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## **TAX ASPECTS OF SHARING ECONOMY IN THE CONTEXT OF THE SHADOW ECONOMY ON THE EXAMPLE OF THE PODKARPACKIE VOIVODESHIP<sup>1</sup>**

### **Summary**

*Purpose* – The aim of this article is an attempt to assess the scope of the shadow economy in transactions concluded within the sharing economy based on the authors' own research.

*Research method* – The implementation of the aim required the use of the direct method – a questionnaire. The results of empirical research from years 2016–2022 carried out in the Podkarpackie Voivodeship are presented.

*Results* – The paper describes the essence and scope of the shadow economy, as well as the legal and tax aspects of the sharing economy. Parts of own survey research from years 2016–2022 on the issue under study are also presented.

*Originality/value/implications/recommendations* – The obtained results of own research and the data taken from reports of other research centres do not give a clear answer to the question of how great the scope of unrecorded transactions made within the sharing economy in the area of Podkarpackie Voivodeship is. In the future, it is necessary to continue research in the marked area.

**Keywords:** sharing economy, personal finance, shadow economy (grey economy), tax frauds

**JEL Classification:** A11, H21, H24, H26, H83

### **1. Introduction**

The shadow economy is an influential problem that has an important place both in the literature of the subject and in the functioning of the State. Even though many countries have taken steps to prevent unofficial activities, their increase seems to be inevitable. Recent estimates of the size of the underground economy have ran-

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ged on average from 28 to 43% of GDP in developing countries, 38–40% of GDP in transactional countries and 14–17% of GDP in developed countries [Imamoglu, 2021].

At the same time, the epidemiological crisis and the unstable socio-economic situation, as well as the earlier subprime crisis, contributed to a change in consumption trends. Buyers began to prefer skepticism, caution and usefulness more and more rather than the tendency to ostentatiously manifest consumerism. Culture of cooperation was born as a behavior resulting from the needs of the economy during the crisis, but also from the fatigue of overconsumption of market participants. It is based on the belief that access to goods and services is more important than the possession of them. Modern technology enables constant and universal access to the Internet, which means that not only has the relationship between consumers and producers changed, but also active market participants have been born in place of passive recipients.

Therefore, alternative methods of exchange have emerged, such as collaborative consumptions and the sharing economy based on the exchange of goods, services, and even capital between community members, avoiding the traditional market and also shared use of these goods. This type of exchange is not based on competition, but on individual forms of cooperation, such as: loans, gifts, barter, community property, etc. The primary goal of these alternative models is not the acquisition and owning goods, but gaining access to them when they are really needed.

The sharing economy has not had a Polish equivalent for a long time. This trend was described only in a report published in 2012 as one of ten mass consumer trends that affect how Polish consumers buy, what they look for and dream about, and also what they fear and want to avoid [*Teczka...*, 2012]. Currently, it is defined as the shared economy, sharing, the economy of cooperation, the common (shared) consumption, and the social trend. English phrases such as collaborative consumption, collaborative economy, peer-to-peer economy, mesh are also used interchangeably. The idea of shared consumption is not new. The term „collaborative consumption” was introduced by Marcus Felson and Joe L. Spaeth as early as 1978 [Felson, 1978]. In the contemporary context, this phrase was used by the British consultant Ray Algar in 2007 [Algar, 2007].

The sharing economy definitions come from various scientific disciplines, such as economics, law, psychology. In economic sciences, there are macro- and micro-economic approaches. The first focuses on market models, the second examines the strategies, processes and systems used by companies and their interactions with consumers [Puschmann, 2016]. In the macroeconomic perspective, the economy of cooperation is understood as a hybrid market model in which the traditional model (exchange in which money is involved) is combined with the sharing model, in which the product, as a result of a transaction process, goes to another entity and this process is not always accompanied by money as broker. In microeconomic terms, the sharing economy is considered differently, depending on the scientific discipline that the researcher represents.

The sharing economy is also described as the hybrid market model (between possessing and the gift of giving), which refers to community-coordinated exchange through on-line services [Hamari, Sjöklint, Ukkonem, 2015]. It is a trend from the area of the economy, technology and social life, the basis of which is the voluntary lending to other people, often for a fee, their free (or not) resources. It can be an apartment, free time, litter or a car.

