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# 社会保障とその財源

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# 構成

1. 財政の現状－  
歳出と歳入の一体改革の必要性
2. ドイツの取り組み
3. 日本の税制の問題と抜本改革
4. 財政再建の財源としての消費税の特徴

# 1. 財政の現状－

## 歳出と歳入の一体改革の必要性(1)

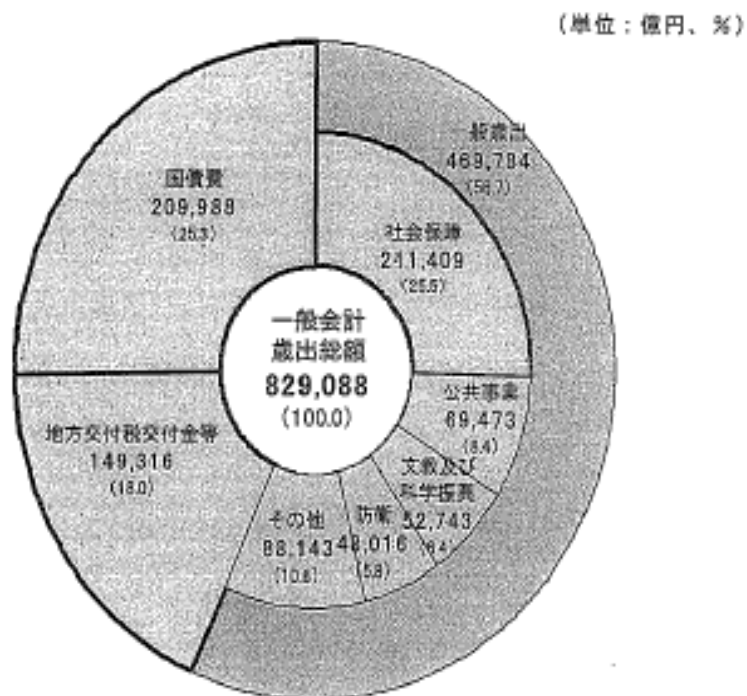
- 田近栄治、「財政再建と予算管理」、『会計検査研究』、37号、5 - 11ページ、2008年3月

表1 2007年度一般会計の内訳

国債費	地方交付税 交付金	社会保障費	その他	合計
20.9兆円	14.9兆円	21.1兆円	26兆円	82.9兆円
25.3%	18.0%	25.5%	31.3%	

出所：財務省資料

平成19年度一般会計予算の内訳(単位:億円、%)  
(2007)



(注) 計数はそれぞれ照替玉入によっているので、掲載において会計とは合致しないものがある。

区 分	19年度予算 (2007)
1. 医 療	84,285
(1) 国民健康保険	33,168
(2) 政府管掌健康保険	8,383
(3) 老人医療給付費	30,654
(4) 生保・医療扶助	9,843
(5) そ の 他	2,237
(老人医療費再掲)	(42,171)
2. 年 金	70,305
(1) 厚生年金	51,659
(2) 国民年金	18,436
(3) 福祉年金	210
3. 介 護	19,485
(1) 給付費負担金等	15,206
(2) 2号保険料国庫負担	4,237
(3) 財政安定化基金	42
4. 福祉・その他	37,334
(1) 生活扶助	6,307
(2) 保育所運営費	3,127
(3) 雇用保険	1,846
(4) そ の 他	26,054
(生活保護費再掲)	(19,525)
合 計	211,409

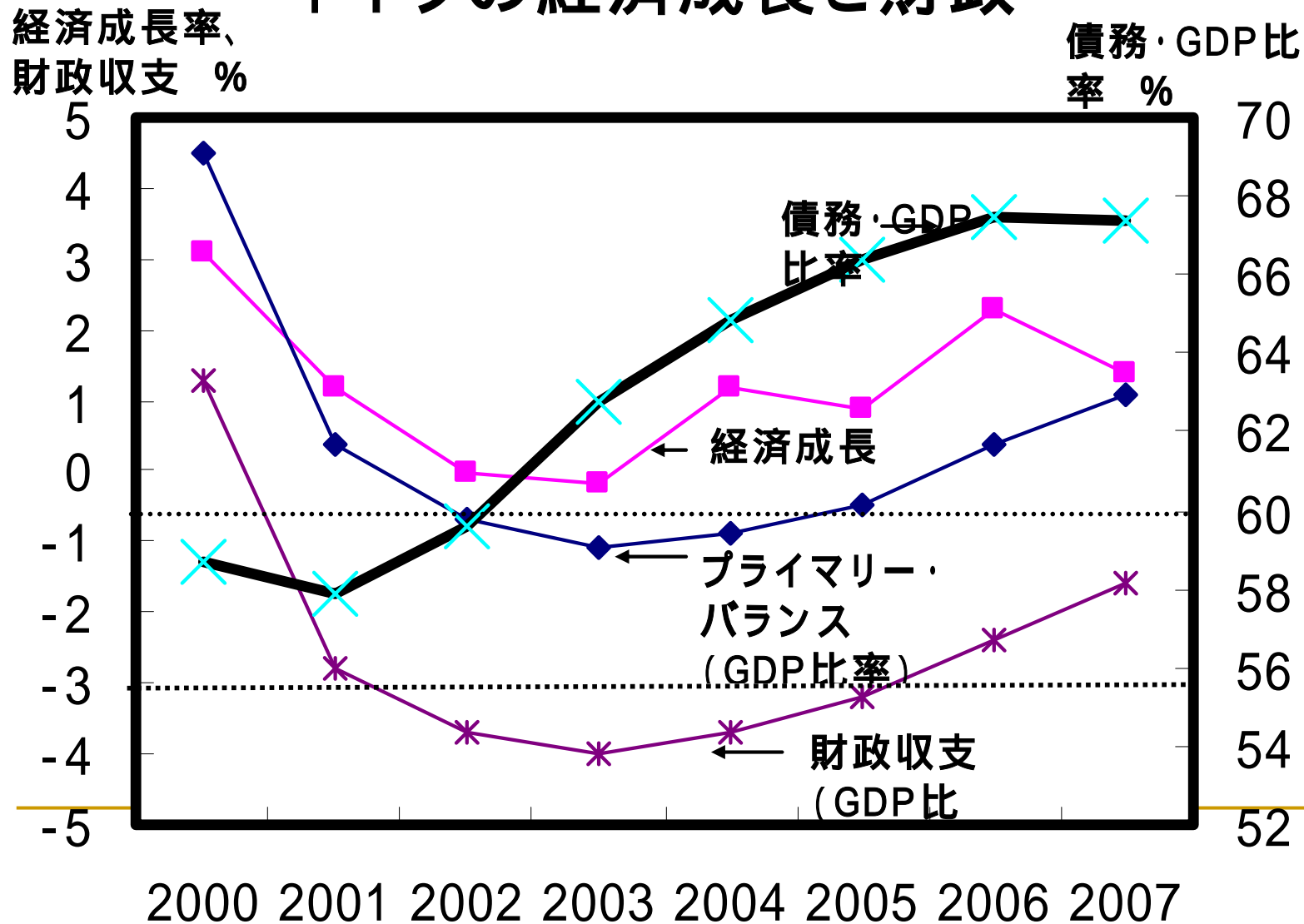
# 財政の現状一

## 歳出と歳入の一体改革の必要性(2)

- 硬直化した財政
- 地方交付税：総枠としての地方財政計画により地方歳出総額が決まり、その財源調達手段としての交付税の改革が必要(財源保障の廃止)
- 社会保障：社会保障の多くを社会保険とすることによる負担調整の必要性。ここでも、医療費、介護費用の総額の一定割合を自動的に公費への付けとする総枠管理方式を廃止し、負担能力による個人救済とするべき。

## 2. ドイツの取り組み

### ドイツの経済成長と財政



2006年3月には、ドイツの財政改善をテーマにEU経済・財政相理事会 (ECOFIN) が開催され、2007年までには財政収支の規律を達成することを正式に求めた。メルケル首相率いる大連立政権が断行した税制改革とは、

- ・付加価値税を16%から19%へと引き上げ、そのうち2%は財政赤字の削減、1%は雇用保険料の6.5%から4.2%への引下げに用いる (2007年1月施行)。
- ・経済活性化のために法人税率を38.7%から30%へと引下げる (2008年1月施行予定)。ただし、減税財源は、できるだけ法人税の課税ベースの拡大、移転価格税制など執行の強化により、ネットの減税額は50億ユーロ程度に抑える。
- ・経済活性化の観点から、金融所得課税は、配当所得の二重課税の軽減を図るため25%の源泉課税とする (2009年1月施行予定)。

