Improving taxation of agricultural production as a factor of successful development of the agricultural sector in Russia

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Abstract. Modern reality, the current economic situation in the world put forward special requirements for ensuring the food security of the state, and conducting import substitution. The purpose of the study is to identify the advantages and disadvantages of the taxation system of agricultural producers in the form of unified agricultural tax, the impact of changes made to the Tax Code. The study used general methods of cognition (deduction and induction, analysis and synthesis, observation method, generalization and particular methods of cognition (factor analysis, comparison method, grouping, graphical and tabular methods of data presentation). Based on the results of the study, it was concluded that the application of unified agricultural tax in practice raises questions that need to be revised and clarified, especially regarding the effectiveness of the special regime used in the development of small business in the agricultural sector. It is proposed to abolish the exemption from Value-Added Tax duties of all payers of the unified agricultural tax, regardless of their income, and to use the indicator “cost-effectiveness” when setting the single tax rate from 0 to 6%. The significance of the article is the issues addressed in the article are relevant for most countries of the world.

1. Introduction
All over the world, agriculture is subsidized from the state budget, it is provided with many tax and other benefits. The existing objective difficulties of the agricultural economy, due to its specificity, primarily related to seasonality and great dependence on natural and climatic conditions, force Russia to implement state support measures, taking into account the understanding that rapidly developing agricultural production contributes to the growth of socio-economic development of the country and its regions. Ultimately, by the level of agricultural development, one can judge the living standards of the rural population, which makes up a significant part of the population in Russia (according to Rosstat, in 2018 – 26%).

“In the current conditions of financial instability, limited budgetary resources do not allow for the sustainable development of the Russian agricultural sector through direct budget subsidies. In addition, budget support opportunities are limited by the requirements established by the World Trade Organization for the provision of budget subsidies. These factors make it necessary to activate indirect methods of state influence on the development of agricultural sectors, among which taxes play an important role” [1]. If the common feature of all special tax regimes was the exemption from indirect taxation (VAT), then “a distinctive feature of the unified agricultural tax from other special tax regimes is its focus not on supporting small businesses, but on the development of a specific sector of the national economy – agriculture” [2]. The main task of the system of taxation of agricultural producers should be to stimulate the economic activity of their activities, ensuring sustainable competitive advantages. The
unified agricultural tax was originally introduced by the Federal Law of December 29, 2001. The tax was levied in the form of land rent and its size directly depended on the value of agricultural land belonging to the agricultural commodity producers. The tax period was a quarter. Taking into account the seasonal nature of agricultural production and the lack of funds in winter and spring, only 2% of the agricultural commodity producers used the unified agricultural tax in the version of the law of 2001. For agriculture, the level of tax burden is of paramount importance, in connection with which “the state tax policy in relation to the agro-industrial complex should take into account specific features related to differential rents, the effectiveness of additional investments, general favourable production conditions that determine the formation of monopoly rents” [1].

The modern cadastral valuation of agricultural land in the Russian Federation is based on the “principle of land rent formation, mainly due to the fertility of soils of specific land plots. The standard of labour productivity directly depends on its level, indirectly - on the structure of land use, the size of unit costs. Perhaps the closest to the indicator of land rent, calculated in this case, is differential land rent 1, which is formed due to differences in fertility and location of land plots” [3].

Many researchers raise the question of the need for a differentiated approach to taxation of agribusiness, depending on the prevalence of climatic conditions, which would ensure equal conditions for business entities. However, the proposed mechanisms for the differentiation of taxation conditions have not yet been developed.

Currently, the taxation of agricultural commodity producers is carried out according to the rules of Chapter 26.1 of the Tax Code of the Russian Federation, introduced by the Federal Law of December 19, 2002 No. 187-FZ, to which the Federal Law of 11.11.2003 No. 147-FZ was amended, according to which the tax rate became 6% of income reduced by expenses, the tax period was the calendar year, the reporting period – six months. The main condition for the application of unified industrial tax has become: products of own production should account for more than 70% of all revenues from sales of products.

