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POLICY

Pakistan: One Year Growth Strategy

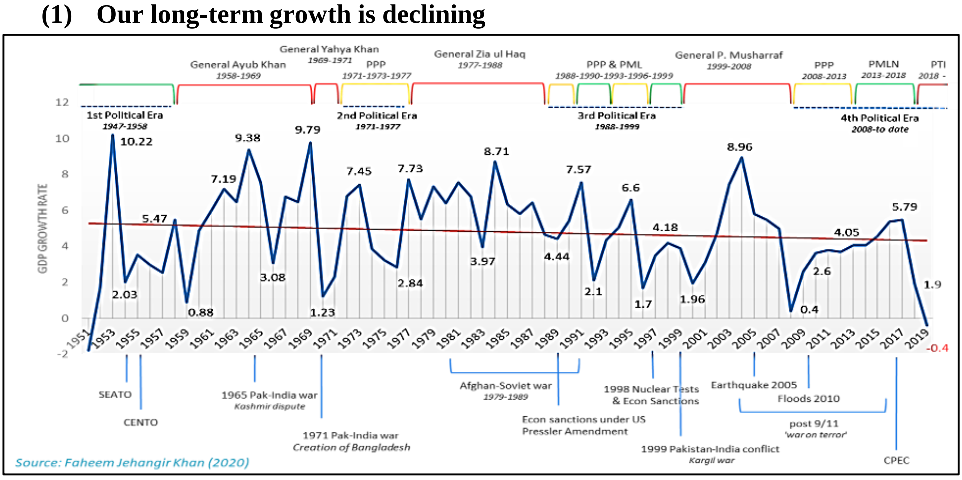
PIDE

ACTION POINTS

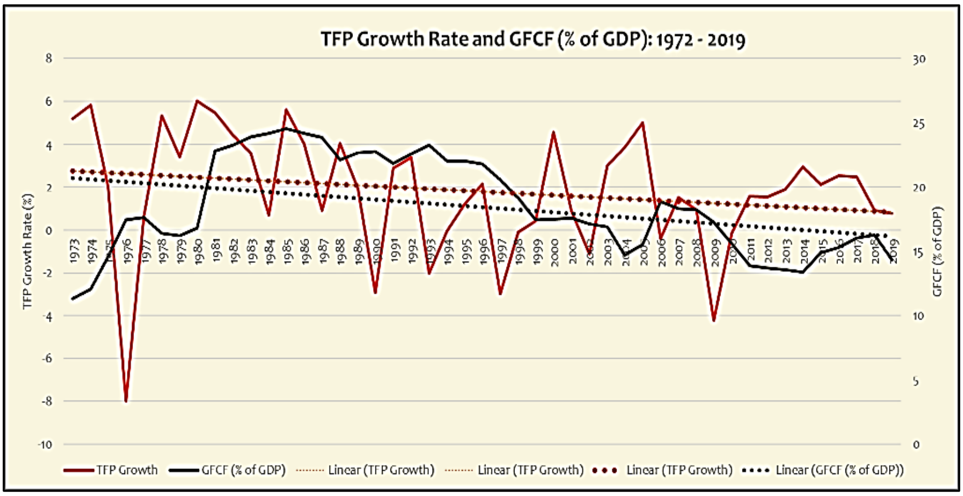
- Focus on Investment, productivity, and exports.
- Remove bottlenecks linked to terrifs, sludge: cost of regulation, financial & energy constraints.
- Initiate “Regulatory Audit”.
- Reduce bank’s holding of the government securities.
- Create a National Debt Management Office.
- Revisit DISCO’s management.
- Introduce pre-paid metering.
- Do away from uniform energy tariffs.
- Introduce wheeling and bilateral agreements.
- Tax Simplification
- Implement Point of Sale (POS)
- Deregulate the real estate market by eliminating NOCs and FBR/DC rates.
- Tie Real estate & city development.
- Unlock dead capital.
- Internet for all.
- Youth Involvement—promote sports, culture & clubs
- Promote street vending—huge employment generation.

BASIC FACTS ON LONG-TERM GROWTH

(1) Our long-term growth is declining



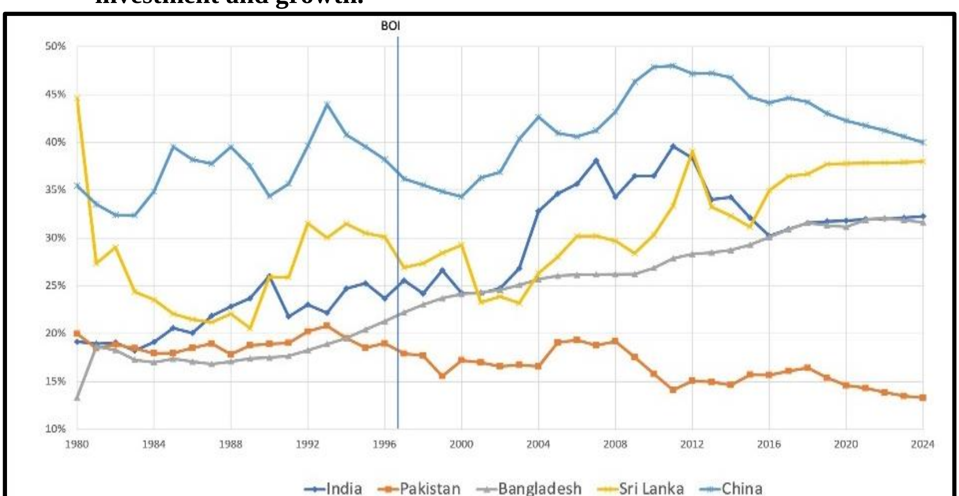
(2) We also have declining productivity and Investment