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## 3 . 日本の税制の問題

- *OECD Economic Survey, Japan,*  
volume 2008/4, April 2008

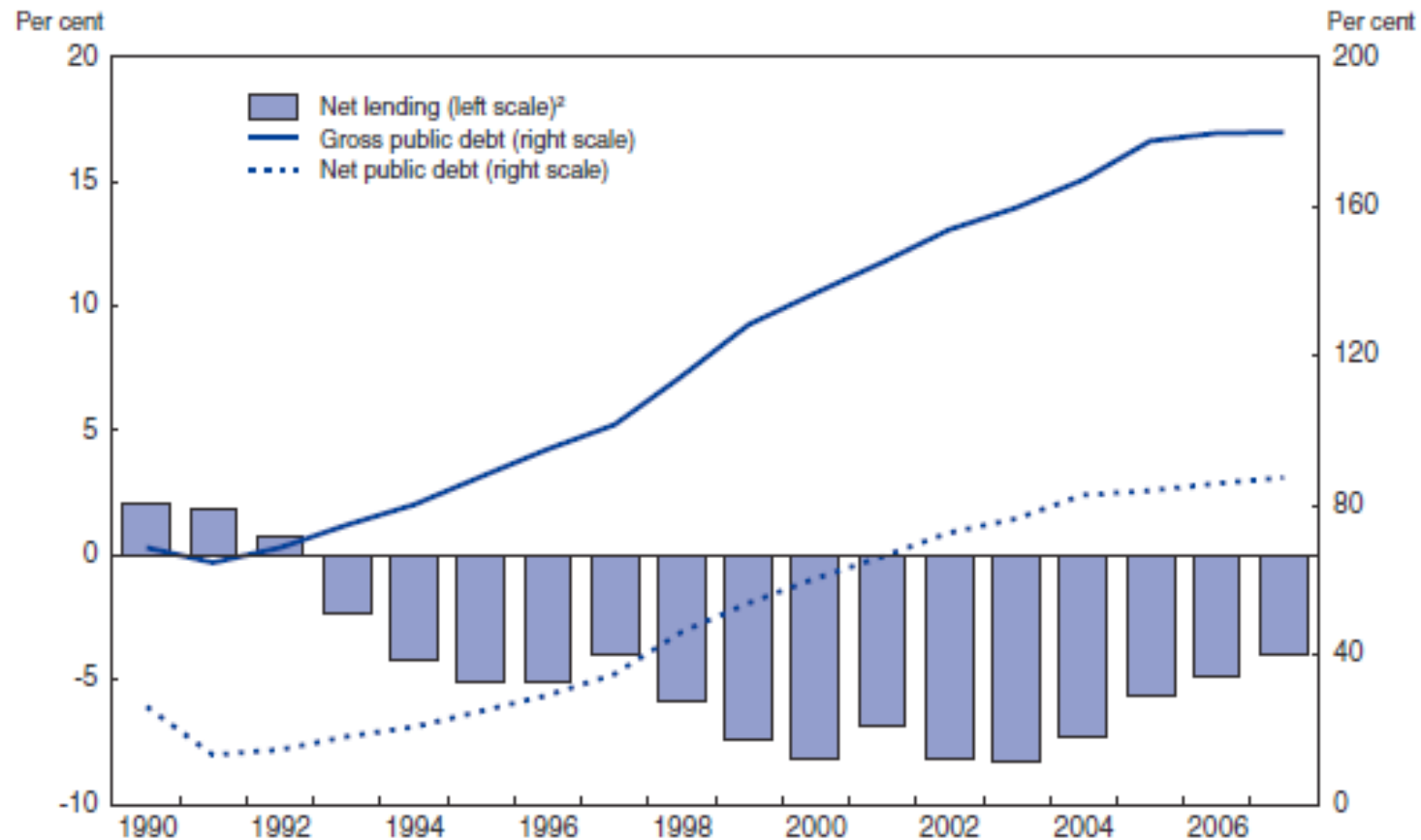
**財政再建の必要性：歳出カットだけでは、財政改善が困難**


**税制：消費税、法人税、個人所得税などの現状と問題の指摘日本の税制の問題**



Figure 1.8. The fiscal situation in Japan

For general government, as per cent of GDP<sup>1</sup>

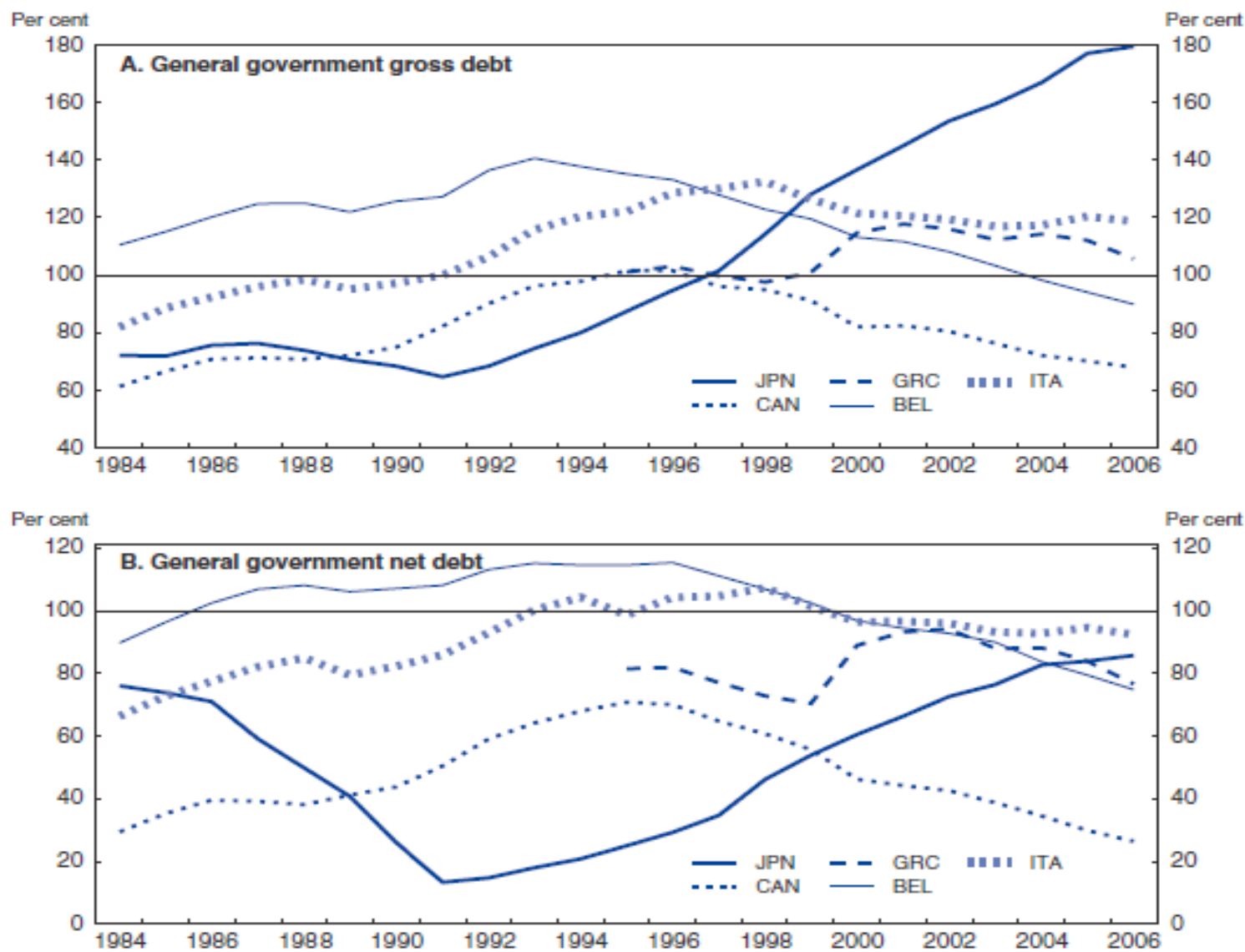



StatLink  <http://dx.doi.org/10.1787/277134173324>

1. OECD estimates for 2006 and 2007.
2. Excludes one-off factors related to the transfer of pension funds, the privatisation of highway corporations and transfers from the Fiscal Loan Funds Special Account.

Source: OECD, OECD Economic Outlook, No. 82 Database, OECD, Paris.

