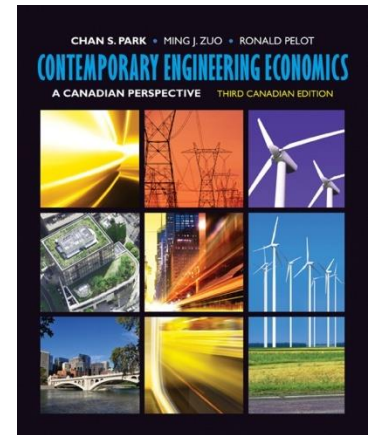


Corporate Income Tax Calculation



Lecture No. 26

Chapter 9

Contemporary Engineering Economics

Third Canadian Edition

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Lecture 26 Objectives

- How do you determine the appropriate tax rate to use in project analysis?
- What is the availability of investment tax credits (ITC) for certain types of expenditures?
- How do you calculate the disposal tax effect when selling off assets?

Combined Corporate Tax Rates on Operating Income

- The combined corporate tax rate consists of a federal rate plus a provincial or territorial rate. Rates can depend on factors such as what the corporation does, where it is located, and how large it is.
- For Canadian-controlled private corporations, there are **three corporate tax rates**.^① **small business**,^② **nonmanufacturing**, and **manufacturing**.^③
- In all cases, the starting point is the basic federal tax rate of 38%, which is reduced by the 10% federal tax abatement. *(28%)* *Provincial obligation*
- Corporate tax rates are flat in each tax category.

Small Business Deductions

Balance Sheet

| Assets | Liabilities + Capital |
|--------|---|
| | <div> <div>Current of L.T. Debt</div> <div>Long-term debt</div> <div>Retained Earnings</div> <div>Shares</div> </div> |

- Private Canadian corporations (as opposed to public corporations listed on the stock exchange) whose taxable capital is less than \$10 million qualify for the federal small business deduction (SBD) of 17% on the first \$400,000 of taxable income. SBDs differ between provinces and territories.

big deduction

Small Business
11%

Specific rate if applicable

- For corporations with taxable capital exceeding \$10 million, the SBD percentage is reduced linearly until it reaches zero when the taxable capital is \$15 million.

100%
(11%)

0% (19.5%)

- Taxable capital includes the company's capital stocks, retained earnings, long-term debt, etc.

Combined Corporate Tax Rates

- Combined corporate tax rate is obtained by adding the federal value for a given type of corporation to the corresponding provincial/territorial value.

Federal Corporate Tax Structure for 2008

| | Type of Corporation | | |
|--|-----------------------------|---------------|------------------|
| | Small Business ² | Manufacturing | Nonmanufacturing |
| Basic federal tax | 38.0% | 38.0% | 38.0% |
| Less: federal abatement | 10.0% | 10.0% | 10.0% |
| Less: SBD | 17.0% | — | — |
| Less: MPPD <i>mfg, processing profit deduction</i> | — | 8.5% | — |
| Less: rate reduction ³ | — | — | 8.5% |
| Total federal tax rate | 11.0% | 19.5% | 19.5% |

Canadian Companies

Combined Corporate Tax Rates

Provincial /Territorial Corporate Tax Structure for 2008

| | Small Business ² | Manufacturing | Nonmanufacturing |
|---------------------------|-----------------------------|--------------------|--------------------|
| Province/Territory | | | |
| British Columbia | 3.91% ³ | 11.5% ³ | 11.5% |
| Alberta | 3.0% | 10.0% | 10.0% |
| Saskatchewan | 4.5% | 10.0% | 12.5% ³ |
| Manitoba | 2.0% | 13.5% ³ | 13.5% ³ |
| Ontario | 5.5% | 12.0% | 14.0% |
| Quebec | 8.0% | 11.4% | 11.4% |
| New Brunswick | 5.0% | 13.0% | 13.0% |
| Nova Scotia | 5.0% | 16.0% | 16.0% |
| Prince Edward Island | 3.47% ³ | 16.0% | 16.0% |
| Newfoundland & Labrador | 5.0% | 5.0% | 14.0% |
| Yukon | 2.5/4.0% ⁴ | 2.5% | 15.0% |
| Northwest Territories | 4.0% | 11.5% | 11.5% |
| Nunavut | 4.0% | 12.0% | 12.0% |

