany. Sweden has roughly 6% foreign nationals which is the highest share among Scandinavian countries .Now it would be wrong to infer a low propensity to migrate from low shares of foreigners. A low level of migration could be a sign of a migration equilibrium. Still, the need for political intervention cannot be ruled out. A migration equilibrium need not be allocationally efficient. Rather, residence choices could be fiscally distorted, which would raise the question of appropriate political measures to be taken. Low shares of foreigners in the EU could alternatively result from obvious or hidden barriers to free movement. It is the non-active citizens of the Union and the nationals of third countries, in particular, who are mobility constrained by present law.

3. Free Movement in the EU

As mentioned before the right of free movement is not enjoyed by all citizens of the Union to the same extent. Only active persons, more precisely persons who are put on an equal footing with active persons such as family members and surviving dependants, are completely free to move and to reside within the territory of the Member States. Non-active persons, more precisely persons who are not put on an equal footing with active persons, are restricted in their freedom to move. Member States may well take a more liberal stance towards migration and the Nordic countries do in fact whenever own citizens are affected. However the rule for the Union is that Member States limit the right of residence and they are even authorised to do so. Thus immigrants must have sickness insurance and sufficient resources at their disposal in order to ensure that they avoid becoming burdens on the social assistance system of the country of immigration during their stay.6 For recipients of social assistance, this provision means that they have de facto no freedom to move. It is precisely because they do not dispose of sufficient resources that they have to rely on social assistance. By moving abroad they, however, lose their claim to welfare support. Social assistance is not portable. According to German law, social assistance can be but need not be granted to German nationals residing abroad.7 If neither the home country nor the country of immigration grants social assistance, the freedom to move does not really exist for the needy. It is certainly not in conformity with the spirit of Maastricht if the freedom to move takes on a different shape for different groups of people (Sasklin, 1997, p.205; Wissenschaftlicher Beirat, 2001). The Treaty of Maastricht introduced the status of Union Citizenship and conferred on beneficiaries not only the right to vote and to stand as a candidate at municipal and European elections. As mentioned before, citizens of the Union were also granted the right to move and reside freely within the territory of the Member States. Although this right is subject to contracted limitations and conditions in accordance with Community law, the contracting parties must, however, have had in mind that such limitations will and should not last for ever. The explicit reference to the freedom to move in Article 18 of the EEC Treaty only makes sense if one assumes that the right to free movement should also be granted to those persons who do not already enjoy this right by virtue of other provisions. Since the right to free movement is already guaranteed to active persons or persons on an equal footing by Articles 39 and 43 of the EEC Treaty, one

has to infer that the contracting parties in Maastricht were decided to regard employment no longer as an absolute requirement for free movement.

4. Avoiding International Collision in Taxation and Social Security

Whenever citizens exercise their right to free movement, it becomes necessary to fix jurisdictional memberships and competencies. Citizens and jurisdictions need to be assigned to each other, and there are collision norms in international tax and social security law to regulate this. The various provisions are, however, anything but uniform both technically and in terms of content. As far as direct taxation is concerned, collision is avoided by the application of bilateral tax conventions. One has to rely on such conventions as the EEC Treaty provides no legal basis for co-ordinating national policies in the field of direct taxation. The bilateral tax conventions closely follow the OECD Model Tax Convention on Income and on Capital. Article 4 of this Model Convention rules that whenever the residence of a person is in need of clarification, in the first instance, he shall be deemed to be a resident of the State in which he has his permanent home available to him. Special provisions, however, apply when dealing with cross-border matters. For example, Article 15 of the OECD Model allocates the right to levy taxes on earned income to the country of employment if that employment exceeds an agreed period of time. It is then the responsibility of the residence country to avoid double taxation. This general provision does not rule out special ones in specific bilateral tax conventions. Several countries have agreements with their neighbours according to which so-called frontier workers, regular commuters across the border, are subject to taxation in the country ofresidence.Aside from such atypical special provisions, it is the country of employment which has the right to levy taxes on earned income in the EU. Employment-based taxation goes so far that workers in Germany who are resident abroad can apply to be taxed as if they were resident in Germany. In this way , they enjoy all the personal and family tax concessions that a resident can claim. It was only in 1996 that Germany enacted this provision thus reacting to the Schumacker ruling by the European Court of Justice in 1995.9 This development can be interpreted as a confirmation and a strengthening of the Employment Principle (Wissenschaftlicher Beirat, 2001. p. 52). The Employment Principle also dominates social security law, at least as far as the scope of Regulation (EEC) No. 1408/71 on social security for migrant workers is concerned.