The publication attempts to assess the scale of non-accounted transactions concluded within the sharing economy. The first part presents the essence and scope of the shadow economy as well as the legal and tax framework on which the sharing economy is based. The next part of the publication presents selected parts of own research on the subject of recording transactions concluded using the sharing economy and the taxes paid on them. The aim of the article is an attempt to assess the scope of the shadow economy in transactions concluded within the sharing economy based on the authors' own research. The implementation of the aim required the use of the direct questionnaire method. The results of the surveys from years 2016–2022 carried out in the Podkarpackie Voivodeship are presented.

## 2. Theoretical basis of the shadow economy and its scope

The informal economy, often referred to as the shadow economy, is an ambiguous term, because literature of the subject offers many, often similar, but also contradictory definitions. The variety of definitions results from the different aims of researchers of this phenomenon and the differentiation of the socio-economic systems subject to observation [Mróz, 2002]. However, there is no consensus on the definition of the term of underground economy [Schneider, 2019; Koufopoulou et al., 2019; Schneider and Buehn, 2018; Williams, 2011; 2010]. The most popular view is that it is an activity that is not subject to registration in the national accounts. It is emphasized almost as often that this is an activity that comes down to tax evasion. Hence, the informal economy is regarded by many financiers as “tax dexterity” or an abuse of tax law [Martinez, 2001]. This approach is the focus of this publication.

The term of the shadow economy is understood as undertaking economic activity outside the official economic circuit – wholly or partially concealing the obtained financial benefits from state administration bodies [Szara *strefa*, 2019]. According to E.L. Feige, the shadow economy is a part of economic activities, the income from which is exempt from legal regulations, taxation and observation of official bodies. All these activities have one thing in common – people involved in them try to hide their income from government bodies [Feige, 1989]. D. Cassel and A. Caspers understand the concept of unofficial economy as all forms of economic activity that are not regulated by law and are not subject to taxation [Cassel, Caspers, 1984]. Similarly, F. Schneider uses the term shadow economy to describe market activity consisting in the production of non-forbidden products, hidden from public control, in order to avoid the payment of taxes, social benefits or other regulations

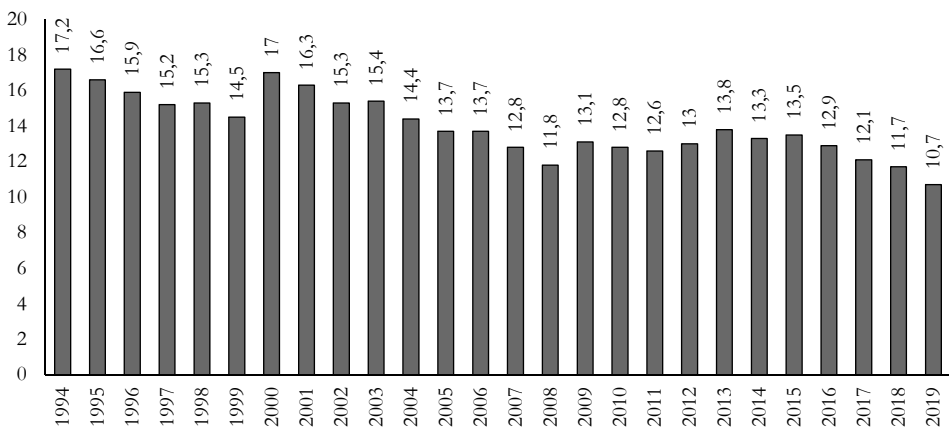
[Schneider, Williams, 2013]. S. Pozo, in turn, defines it as economic undertakings that are carried out outside the rules of law [Pozo, 1996].

The literature emphasizes the fact that the shadow economy covers tax-free income obtained in the production of legal goods and services. It is associated with non-payment of taxes, although the desire to avoid them does not have to be the only motive for action. This feature was noted by Z. Rajewski and L. Zienkowski, who emphasize that the goal of entities operating in the informal sector is consciously avoiding paying benefits to the state [Rajewski, Zienkowski, 1995]. Also K. Dzierżawski defines the shadow economy mainly as tax evasion [Dzierżawski, 2006]. In the National Accounts, the shadow economy covers production activities that are completely legal, but hidden from public authorities in order to avoid paying taxes and social security contributions [Rachunki..., 2020].