Considering the features of the application of the unified agricultural tax system in Russia and its impact on the development of agricultural enterprises, the authors rightly point out that “the smallest share of taxpayers among taxpayers applying special tax regimes is taxpayers of the unified agricultural tax.” [4], that’s why it is necessary to strengthen the role of the unified agricultural tax in the Russian economy. This conclusion is confirmed by the authors with data on the submitted declarations of unified agricultural tax: on the 1st of January 2016 – 98.3 thousand units, on the 1st of January 2018 – 100.7 thousand units.

The authors consider agriculture from the point of view that “first of all it contributes to solving the problem of food security of the country” [5]. In the agricultural sector, there is a large number of benefits and preferences for all taxes, so taxes in agriculture mainly perform a stimulating function, and the fiscal value is practically minimized. According to V G Panskov, “small business does not play a significant role in ensuring the financial needs of the state in Russia” [6], and he does not even analyze the fiscal function of the unified agricultural tax.

2. Research materials and methods

The study is based on data from the Federal State Statistics Service, the Federal Tax Service of Russia, the Federal Treasury on budget execution, data from periodicals, as well as on the results obtained by the authors during the research. Changes in the tax administration of agricultural producers are considered on the basis of federal laws that have introduced the corresponding amendments to the Tax Code of the Russian Federation.

In this work, the taxation system in the form of the unified agricultural tax is considered as an instrument of state support for the development of the country's agro-industrial complex. The main performance indicators of agricultural enterprises applying the unified agricultural tax are considered at the federal and regional levels based on the data of the Consolidated Tax Passport of the Russian Federation and the Chuvash Republic Tax Passport for 2016-2018 years.
In the course of the study, general methods of cognition were used (deduction and induction, analysis and synthesis, analogy, methods of observation, description, generalization, expert assessment method, private methods of cognition (factor analysis, comparison method, tabular method of data presentation).

3. Results
The introduction of the unified agricultural tax is largely due to the desire to support owners of small and medium-sized businesses by reducing the tax burden and simplifying the procedure for calculating and paying tax.

In addition, the activation and growth of entrepreneurial activity in the agricultural sector contributes to an increase in the level and quality of life of the rural population.

In the course of the study, such shortcomings of the unified agricultural tax were revealed, as:

- low interest of taxpayers in its application;
- the need for continuous monitoring of revenues from the sale of agricultural products, so that it does not exceed 70% of the total revenues;
- in contrast to the general taxation regime, in which the list of expenses is open, while under the unified agricultural tax – closed;
- loss of a part of the market in the face of large processing enterprises and retail chains interested in VAT (before making the appropriate changes);
- the special tax regime in the form of the unified agricultural tax is not flexible enough, and therefore it is impossible to regulate certain processes in the production sector with its help; the main goal of the introduction of unified agricultural tax is to increase the investment attractiveness of agricultural production.

The advantages of the unified agricultural tax can be noted:

- tax minimization by paying a single tax in return for the corporate income tax, corporate property tax;
- the absence of any restrictions in returning to the general taxation regime;
- low unified tax rate at the unified agricultural tax (6%) compared with the general regime - 20%, with the simplified tax system – 15%;
- the frequency of submitting a declaration is only once a year.

Next, we will consider the indicators of application of the unified agricultural tax administered by the Federal Tax Service of the Russian Federation.

According to the data shown in table 1, in 2018 compared to 2016:

- Gross Domestic Product (GDP) increased by 59.8%, while agricultural output decreased by 9.0%;
- the share of agricultural production in total GDP decreased from 8.66 % in 2016 to 4.93% in 2018;
- the number of individual entrepreneurs and peasant (farm) farms contained in the Unified State Register of Individual Entrepreneurs increased by 6.7% over the specified period, the number of the unified agricultural taxpayers decreased by 2.7% (from 99,176 units to 97035 units.);
- the tax base for the unified agricultural tax increased by 33.2%, the amount of the unified agricultural tax increased by 35.2%, the average tax rate increased from 5.35% to 5.43%;
- the share of the unified agricultural tax in the total amount of taxes administered by the Federal tax service of Russia remains negligible (0.06%), while all received taxes administered by the Federal tax service of Russia, for the specified period increased by 47.3%, the unified agricultural tax increased by 19.2%;
- the population employed in the economy is 72,354 thousand people in 2018, including those employed in agriculture and fish farming, decreased in 2018 by 29.2% and amounted to 1,760 thousand people;
- the tax burden on the consolidated budget of the Russian Federation has decreased from 22.3% in 2016 to 20.5% in 2018, or by 8.1%, while the burden in agriculture remains insignificant (3-4%).
Table 1. Indicators of the unified agricultural tax application in the Russian Federation for 2016-2018 (compiled on the basis of [7]).

| Indicator | 2016          | 2017          | 2018          | 2018 to 2016, % |
|-----------|---------------|---------------|---------------|----------------|----------------|
| GDP, billion rub. | 64997,0 | 86148,6 | 103875,8 | 159.8 |
| Volume of agricultural production, billion rub. | 5626,0 | 5654,0 | 5119,8 | 91.0 |
| Share of agricultural products in GDP, in % | 8.66 | 6.56 | 4.93 | - |
| Number of individual entrepreneurs and peasant (farm) farms in Unified State Register of Individual Entrepreneurs, units | 3732657 | 3847534 | 3983423 | 106.7 |
| Individual entrepreneurs are ones of them, units | 3584178 | 3696127 | 3835751 | 107.0 |
| The number of taxpayers of the unified agricultural tax, units | 99176 | 100712 | 97035 | 97.3 |
| Tax base, mln. rub. | 212471,7 | 296644,4 | 282916,0 | 133.2 |
| The amount of the unified agricultural tax, mln. rub. | 11367,5 | 11193,8 | 15364,5 | 135.2 |
| Average rate, in % | 5.35 | 5.42 | 5.43 | - |
| Received taxes administered by the Federal tax service of Russia, mln. rub. | 14482884,3 | 17343436,1 | 21328495,4 | 147.3 |
| including the unified agricultural tax, mln. rub. | 11436,4 | 11890,4 | 13628,0 | 119.2 |
| Share of the unified agricultural tax in the total amount of taxes administered by the Federal tax service of Russia , in % | 0.08 | 0.07 | 0.06 | - |
| Employed population, thousand people | 72393 | 72142 | 72354 | 99.9 |
| including in agriculture, fish farming, thousand people | 2486 | 1766 | 1760 | 70.8 |
| Tax burden on the consolidated budget of the Russian Federation, in % | 22.3 | 20.1 | 20.5 | 91.9 |
| including in agriculture | 3.5 | 4.3 | - | - |
| Turnover of small enterprises, billion rub. | 38877,0 | 48459,2 | 53314,2 | 137.1 |
| Total | 731,8 | 998,5 | 1057,4 | 144.5 |
| including in agriculture, forestry, hunting | 3801,6 | 853,0 | 970,1 | 121.0 |
| Investments in fixed assets, billion rub. | 121,0 | 168,9 | 163,1 | 134.8 |
| Total | 2,06 | 1,76 | 1,82 | 88.3 |
| including in agriculture, forestry, hunting | 16,5 | 16,9 | 15,4 | 93.3 |

In 2018, compared with 2016, the turnover of small enterprises (including microenterprises) increased by 37.1%, including in agriculture – by 44.5%. Investments in fixed assets of small enterprises (including microenterprises) for the indicated period increased by 21.0%, including in agriculture – by 34.8%. Investments in fixed assets per 1 ruble of turnover decreased by 11.7%, including in agriculture – by 6.7%. At the same time, funds were invested in small enterprises engaged in agriculture in 2016 8 times more, in 2018 – 8.5 times more than in general for all small enterprises. Next, we will consider the calculation of the tax base and tax liabilities for the unified agricultural tax.