4.1 Taxable Social Security Income

For Social Security benefits to be taxable, individuals must have income above the threshold. This is based on total combined income, calculated as an individual's adjusted gross income plus nontaxable interest earnings and half of his or her Social Security benefit. If combined income for a single individual is above $25,000 but below $34,000, or above $32,000 but below $44,000 for married couples, 50% of Social Security benefits are taxed. Combined income above these maximum amounts results in benefits taxed up to 85%. At this time, there is no income level that creates a situation where Social Security benefits are 100% taxable for retirees.

5. Critical Assessment of the Employment Principle

The employment-based regulation of jurisdictional memberships and competencies has advantages and disadvantages. It is chiefly the disadvantages which will be examined here. The most obvious drawback is a result of the fact that the Employment Principle is not applicable to non-active persons. Either special provisions become necessary if non-active persons may wish to migrate or some discrimination of such persons must be accepted. It has already been pointed out that an unequal treatment of Union Citizens hardly conforms to the spirit of the Treaty of Maastricht. Special provisions are just as problematic, however, because the separation of employment and non-employment is difficult to enforce in practice. According to a ruling of the European Court of Justice, as few as 10 to 12 hours of work per week may suffice for a person to qualify as working from a legal point of view.Once being qualified as working, such a person is eligible to all the social benefits granted in the country of employment, supplementary social assistance, housing and child benefit, in particular. Economic reasoning suggests that the claim to such benefits impacts residential and occupational decisions even if it is only a conditional one. In any case, special provisions for non-active persons are difficult to enforce if the only objective is to deny these persons workrelated social benefits. Even if one could ignore migration of non-active persons, the Employment Principle would still give reason for criticism on allocational grounds. In order to understand this kind of criticism one has to consider the joint interest of the countries of emigration and immigration. Labour is a factor of production which, in the case of perfect mobility, is only then globally efficiently allocated if its marginal product is equated across countries. The marginal product is reflected by the firms' cost of labour. When making locational decisions, workers do not compare costs of labour however. Instead, they compare wages net of taxes and subsidies. A migration equilibrium is, therefore, characterised by equalised net wages. Such a behaviour is only able to sustain production efficiency if equated net wages translate into equated costs of labour. Obviously a precondition for this to result is that the tax-subsidy wedge is of the same magnitude in the different jurisdictions. Only policy harmonisation can ensure this. Policy harmonisation, as has been explained, is no viable option for the EU, however. Hence the Employment Principle induces an internationally inefficient allocation of labour. The

Employment Principle is also criticised for impeding non-paretian distributive policy pursued at the national level . In order to provide a better explanation of this objection, it is advisable to make some simplifying assumptions. Suppose that the labour force divides into perfectly mobile and perfectly immobile workers. Both groups are complementary in production, so that the productivity of one factor increases with the availability of the other. This division into mobile and immobile is exogenous and not, for instance, the result of human capital investment. In such circumstances immobile labour cannot wish mobile labour to be taxed in the country of employment. Perfectly mobile workers must earn an internationally competitive wage. Hence their net remuneration cannot fall short of what is paid elsewhere in the world. By emigrating, they are able to avoid any wage tax levied at source. Any tax on mobile labour which is not internationally harmonised is, therefore, shifted backward. This is harmful for the immobile factor. Not only is it left with the full tax burden, but as a result of factor complementarity, its productivity is less than it would be without taxation. A positive correlation between mobility and earned income not only seems highly plausible.

A willingness to move is surely encouraged by cosmopolitanism, a knowledge of foreign languages, etc and thus by innate and acquired intellectual abilities which tend to have a positive effect on labour productivity. A positive correlation is also supported by empirical evidence. The empirical studies tend to focus on the connection between mobility and education.