Not only the definition of the shadow economy is imprecise. Similarly, the estimates of this phenomenon, due to its „intangible” nature, are difficult to measure. In the longest time perspective, the estimates of the size of the informal economy in Poland are made by the Central Statistical Office.

**FIGURE 1**

**Shadow economy in Poland according to the Central Statistical Office in  
1994–2019 (in % of GDP)**



Source: own study based on: National accounts by institutional sectors and subsectors, Central Statistical Office of Poland from 1995–2021.

Figure 1 shows the share of the shadow economy in generating GDP in the years 1994–2019. In 1994, this share was at the highest level of 17.2%, after which it began to systematically decline until year 2000, when it increased again to 17%. In 2008, it fell to the lowest level, estimated at 11.8% of GDP. In the following years, along with the economic slowdown resulting from the subprime crisis, the index increased by 1–2 percent points. In the years 2012–2015, the share of the shadow economy in the Polish economy amounted to an average of 13.4%. The

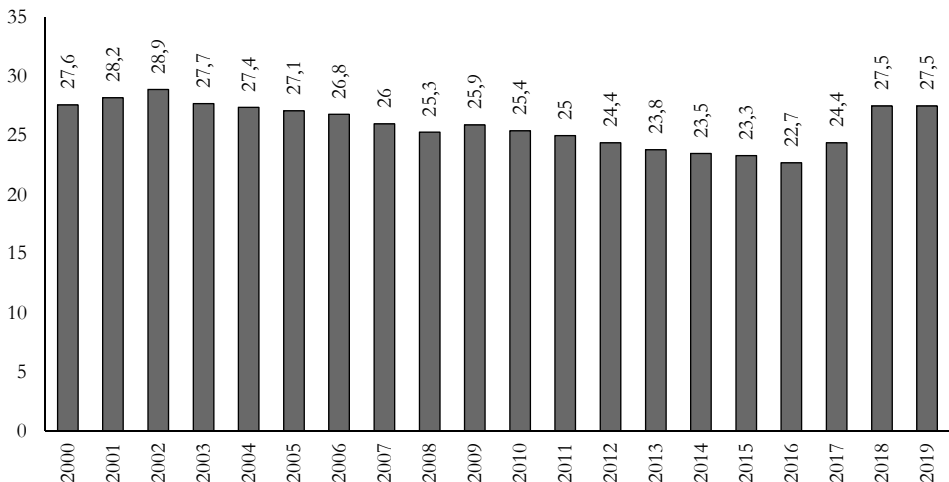
lowest level was recorded in 2012 (13.0%), and the highest level in 2013 (13.8%) [Rachunki..., 2017]. In 2019, the share of the unobservable economy was estimated at 11.1% of GDP, of which the shadow economy in registered units was 9.1%, 1.7% due to undeclared work, while illegal activities (pimping, drugs, cigarette smuggling) were estimated at 0.4% of GDP [Rachunki..., 2021].

The shadow economy is calculated by the Institute of Economic Forecasts and Analyzes (IPAG) at a slightly higher level, according to which the total value of the unobservable economy in 2020 amounted to PLN 439 billion, which accounted for 17.4% of GDP (in 2016 – 19.0%, 2017 – 18.7% of GDP, in 2018 – 18.0%, in 2019 – 17.2%) [Fundowicz, Łapiński, Wyżnikiewicz, Wyżnikiewicz, 2019; Fundowicz, Łapiński, Wyżnikiewicz, Wyżnikiewicz, 2020, p. 26].

On the other hand, the highest indications are visible in the achievements of Friedrich Schneider, who specializes in research on the shadow economy based on the MIMIC (Multiple Indicators Multiple Causes) method. He calculates the share of the unofficial economy in GDP in Poland at the level of 27.5% of GDP in 2019 (22.7% in 2016; 24.4% in 2017) [Medina, Schneider, 2018; Kelmanson, Kirabaeva, Medina, 2021] – Figure 2. From Schneider's estimates it can be concluded that about one fifth of the conducted economic activity is hidden from the tax administration in Poland. Its largest part is the so-called hidden activities, i.e. unregistered transactions and the turnover of legally operating enterprises. What stands out in the activity in the shadow economy is, above all, understating income for the purposes of lowering tax liabilities.