Example 9.4: Corporate Income Taxes

- local rate?*
- A Canadian-controlled and private mail-order computer company in Truro, Nova Scotia, sells computer supplies and peripherals. The company leased showroom space and a warehouse for \$20,000 a year and installed \$100,000 worth of inventory checking and packaging equipment. At a 30% CCA rate, the CCA within the first year will amount to \$15,000. The store was completed and operations began on January 1. The company had a gross income of \$1,450,000 for the calendar year. Supplies and all operating expenses other than the lease expense were itemized as follows: *50%*

| | |
|------------------------------|-----------|
| Costs of goods sold | \$500,000 |
| Employee salaries & benefits | \$250,000 |
| Other supplies and expenses | \$90,000 |
| Total expenses | \$840,000 |

- COGS*
SG. & A
- How much will the company pay in federal and provincial income taxes for the year?

Example 9.4: Corporate Income Taxes (continued)

Facts:

Capital expenditure
CCA

\$100,000 ✓
\$15,000 , 1st year 50%

Gross Sales revenue

\$1,450,000 ✓

Expenses:

Cost of goods sold

\$500,000 ✓

Employee salaries and benefits

\$250,000

Other Supplies

\$ 90,000

Leasing warehouse

\$ 20,000

Question: Taxable income?

Example 9.4: Solution

- **Given:** Income, cost information, and CCA
- **Find:** Taxable income, federal and provincial income taxes

Taxable income:

| | | |
|--|-------------------------|-------------------------------------|
| Gross income | \$1,450,000 | ✓ |
| Expenses: <i>(Exclude leasing + CCA)</i> | \$840,000 | ✓ |
| * leasing expense | \$20,000 | ✓ <i>(Singled out for taxation)</i> |
| * CCA | \$15,000 | |
| Taxable income | <u>\$575,000</u> | |

Example 9.4: Solution: Federal Income Tax

Taxable income

\$575,000

First \$400,000 is taxable at the rate of 11%
(Small business federal corporate tax rate)

Federal tax = 400,000 × 11% = \$44,000

The remaining \$175,000 is taxable at the
rate of 19.5%

Federal tax = 175,000 × 19.5% = \$34,125

Federal tax payable

\$78,125

Example 9.4: Solution: Provincial Income Tax

Taxable income **\$575,000**

First \$400,000 is taxable at the rate of 5% of the small business federal corporate tax rate:

Provincial tax = $400,000 \times 5\%$ = \$20,000

The remaining \$175,000 is taxable at the rate of 16%:

Provincial tax = $175,000 \times 16\%$ = \$28,000

Provincial tax payable **\$48,000**

Total combined corporate tax payable **\$126,125**

(Federal + provincial)

Types of Corporate Income and Tax Rates

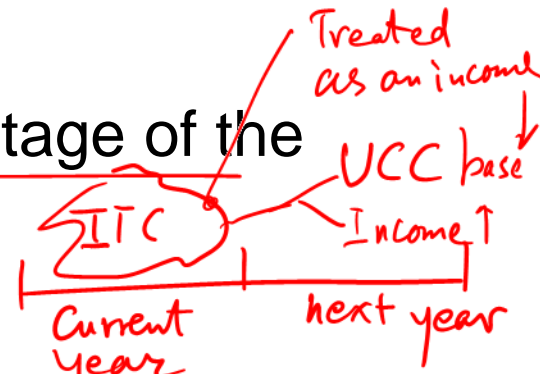
- Tax Rate on Operating Income: t , usually given
- Tax Rate on Capital Gains Income: $\frac{1}{2} t$ — tax
- Tax Rate on Capital Loss: $\frac{1}{2} t$
Credit

Investment Tax Credits

- Investment tax credits (ITC) provide incentives that encourage investments in certain types of activities within specific areas of Canada.
- Income taxes can be reduced by a percentage of the expenditures that are eligible for an ITC.
- ITCs are calculated as follows:

$$\text{investment tax credit} = \text{value of eligible expenditures} \times \text{rate of ITC}$$

- When the ITC is earned from expenditures toward the capital cost of qualified depreciable assets, the UCC in that class must be reduced by the ITC amount in the year following the corresponding ITC claim for that investment.