Figure 3.1. OECD countries with a large public debt ratio  
As a share of GDP<sup>1</sup>



StatLink  <http://dx.doi.org/10.1787/277327363337>

1. The five countries in this figure had the highest gross debt ratios in the OECD area in 2000.

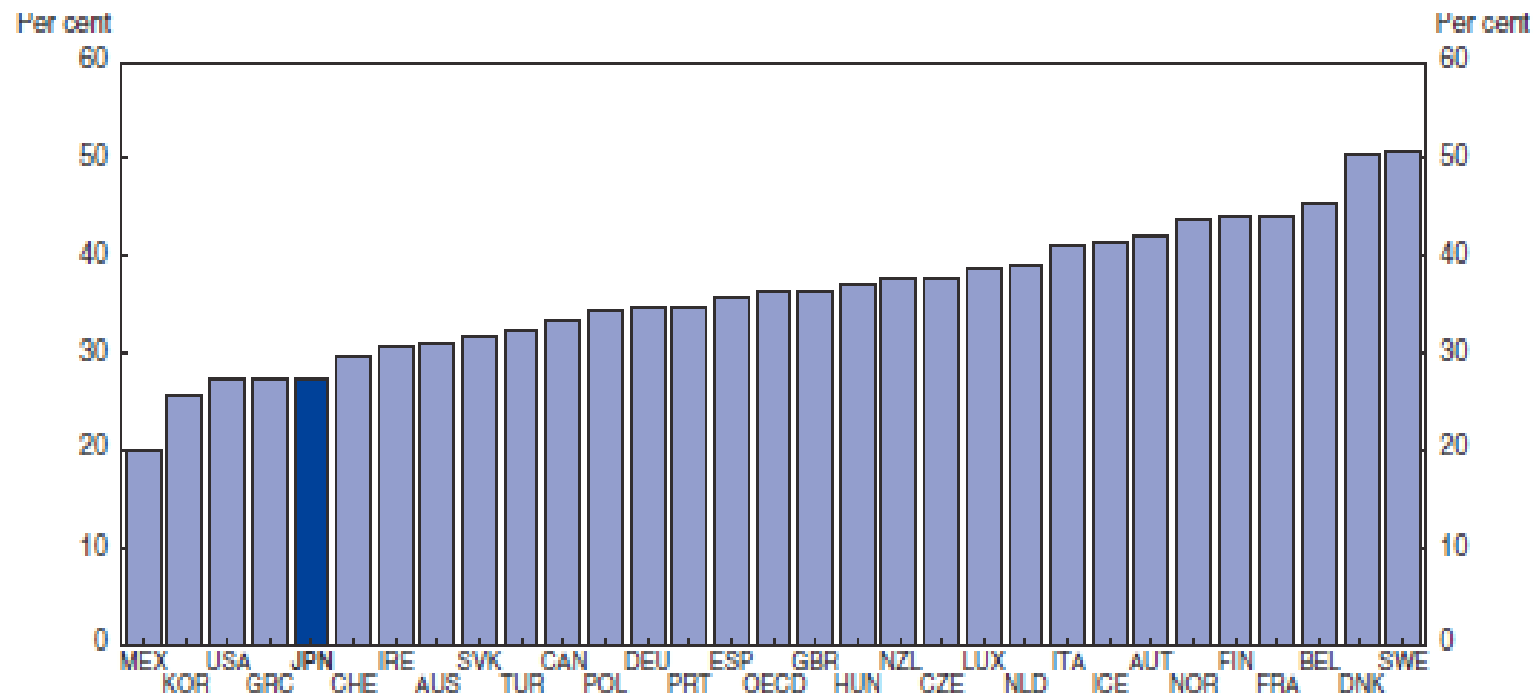
Source: OECD, *OECD Economic Outlook*, No. 82 (December 2007), OECD, Paris.

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In any case, expenditure cuts alone are inadequate, given the size of Japan's fiscal deficits. Projections by the government show that an improvement in the primary budget surplus of between 4% and 5% of GDP<sup>24</sup> – a range in line with OECD estimates discussed above – is needed to achieve the government's objective of balancing the public debt ratio. Achieving such an improvement will require increased government revenue. Indeed, the same government projection expects that between 4.6% and 5.9% of GDP in additional tax revenue is needed for this goal, while an even larger amount is required to reduce the debt ratio beginning in the mid-2010s. However, the government's medium-term fiscal plans do not suggest any concrete measures to raise revenue. While this may have been an appropriate strategy to focus attention on expenditure cuts during the initial stage of fiscal consolidation, the serious fiscal situation now requires a comprehensive tax reform to achieve the government's fiscal objectives. Chapter 4 analyses Japan's tax system and proposes a comprehensive reform plan.

# Reforming the tax system to promote fiscal sustainability and economic growth

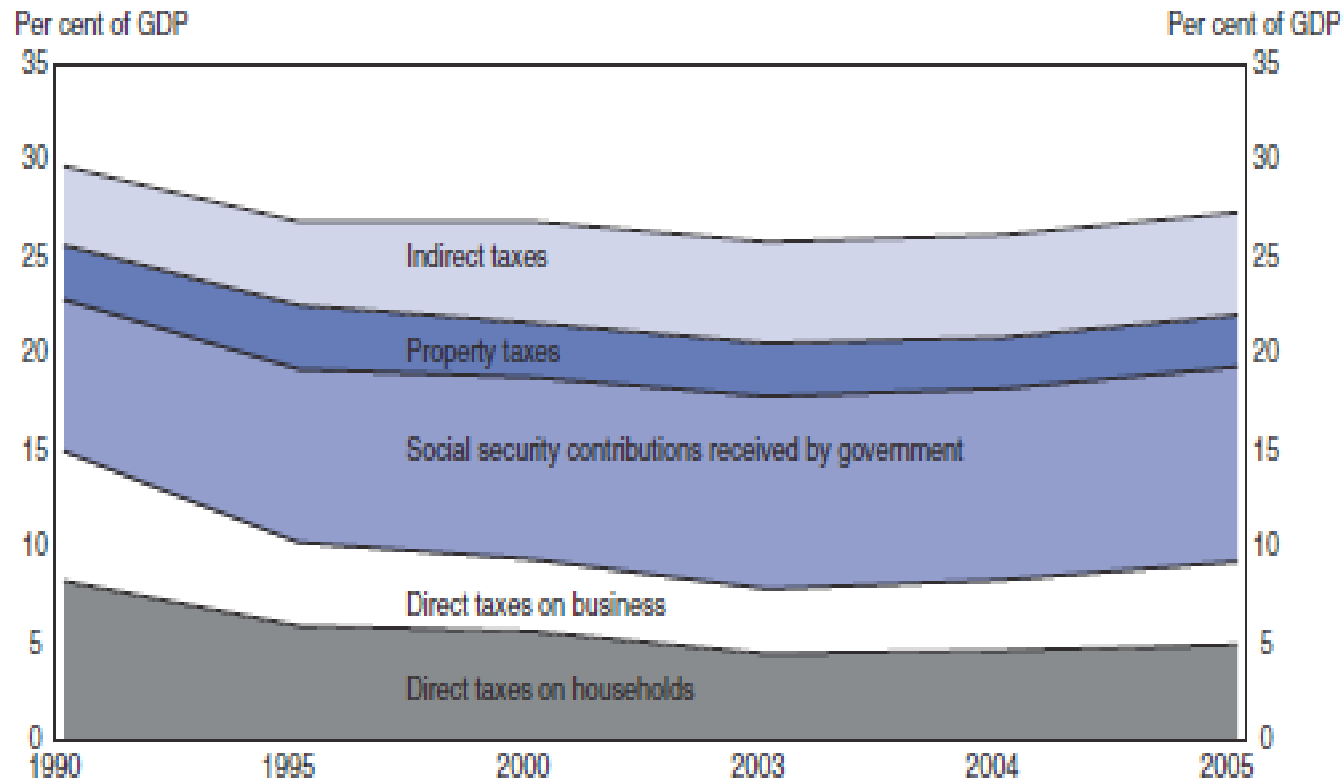
Figure 1.9. Tax revenue in OECD countries  
Per cent of GDP in 2005



StatLink  <http://dx.doi.org/10.1787/277164218143>

Source: OECD (2007), Revenue Statistics 1965-2006, OECD, Paris (<http://dx.doi.org/10.1787/366725334503>).