**FIGURE 2**

**Shadow economy according to F. Schneider in Poland in 2000–2019  
(in % of GDP)**



Source: own study based on: [Schneider, 2018, p. 18, 66 passim; Medina, Schneider, 2019, p. 30; Kelmanson, Kirabaeva, Medina, 2021].

### 3. The legal and tax framework of the sharing economy

The creating of the Internet, and then the intensive development of the Internet platforms, including those that can be counted among the sharing economy, resulted in new challenges for the current legal order.

In June 2016, the European Commission presented a communication entitled “The European Agenda for the Collaborative Economy [COM (2016)]”, which underlined the growing importance of a new form of activity and its impact on economic policy. It has been noted that the sharing economy poses problems with the application of the existing legal framework, as it leads to the blurring of the boundaries of, *inter alia*, between the consumer and the supplier or professional and unprofessional provision of services, which is particularly problematic in relation to the tax law.

On May 11, 2017, the European Parliament presented a draft bill for a resolution on the European agenda for the collaborative economy (2017/2003 (INI)) [Rezolucja, 2017] to provide the legal framework and close the regulatory gap allowing benefits while respecting the principles of fair competition and tax regulations. The intention of the European Parliament was to draw attention to the need to establish criteria that will clearly separate the services provided by professionals from service providers operating in the real sharing economy, and will also allow the elimination of tax avoidance in this area. The sharing economy phenomenon has also been noticed in individual sectors of the digital single market [Rezolucja, 2015].

In March 2018, the European Commission presented the assumptions of two directives, which were to be a recipe for the current problems related to the taxation of digital enterprises. The European Commission plans to introduce a special 3% tax on revenues generated from activities conducted through digital technology. The tax is to apply to the so-called intermediary platforms. Companies with annual revenues exceeding EUR 750 million and additionally achieving at least EUR 50 million of annual revenues from digital activities in the EU will be subject to taxation [Nadolski, 2019]. Work on the project was resumed in July 2020, extending the scope of the directive to digital platforms (Council Directive 2011/16/EU). In Poland, plans to introduce a digital tax have been suspended. Since July 1, 2020, only a video-on-demand (VOD) operator fee has been introduced [Wagner, Dudka, 2022].

From the point of view of tax law, the sharing economy is a complex phenomenon, and the related tax consequences depend on many factors, including: the entity, the object or the nature of the service. The entities are operators of internet platforms or mobile applications through which the sharing process takes place and their users, including service recipients and service providers who are Polish or foreign tax residents. On the other hand, the subject of the transaction is an open set that dynamically changes and adapts to the needs of consumers. Similarly, the nature of the transaction is not uniform, because the sharing economy enables transactions to be concluded against payment, free of charge, and in the form of mutual provision (barter). This state of affairs makes it difficult for both the operators of

internet platforms and their users (service providers and recipients) to assess the tax obligations and consequences of their activities [*Prawno-podatkowe aspekty...*, 2016].

Zbigniew Chmielowiec pointed out the tax aspects of the sharing economy in Poland in his parliamentary question no. 30854 from February 2015, following the British report by Debbie Wosskow, which emphasized that in the case of the sharing economy, it is important to adjust the law to the scale of operations and the amount of revenues obtained from it. In response, Jarosław Neneman, Undersecretary of State in the Ministry of Finance, emphasized that „contracts concluded with the use of websites and mobile applications between service providers and service recipients do not create facts that go beyond the current Polish law” [Kochel, 2018]. The position presented by the Ministry of Finance in two responses to tax inquiries provided in 2015 shows that the currently applicable tax regulations should apply to the sharing economy, because the sharing process is an agreement concluded between service recipients and service providers using a website or a mobile application. Therefore, there is no need to create a new tax regime dedicated to the phenomenon in question. The problem is not the lack of tax regulations, but the lack of knowledge on the part of taxpayers about the need to fulfill fiscal obligations. The position presented by the ministry is not unique compared to other countries and does not differ from other jurisdictions.