Table 2 shows that most of the agricultural products are produced by large agricultural organizations (80.0-85.2%), the share of individual entrepreneurs and farms accounts for 14.8-20.0%. In 2017, 72.2% of the tax base is accounted for by organizations. Organizations account for 90.0% of losses annually. The received amount of the unified agricultural tax in 2017 is 70.4% provided by organizations. The
real tax rate at the rate of 6.0% under the tax code of the Russian Federation, including deferred losses, was 3.7% in 2014 and 5.3% in 2017 (for organizations – respectively 3.2% and 5.0%, for individual entrepreneurs and farms – 5.2% and 5.8%).

**Table 2.** Calculation of tax liabilities according to the unified agricultural tax for 2014-2017 years (compiled on the basis of [7]).

| Indicator | 2014 | 2015 | 2016 | 2017 |
|-----------|------|------|------|------|
|           | mln. rub. | %    | mln. rub. | %    | mln. rub. | %    | mln. rub. | %    |
| Revenues  |      |      |      |      |
| total     | 1145857 | 100  | 1443238 | 100  | 1602573 | 100  | 1548773 | 100  |
| enterprises | 976439  | 85.2 | 1209177 | 83.8 | 1321088 | 82.4 | 1238808 | 80.0 |
| individual | 169418  | 14.8 | 234061  | 16.2 | 281486  | 17.6 | 309966  | 20.0 |
| entrepreneurs and farms |      |      |      |      |
| Costs     |      |      |      |      |
| total     | 1064504 | 100  | 1295986 | 100  | 1434498 | 100  | 1390556 | 100  |
| enterprises | 917591  | 86.2 | 1102397 | 85.1 | 1200380 | 83.7 | 1132970 | 81.5 |
| individual | 146913  | 13.8 | 193589  | 14.9 | 234118  | 16.3 | 257586  | 18.5 |
| entrepreneurs and farms |      |      |      |      |
| Tax base  |      |      |      |      |
| total     | 81353  | 100  | 147252  | 100  | 168075  | 100  | 158218  | 100  |
| enterprises | 58848  | 72.3 | 106780  | 72.5 | 120708  | 71.8 | 105838  | 66.9 |
| individual | 22505  | 27.7 | 40472   | 27.5 | 47368   | 28.2 | 52380   | 33.1 |
| entrepreneurs and farms |      |      |      |      |
| Loss of previous years |      |      |      |      |
| total     | 30771  | 100  | 32020   | 100  | 19206   | 100  | 19292   | 100  |
| enterprises | 27777  | 90.3 | 29187   | 91.2 | 17154   | 89.3 | 17232   | 89.3 |
| individual | 2994   | 9.7  | 2833    | 8.8  | 2052    | 10.7 | 2060    | 10.7 |
| entrepreneurs and farms |      |      |      |      |
| Accrual tax |      |      |      |      |
| total     | 3034.9 | 100  | 6913.9  | 100  | 8932.1  | 100  | 8335.6  | 100  |
| enterprises | 1864.3 | 61.4 | 4655.6  | 67.3 | 6213.1  | 69.6 | 5316.4  | 63.8 |
| individual | 1170.6 | 38.6 | 2258.3  | 32.7 | 2719.0  | 30.4 | 3019.2  | 36.2 |
| entrepreneurs, collective farms |      |      |      |      |
| Real rate, % |      |      |      |      |
| total     | 3.7   |      | 4.7   |      | 5.3    |      | 5.3    |      |
| enterprises | 3.2   |      | 4.3   |      | 5.1    |      | 5.0    |      |
| individual | 5.2   |      | 5.6   |      | 5.7    |      | 5.8    |      |
| entrepreneurs and farms |      |      |      |      |
| The number of payers, in person |      |      |      |      |
| total     | 94014  | 100  | 98310  | 100  | 99716  | 100  | 100673  | 100  |
| enterprises | 23586  | 25.1 | 23381  | 23.8 | 22787  | 22.9 | 21755  | 21.6 |
| individual | 70428  | 74.9 | 74929  | 76.2 | 76929  | 77.1 | 78918  | 78.4 |
| Return on costs, % |      |      |      |      |
| total     | 7.6   |      | 11.4  |      | 11.7   |      | 11.4   |      |
| enterprises | 6.4   |      | 8.2   |      | 8.4    |      | 7.6    |      |
| individual | 27.7  |      | 20.9  |      | 20.2   |      | 20.3   |      |
| entrepreneurs and farms |      |      |      |      |