Investment Tax Credits

Investment Tax Credit Rates (2008) and Key Conditions

| Expenditure category | Rate (%) | Region | Refundable tax credit | Limits |
|-----------------------------|-----------------------|---|-----------------------|-------------------------------|
| SR&ED | 20 or 35 ¹ | Canada | Y ✓ | \$3,000,000 ² |
| Qualified property | 10 | Atlantic provinces and offshore; Gaspé Peninsula | Y ✓ | n/a |
| Pre-production mining | 10 | Canada | N | n/a |
| Child-care spaces | 25 | Canada | N | \$10,000 per child-care space |
| Apprenticeship job creation | 10 | Canada | N | \$2,000/year/employee |

SR&ED: Scientific Research & Experimental Development

Example 9.5: Investment Tax Credits

- During 2009, Medea Metals, near Moncton, New Brunswick, invested \$2,000,000 in precision processing machinery to expand their operation (Class 43) and also hired seven apprentices to assist with the increased workload. Their combined salaries eligible for ITCs amounted to \$140,000 for the year. Calculate the impact of the investment tax credits for 2009 and 2010.

$$\begin{aligned} \text{limit } \$2,000,000 \times 7 &= \$14,000,000 \\ \text{just right for} \\ 10\% \times \$140,000 &= \$14,000 \\ \text{ITC rate} \end{aligned}$$

Example 9.5: Solution

- **Given:** Expenditures on Qualified Property and on Eligible Apprentices \$2,000,000,
- **Find:** The ITCs and their impact on taxes and on CCA for two years 10% ITC
- For the current expenditures on apprentices the ITC rate is 10%, so there will be a \$14,000 credit against the 2009 tax payable. This amount of \$14,000 must be included as income in 2010.
- The ITC for the capital investment is 10% in the Atlantic Provinces, thus there will be a credit of \$200,000 against Tax Payable in 2009.

Example 9.5: Solution

- The Class 43 depreciation rate is 30%. The 50% rule will be applied to the total capital investment of \$2,000,000 to calculate the capital cost allowance for 2009 as follows:

$$\square \text{CCA}_{2009} = 1/2 * 0.30 * \$2,000,000 = \$300,000$$

$$\text{UCC} = \$2\text{M} - \$300\text{k} = \$1.7\text{M}$$

- Therefore, this allowance will reduce the UCC at the end of 2009 to \$1,700,000.
- In 2010, the \$200,000 ITC must be deducted from the January 1, 2010, UCC, leaving a balance of \$1,500,000. So the 2010 CCA will be:

$$\square \text{CCA}_{2010} = 0.30 * \$1,500,000 = \$450,000$$

$$\text{UCC}_{2010} = \$1.7\text{M} - \$200\text{k} = \$1.5\text{M}$$

(ITC of 2009)

Timing of Corporate Income Tax Payments

- It is assumed that corporate investments occur at the beginning of each fiscal year and income taxes are paid as a lump sum at the end of each fiscal year.