With regard to the sharing transaction, the general principle of taxation with income taxes and the principle of self-taxation apply, which means that after the end of the tax year, we are obliged to pay the taxes due on the income received, constituting the excess of revenues over the costs incurred to obtain them. Taxpayers have got to their disposal a varied catalog of taxation forms, including a lump-sum of recorded income, where, for example, the rate of rental income is 8.5% (for income up to PLN 100,000, in the case of a surplus, the rate is 12.5%). In addition, since 2022, entrepreneurs running a business activity in the IT sector, in the field of IT and programming services may benefit from a lower flat rate of 12% (Article 12 (2b) of the flat rate personal income tax Act).

According to the Ministry of Finance, a person who makes his resource available to another person and in return does not receive benefits in excess of the usual costs of maintaining this resource, thus does not earn income subject to income tax, e.g. drivers who occasionally offer a free seat in their car to other travelers in exchange for participation in fuel costs, they receive no taxable income as there is no gain in their wealth. Similarly to the PIT and CIT tax provisions, also under the VAT legislation, entities are not differentiated according to the form of services provided. However, the essence of the sharing economy is often its international character, so web portals offering the possibility of providing goods and services to their users may be registered in different countries. The fiscal burden depends on the jurisdiction of the country in which the service provider is established. This led to a situation in which the Polish buyer was forced to pay 23% of the tax for the service, and the buyer of the same in Luxembourg – 15%. Recognizing the above problem, the European Commission introduced on January 1, 2015 the obligation to tax electronic services at the buyer's place.

Pursuant to Art. 28k point 1 of the VAT Act, the place of providing services by electronic way to non-taxable persons should be the territory of the country in which the customer has his place, permanent address or usually resides. These rules must be applied when the net value of electronic services exceeds PLN 42,000 per year. This threshold must include the value of all services sold, not just this one counterparty.

#### 4. Unrecorded transactions of sharing economy based on own survey

In this part of the article, the author's own research on the described issue is presented. The survey was conducted on a target sample of 1,103 households (in January 2016), 1,038 households (in January 2017), 883 households (in January 2018); 975 households (in January 2019); 758 households (in January 2020) and 673 households (in January 2022). The interviews were conducted in the Podkarpackie Voivodeship. The choice of the Podkarpackie Voivodeship was dictated by its border location conducive to activity in the shadow economy, which can also be initiated as a part of the sharing economy. It is also a region whose inhabitants often emigrate for profit (often working illegally), which also contributes to lowering tax morality. 2,121,000 people live in the Podkarpackie region, of which 1,295 thousand people of working age. Men represent 48.95% of the population, people living in cities 41.4% of the population (58.6% live in rural areas). The unemployment rate among men is 4.4%, women are characterized by a higher one – 5.9%. The average monthly disposable income per 1 person in a household in Podkarpackie was PLN 1,588.57 in 2021 [Statistical Yearbook, 2021]. The questionnaires were addressed to the inhabitants of the Podkarpackie Voivodeship who were over 20 years old (the most numerous group were people aged 36–50 – 23%; aged 26–35 – 21.4%) with a diversified level of income (from PLN 600 to over PLN 2,000 per person in a household) and the standard of living. The respondents participating in the study were people with different education (mostly people with higher education (28%) as well as secondary and post-secondary (42.5%)). City inhabitants accounted for 49% of the survey participants, and the inhabitants of rural areas – 51%. As a part of the own research conducted in 2016–2022, respondents were asked their opinions about the sharing economy in the context of tax issues. At first, the respondents were asked to express their opinion on what, according to them, the sharing economy is – every fifth person (22.0%) indicated the exchange of goods and services without the mediation of money, 19.0% – a new fashion, according to 14.5% it is a new lifestyle aimed at limiting consumption, 11.6% of people emphasized that the sharing economy is an exchange that allows avoiding taxes, and 5.3% of the respondents considered that it is an insignificant trend in consumption. Almost 40% of the respondents did not hear about the studied issue, however, while answering the next questions included in the questionnaire, it turned out that the respondents participated in or used the services provided under the sharing economy (due to editorial limitations, this aspect appears in the research, but in the article it has been omitted).



