

THE ASSESSMENT OF LEGAL CONSTRUCTS PROTECTING TAXPAYERS AGAINST OF INFLATION IN THE PERSONAL INCOME TAX AND THE INHERITANCE AND DONATION TAX

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Abstract. One of the factors negatively influencing an assessment of the tax liability is inflation. An increase in prices of goods and services without simultaneous adjustment for inflation of the construction elements sensitive to erosion, or lack of application of an effective corrective mechanism, leads to a gradual reduction in the taxpayer's ability to pay. This results in a violation of the principle of tax justice, even in a situation where the provisions of tax law are formally correct. The aim of this article is to answer the question whether there are any legal constructs in Poland that protect taxpayers against the negative impact of inflation and, if so, whether they protect them effectively. The article analyses legal regulations contained in the Personal Income Tax Act and the Inheritance and Donation Tax Act which refer to structural elements of taxes expressed as an amount. The research covers the period of over thirty years, i.e. from the beginning of social and economic changes in Poland, characterised by high inflation, to the present day.

Keywords: inflation, inflation adjustment mechanism, personal income tax, inheritance and donation tax

INTRODUCTION

In the Polish legal system, the basis for levying taxes is Article 84 and Article 217 of the Constitution.¹ According to Article 84, everyone is obliged to comply with his responsibilities and public duties, including the payment of taxes, as specified by statute. Article 217 stipulates that imposition of taxes and other levies, including the determination of the subject and object of taxation, tax rates and the application of reliefs, exemptions and remissions shall be made exclusively by statute. It should be noted, however, that within the

¹ Constitution of the Republic of Poland of 2 April 1997, Journal of Laws No. 78, item 483 as amended.

existing obligation to bear public levies, including taxes, the ability to pay of the entity bearing a given burden should be taken into account each time. Without going into further detail here, the above means that taxpayers should be taxed according to their individual capacity to bear the tax burden. Thus, imposed taxes should not constitute a greater burden than necessary. In this context, it should be noted that the legislator, imposing on the taxpayer the obligation to bear the tax burden, should protect him or her by shaping the legal provisions in a way that strengthens his or her ability to bear this burden. Indeed, it is desirable that, in accordance with the provisions of the law, a tax liability is correctly created, which corresponds to the taxpayer's ability to pay. It should be stressed that the above protection in relation to the taxpayer should refer to phenomena of an economic nature, which include, *inter alia*, inflation. The relevant literature indicates that inflation can have a negative impact in the field of taxes, as it erodes the structural elements of the tax expressed as an amount in the Act; it erodes the value of the tax liability; and affects the size of the tax base [Thuronyi 1996, 435–40; Aaron 1976, 5–9]. Therefore, it should be noted that from the point of view of the taxpayer, it is extremely important that the tax liabilities borne by him or her are secured against the negative phenomenon of inflation. The lack of measures taken by the legislator in this respect leads to a gradual decrease in the taxpayer's ability to pay. This in turn leads to a breach of the principle of tax justice, even in a situation where the provisions of tax law are correct in formal terms.

The aim of this article is to answer the question whether there are any legal constructs in Poland that protect taxpayers against the negative impact of inflation, and if so, whether they effectively protect them. The article analyses the legal regulations contained in the Personal Income Tax Act² and the Inheritance and Donation Tax Act,³ which refer to structural elements of taxes expressed as an amount. The author deliberately ignored the issue of adjustment for inflation of expenses borne by a taxpayer in a situation where there is a large time span between their payment and the moment of deducting them from the obtained income. In the structure of the Polish income tax, such a situation may concern tax deductible costs in the case of obtaining income from the sale of real property against payment or depreciation of fixed assets made by taxpayers conducting business activity. The problems occurring in this context are so complex that the formal framework of the article does not allow for a thorough presentation of the problem. Hence, also the final conclusions, including the suggested *de lege ferenda* proposals, do not address the issues indicated above. The research covers the period of over thirty years, i.e.

² Act of 26 July 1991 on Personal Income Tax, Journal of Laws of 2020, item 1426 as amended.