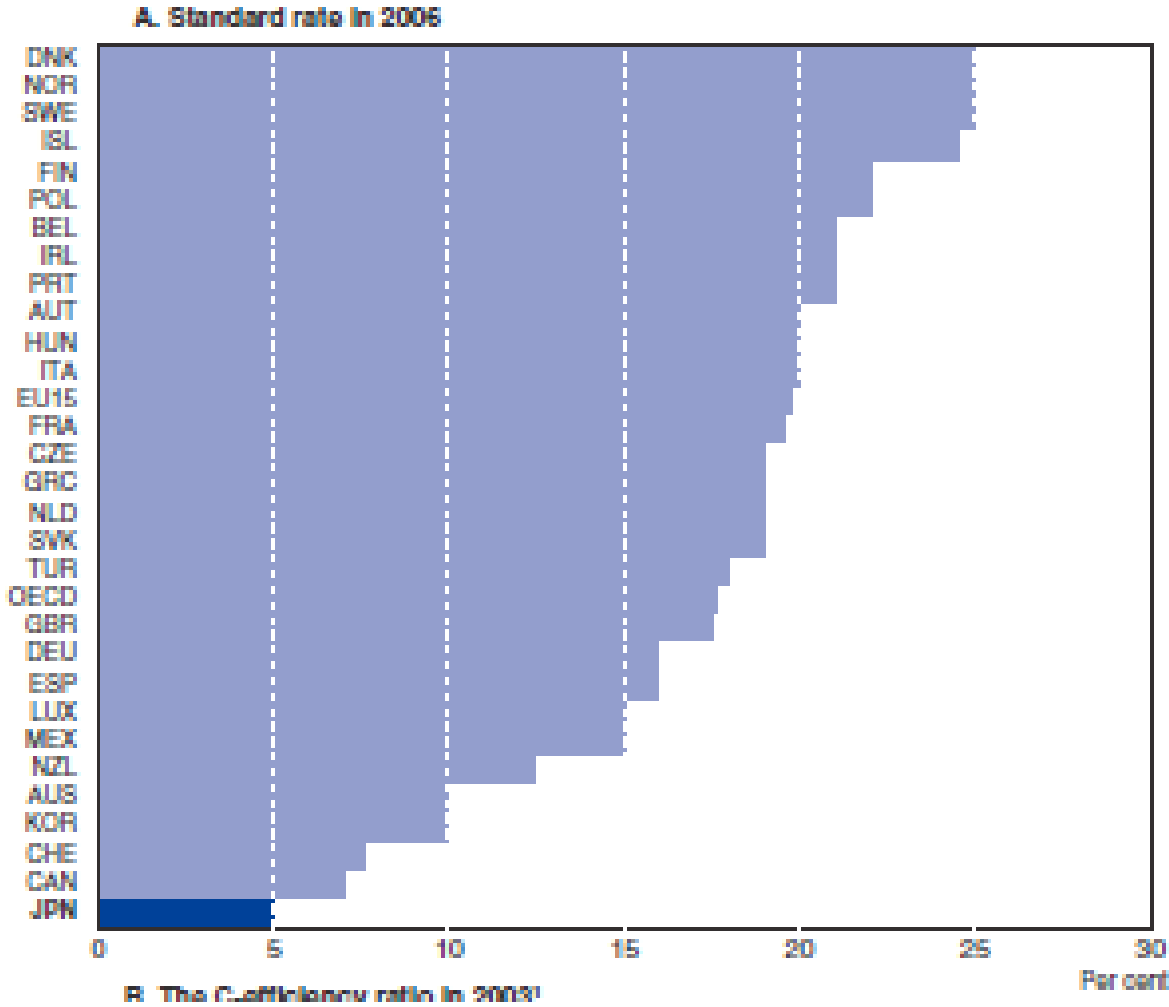
Figure 4.1. Trends in Japanese tax revenue, 1990-2005

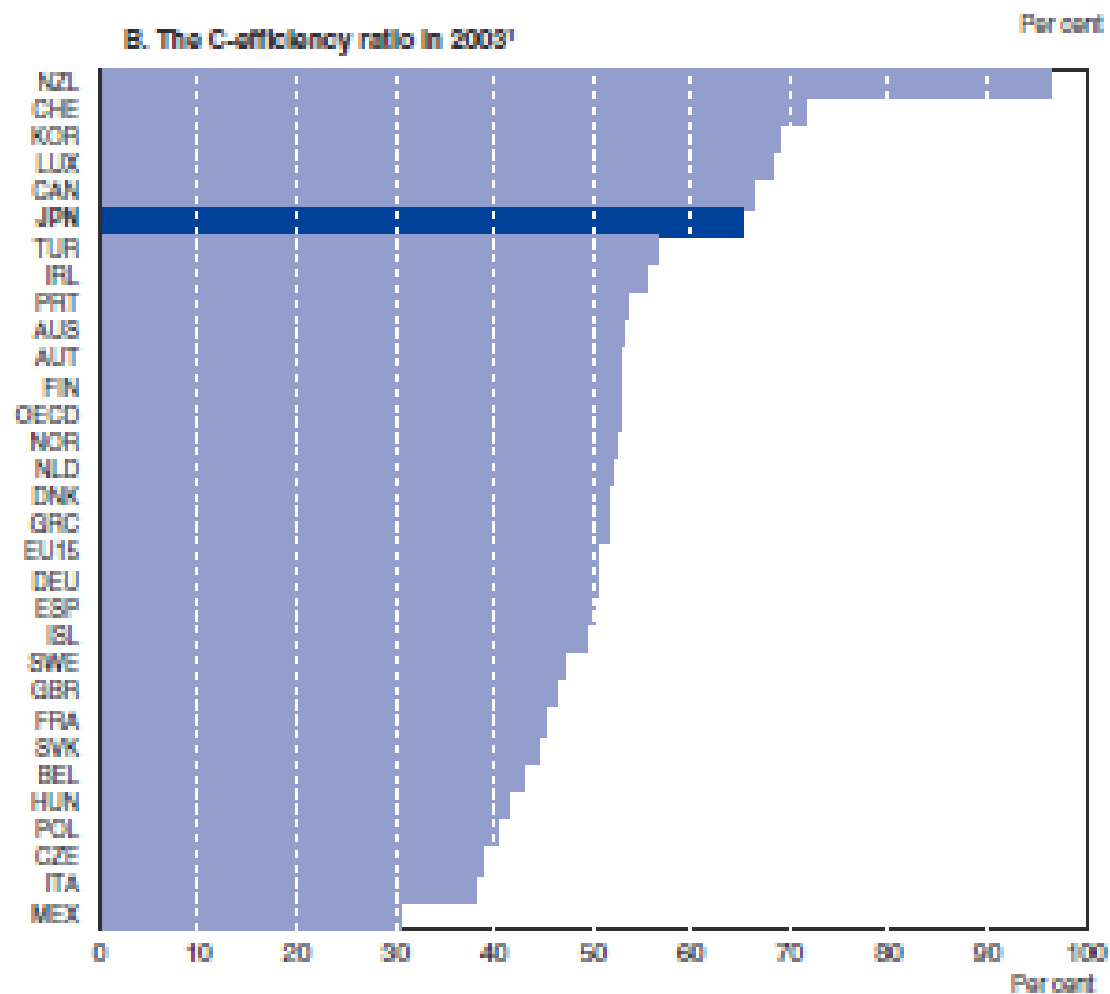


StatLink  <http://dx.doi.org/10.1787/277475731725>

Source: OECD (2007c), Revenue Statistics 1965-2006, OECD, Paris (<http://dx.doi.org/10.1787/366725334503>).