The sharing economy is based on distributed networks of interconnected individuals and communities as opposed to centralized organizations as we understand them so far. Its main feature is decentralized exchange, without the intermediation of traditional entities (maximum shortening of the supply chain), which can make it tempting not to record the entire turnover and not to pay the taxes due.

Passenger transport services and rental of residential premises are the most popular forms of services offered under the sharing economy. Transport or rental services are, in principle, taxed at the rate of 8%. In the case of renting and leasing real estate for residential purposes, you can take advantage of VAT exemption if the conditions set out in Art. 43 sec. 1 point 36 of the Act of March 11, 2004 about tax on goods and services (Journal of Laws of 2021, item 685) are met.

The problem of the sharing economy is the fact that the services provided within this sector often remain outside the scope of tax records [*Prawno-podatkowe aspekty...*, 2016, p. 5]. This is due to the fact that the entity that actually provides the service is not an online platform, but entities that share services through it. An example would be an Uber that offers transport services and is an entity conducting business activity (drivers are required to register a business), but will not always be required to pay tax (the driver may be tax exempt). A similar situation applies to Airbnb, where the person who rents the apartment is obliged to pay fiscal charges. Actual service providers can, in principle, benefit from the VAT inherent exemption. The subjective exemption is related to the amount of generated revenues. Pursuant to Art. 113 of the VAT Act, sales made by taxpayers whose value in the previous tax year did not exceed the total of PLN 200,000 (in 2022 the exemption limit amounting to the equivalent of EUR 40,000 was maintained) are exempt.

**TABLE 1**

**The structure of answers to the question: How often do you think taxes are paid in relation to the exchange of goods and services within the sharing economy (exchange of goods via internet portals)?**

Opinion	Percentage structure					
	2016	2017	2018	2019	2020	2022
Never	40,4	36,0	40,1	37,7	39,7	17,53
Very rarely	35,1	43,8	42,7	42,1	41,7	58,10
Almost always	11,3	10,7	9,3	10,7	11,1	19,61
Always	9,3	3,9	2,7	3,6	4,1	3,57
other	4,0	4,5	4,2	4,6	2,1	1,19
IN TOTAL	100,0	100	100,0	100,0	100,0	100,0
no answer	0	1,0	1,0	1,3	1,3	0

Source: own calculations based on the household survey in the Podkarpackie Voivodeship conducted in the years 2016–2022.

As a consequence, the service offered within the framework of the sharing economy may be tax-free and cheaper than that of an entity operating in a traditional way. Thus, it is tempting not to record all the revenues obtained through the use of web portals. Table 1 presents the structure of responses to the question about the frequency of paying taxes in connection with the exchange of goods and services within the sharing economy, which means how often respondents receive a receipt or invoice after purchasing goods or services via internet portals. In the opinion of most of the respondents, due taxes are not paid on the services offered through the sharing economy. Over 75% in 2016, 79.8% in 2017, 82.8% in 2018, 81.4% in 2020 and 75.6% in 2022 of people participating in the survey believe that sharing economy service providers do not settle their tax liabilities in the amount due. At the same time, in 2022, there is a noticeable decrease in the percentage of people convinced that the services provided under sharing are never paid fiscal charges – 39.7% in 2020, 17.5% in 2022.

Entrepreneurs who operate in the shadow economy often appear as a part of the sharing economy. These are often entities that conduct regular business activity and achieve significant revenues on this account (not subject to tax exemption), from which the due fiscal charges are not paid. The sharing economy becomes a way for them to bypass tax regulations, mainly due to the fact that keeping a user account on a digital portal does not require a lot of work, and allows them to bypass tax regulations. According to the results presented in Table 2, transactions of exchange of goods and services offered through the use of the sharing economy, in the opinion of respondents, increase the shadow economy (52.3% in 2016, 48.9% in 2019 and 35.2% of responses in 2022). According to every third person, the volume of turnover with the use of online platforms is only sporadically recorded – 43.98% in 2022).