³ Act of 28 July 1983 on Inheritance and Donation Tax Act, Journal of Laws of 2019, item 1813 as amended [hereinafter: Inheritance and Donation Tax Act].

from the beginning of social and economic changes in Poland, characterised by high inflation, until now.

1. THE IMPACT OF INFLATION ON THE STRUCTURAL ELEMENTS OF TAX

In the minds of most Polish taxpayers, the problem of inflation does not play a significant role. After all, compared to the beginning of the economic transformation at the turn of 1990s, inflation, from the record level of 585.8%, in 1990, decreased to 2.3% in 2019. In addition, it should be noted that in 2014 there was no increase in the prices of goods and services at all, while in 2015 and 2016 the problem of those in power as well as most economists was the occurrence of deflation, which amounted to -0.9% and -0.6%, respectively. In order to achieve the objective of this article it is necessary to briefly present how the level of inflation has evolved over more than thirty years. It is necessary because it will allow an assessment of actions taken by the Polish legislator in order to introduce elements correcting by the level of inflation these structural elements of tax, which affect the amount of tax liability in the personal income tax and the inheritance and donation tax. There is no doubt that correct actions of the Polish legislator in the above-mentioned scope determine whether we can say that certain taxes are determined in a fair manner. Or whether perhaps that lack of comprehensive solutions or inadequate legal regulations results in the phenomenon about which J.M. Keynes wrote over 100 years ago; that “by a continuing process of inflation, governments can confiscate, secretly and unobserved, an important part of the wealth of their citizens” [Keynes 1919].

When analysing the phenomenon of inflation in Poland from the beginning of the implementation of socio-economic reforms in 1989 until the present day, three periods can be distinguished. The first one took place in 1989–1995, a period characterised by inflation ranging from several hundred (in 1989 and 1990) to under 50 percent annually (1992–1995). The second period covered the years 1996–2000, during which inflation was stabilised at a level of several percent annually. A breakthrough in the fight against price increases occurred in 2001, when for the first time from 1982 (with an annual exception in 1999) a single-digit increase in the prices of consumer goods and services was recorded. Since then, inflation has ranged between 0% and 3%, with slight deviations such as in 2011 and 2012 (4.3% and 3.7% respectively) or in 2015 and 2016 (-0.9% and -0.6% respectively). Currently, inflation oscillating around 2% has been recorded since 2017. At the same time, in the coming years, according to the forecasts of the National Bank of Poland, there will increase in the prices of goods and services compared to previous years.

**The table presents changes in the annual inflation in Poland
in the years 1989–2021⁴**

Year	Inflation (%)	Year	Inflation (%)	Year	Inflation (%)
1989	251,1	2000	10,1	2011	4,3
1990	585,8	2001	5,5	2012	3,7
1991	70,3	2002	1,9	2013	0,9
1992	43,0	2003	0,8	2014	0,0
1993	35,3	2004	3,5	2015	-0,9
1994	32,2	2005	2,1	2016	-0,6
1995	27,8	2006	1,0	2017	2,0
1996	19,9	2007	2,5	2018	1,6
1997	14,9	2008	4,2	2019	2,3
1998	11,8	2009	3,5	2020	3,4
1999	7,3	2010	2,6	2021	4,9 (estimated)

Source: data from Statistics Poland and National Bank of Poland

It is on the basis of the above data on the increase in the prices of goods and services in Poland over more than thirty years that it is possible to analyse the solutions introduced by the legislator to protect taxpayers of the personal income tax and the inheritance and donation tax against inflation.

There are essentially two mechanisms used by states to make inflation adjustment to the structural elements of taxes which are sensitive to erosion. The first one is the possibility to refer directly to inflation. Accordingly, the adjustment of the structural elements of taxes expressed as an amount is based on the consumer price index. The other mechanism concerns economic values other than inflation. These values include legal minimum wages, earnings of industrial workers and the cost of living index [Tanzi 2009, 19–50; Idem 1976, 408–35]. However, it should be emphasised that the mechanism of inflation adjustment based on criteria other than the consumer price index does not always turn out to be appropriate. It is because basing the adjustment of the structural elements of tax sensitive to erosion on other economic values sometimes results in a deviation from the actual increase in the prices of goods and services. This may occasionally be beneficial for the taxpayer, as legal minimum wages or earnings of industrial workers often increase faster than the increase in prices of goods and services. These mechanisms can usually be used in the structure of income tax. Nonetheless, due to the fact that inflation is low in many states, especially OECD member states, legal regulations containing