6. Qualifying the Criticism of the Employment Principle

The negative allocation effects of the Employment Principle asserted above should also be put into perspective. It is frequently doubted that the propensity to move is sufficiently pronounced to have the distortive effects indicated. Such objections need to be tackled empirically and theoretically. Feld (2000a, Section 2.2.2)16 has recently provided a comprehensive survey of the empirical literature on fiscal competition in Tiebout's tradition. According to Feld, a distinction between the different causes of fiscally induced mobility must be made when evaluating this literature. The recipients of social assistance obviously strongly respond to the transfer level. At leastthis has been shown for the USA for the period since 1969. In that year, the Supreme Court ruled that the Residence Requirements for the recipients of welfare payments were in breach of the American Constitution. According to these requirements, transfer benefits were conditioned on years of residence and on the labour market status of the potential claimants. Since 1969, all US citizens or lawfully resident aliens may claim welfare payments in the State where they reside.It is non-paretian redistribution that, above all, suffers from competitive pressure. Taxes that merely cover the cost of rivalry in consumption must be levied according to the Benefit Principle if allocational efficiency is to be achieved. This means that such taxes should be levied employment-based if the cost of providing such goods is employment related. The taxes are set first-best efficient if, just as the marginal-cost pricing rule would suggest, they cover the cost which the jurisdiction incurs by the marginal job. This means that the taxes would in principle have to be imposed as a poll tax if the cost incurred by the jurisdiction is related to the creation of the job and not to earned income. When taxes are based on income or expenditure, as is commonly the case, allocational efficiency is at risk. In particular, labour supply decisions will be distorted if taxes are wage related although costs incurred by the jurisdiction are not. Migration decisions still remain undistorted if only the location-specific tax equals the cost that is caused by the free provision of local public goods and services to the marginal individual. A detailed analysis of the various distortions of possible forms of taxation goes beyond the scope of this paper. It should be noted, however, that employment based taxes are efficiency enhancing to the extent that they can be rationalized by the Benefit Principle. Now one may rightly doubt that the high level of employment-based taxes and social security contributions in Europe can be justified by the Benefit Principle. A recent attempt to support such scepticism empirically is made by Sinn et al. (2001).20 In their study, the direct fiscal effects of immigration per immigrant and year are calculated for West Germany for 1997. More precisely, the present values of tax revenues and the various social insurance

7. Alternatives to the Employment Principle

Theoretically, there are several possibilities to eliminate the distorting effect of employment based taxation on migration while sticking to the freedom of movement. Certain fairly obvious possibilities do not constitute viable political options, however. One of these is the adoption of the Nationality Principle as a substitute for the Employment Principle. Despite certain economic advantages, which will be described in connection with the Origin Principle, the Nationality Principle cannot be the basis for co-ordinating national policies in the EU. Treating Union Citizens differently according to their nationality would be interpreted as a form of discrimination which is expressly forbidden in Article 12 of the EU Treaty. Regulating migration by means of taxation is not a viable solution for the EU either. Taxing emigration and/or immigration would be interpreted as a violation of the right to free movement and would therefore have little chance of realisation. Another proposal with doubtful prospects of political success provides for a transition from the Employment Principle to the Origin Principle. This option was brought up by Sinn (1994) who chose to speak of the Home Country Principle and who pleaded for its adoption with a These numbers are taken from the German translation of Sinn and Werding (2001). One need not

stress that they are to some extent debatable. In a different study Bonin (2001) finds that the fiscal balance of immigrants to Germany is positive on average. Any such result is heavily dependent on the kind of social and economic characteristics assumed to hold for immigrants. The Origin Principle shows certain similarities to the Nationality Principle without being equivalent. On the one hand, it is more liberal than the latter as it allows a free first choice among redistributive systems. On the other hand, it is more restrictive as it rules out any later switch in life. "Origin" may have fewer negative political connotations than "nationality" and, in this respect, a change in Europe from the Employment Principle to the Origin Principle may have somewhat better chances than a change to the Nationality Principle. With regard to economic incentives, by contrast, the difference between the two principles is not that large. Therefore, it should suffice if the discussion of specific features is restricted to the Origin Principle. On the positive side, migration decisions are not distorted by taxes and transfer payments. Individuals cannot escape their origin, once fixed, by migrating. Production efficiency is maintained internationally since net wage arbitrage implies equalisation of gross wages and marginal products of labour. Distributive policies by individual countries are not thwarted by mobile taxpayers' threat to emigrate. The country of origin also shares the gain in income that the emigrants make. Hence, there is income redistributed from countries of immigration to countries of emigration, which helps to mitigate regional shocks. Finally, and positively, it should be noted that the Origin Principle, unlike the Employment Principle, is applicable to non-active persons. These individuals can be granted the right to free movementwithout the threat of social tourism arising.