Depreciable Assets: Disposal Tax Effects

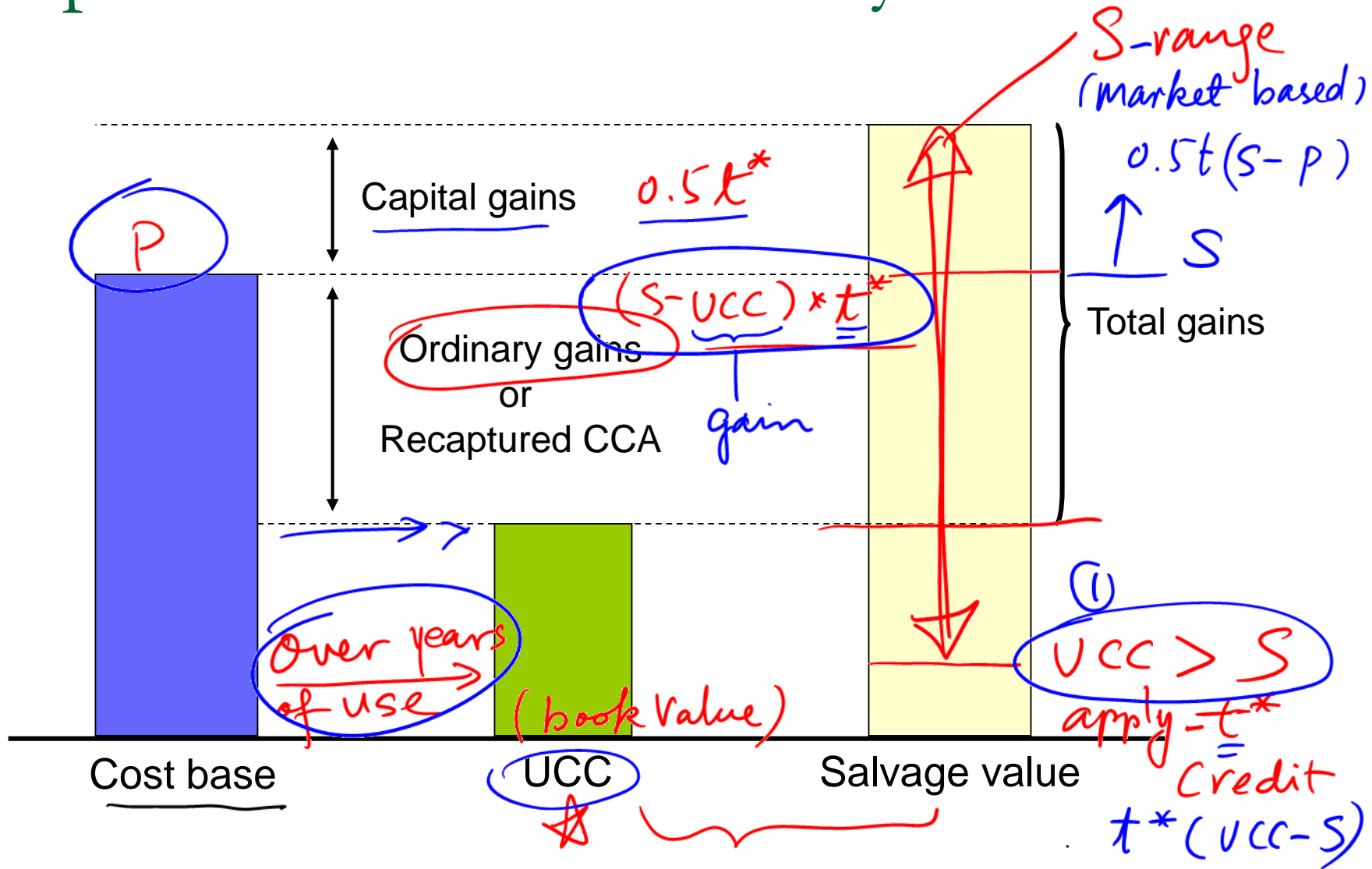
- During the disposal of capital assets, there are generally gains or losses on the sale (or exchange) of depreciable assets. To calculate a gain or loss, we first need to determine undepreciated capital cost (UCC) of the depreciable asset at the time of disposal.
- When a depreciable asset used in business is sold for an amount different from its UCC, this gain or loss has an effect on income taxes. The gain or loss is found as follows:

$$\text{Gains (losses)} = \overset{S}{\text{salvage value}} - \text{UCC}.$$

when $S > P$
[S - P] - Capital gain

- These gains, known as recaptured CCA, are taxable.

Capital Gains and Ordinary Gains



Disposal Tax Effects

1. If Cost Base > Salvage Value > UCC, CCA recapture ^t applies.
2. If Salvage Value > Cost Base > UCC, Capital Gains and CCA recapture applies.
 - Capital gains tax = capital gains × tax rate on capital gains, which is currently ½ of the effective income tax rate
3. If Cost Base > UCC > Salvage Value, CCA tax reduction applies.

Calculation of Disposal Tax Effects



- We assume that the tax implications of the disposal are completely realized in the year of disposal and there are no new acquisitions to the asset class in that year. Specifically, we assume that the disposal occurs just prior to the end of the last year of service and that the CCA in the year of asset disposal is calculated in the usual manner and without reference to the disposal.
- Because of the above assumptions, any gains on disposal are taxable at appropriate tax rates, and any losses incurred result in tax savings.