⁴ *Yearly price indices of consumer goods and services from 1950*, Statistics Poland, <https://stat.gov.pl/en/topics/prices-trade/price-indices/price-indices-of-consumer-goods-and-services/yearly-price-indices-of-consumer-goods-and-services-from-1950/> [accessed: 21.12.2020].

inflation adjustments are often abandoned [Thuronyi 2003, 300–301]. In such a situation an important problem from the point of view of taxpayers' safety is whether a given legislator will, on a relatively regular basis, adjust the structural elements of the tax expressed as amount, which under the influence of erosion significantly distort the final amount of the tax liability. Indeed, it should be noted that even low inflation is a significant problem, because when accumulated over several years it causes an increase in the tax burden.

As it has already been indicated above, inflation leads to erosion of those structural elements of tax which are expressed as an amount. These include, in particular, tax reliefs and exemptions limited to a statutorily determined amount or the tax-free amount in the structure of personal income tax, as well as in some inheritance and donation taxes. Inflation also negatively affects the erosion of tax thresholds in taxes with a progressive tax scale, i.e. also in the income tax and usually in the inheritance and donation tax. In the case of the income tax, this problem mainly, although not only, concerns taxpayers earning income from paid employment. Periodic salary increases by employers resulting, *inter alia*, also from increases in the prices of goods and services, with the simultaneous lack of application of inflation adjustment by the legislator for several years, causes the income obtained by employees to exceed tax brackets, thus increasing the amount of tax liability. In addition, it should be noted that the problem of inflation also relates to the appropriate formation of the tax base. This situation occurs mainly in relation to lump-sum deductible costs, which are determined in terms of a monetary amount. The more so as in many legislations it is common to apply deductible costs expressed as an amount when determining income from paid employment. A kind of remedy for such problems may be the adoption of deductible costs in percentage terms. However, it may be questionable whether it is fair to set costs in this way. Especially as this could lead to little perceptible tax regression for higher income taxpayers. In addition, many countries struggle with the problem of the so-called tax wedge. The adoption of unlimited tax deductible costs in percentage terms may have the undesirable effect of increasing it. Therefore, if legislators set tax deductible costs in percentage terms, they often limit their amount to a certain limit based on relatively fixed values (e.g. the limit of the lower tax threshold). It should be noted, however, that deductible costs set in this way may be vulnerable to depreciation. Such a situation usually occurs when the legislator introduces restrictions on the deduction of deductible costs by making it dependent on the amount values expressed in an act as an amount, if no systematic adjustment is made in relation to them [Burzec 2016, 34–36].

3. THE ASSESSMENT OF LEGAL REGULATIONS CONCERNING INFLATION ADJUSTMENT IN THE PERSONAL INCOME TAX AND THE INHERITANCE AND DONATION TAX

In the structure of the Polish personal income tax until 31 December 2003, i.e. in the period of high inflation, the problem of lump-sum tax deductible costs was resolved in such a way that they were determined as a percentage. For the most part, such costs were applicable to income obtained from employment relationship (and related relationships). A taxpayer could monthly deduct 0.25% of the amount constituting the upper limit of the first bracket of the tax scale, which was subject to annual adjustment. It was only after inflation had stabilised that the legislator decided to adopt deductible costs expressed as an amount [Ofiarski 2018, 119–21]. One of the main arguments in favour of this way of determining costs was, *inter alia*, the desire to broaden the tax base.⁵ The main problem of the adopted solutions is the fact that since 1 January 2004 the Polish legislator has only twice adjusted the tax deductible costs expressed as an amount. This was first done in 2006 and the adjusted costs took effect from 1 January 2007,⁶ while the second time – new amounts were introduced on 1 October 2019.⁷ It should be noted that for less than 13 years (from 2007 to 2019), taxpayers earning income from employment as well as certain income from personal activities, in order to determine their taxable income, determined deductible expenses based on a historical amount, depreciated by inflation, which, when accumulated over 13 years, amounted to 27.5%. It also seems that an increase in deductible costs, made at the end of 2019, was aimed at reducing the tax wedge for the lowest paid persons earning income from paid employment. This may be evidenced by the fact of the simultaneous reduction by one percentage point of the personal income tax rate provided for the first threshold of the tax scale while there was no increase in the tax-free amount and no adjustment of tax threshold.