Figure 4.6. Value-added taxes in OECD countries



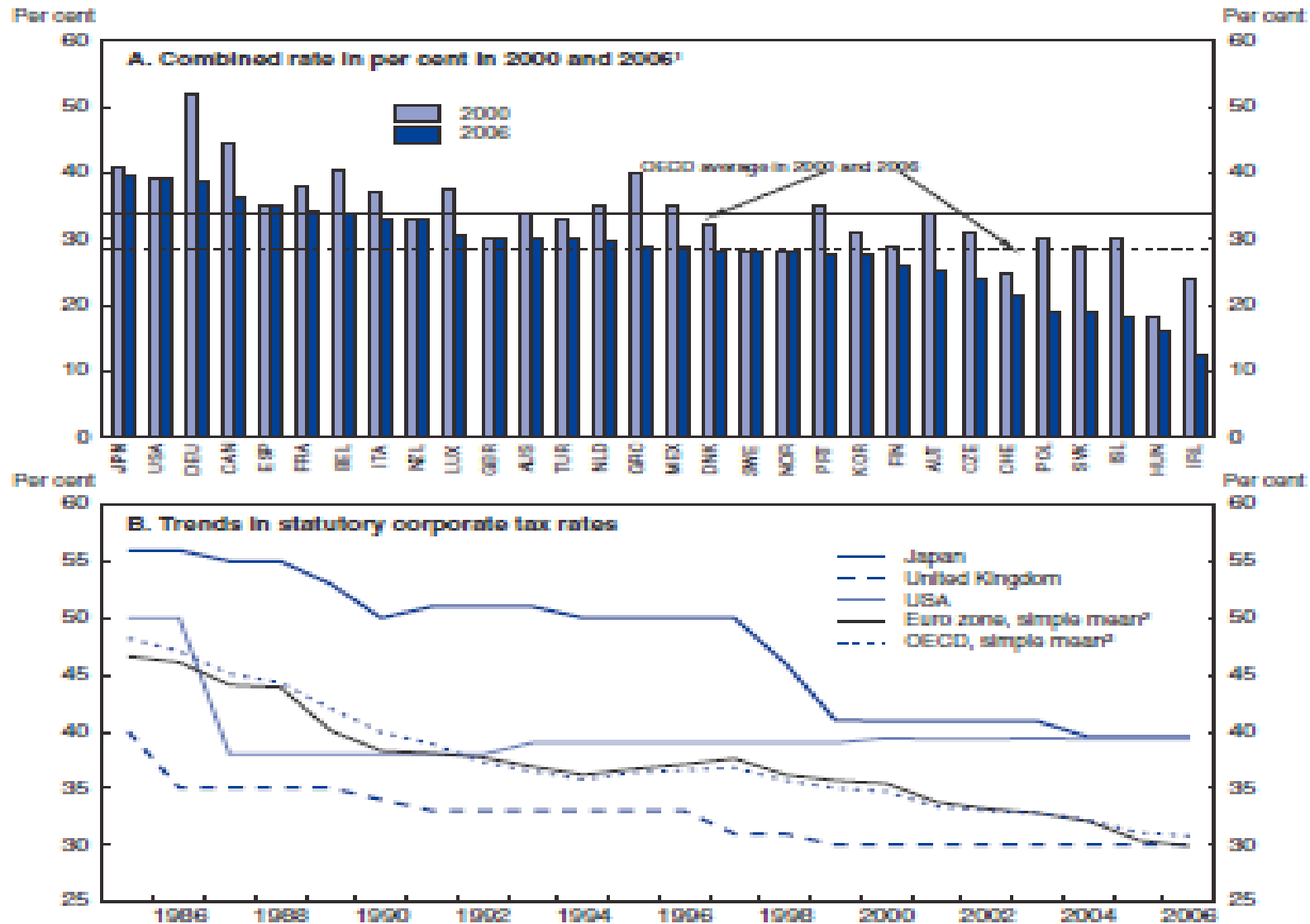


StatLink  <http://dx.doi.org/10.1787/277869051510>

1. The C-efficiency measure is the ratio of value-added tax revenue to consumption spending divided by the standard tax rate. 2003 is the most recent year for which complete data are available.

Source: OECD (2006a), *Consumption Tax Trends*, OECD, Paris.

Figure 4.7. Statutory corporate income tax rates



StatLink <http://dx.doi.org/10.1787/278008265144>

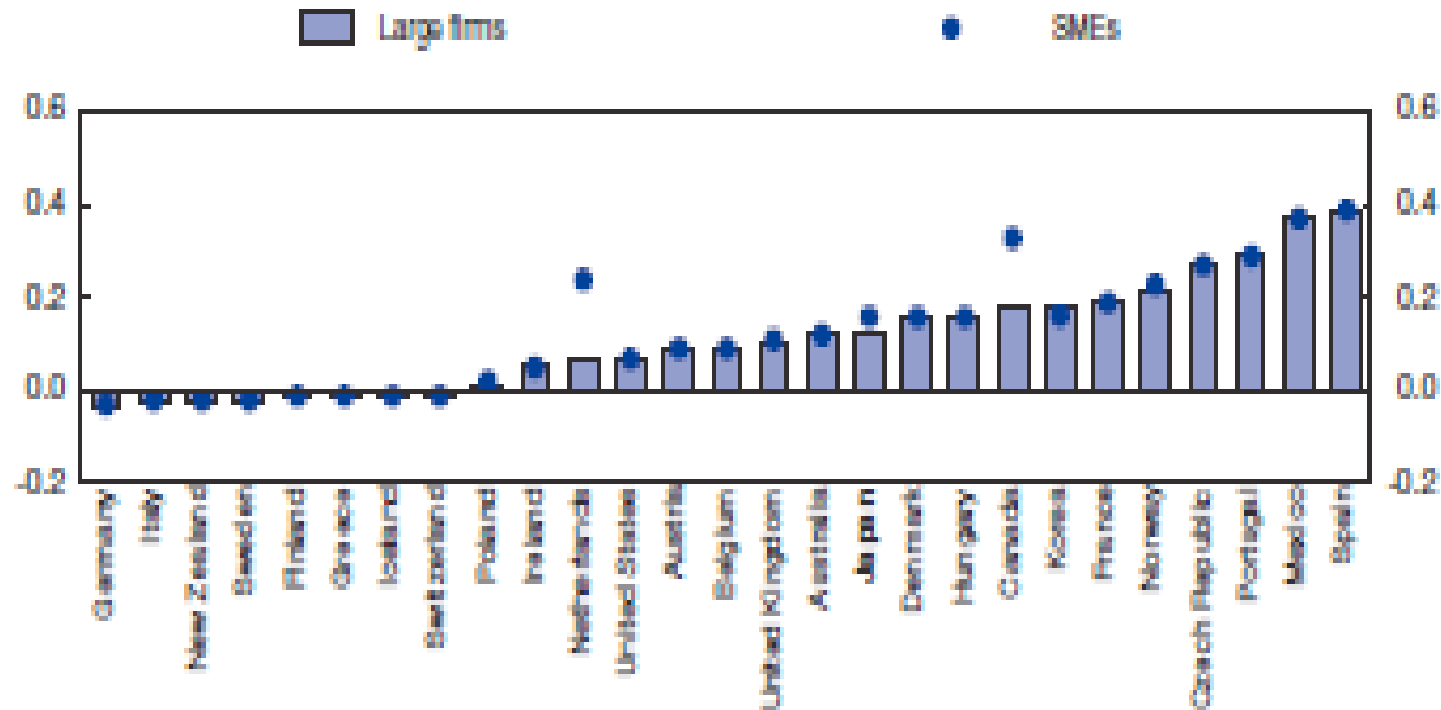
1. Basic combined central and sub-central (statutory) corporate income tax rate. Averages are un-weighted.
2. Excludes Luxembourg.
3. Includes 17 OECD countries.

Source: OECD (2007e), Tax Database, OECD, Paris ([www.oecd.org/cip/taxdatabase](http://www.oecd.org/cip/taxdatabase)); European Commission (2006), Structures of the Taxation Systems in the European Union; and OECD (2007b).