Calculation of Disposal Tax Effects

- Let G be the extra tax payment or the tax savings realized in the year of disposal. We usually have:

$$G = \underline{t} (U_{\text{Disposal}} - S),$$

$$P > S > UCC$$

- where $U_{\text{Disposal}} = UCC_N$, and t is the tax rate

- When capital gains are involved, the total disposal tax effect G becomes

$$G = \underline{t} (U_{\text{Disposal}} - P) - t_{CG}(S - P)$$

$$S > P$$

$$t_{CG} = 0.5t$$

- where P is the initial cost base (time zero installed cost), t_{CG} is the capital gains tax rate, and U_{Disposal} is the asset's UCC at the end of the year in which the disposal occurs.

Calculation of Disposal Tax Effects

- The net salvage value, NS, is the sum of the salvage value and the disposal tax effect:

$$\text{NS} = \text{S} + \text{G}$$

taxation effect

Example 9.7: Disposal Tax Effects on Depreciable Assets

- A company purchased a drill press costing \$250,000. The drill press is classified as a CCA Class 43 property with a declining balance rate of 30%. If it is sold at the end of three years, compute the disposal tax effects and the net salvage values for the following four salvage values: (a) \$150,000, (b) \$104,125, (c) \$90,000, and (d) \$280,000. Assume that the company's combined federal and provincial tax rate is 40% and that capital gains are taxed at 1/2 of their value, i.e., effectively taxed at 20% in this example.

t

$$t_{CG} = 0.5t = 20\%$$

Example 9.7: Solution

- **Given:** a CCA Class 43 asset, cost base \$250,000, sold three years after purchase.
- **Find:** Disposal tax effects, and net salvage value from the sale if sold for \$150,000, \$104,125, \$90,000, or \$280,000

| Year | Capital Cost Allowance (30% CCA rate) | UCC |
|------|--|----------------|
| 0 | | \$250,000 |
| 1 | \$37,500 | 212,500 |
| 2 | 63,750 | 148,750 |
| 3 | <u>44,625</u> | <u>104,125</u> |

Handwritten notes: A red 'P' is written above the 'Given' section. A red 'DB' is written above the 'UCC' column. Red arrows and calculations show the CCA process: from Year 0 to 1, a 30% CCA (50% x 30%) is applied to \$250,000 to get \$37,500; from Year 1 to 2, 30% CCA is applied to \$212,500 to get \$63,750; from Year 2 to 3, 30% CCA is applied to \$148,750 to get \$44,625. The final UCC of \$104,125 is circled in red.

Example 9.7: Solution (a)

- Case 1: $UCC < \text{salvage value} < \text{cost base}$

$$\begin{aligned}\text{Disposal tax effects} &= G = t(U_{\text{Disposal}} - S) \\ &= 0.4 \times (\$104,125 - \underline{\$150,000}) \\ &= -\$18,350\end{aligned}$$

change of sign

payback to government

$$\begin{aligned}\text{Net salvage value} &= \text{salvage value} + \text{disposal tax effects} \\ &= \underline{\$150,000} - \underline{\$18,350} \\ &= \underline{\underline{\$131,650}}\end{aligned}$$

Example 9.7: Solution (b)

- Case 2: Salvage value = UCC
- In Case 2, the UCC is again \$104,125. Thus, if the drill press's salvage value is \$104,125, equal to the UCC, no taxes are calculated on that salvage value. Therefore, the net proceeds equal the salvage value.

$$G = 0$$

$$NS = \underset{=}{S} + \underset{=}{G} = \$104,125$$

Example 9.7: Solution (c)

■ Case 3: Salvage value < UCC

Credit - t

$$\begin{aligned}\text{Disposal tax effects} &= G = \underline{t}(U_{\text{Disposal}} - S) \\ &= 0.4 \times (\$104,125 - \$90,000) \\ &= \underline{\underline{\$5,650}}\end{aligned}$$

14,125

UCC - S

Sign has to be judged on the term referred

Net salvage value = salvage value + disposal tax effects

$$\begin{aligned}&= \underline{\$90,000} + \underline{\$5,650} \\ &= \underline{\underline{\$95,650}}\end{aligned}$$

