SERVANTS OF INDIA SOCIETY'S LIBRARY, POONA A.

FOR INTERNAL CIRCULATION
To be returned on or before the last date stamped below

10 SEP 1962

- 1 0C/1962

- 5NOV 1962

5 SEP 1973

8 FEB 1985

Dhananjayarao Gadgil Lil

THE FUNDAMENTAL PRINCIPLES OF TAXATION

IN THE LIGHT
OF MODERN DEVELOPMENTS



MACMILLAN AND CO., LIMITED LONDON · BOMBAY · CALCUTTA · MADRAS MELBOURNE

THE MACMILLAN COMPANY
NEW YORK · BOSTON · CHICAGO
DALLAS · SAN FRANCISCO

THE MACMILLAN CO. OF CANADA, LTD. TORONTO

THE FUNDAMENTAL PRINCIPLES OF TAXATION

IN THE LIGHT OF MODERN DEVELOPMENTS

(THE NEWMARCH LECTURES FOR 1919)

BY

SIR JOSIAH STAMP K.B.E., D.Sc.

MACMILLAN AND CO., LIMITED ST. MARTIN'S STREET, LONDON
1921

COPYRIGHT

X72 F1 1728 TO MY WIFE

PREFACE

THESE Lectures, delivered to public audiences at the end of 1919, under the Newmarch foundation of University College, London, are now published in book form in response to numerous requests from those who heard them and from others in different parts of the world.

I have thought that, on the whole, it was best to leave them practically in the form in which they were given, and without correction, for modifications in practice that have since taken place, beyond brief footnotes.

For the convenience of students who wish to pursue and study any particular points, a number of references have been given.

I would remind readers that it was no part of my design to make a complete appraisal of any tax, and that critical references to particular aspects of a particular tax for the purpose of illustrating general principles should not be taken to imply a balance of approval or disapproval of that tax taken as a whole. Such views may be gathered elsewhere.

J. C. S.

September 1920.

CONTENTS

	CHAPTER I	
THE	GENERAL TREND OF RECENT DEVELOPMENTS AND THE	PAGE
	NEED FOR RESTATEMENT OF PRINCIPLES	1
	CHAPTER II	
THE	Individual Standpoint for the Taxation of	
	INCOMES	25
	CHAPTER III	
THE	STANDPOINT OF THE INDIVIDUAL IN RELATION TO TAKES ON EXPENDITURE, SPECIAL RECEIPTS, AND	
	Savings	55
	CHAPTER IV	
THE	STANDPOINT OF THE STATE	92
	CHAPTER V	
Тни	STANDPOINT OF THE COMMUNITY: ECONOMIC EFFECTS	130
	CHAPTER VI	
Tar	STANDPOINT OF THE COMMUNITY: ULTERIOR OBJECTS	170
IND	PEX	100

NOTE ON ABBREVIATIONS USED IN THE FOOTNOTES

Select Committee on the Income Tax .				1851-52
Joint Committee on the Income Tax .				1863
Departmental Committee on the Income	Tax			1905
Select Committee on the Income Tax .	•			1906
Royal Commission on the Income Tax				1920
The Reports and Evidence of the al-	MV# ATF	refe	er-red	to briefly

The Reports and Evidence of the above are referred to briefly by the date, e.g. "1906 Comm."

E.J. = Economic Journal. Writings by the author are distinguished thus: (S.).

Readjustments = Readjustments in Taxation. The Annals of the American Academy of Political and Social Science, March 1915, No. 147.

Foreign Income Taxes, 1905
and
Foreign Income Taxes, 1913

Bluebook on Graduated Income
Taxes in Foreign States,
1905 and 1913.

Dowell = History of Taxation in England, by Stephen Dowell.