Note that the Origin Principle requires the latter to remain assigned to their country of origin even if they decide to leave it for ever. For this reason, the country of origin is able to pursue a policy of non-paretian redistribution, but any policy of paretian redistribution will not be sufficiently internalised.

Such considerations concerning the effectiveness of distributive policy are based on a benevolent planner approach. The argument against the Origin Principle is strengthened if one adopts a Leviathan-state perspective. For it is clear that the Origin Principle provides governments with the leeway to abuse their fiscal power. Taxpayers cannot threaten to emigrate. As a result, the incentive for governments to pursue a policy in the interest of their citizens is weak. The Origin Principle is not favourable to competition among jurisdictions. The Employment Principle has more of a disciplinary effect on Leviathan governments. The same applies to the Residence Principle. This principle is probably the most liberal rule of assigning individuals to jurisdictions. It respects private decisions to migrate without imposing activity requirements. It is, however, rarely adopted when international migration is concerned. A prominent exception is given by the Nordic countries. In all these countries the right to social security is based on residence and all lawful residents, including recipients of social assistance and third-country citizens, enjoy free movement. Sufficient resources are not a condition for the entry. Expulsion is not possible for reason of insufficient resources after three years of residence (Sakslin, 1997).

8. The Principle of Delayed Integration

In a certain sense the Origin Principle, on the one hand, and the principles of employment or residence, on the other hand, represent extreme solutions to the problem of assigning migrants to jurisdictions. The Origin Principle does not permit any switching of jurisdictional membership while the principles of employment and residence leave the decision to switch completely to the discretion of the migrant. Since these solutions are extreme, it comes as no surprise that they are open to criticism. Besides certain merits, they also have serious shortcomings. Even more: what appears to be an advantage of one solution can be regarded a disadvantage of the other, and vice versa. For example, there are no distortions to migration with the Origin Principle if local redistribution is non-paretian, whereas the principles of employment and residence induce such distortions. The reverse also holds: The latter principles favour an internalisation of the cost of providing local public goods at the place of work and residence, respectively, while the Origin Principle does not permit such an internalisation. Whenever extreme solutions are not completely convincing, it seems reasonable to seek for compromises. The Principle of Delayed Integration represents one such compromise. It means that moving from one country to another will result in a delay in reassignment for fiscal purposes . The longer the chosen duration of the delay, the closer this principle comes to the Origin Principle. The shorter the duration is, the more similar to the Residence Principle it becomes. This duration, or period of transition, is a parameter which can be used as a policy instrument.

9. Conclusions

Europe has made great progress in its efforts to overcome the political and economic separation of its Member States. The level of integration achieved cannot be estimated highly enough. The willingness to deepen integration finds particular expression in the introduction of Union citizenship and the prohibition of discrimination on the basis of nationality in the European Treaty. There is, however, a certain degree of strain between integration and subsidiarity. Integration is enhanced by the harmonisation of national policies whereas subsidiarity requires political autonomy of the Member States and/or regions. It is necessary to establish some sort of balance in this strained relationship. In order to do so, there is a need for a regulatory framework which allows for free movement

at the individual level and which, at the same time, allows the pursuit of independent political objectives at an jurisdictional level. Rules of assigning individuals to jurisdictions are of fundamental importance in this regulatory framework. The necessity to differentiate between persons who belong to a jurisdiction and persons who do not also arises in an integrated Europe. Otherwise the claims to regional autonomy cannot be settled. Abandoning the notion of nationality as a rule of jurisdictional assignment without some form of replacement will not do. An important function of the notion of nationality has always been the regulation of the membership of individuals to home communities. Union Citizenship just does not do this. What is needed is a rule according to which Union Citizens are assigned to Member States for the purpose of taxation and social security. This rule must be integration-friendly and anchored in Community law. The Principle of (the Country of) Employment only partially serves this purpose because it does not cover all Union Citizens. Furthermore, it tends to distort migration decisions. After weighing up the various advantages and disadvantages, the Principle of Delayed Integration seems to be an alternative rule worth considering. It shares two attractive features. First it is a rule which would allow one to extend the policy of free movement to all citizens without discriminating between active and non-active ones. Second by fixing the period of delay it would allow policy makers to trade off competing objectives. The longer the delay is chosen the less will locational choices be fiscally distorted. The shorter it is the fiercer will fiscal competition be among Member States. Europe would have to strike a balance between such objectives.

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