Transfer of losses for the future is provided for in paragraph 5 of Art. 346.6 of the Tax Code of the Russian Federation. At the same time, the profit of the current tax period can be reduced by the loss of previous years without restrictions (and under the general regime, it cannot exceed 50% of the tax base.
of the tax period). For this reason, “the transfer of losses following the results of previous tax periods without limitation for the current period is not an incentive for making a profit” [8].

In 2017, compared with 2014, the number of payers of unified agricultural tax increased by 7.1%, including organizations – decreased by 7.8%, individual entrepreneurs and peasant farms – increased by 12.9%, and therefore the share of organizations decreased from 25.1% to 21.6%. The reduction of organizations – payers of the unified agricultural tax is associated with the withdrawal of insolvent organizations from the market, as well as their integration into large agricultural holdings, an increase in the rate of insurance contributions to extra-budgetary funds.

Cost-effectiveness in 2017 compared to 2014 increased by 50.0%, including for organizations – by 18.7%, individual entrepreneurs and peasant farms – decreased by 26.8%. At the same time, the profitability of costs for individual entrepreneurs and peasant farms exceeds the profitability of organizations by 4.3 times in 2014, 2.7 times in 2017.

**Table 3.** Dynamics of the number of registered peasant farms and ceased their operations (compiled on the basis of [7]).

| Indicator                                      | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|
| Registered peasant farms, in units             | 131479 | 157106 | 146735 | 141554 | 129750 | 130412 | 149479 | 147672 |
| Ceased their operations, in units              | 50436 | 72036 | 115762 | 155329 | 189148 | 210345 | 228357 | 246630 | 288361 |

From the analysis of the data in table 3, a noticeable predominance of the number of peasant farms that have ceased their activity over the registered farms is traced. Accordingly, there is a decrease in the number of peasant farms.

Next, we consider the data for the Chuvash Republic, which belongs to the group of agro-industrial regions and is an outsider in the Volga Federal Region.

**Table 4.** Indicators of the application of the unified agricultural tax in the Chuvash Republic for 2016-2018 years (compiled on the basis of [7]).

| Indicator                                      | 2016   | 2017   | 2018   | 2018 to 2016, % |
|------------------------------------------------|--------|--------|--------|-----------------|
| Gross regional product, billion rub.           | 250,4  | 261,6  | 270,6  | 108,1           |
| Volume of agricultural production, billion rub.| 46,7   | 45,2   | 37,4   | 80,1            |
| Share of agricultural products in GDP, in%     | 18,6   | 17,3   | 13,8   | 74,2            |
| Number of individual entrepreneurs and peasant (farm) farms in Unified State Register of Individual Entrepreneurs, units | 33094 | 33310 | 33876 | 102,4 |
| Individual entrepreneurs are ones of them, units| 31670 | 31852 | 32457 | 102,5 |
| The number of taxpayers of the unified agricultural tax, units | 1385 | 1353 | 1289 | 93,1 |
| Tax base, million rub.                         | 766,0  | 2073,8 | 1871,4 | 244,3           |
| The amount of the unified agricultural tax, million rub. | 24,0  | 36,3   | 32,6   | 135,8           |
| Average rate, %                               | 3,13   | 1,75   | 1,74   | 55,6            |
| Received taxes administered by the Federal tax service of Russia, mln. rub. | 40848,9 | 43564,5 | 49437,3 | 121,0 |
| including the unified agricultural tax, mln. rub. | 28,6   | 30,0   | 35,8   | 125,2           |
| Share of the unified agricultural tax in the total amount of taxes administered by the Federal tax service of Russia, in % | 0.07 | 0.07 | 0.07 | - |
| Employed population, thousand people           | 611,8  | 594,0  | 587,3  | 96,0            |
| including in agriculture, fish farming, thousand people | 42,6  | 38,4   | 21,8   | 51,2            |
| The share of the population employed in agriculture and fish farming, in % | 7,0    | 6,5    | 3,7    | 52,8            |