**TABLE 2**

**The structure of answers to the question: Are the transactions of exchange of goods and services recorded within the shared economy?**

Opinion	Percentagestructure					
	2016	2017	2018	2019	2020	2022
They are not, they increase the shadow economy	52,3	52,4	52,1	48,9	49,2	35,22
They are always recorded and taxed	15,9	13,9	10,6	10,9	11,7	18,72
Sometimes they are recorded and taxed	29,0	28,1	30,9	31,2	33,5	43,98
Other, e.g. I don't know	1,9	4,2	4,6	5,8	4,1	1,63
IN TOTAL	0,8	100	100,0	100,0	1,5	100,0
no answer	100,0	1,3	1,7	3,2	1,2	0,45

Source: own calculations based on the household survey in the Podkarpackie Voivodeship conducted in the years 2016–2022.

## 5. Summary

Both the informal economy and the sharing economy are not an easy research area, as evidenced by the ongoing definitional disputes and discrepancies in the manner and scope of perceiving various manifestations of this economic activity. The review of the definitions shows that the shadow economy most often applies to conducting economic activity consisting in avoiding fiscal burdens. At the same time, it indicates the most important stimulus for economic activity in the shadow zone.

All European Union countries, where the informal economy amounted to an average of 17.1% of GDP, face the problem of the shadow economy. In Poland, the national estimates of the shadow economy show a decreasing trend of the described phenomenon. According to the Central Statistical Office, the unobservable economy in Poland decreased from 17.2% of GDP in 1994 to 10.7% of GDP in 2019. According to F. Schneider, compared to 2000, the scale of the shadow economy shrunk from 27.6% to 22.7% of GDP in 2016, to increase again to 27.5% of GDP.

The sharing economy, which spread several years ago, revolutionized the consumer market. Estimates indicate that in 2022, Europe will account for 19.2% of the total revenue of the sharing economy, and the value of the sharing economy will amount to \$ 40.2 billion (Statista Research Department, 2021). At the same time, the emergence of this new form of activity creates new threats in the form of not recording all revenues. It seems that auction portals can be an excellent machine to hide the revenues from the tax authorities (both from the perspective of income tax and VAT).

Considering the nature of the services provided by people using mobile applications or online platforms supporting sharing, the above-mentioned entities often benefit from the objective exemption. Often, however, these services are provided by quasi-professional or professional entities which, taking advantage of the ease of registration on digital platforms and the relative difficulties in monitoring the size of these services by tax authorities, gain from unjustified tax benefits, thus increasing the scope of the shadow economy. As in the case of income taxes, also in terms of VAT, activities undertaken within the sharing economy are subject to taxation under the previously applicable regulations relating to the traditional economy.

According to the current shape of tax regulations, it is the taxpayer that bears the burden and the risk of the proper legal qualification of the benefits he or she offers, assessing whether and in what amount the income triggering the tax obligation arises. In such a case, it cannot be ruled out that the incorrect qualification of sharing services may, to some extent, be the result of the lack of tax awareness and knowledge. However, such behavior may also be a consequence of deliberate avoidance of legal regulations. According to the majority of respondents participating in the survey conducted in the area of Podkarpackie Voivodeship, activities taking place within the framework of the sharing economy are never or very rarely recorded. Also, the majority of respondents were of the opinion that transactions of this type increase the shadow economy.

Summarizing the considerations on tax problems related to the functioning of the sharing economy in the Podkarpackie Voivodeship, it should be noted that this is not a sector that requires the creation of completely new fiscal regulations. On the other hand, however, the existence and development of this relatively new phenomenon proves that tax regulations must systematically evolve to meet the requirements of the developing economy, for example in terms of new technologies appearing in it. From the point of view of assessing the economic efficiency of taxation of sharing transactions, the cost of monitoring and enforcement of tax obligations by fiscal authorities is also of particular importance. High dispersion, variety and frequent lack of formalization of the transactions carried out may cause the costs of enforcement to exceed the value of tax revenues. On the other hand, failure to pay due tax charges on sharing transactions may contribute to the unequal treatment of analogous transactions that are provided in a traditional way, which may determine further tax abuses.

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