INDEX

Ability Principle, 7, 12, 15, 55, 83
Adams, T. S., 129
Ad valorem Duties, 95-100, 106-9
Advertisements, 186
Agricultural Rates Act, 136
Agricultura, Royal Commission on, 135
Alcoholic Liquors, 69, 180-81
Amortisation, 132, etc.
Australia, 37, 67, 124-5, 139, 184
Austria, 127
Average, effects of, 27

Baden, 127
Bastable, C. F., 150
Bene6t Principle, 6
Betterment, 7
Bickerdike, C. F., 141-3
Bülow, 192
Business Taxation, 41, 64-5, 96, 110-11, 197
Byron, 104

Canada, 23, 100
Canard, 50
Cannan, E., 20, 151
Capital Accumulation, 56, 144-55
Capital Basis, 41
Capital Taxes, 12, 81
Capital Taxes, 12, 81
Capitalisation of Taxes, 132, etc.
Caprivi, 191-2
Carnegie, 153, 161
Cecil, Lord H., 86
Chapman, Sir S., 44-5
Children, allowances for, 78, 114
China, 94
Cigara, 99

Communal evasion, 112
Companies, 97
Compensation, 109
Consumers' Rent, 50
Consumption, test of ability, 12
Co-operative income, 33
Coste, Income Tax, 37; Taxation of, 42, 76, 89
Cunningham, T., 73

Death Duties, 10, 12, 144-55
Diamonds, Taxation of, 10
Dietzel, 191-5
Differential Taxation, 132, etc.
Diminishing Utility, 37, 40, 44-8
Dingley Tariff, 117
Discriminations, 196
Dividend, Co-operative, 33-5
Dog Tax, 186
Domestic Circumstances, 15
Double Taxation, 2, 57, 118-29, 139
Drawbacks, 79
Dumping, 188, 194

Earned Income, 15, 83, 95, 179, etc. Economic Effecta, 130, etc. Economic Surplus (see Surplus), 15 Economy, 3, 93
Edgeworth, Prof., 51, 53
Education Expenditure, 7
Efficiency (see Surplus), 75
Egypt, 39
Established Rights, 177, etc.
Estate Duty, 106, 110, 144-55
Estate Values, 10
Evasion (see Fraud)
Excess Profits Duty, 29, 37, 63-4, 109, 136-40, 197

Expenditure, test of ability, 31, 55; Taxes, 67

Family, as unit, 76-8 Farmers, 22, 97 Federal Inheritance Duties, 123 Federal Taxation (see Jurisdiction) Flanders, 194 Formulae, 46, 52-3 France, 20, 24, 38-9, 80, 102, 116-

117, 123 Fraud and Evasion, 103-14

General Property Tax, 19, 82, 112, Germany, 40, 60-62, 78, 99, 101, 116, 126, 129, 191-4 Gladstone, 80, 103, 147 Gonner, E. C., 157 Gun Licence, 186

Haig, Prof., 28 Hamburg, 111 Higginson, J. H., 69, 99, 100, 108 Hobhouse, L. T., 90 Hobson, J. A., 42-3, 72, 76, 89-90 Holland, 40 House Duty, 70, 185 Houston, Texas, 183-4 Hull, Mr., 14 "Hurt of Taxation," 49-51

Import Duties (see Tariff), 167, 187 Incidence, 130, etc. Income, test of ability, 12 Income Tax (see Countries) Increment Value Duties, 59-62, 109, 140, 182 India, 97 Indirect Taxes (see Expenditure), 31 Insurance, 159, 160 Investment Income, 83-91 Ireland, 117-18 Italy, 111

Jamieson, J., 94 Jones, R., 3, 44 Jurisdictions, conflict of, 117-29

Kelly, Michael, 11 Kennan, K. K., 24, 39, 111 Kind, Income in, 33

Lamb, Charles, 104 Land Tax, 18, 20, 134-6, 181-5 Land Value Duties, 59, 93, 96, 101, 116, 181-5 Leaseholds, 63 Licensing Acts, 109, 180 Life Insurance, 36 Local Administration, 21 Lotteries, 67 Lutz, H. L., 113 Luxury Tax, 102