Figure 4.9. Tax treatment of R&D in OECD countries

Rate of tax subsidy for one unit of R&D in 2007<sup>1</sup>

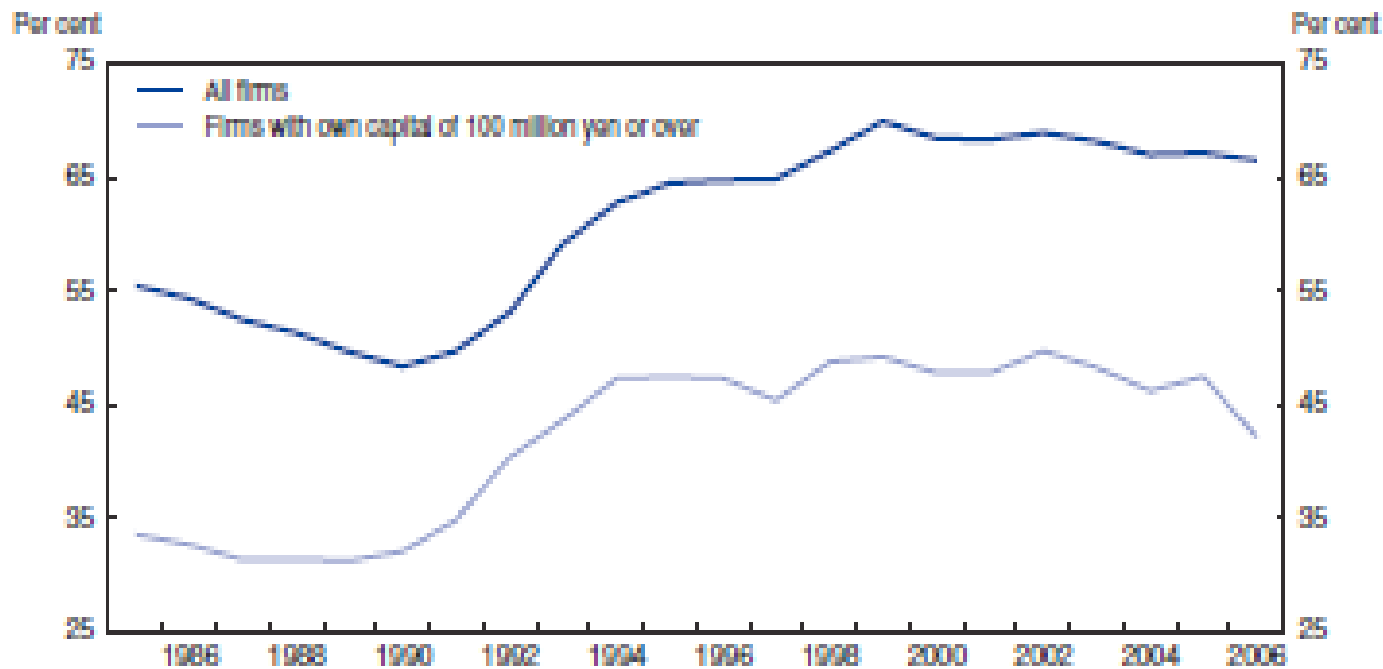


StatLink  <http://dx.doi.org/10.1787/778027158847>

1. For example, the score of 0.12 for large firms in Japan means that 100 yen of R&D spending resulted in 12 yen of tax relief for them.

Source: OECD (2007d), *Science, Technology and Industry Scoreboard*, OECD, Paris.

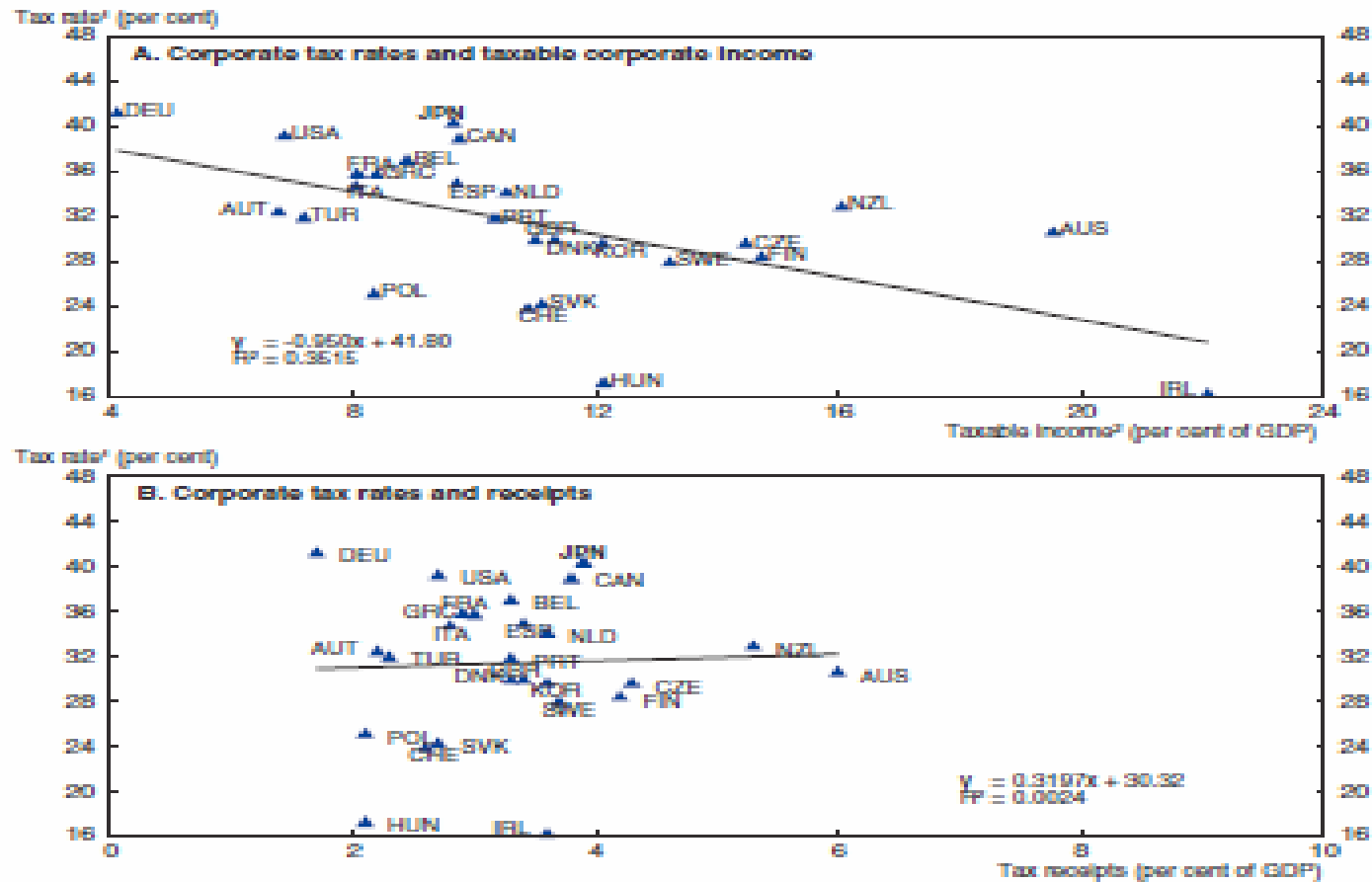
Figure 4.10. Proportion of firms making losses according to the national tax code



StatLink  <http://dx.doi.org/10.1787/277511213853>

Source: National Tax Agency, Results of the Corporation Sample Survey.

Figure 4.11. International comparison of corporate taxes  
Average 2000-05



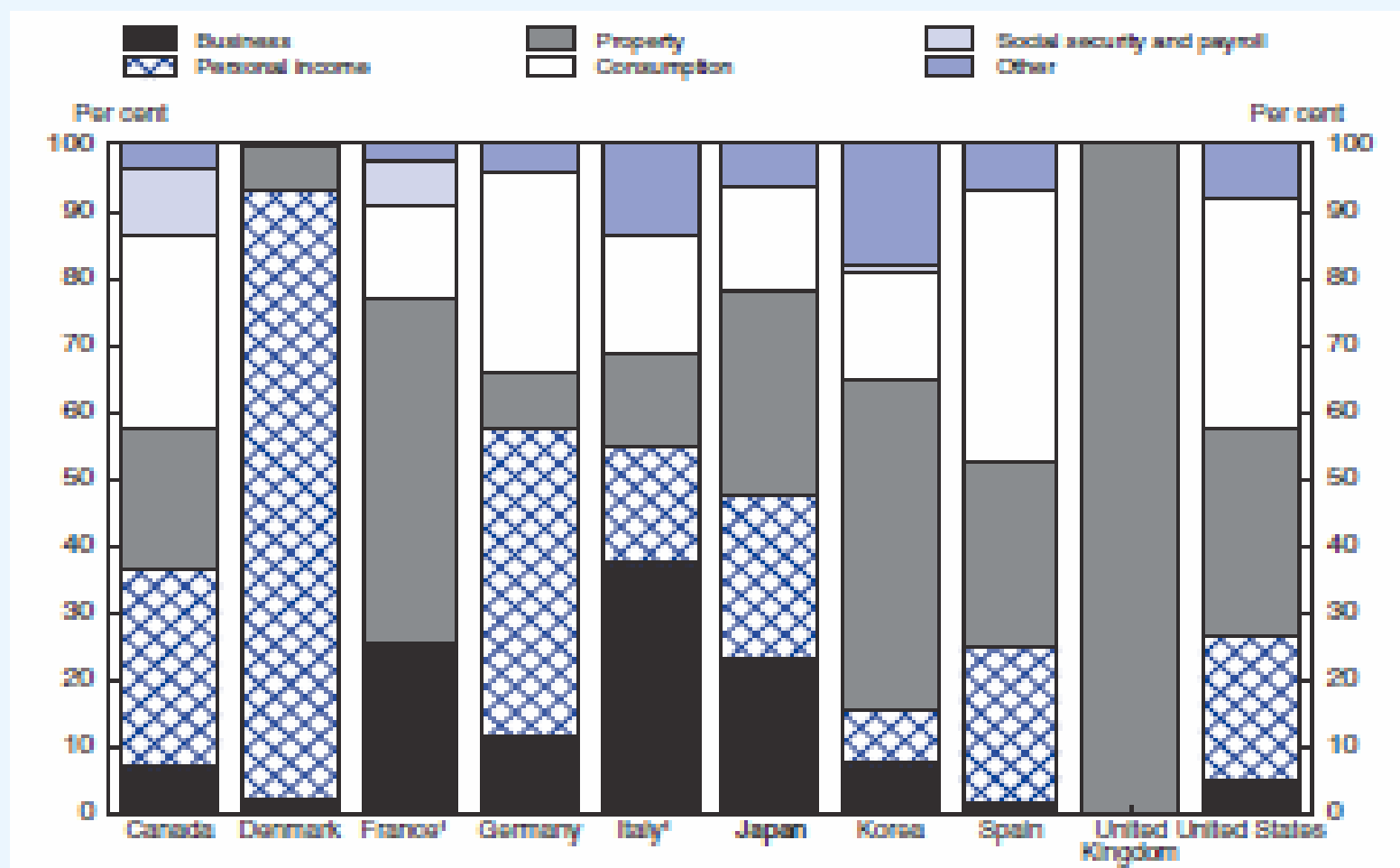
Source: <http://dx.doi.org/10.1787/277527153057>