The Polish legislator should also be criticised in the context of solving problems related to the adjustment of tax thresholds and the tax-free amount. While until 1 January 2004 actions taken by the legislator were relatively consistent and rational, actions taken after that date should be assessed negatively. Until 31 December 2003, there were two types of mechanisms in force regarding automatic adjustment of tax brackets and the tax-free amount. In the period of high inflation, the indexation of tax threshold and the tax-free amount

⁵ Justification of the project of the Act of 12 November 2003 on amendments to the Act on Personal Income Tax, Journal of Laws No. 200, item 1956.

⁶ Pursuant to the PIT Act of 2006, the rate of the monthly tax deductible costs was set at PLN 111.25.

⁷ Pursuant to the PIT Act of 2019, the rate of the monthly tax deductible costs was set at PLN 250.00.

was based on the growth rate of the average monthly salary in the national economy in the three quarters of the year preceding the tax year compared to the corresponding period of the previous year. The solution adopted at that time was beneficial for taxpayers due to the fact that the growth rate of average remuneration did not differ too much from the annual inflation rate, and the tax thresholds indexed on its basis as well as the tax-free amount increased year by year faster than the inflation rate [Burzec 2016, 39–40]. This method of adjustment was applicable until 31 December 2001. As of 1 January 2002, indexation based on the index of growth of average monthly remuneration in the national economy was replaced by the consumer price index in the three quarters of the year preceding the tax year compared to the corresponding period of the previous year. This mechanism did not last very long, as it was only in force until the end of 2003. During this time, only the indirectly determined so-called tax-free amount was adjusted. The current tax thresholds in the structure of the personal income tax have been in force since 1 January 2007 [Kucia–Guściora 2012, 24–29]. It should be emphasised that it has not been adjusted so far. Although in 2019 the legislator lowered the tax rate for income falling within the first tax bracket from 18% to 17%, which could be a kind of compensation for the lack of adjustment of the only tax bracket, such action served more to reduce the tax wedge. One should assess in a similar way the behaviour of the legislator with regard to the lack of adjustment of the tax-free amount, with which the tax-reducing amount is closely related in the structure of the Polish personal income tax [Duda–Hyz 2016, 53–57]. Importantly, it was only as a result of the judgment of the Constitutional Tribunal, which decided that the low tax-free amount, which is additionally not subject to adjustment, does not correspond to the so-called living wage, and therefore the current legislation was found to be incompatible with Articles 2 and 32 of the Constitution.⁸ As a result of this judgment, as of 1 January 2017, the manner of determining the tax-free amount was slightly modified. This was done, however, in such a way that the tax-reducing amount and thus the tax-free amount were increased for a marginal group of taxpayer earning income up to PLN 11,000.00. For other taxpayers it remained at the same level. According to the regulations at that time, taxpayers with income exceeding PLN 127,000.00 were deprived of the possibility to take advantage of the tax-reducing amount. These solutions should be assessed critically – although the legislator by its actions referred to the judgment of the Constitutional Tribunal, it did so in such a way that the result of the introduced solutions benefited the smallest possible number of taxpayers. In practice, only those persons whose annual income is not sufficient to function properly may benefit from the higher tax-reducing amount [Flis 2019, 15–17]. The amendments that entered into

⁸ Judgement of the Constitutional Tribunal of 28 October 2015, ref. no. K 21/14.

force on 1 January 2017 authorised the Minister of Finance to review the tax-reducing amount annually in the event of a significant increase in the amount of the living wage for a one-person household determined by the Institute of Labour and Social Affairs. However, the above regulation authorising a potential change of the tax-reducing amount should be regarded as superficial.