M'Culloch, 39, 198] Mallock, W. H., 91, 163 Marshall, Prof., 10, 48-9, 70, 101, 171-2, 186, 189, 192-3 Match Tax, 116 Mexico, 79, 80 Middleton, J. H., 193-4 Mill, J. S., 38, 56, 86, 142, 147, 149 Money, Sir Leo Chiozza, 51 Monopoly, 131, 166 Montesquieu, 40 Moore, 104 Mortgages, 119-22 Motor Spirit Duty, 100 Municipal Trading, 36 Munitions Levy, 30 Mutual Trading, 34

National Debt. 147 Naumann, 193 Newmarch, William, 1, 39, 55-6 New Zealand, 184

Objective Taxation, 17 " Origin," 117, etc.

Paley, 40

Pascal, 54 Pastoriza, J. J., 184 Persia, 94 Pigou, Prof., 56-7, 151, 153 Pitt, 20, 186 Plehn, Prof., 32 Political Aspects, 116 Pope, 198 Powers of Administration, 101 Practicability, 95-103 Preferential Tariff, 100, 195 Pressley, 20 Presumptive Taxes, 22, 185-6

Partridge v. Mallandaine, 88

Prices, effects on, 165
Pride, as a taxation principle, 9
Productivity and progression, 41
Progressive Taxation, 31, 37-54, 171-4
Protection (see Tariffs)
Prussia, 29, 78, 97, 102, 129
Psychological Aspects, 154-60, 163

Quantitative, aspect of ability, 15

Rating, 19, 36-7, 71, 113
Receipt Duty, 79-80
Redistribution of Wealth, 171
Regressive Taxes, 68-71
Rental Tax, 39, 71
Reserves, 161
Residence, as income, 32; taxation, 70, 117, etc.
Retailers, 23
Retaliatory Duties, 188, 194-5
Reversion Duty, 63
Romanes, 163

Sacrifice, least aggregate, 49, 172, eto, Samuel, Sir H., 13, 77 Sargant, 39 Savings, 157 Savings Exemption, 57 Segregation of the source, 129 Seligman, Prof., 14, 17, 19, 21, 39, 40 Ships, 137 Single Tax, 183-4 Site Values, 61, 183 Smith, Adam, 3, 4, 8, 12, 37, 53, 111, 177-8, 193 Smith, Armitage, 20, 94 Social Improvement and Progression, 48 Source, Taxation at, 40 Special Ability, 59-67 Special Assessments, 7 Stamp, Sir J. C., 4, 15, 18, 22, 32, 36, 41, 44, 60-61, 64, 70, 73, 83, 85, 91, 108, 110, 111, 113, 117, 128, 135-6, 139, 141, 144, 148, 167 Standpoints, set out, 5
State Standpoints, 92, etc.
State Tax Commissions, 113
Stevenson, Sir John, 104
Stock Exchange Losses, 67
Subjective Taxation, 17
Subsistence Taxation, 42, etc.
Substitution, Law of, 115
Super-Tax, 90-91
Surplus Taxation, 42, etc., 72, 89, 154
Swift, 8
Switzerland, 112, 126

Tariffs, 14, 69, 94-5, 98-100, 116, 167, 187-96
Tasmania, 67
Taussig, Prof., 168, 175-7, 179, 195-6
"Taxable Capacity," 117
Time Element, aspect of ability, 15, 25
Tucker, R. F., 141
Turkey, 94
Turnover Tax, 79

Ulterior Objects, 170, etc. Unearned Income, 83-91, 179, etc. United States Taxation, 14, 19, 28, 29, 32, 82, 99, 102, 110-13, 118-23, 138, 165, 183-4, 187, 195, 197

Vineberg, 24

Wage-earners, 26, 71-8
War Wealth Taxation, 66, 96, 101, 197
Wasting Assets, 81, 140
Western Australia, 33
Windfsil Taxation, 59
Wisconsin, 32, 121, 127-8
Withers, Hartley, 78
Wren, W. S., 184