1. Combined central and sub-central statutory corporate income tax rate.

2. Calculated by grossing up corporate tax revenue and dividing by the tax rate.

Source: OECD (2007e), Tax Database, OECD, Paris ([www.oecd.org/cip/tax/database](http://www.oecd.org/cip/tax/database)) and OECD (2007c), Revenue Statistics 1965-2006, OECD, Paris (<http://dx.doi.org/10.1787/366725334503>).

Figure 4.3. Composition of sub-national government tax revenues  
2005



StatLink  <http://dx.doi.org/10.1787/277827004437>

1. Including other taxes paid solely by business (Taxe professionnelle in France and IRAP in Italy).

Source: OECD (2007c), Revenue Statistics 1965-2006, OECD, Paris (<http://dx.doi.org/10.1787/366725334503>).

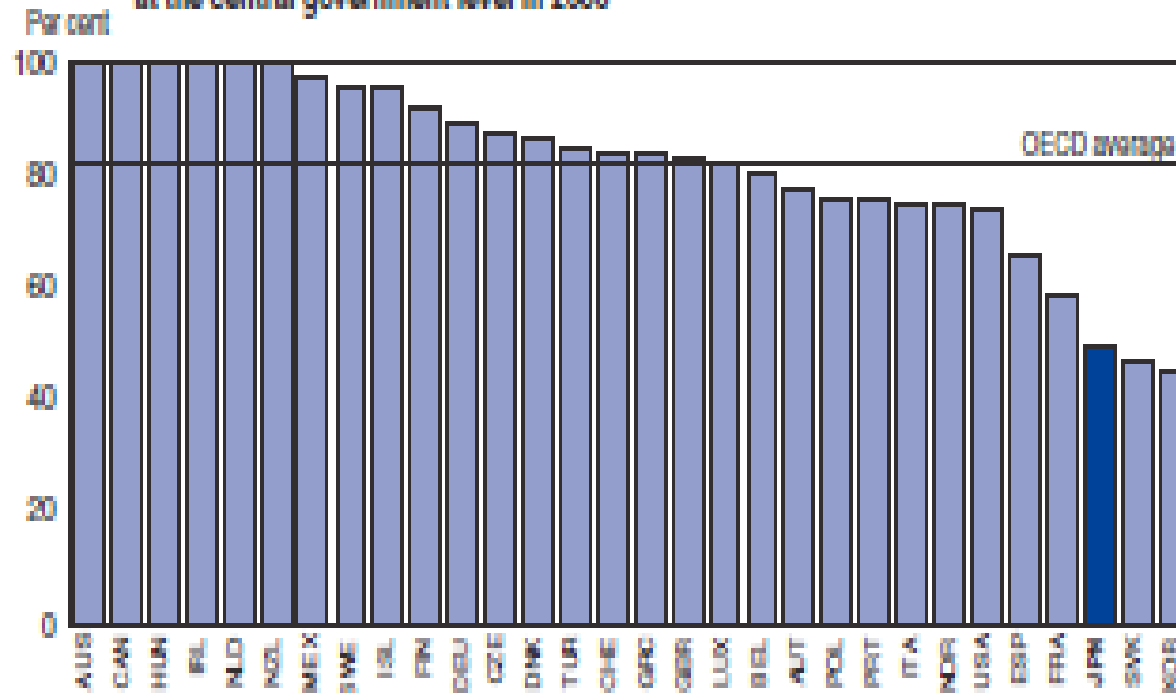
## Improving the local tax system

One way to lower the corporate tax rate and improve the local tax system would be to phase out local taxes on enterprises, while increasing other local taxes, notably on personal income, property and consumption. A unique feature of Japan's corporate tax system is the significant amount that is imposed at the local level through the prefectural enterprise tax and the local inhabitant tax on corporations. Corporate taxation at the local level has various drawbacks such as the large revenue gap between jurisdictions – tax revenues per capita in Tokyo were nearly seven times higher than in the poorest prefecture between 2001 and 2005 (Figure 4.5) – and high volatility in revenue. These problems could be reduced by the pro-forma scheme introduced in 2004, which determines the enterprise tax on the basis of assets and value-added, as well as income. Such an approach can be justified by the benefit principle – even firms that are not profitable should pay for the services they receive. However, many OECD countries have phased out this type of taxation as it tends to discourage job creation and business investment. Moreover, it may exacerbate enterprise failures during economic downturns by transferring the cyclical risk from local governments to companies (2005 OECD Economic Survey of Japan). Given the numerous drawbacks, Japan should shift away from corporate taxation at the local level, which would reduce the overall corporate tax rate toward the OECD average.

Figure 4.12. Personal income tax



**B. International comparison of wage income subject to personal income tax at the central government level in 2006**

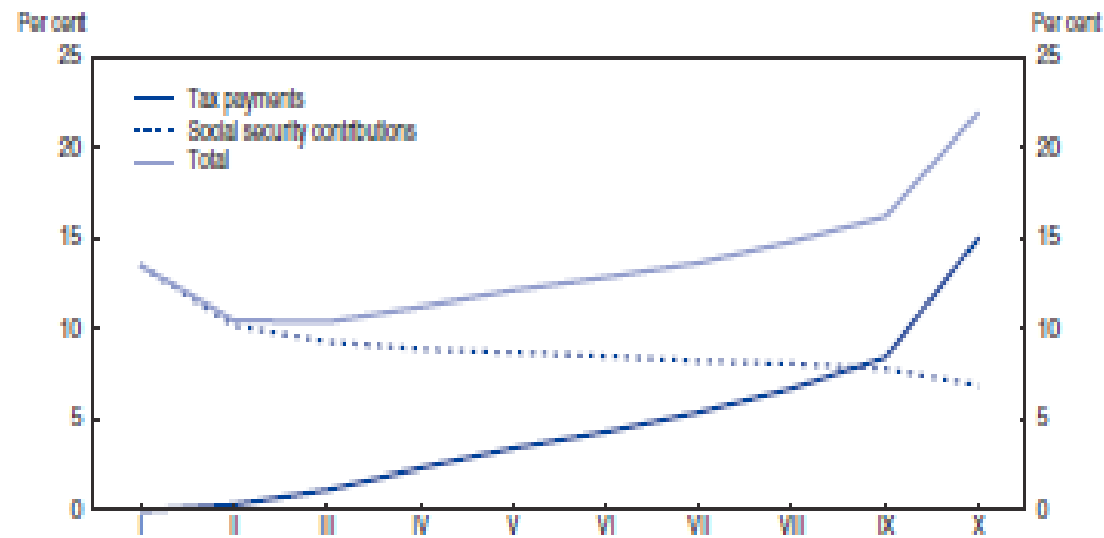



StatLink  <http://dx.doi.org/10.1787/777534646512>

1. Primarily ageing-related deductions, such as pension contributions.
2. OECD calculations based on data from the Ministry of Finance, *Explanation of Tax and Stamp Revenues in FY 2007*.
3. OECD calculations based on data from the National Tax Agency, *The Statistical Survey of Actual Status of Salaries in the Private Sector*.