It should be emphasised that work on the Polish personal income tax act was conducted in the conditions of high inflation. Therefore, the legal regulations that were applied ensured that the remaining structural elements of the tax, affecting the amount of tax liability, were protected against erosion. The measures adopted for such structural elements as tax exemptions, deductions or tax reliefs did not relate to the level of inflation. In the structure of the personal income tax, the legislator deliberately omitted the possibility to directly express the amount of tax preferences by means of monetary amounts, which would have to be subject to adjustment – their amount was set as a percentage. The base value was the taxpayer's income,⁹ the amount of the average monthly remuneration in the national economy¹⁰ or a reference to the upper limit of the first tax bracket¹¹ or the lowest remuneration for work.¹² It was not until 1 January 2003, i.e. after inflation had been brought down to a low level, that limits on tax preferences expressed in terms of amounts were introduced into the income tax system. However, since then, the Polish legislator has been very reluctant to increase the limits expressed as an amount by the increase in the prices of goods and services. In practice, some amounts have not been changed since their introduction on 1 January 2003. Such a situation concerns the amount of PLN 2,280.00 that can be deducted from income in a tax year for expenses incurred by a taxpayer to pay for guides for the blind. Since 1 January 2004, there has been in force an amount of PLN 2,280.00, which has not been adjusted to date, constituting an annual limit of expenses incurred by a disabled person or a taxpayer who has a disabled person as

⁹ Based on the value of the taxpayer's income, a limit is calculated on deductible expenditure through donation. The limit changed in time. Since 1 January 2005, taxpayers can deduce donations up to 6% of their income, yet by the end of 2003, this limit could be up to 10 or even 15%, depending on the objective of the donation. For one year only, in 2004, the limit was defined as an amount of money and equalled PLN 350.

¹⁰ In the period from 1 January 1993 until 31 December 1994, the taxpayers were entitled to deduce the expenses for education of children and youth at private (non-public) schools that had the official status (*curricula*) identical to public schools. The upper limit of this tax preference was set at 1/5 of an average monthly pay in domestic economy per child.

¹¹ This was the case when the taxpayer deducted from their income the expenses to refurbish the house or flat, or the shared costs of modernization or refurbishment of a block of flats and the like. The amount deducted in this way could not exceed 15% of the amount marking the upper limit of the first tax bracket for a given tax year.

¹² The criterion of minimal wage was used in the years 2001–2002 for the purposes of the so-called rehabilitation tax allowance. It was used to calculate the upper limit of the amount deductible from the tax base, owing to expenditure on medicaments.

a dependent in respect of the use of a passenger car which is his or her property or co-ownership.

Another tax imposed on natural persons is the inheritance and donation tax. It should be noted that some of the elements in its structure are also expressed as an amount. In this way the legislator determined the amount of exemption in the case of acquisition by way of a donation of money or other items for housing purposes by a person classified in tax group I (Article 4(1) (5) of the Inheritance and Donation Tax Act), tax-free amounts for taxpayers classified in one of the three tax groups (Article 9(1) of the Inheritance and Donation Tax Act), and thresholds in the progressive tax scale (Article 15(1) of the Inheritance and Donation Tax Act). It must be emphasised that although the provisions of the Inheritance and Donation Tax Act provide for the possibility of the adjustment of the above-mentioned structural elements, the last adjustment took place as a result of an amendment that came into force on 1 January 2003.¹³ This situation is largely due to incorrectly adopted methods of adjustment. Under the current regulations, the amounts mentioned above are increased in the event of a rise in the prices of non-food durable goods of more than 6%, to the extent corresponding to the increase in those prices. Their increase is calculated on the basis of a cumulative index of quarterly published indices. In this context, it should be noted that the solution whereby the increase in prices is calculated on the basis of a cumulative index of quarterly indices was rightly adopted. However, the adjustment based on the increase in the price of non-food durable goods should be critically assessed. As a result of the reference to the above-mentioned index, despite the fact that the accumulated inflation since 2003 has reached a high level, the legislator has not been able to perform adjustment so far. Perhaps the intention of the legislator in referring to the above value was most appropriate. The inheritance and donation tax is a property tax, therefore setting the price increase only with reference to the prices of non-food goods seemed to be reasonable. Nonetheless, the adopted solutions mean that adjustment based on prices of non-food goods is not possible due to their low growth. Meanwhile, other economic indicators have increased since 2003 by more than well over ten or even by several hundred percent. This concerns mainly the cumulative increase in the prices of goods and services, the increase in the average salary in the enterprise sector, the minimum salary, and the increase in the prices of real estate, which is very often the subject of gratuitous transfer as a result of *mortis causa* or *inter vivos* transactions. It is worth noting that in the United Kingdom, for example, the adjustment in the inheritance tax is based on the consumer prices index (Article 8(1) of the Inheritance Tax Act 1984), and not on the increase in the price of non-food goods.