Compiled on the basis of the tax passport of the Chuvash Republic for 2016-2018.
Analyzing the data in table 4, we can draw the following conclusions. In 2018, compared with the 2016:

- the gross regional product of the Chuvash Republic increased by 8.1%, the volume of agricultural products decreased by 19.9%, which led to a decrease in the share of agricultural products in the total GRP of the Republic from 18.6% to 13.8%;
- the number of individual entrepreneurs and peasant (farm) farms contained in the Unified State Register of Individual Entrepreneurs increased by 2.4%, while the number of the unified agricultural taxpayers decreased from 1,385 units to 1,289 units, or by 6.9%;
- with a 2.44-fold increase in the tax base, the amount of the unified agricultural tax increased by 35.8% over the specified period, which was affected by a reduction in the unified agricultural tax rate from 3.13% in 2016 to 1.74% in 2018.;
- the share of the unified agricultural tax in the total amount of taxes administered by the Federal tax service of Russia remains insignificant (0.07%);
- while the number of people employed in the economy of the Republic decreased by 4.0%, the share of the population employed in agriculture decreased by half, and its share decreased from 7.0% in 2016 to 3.7% in 2018.

Next, we consider the data of tax revenues to budgets for a longer period of time.

Table 5. Revenues of the consolidated budget of the regions of the Russian Federation for 2005-2018, billion rub. (compiled on the basis of [7]).

| Revenues                          | 2005    | 2006    | 2007    | 2008    | 2009    | 2010    | 2011    |
|-----------------------------------|---------|---------|---------|---------|---------|---------|---------|
| Tax revenues                      | 2247,5  | 2770,9  | 3638,9  | 4382,2  | 3793,3  | 4519,9  | 5273,0  |
| Total revenue                     | 2999,8  | 3797,3  | 4828,5  | 6198,7  | 5926,6  | 6537,4  | 7644,2  |
| From tax revenues:               |         |         |         |         |         |         |         |
| - comprehensive income tax        | 71.7    | 95.9    | 123.7   | 161.3   | 151.6   | 178.9   | 215.2   |
| of these, the unified agricultural tax | 0.7     | 1.0     | 1.4     | 2.2     | 1.9     | 2.4     | 3.6     |
| same as in %                      | 1.0     | 1.0     | 1.1     | 1.36    | 1.25    | 1.34    | 1.67    |

Continuation of table 5

| Revenues                          | 2012    | 2013    | 2014    | 2015    | 2016    | 2017    | 2018    | 2018 to 2005, times |
|-----------------------------------|---------|---------|---------|---------|---------|---------|---------|--------------------|
| Tax revenues                      | 5800,3  | 5966,6  | 6492,5  | 6925,1  | 7573,9  | 8205,5  | 9428,7  | 4,2                |
| Total revenues                    | 8064,6  | 8165,1  | 8905,6  | 9308,1  | 9923,8  | 10758,1 | 12392,5 | 4,1                |
| From tax revenues:               |         |         |         |         |         |         |         |                    |
| comprehensive income tax          | 271,7   | 292,8   | 315,1   | 347,7   | 388,5   | 446,9   | 520,5   | 7,2                |
| of these, the Unified             | 3.8     | 4.0     | 4.7     | 7.4     | 11.4    | 11.9    | 13.6    | 19                 |
| agricultural tax                  |         |         |         |         |         |         |         |                    |

Compiled on the basis Of the report of the Federal Treasury on the execution of the consolidated budget of the Russian Federation and the budgets of state extra-budgetary funds for 2005-2018 (form for All-Russian classifier of management documentation OKUD 0507021)