(Continue next time)

Example 9.7: Solution (d)

■ Case 4: Salvage value > cost base

$$\begin{aligned}\text{Capital gains} &= \text{salvage value (S)} - \text{cost base (P)} \\ &= \$280,000 - \$250,000 = \$30,000\end{aligned}$$

$$\text{Capital gains tax} = \$30,000 \times \frac{1}{2} \times 0.4 = \$6,000$$

$$\begin{aligned}\text{Disposal tax effects} &= -\text{capital gains tax} + t(U_{\text{Disposal}} - P) \\ &= -\$6,000 + 0.4 \times (\$104,125 - \$250,000) \\ &= -\$6,000 - \$58,350 \\ &= -\$64,350\end{aligned}$$

$$\begin{aligned}\text{Net salvage value} &= \text{salvage value} + \text{disposal tax effects} \\ &= \$280,000 - \$64,350 = \$215,650\end{aligned}$$

Extra Example

An asset in Class 8 with a CCA rate of 20% costs \$120,000 and has a zero estimated salvage value after six years of use. The asset will generate annual revenues of \$300,000 and will require \$80,000 in annual labour and \$50,000 in annual material expenses. There are no other revenues and expenses. Assume a tax rate of 40%.

- (a) What is the net income in a specific year?
- (b) What is the net cash flow in a specific year?
- (c) What is the net salvage value of the disposal of the asset?

Calculation Results

| Given | CCA rate | 20% | | Tax rate | 40% | | |
|-----------------------------|------------|------------|------------|------------|------------|------------|------------|
| Year | 0 | 1 | 2 | 3 | 4 | 5 | 6 |
| Investment on equipment | \$ 120,000 | | | | | | |
| Revenue | | \$ 300,000 | \$ 300,000 | \$ 300,000 | \$ 300,000 | \$ 300,000 | \$ 300,000 |
| Labour Cost | | \$ 80,000 | \$ 80,000 | \$ 80,000 | \$ 80,000 | \$ 80,000 | \$ 80,000 |
| Material Cost | | \$ 50,000 | \$ 50,000 | \$ 50,000 | \$ 50,000 | \$ 50,000 | \$ 50,000 |
| UCC | | \$ 120,000 | \$ 108,000 | \$ 86,400 | \$ 69,120 | \$ 55,296 | \$ 44,237 |
| (Cost) CCA | | \$ 12,000 | \$ 21,600 | \$ 17,280 | \$ 13,824 | \$ 11,059 | \$ 8,847 |
| Gross Income | | \$ 158,000 | \$ 148,400 | \$ 152,720 | \$ 156,176 | \$ 158,941 | \$ 161,153 |
| Operating Tax | | \$ 63,200 | \$ 59,360 | \$ 61,088 | \$ 62,470 | \$ 63,576 | \$ 64,461 |
| Salvage Value | | | | | | | |
| Disposal Tax Saving (UCC>S) | | | | | | | \$ 17,695 |
| Net Income | | \$ 94,800 | \$ 89,040 | \$ 91,632 | \$ 93,706 | \$ 95,364 | \$ 114,386 |
| Net Cash Flow | | \$ 106,800 | \$ 110,640 | \$ 108,912 | \$ 107,530 | \$ 106,424 | \$ 123,234 |
| Net Slavage Value | | | | | | | \$ 17,695 |

CCA 20%

40%

Tax Credit

0

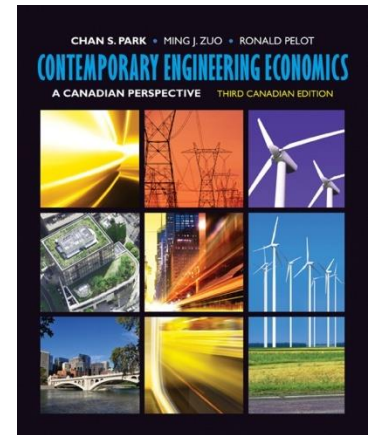
40%

timing +8,847

used in tax reduction

50% first-yr rule applied

Summary



Disposal of depreciable assets – as with disposal of capital assets – may result in gains (recaptured depreciation) or losses, which must be considered in calculating taxes.