¹³ Act of 12 November 2003 on amendments to the Inheritance and Donation Tax Act of 28 October 2002, Journal of Laws No. 200, item 1681.

CONCLUSIONS

To sum up, one can conclude that the provisions of Polish tax law on the personal income tax and the inheritance and donation tax do not protect taxpayers against negative consequences of inflation. This has been the case since the inflation was brought under control, which resulted in abandoning the mechanism of the automatic adjustment of amount limits of structural elements of the personal income tax. As far the structure of the inheritance and donation tax is concerned, the legislator included legal regulations aimed at protecting the taxpayer from the phenomenon of inflation, which should be assessed negatively. The main reason for this is that the provisions regulating the mechanism of an automatic adjustment were constructed in such a way that they have never had a chance to work in practice. As was noted earlier, the regulations were based on economic values, the value of which, in comparison to the increase in the price of goods and services (consumer price index) over a dozen or so years, has practically not changed. Therefore, regulations in this area should be assessed negatively.

The problems presented in the article suggest *de lege ferenda* conclusions relating both to the legal regulations of the personal income tax and the inheritance and donation tax. Firstly, as it has already been shown, the Polish legislator, in contrast to for example the French one,¹⁴ is reluctant to perform the adjustment of the elements of the tax structure expressed as an amount. Therefore, it is reasonable to introduce into the structure of the personal income tax a mechanism of an automatic adjustment of amount limits, such as tax deductible costs, tax reliefs and exemptions, tax thresholds and the tax-free amount. Secondly, the provisions relating to the adjustment of the amount of exemption from housing donations, the tax-free amount and tax thresholds for the inheritance and donation tax should be amended. Thirdly, the structure of the introduced adjustment mechanism should be the same and apply both to the personal income tax and the inheritance and donation tax. Fourthly, this mechanism should be based solely on the index of price increases for goods and services (consumer price index). This means that the current automatic adjustment mechanisms, which apply mainly to the inheritance and donation tax, should be abandoned. Fifthly, the automatic adjustment mechanism should apply when the cumulative increase in the price of goods and services in relation to the previous adjustment exceeds 3%. Based on this value, it would be in line with the inflation target of the Polish central bank, which is 2.5% with a possible deviation of 1 percentage point. In addition, the application of the above correction mechanism means that in the case of inflation

¹⁴ “Projet de loi de finances pour 2021: Les conditions générales de l'équilibre financier”, Sénat, <http://www.senat.fr/rap/120-138-21/120-138-212.html> [accessed: 22.12.2020].

below the inflation target, there will be no need for annual adjustment. Instead, it will be done in the event of significant changes in the prices of goods and services.

Only after the above proposals have been fulfilled will it be possible to give a positive answer to the question of whether the legislator, by imposing obligations on the taxpayer to bear the tax burden, at the same time secures him or her through legal regulations in such a way as to strengthen his or her ability to bear this burden. The above solutions are important in view of the noticeable high inflation recorded in 2021 in Poland, resulting mainly from external factors (e.g. an increase in gas and fuel prices) but also the disruption of the supply chain and the resulting shortages of goods. Additionally, the above mentioned proposals are important in the context of the adoption by the Council on 11 February 2021 of a regulation establishing The Recovery and Resilience Facility, with a budget of EUR 672.5 billion. There is great concern that the above measures, which aim to help Member States counter the socio-economic impact of the pandemic, will contribute to an increase in the price of goods and services.

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