According to table 5, we can say that in 2018 compared to 2005:

- tax revenues of the consolidated budget of the regions of the Russian Federation increased by 4.2 times;
- the share of total income tax paid by small businesses with special tax regimes in the total amount of tax revenue increased from 3.19% in 2005 to 5.5% in 2018;
- the share of the unified agricultural tax in the total amount of tax on total income remains insignificant (1.0% in 2005 and 2.61% in 2018).
4. Discussion

As practice has shown, the exemption of special regimes, including payers of the unified agricultural tax, from VAT does not contribute to the development of small businesses: the inability to include the amount of “input” VAT in the cost of goods (work, services) sold restricts many entities working with organizations that pay VAT, since the latter are most interested in the deduction of the amount of VAT, which in practice led to the refusal to work with entities – non-payers of VAT (special regimes, as well as with persons receiving exemption from VAT under article 145 of the Tax Code of the Russian Federation).

Authors pay attention to newly imposed obligation to pay VAT to payers of unified agricultural tax and emphasize that “the transition from unified agricultural tax to VAT for many entrepreneurs in the agricultural sector means that the tax system has ceased to be convenient and comfortable, facilitating the difficult life of a person doing business in agriculture. Since 2019 a system like this can stay convenient only if the application for exemption or receipt of income will be timely submitted in accordance with the established limit”. According to the authors, “a refund since 2019 of the previously excluded tax was undertaken to conduct this import substitution. Retail chains were forced to sell imported products cheaper than domestic, because VAT was excluded from the unified agricultural tax and stores could not deduct it” [9].

The author believes the main advantage of the duty to pay VAT in the unified agricultural tax system is that “unified agricultural taxpayers can get a tax deduction for VAT, issued invoices with allocated VAT attract large companies to cooperate with agricultural producers, the disadvantage is additional duties due to the need to fill out an invoice, a book of purchases and sales, and submitting VAT reports” [10]. The law provides for the right of taxpayers of the unified agricultural tax to receive exemption from VAT provided that the amount of income for the previous tax period does not exceed a certain amount, for example, in 2020 -70 million rubles. These provisions of the law lead to the fact that prices for agricultural products will be different: they will be higher, as a rule, for large taxpayers who pay VAT. Large organizations will not work with taxpayers who receive VAT exemption, as it is impossible to deduct the amount of “input” VAT for deduction, they, as calculations show, attributing the amount of “input” VAT to costs, lose exactly this amount. With this in mind, the article proposes amendments to the Tax Code of the Russian Federation, according to which all VAT payers are recognized as VAT payers, regardless of the amount of income. This change needs to be made not only with respect to payers of the unified agricultural tax, and a similar situation is created when applying the simplified tax system, the unified tax on imputed income.

After making the appropriate calculations, the author concludes that “the latest changes in tax legislation introduced by the Federal Law of November 27, 2017 No. 335-FZ, had a positive effect on the integration capabilities of the unified agricultural tax. At the same time, a significant part of taxpayers (35%) considered the new opportunities useless and refused VAT” [10].

Another innovation is the right granted to the regions of the Russian Federation to establish differentiated tax rates in the amount of 0 to 6 percent for certain categories of taxpayers depending on the types of products produced, the size of income from the sale of agricultural products, the place of business, and the number of employees (Federal Law of March 70, 2018 No. 51-FZ).

Emphasizing the importance of introducing differentiated tax rates for certain categories of taxpayers, the relationship between factors and production results has been established, and proposals for differentiating tax rates have been developed at the article “on the basis of correlation analysis and groupings of peasant (farm) farms and individual entrepreneurs. According to the developers “their distribution to agricultural organizations in combination with a “single subsidy” can become a serious resource for innovative development of agricultural business” [11].

Considering the right granted to the regions of the Russian Federation to reduce rates as the provision of subsidies, the author notes that “the introduction of a new form of state support for agricultural producers significantly simplifies the procedure for providing subsidies to final recipients” [12].