Source: Ministry of Finance, National Tax Agency and OECD (2006), *Taxing Wages 2005-2006*, OECD, Paris.

Figure 4.17. Tax and social security payments by income decile  
Per cent of income<sup>1</sup>



StatLink  <http://dx.doi.org/10.1787/277714862455>

1. For households receiving salaries. I represents the lowest-income decile.

Source: Tajika and Yashio (2007).



Table 4.2. Summary of OECD recommendations

	<i>Raising revenue</i>	<i>Promoting growth</i>	<i>Reducing inequality</i>	<i>Increasing gains from decentralisation</i>
Consumption tax	<ul style="list-style-type: none"> <li>• Raise the rate from the current 9%, while maintaining a unified rate.</li> </ul>	<ul style="list-style-type: none"> <li>• Raise the rate from the current 9% to increase reliance on indirect taxes relative to direct taxes.</li> </ul>	<ul style="list-style-type: none"> <li>• Raising the rate increases the tax burden on pension recipients, thus improving inter-generational equity.</li> </ul>	<ul style="list-style-type: none"> <li>• Raising the overall rate would increase the local consumption tax (set at a % of the national rate) under the current system.</li> </ul>
Corporate income tax	<ul style="list-style-type: none"> <li>• Broaden the tax base by reducing tax expenditures and cutting generous deductions.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce the share of corporate income tax in total direct tax.</li> <li>• Lower the statutory tax rate on corporations.</li> <li>• Phase out local taxes on corporations</li> </ul>		<ul style="list-style-type: none"> <li>• Phase out local taxes on corporations, while relying more on taxes on personal income, consumption and property.</li> </ul>
Personal income tax	<ul style="list-style-type: none"> <li>• Broaden the tax base.</li> <li>• Increase compliance of the self-employed by improving enforcement, in particular by introducing taxpayer identification numbers and stronger penalties for tax evasion.</li> </ul>	<ul style="list-style-type: none"> <li>• Increase the share of personal income tax in total direct tax.</li> <li>• Remove features that distort the allocation of investment.</li> <li>• Weaken disincentives for full-time employment of secondary earners in households.</li> <li>• Reduce the preferential treatment of retirement allowances.</li> <li>• Consider reducing personal income tax rates if the base broadening of direct taxes provides adequate revenue.</li> </ul>	<ul style="list-style-type: none"> <li>• Scale-down exemptions that favour high-income households.</li> <li>• Introduce an Earned Income Tax Credit.</li> </ul>	<ul style="list-style-type: none"> <li>• Broaden the base for the local inhabitant tax, thereby offsetting the phasing out of local taxes on corporations.</li> </ul>
Property and inheritance taxes	<ul style="list-style-type: none"> <li>• Bring evaluations closer into line with market prices.</li> </ul>		<ul style="list-style-type: none"> <li>• Bring evaluations closer into line with market prices.</li> <li>• Strengthen the inheritance tax by scaling back the basic deductions.</li> </ul>	<ul style="list-style-type: none"> <li>• Bring evaluations closer into line with market prices.</li> </ul>

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The government plans to implement a fundamental tax reform. As a first step, the Tax Commission, a group of private-sector experts that was established by law in 1959, released its report on the direction for tax reform in November 2007. Many of the recommendations by the Tax Commission, which are summarised in Box 4.5, correspond to those proposed in this chapter. However, there are a number of significant differences:

- The Tax Commission proposes a hike in the consumption tax rate to finance social welfare expenditures. The rise in social spending is part of the fiscal challenge facing Japan: the government projects that it will increase by 1% of GDP over the decade 2005 to 2015 (Table 3.5). However, the need for additional revenue extends beyond social spending. From a long-term perspective, earmarking the rise in the tax revenue could weaken efforts to control social spending, while limiting flexibility in expenditures.

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- The Tax Commission favours expanding the pro-forma local government tax on enterprises. However, such taxes, which are based on the size of firms, are negative for growth and increase the risk of company failures during downturns. For this reason, a number of OECD countries have abolished or sharply reduced such taxes in recent years.
  - The Tax Commission supports continued tax expenditures for activities, such as R&D, that promote productivity. Such incentives should only exist if rigorous cost-benefit analysis reveals that they expand productivity-enhancing activities to levels that are socially optimal.

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- To enhance the role of the personal income tax system in income redistribution, the Tax Commission recommends that a number of policies be examined; i) changes in tax brackets and rates, including the top rate of 50%; ii) replacing personal deductions by tax credits; and iii) introducing an Earned Income Tax Credit, following an in-depth analysis of costs and benefits. Given that increasing the progressivity of tax rates risks discouraging the supply of labour and the acquisition of human capital, this chapter favours achieving greater redistribution through an Earned Income Tax Credit that is financed through a broadening of the personal income tax system.

## 4 . 財政再建の財源としての消費税の特徴

- 日本の消費税

- 単一・低税率 (  $5\% = 4\% + 1\%$  )

- ・ 財源としての消費税の特徴

- 生涯負担の観点からみると、消費の変動(山と谷)は、所得より小さい。

- 貯蓄選択への影響が小さい。

- 社会保障負担が、若年者にしわ寄せされることを是正。

- 同額税収を所得税(個人 + 法人)からあげる場合と比べて、成長への負の効果が小さい。

## コラム 消費税と社会保障財源

### 「逃げず、逃げ込まず」

振り返ると安倍晋三内閣は、1年間という短い期間であったが、その初めから、最後まで、消費税がつかまわってほしいってよいであろう。その所信表明演説（2006年9月）は、「美しい国」、「再チャレンジ支援」、「成長なくして財政再建なし」、「筋肉質の政府」を謳い、「改革を徹底して実施した上で、それでも対応しきれない社会保障や少子化などに伴う負担増に対しては、安定的な財源を確保するため、抜本的・一体的な税制改革を推進し、将来世代への負担の先送りを行わないようにします。消費税については、「逃げず、逃げ込まず」という姿勢で対応してまいります」と締めくくっている。そして、その翌年7月の参議院選挙を前に、民主党とは一線を画すとして、首相自身の「上げないなんて一言も言っていない」発言が飛び出すまで、逃げないはずの消費税に最後まで踏む込むことなく、その内閣は幕を閉じた。

高齢化社会のなかで、今後増大する社会保障負担を、後代世代に押し付け続けることは不可能である。また、定元では、基礎年金の国庫負担を3分の1から、2分の1に引上げることが決まっている。社会保障財源については、もう、持ったは許されない状況となっている。

### 政府税調と自民党税調の苦中

安倍内閣退陣によって、2007年秋をめどになされるはずの税制の抜本改革は先送

りされたが、高齢化社会における消費税のあり方について、政府税調および自民党税調でこれまでより、踏み込んだ議論がなされている。政府税調の「抜本的な税制改革に向けた基本的考え方」（2007年11月）では、社会保障財源としてふさわしい税とは、①一定規模の財政需要を賄えるものであること、②現世代の国民が広く公平に負担を分かち合い、世代間の不公平の是正に資するものであることとされ、こうした条件にかなう税が、消費税であるとしている。また、消費税の負担が所得に対して逆進的であるという点に関しては、社会保障の安定的な財源となることから、所得再分配上も意義を持つこと。また、生涯にわたって負担をする視点から、消費への課税は、一般に若い時と高齢になった時では大きく異なる所得に累進的にかかる税よりも、「むしろ負担の公平に資するとの見方もある」としている。

このように、高齢化社会で増大する社会保障の税財源としては、消費税によるべきだという主張がなされている。自民党税調では（税制改正大綱、2007年12月）、消費税の目的税化について触れ、「新たな国民負担はすべて国民に還元するとの原則に立って、経済動向等に左右されにくい消費税をこれらの費用を賄う主要な財源として位置付けた上で、社会保障財源を充実することを検討する」としている。

衆参両議院のねじれ国会のなかで、消費税という言葉さえなかなか発しにくい政治

状況となっている。一方、景気のかげりを受けて、財政再建の入り口である、政府の公約している2010年代初頭における国と地方を合わせた基礎的財政収支の均衡さ

え危ぶまれ始めている。こうしたなかで、国民に真摯に、社会保障をめぐる困難な財政状況とそこから脱出する道を訴えかけていくことが求められている。