NEW WORKS ON POLITICS AND ECONOMICS

- MODERN DEMOCRACIES. By the Right Hon. VISCOUNT BRYCE, O.M. Two Vols. 8vo. 50s. net.
- LABOUR AS AN INTERNATIONAL PROBLEM. A
 Series of Essays comprising a Short History of the International Labour Organisation, and a Review of General
 Industrial Problems. By G. N. Barnes, Arthur Fontaine, Dr. Shotwell, Emile Vandervelde, Minoru Oka,
 Albert Thomas, W. A. Appleton, H. B. Butler, Sophy
 Sanger, E. John Solano. Edited by E. John Solano.
 8vo. 18s. net.
- THE LEAGUE OF NATIONS STARTS: AN OUTLINE BY ITS ORGANISERS. 8vo. 10s. 6d. net.
- KARL MARX AND MODERN SOCIALISM. By F. R. SALTER, M.A., Fellow and Lecturer of Magdalene College, Cambridge. Crown 8vo. 5s. net.
- THE ECONOMICS OF WELFARE. By A. C. Pigou, M.A., Professor of Political Economy in the University of Cambridge. 8vo. 36s. net.
- MUTUALISM: A SYNTHESIS. By ARTHUR TRAVERS-BORGSTROEM. Crown 8vo. 4s. 6d. net.
- Mr. Travers-Borgstroem lays_down in this volume the fundamental principles of a system of politico-economic philosophy which may have profound and far-reaching results, and also gives particulars of an International Prize Competition which he has founded at 4the University of Berne for essays dealing with the Nationalisation of Credit,
- THE STATESMAN'S YEAR BOOK. Statistical and Historical Annual of the States of the World for the year 1921. Edited by Sir John Scott Keltie, LL.D., formerly Secretary of the Royal Geographical Society, and M. Epstein, M.A., Ph.D., F.R.G.S. Revised after Official Returns. With Maps. Crown 8vo.

LONDON: MACMILLAN AND CO., LTD.

WORKS ON ECONOMICS

- PRINCIPLES OF ECONOMICS. Au Introductory Volume. By Alfred Marshall. Eighth Edition. 8vo. 18s. net.
- ELEMENTS OF ECONOMICS OF INDUSTRY. By
 ALFRED MARSHALL. Third Edition. Crown 8vo. 4s. 6d.
- INDUSTRY AND TRADE: A Study of Industrial Technique and Business Organisation; and of their Influences on the Conditions of Various Classes and Nations. By ALFRED MARSHALL. Second Edition. 8vo. 18s. net.
- PAPERS ON CURRENT FINANCE. By H. S. FOXWELL, M.A., Professor of Political Economy in the University of London. 8vo. 10s. net.
- ECONOMIC CONSEQUENCES OF THE PEACE. By J. M. KEYNES. 8vo. 8s. 6d, net.
- INDIAN FINANCE AND BANKING. By G. FINDLAY SHIRRAS. 8vo. 18s. net.
- PRINCIPLES OF ECONOMICS. By Dr. N. G. PIERSON.
 Translated by A. A. Wotzel. Two Vols. 8vo. 12s. 6d.
 net each.
- PRINCIPLES OF ECONOMICS. By Prof. F. W. TAUSSIG. Second Edition. 8vo. Vol. I. 16s. net. Vol. II. 20s. net.
- THE THEORY OF INTERNATIONAL TRADE WITH SOME OF ITS APPLICATIONS TO ECONOMIC POLICY. By Prof. C. F. BASTABLE, M.A., LL.D. Fourth Edition, Revised. Crown 8vo. 4s. 6d. net.
- PUBLIC FINANCE. By Prof. C. F. BASTABLE, M.A., LL.D. Third Edition. 8vo. 16s. net.
- DICTIONARY OF POLITICAL ECONOMY. By various Writers. Edited by Sir R. H. I. PALGRAVE. Three Vols. Medium 8vo. 25s. net each. Appendix to Vol. III. Separately. Sewed. 3s. net

LONDON: MACMILLAN AND CO., LTD.