According to the calculation data in table 2, the cost-effectiveness of individual entrepreneur and peasant farms exceeds the profitability of organizations by 4.3 times in 2014, 2.7 times in 2017. Given
the existence of the above land rents, creating interest in our opinion, it would be better to use land better if rates were set in the range from 0% to 6%, among other factors, taking into account the level of cost-effectiveness as the main criterion, which will contribute to the growth of the economy.

The author sees, among others, “a reduction in the rates of insurance premiums to social extra-budgetary funds for small businesses implementing investment projects” as ways to further improving the efficiency of the system of taxation of agricultural production in the form of the unified agricultural tax [13].

5. Conclusion
Studies have shown:
- the share of agricultural output in the country's GDP is low;
- with an increase in the tax base for the unified agricultural tax system, the amount of the unified tax decreases, which affects the loss-making of peasant farms and their use of the right to transfer losses to the future;
- the share of the unified agricultural tax in the consolidated budgets of the regions of the Russian Federation is insignificant due to the granting the right to regions to set reduced unified agricultural tax rates, which also leads to a small tax burden in agricultural production;
- the share of agricultural products in the Gross Regional Product of the Chuvash Republic is higher as the Chuvash Republic is an agro-industrial region in the Volga Federal region, however the share of accounts in the total amount of tax revenues, the tax burden on agriculture is also insignificant;
- the share of the unified agricultural tax on total income tax paid by small businesses with special tax regimes does not reach 3%.

An increase in the VAT rate from January 1, 2019 from 18% to 20% and the introduction of the obligation to pay VAT to organizations and individual entrepreneurs who apply the unified agricultural tax system, will lead to an additional outflow of financial resources from the regions in favor of the Federal budget.

The financial situation of the regions will further deteriorate due to the following circumstances:
1) since 2019, movable property has ceased to be recognized as an object of taxation of the corporate property tax. In this regard, since 2019, there is no need for tax benefits and other tax preferences previously applied to movable property.

By virtue of clause 1 of article 130 of the Civil Code, real estate includes land plots, subsurface areas and everything that is connected with the land, it means objects that cannot be moved without disproportionate damage to their purpose, including buildings, structures, and objects of incomplete construction. In addition, real estate includes residential and non-residential premises and parts of buildings or structures intended for the placement of vehicles (Parking spaces), if the boundaries of such premises, parts of buildings or structures are described according to the procedure established by legislation on state cadastral.

In this way, machines and equipment were removed from the object of taxation and now it will lead to a decrease in regional budget revenues;
2) in the period from 2017 to 2024, the corporate income tax rate will be credited to the Federal budget at the rate of 3% (instead of the previous 2%).

Due to the insignificance of regional and local taxes received in consolidated budgets of the Russian Federation, they will mostly be formed at the expense of Federal taxes.

As for measures to stimulate the development of the agricultural sector, in our opinion, it is necessary to increase the fiscal function of the Unified agricultural tax for which:
- make amendments to chapters 26.1; 26.2 and 26.3 of the tax code of the Russian Federation stipulating the provision that the application of special tax regimes does not exempt all taxpayers, regardless of their income and activities, from VAT payment obligations;
- the rules for transferring losses for the future should be established uniform for all taxpayers, regardless of their taxation regimes. In particular, clause 2.1 of Art. 283 of the Tax Code of the Russian
Federation, when applying the general taxation regime, it is provided that the tax base for income tax cannot be reduced by more than 50 percent in the amount of losses incurred in previous tax periods;

- when establishing a specific rate for the unified agricultural tax in the range from 0 to 6 percent, the main criterion is to establish the level of cost-effectiveness, which will create interest in improving the economic situation of agricultural enterprises.

Profitability of agricultural production does not exceed 10.0 percent. The average wage of workers in the agricultural sector is much lower than in the economy as a whole. Given the need to increase wages, which, in turn, will lead to a further decrease in profitability, we consider it is necessary to reduce insurance premium rates for agricultural enterprises from 30.0 to 15.0 percent for all accrued wages.

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