(3) Productivity Facts

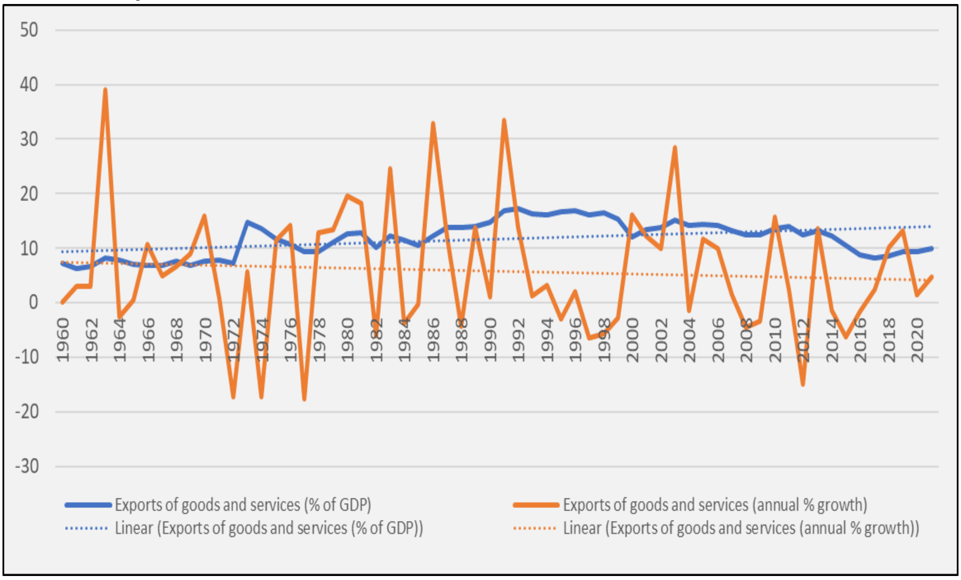
- Negative productivity trend implies a less efficient economy over time
- Sectoral TFP growth estimates show that:
  - Service and tech-based sectors have higher productivity growth
  - The manufacturing sector mostly has low or negative productivity growth
  - Subsidy-receiving sectors have medium/low or negative productivity growth
  - Export-designated sectors have low or negative productivity growth
  - High productivity growth sectors are not major export contributors

(4) We have the lowest investment rate among neighboring countries: our policy is totally focused on the tax rate and revenue collection, with no priority to investment and growth.



Source: IMF World economic outlook graph constructed by authors.

(5) Our export trend is flat despite TDAP, generous trade policies, and MOC fully focused on trade



(6) Government has crowded out market competition

- Government footprint (67 % of GDP)
  - An active player in various sectors: SOEs
  - Energy, transportation, financial, trading, manufacturing
  - Fixing prices
  - Wheat, electricity, gas, medicines, milk, petrol
- Sludge: Over-regulation (39% of GDP)
  - Time-consuming processes in seeking Registration, Licenses, Certificates, and Other permissions (RLCOs)

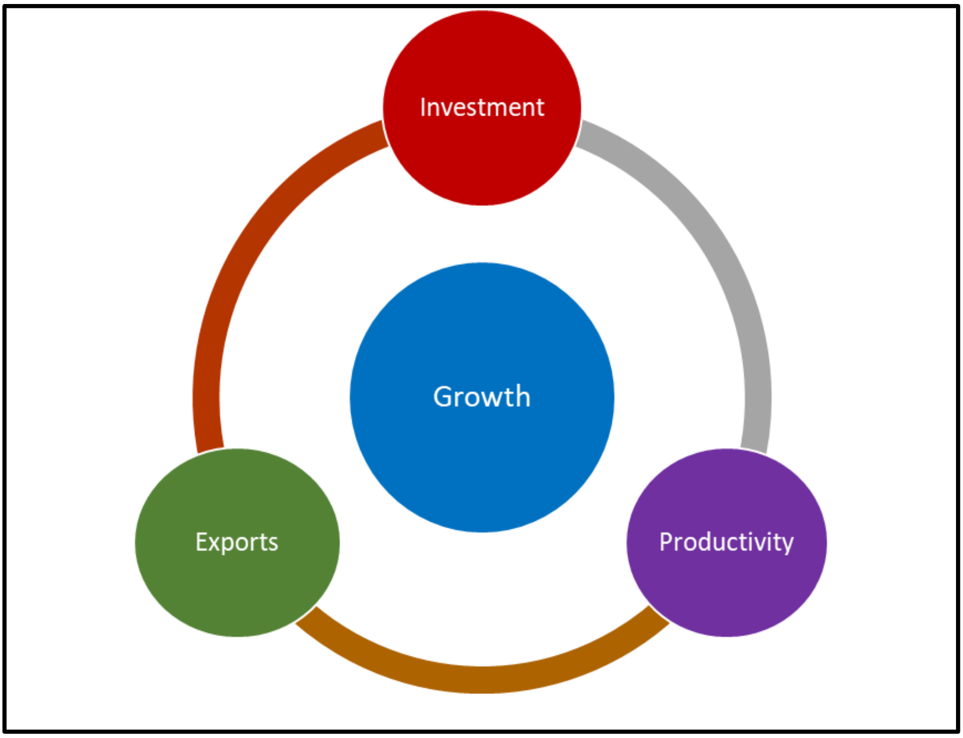
CURRENT CRISIS AND CONSTRAINTS

- Due to the ongoing IMF Program
  - No fiscal space available to the government
  - Increase in public investment is not possible
  - Taxes are too high
  - Balance of payment crisis—highly indebted
  - Rightsizing is required but privatization difficult

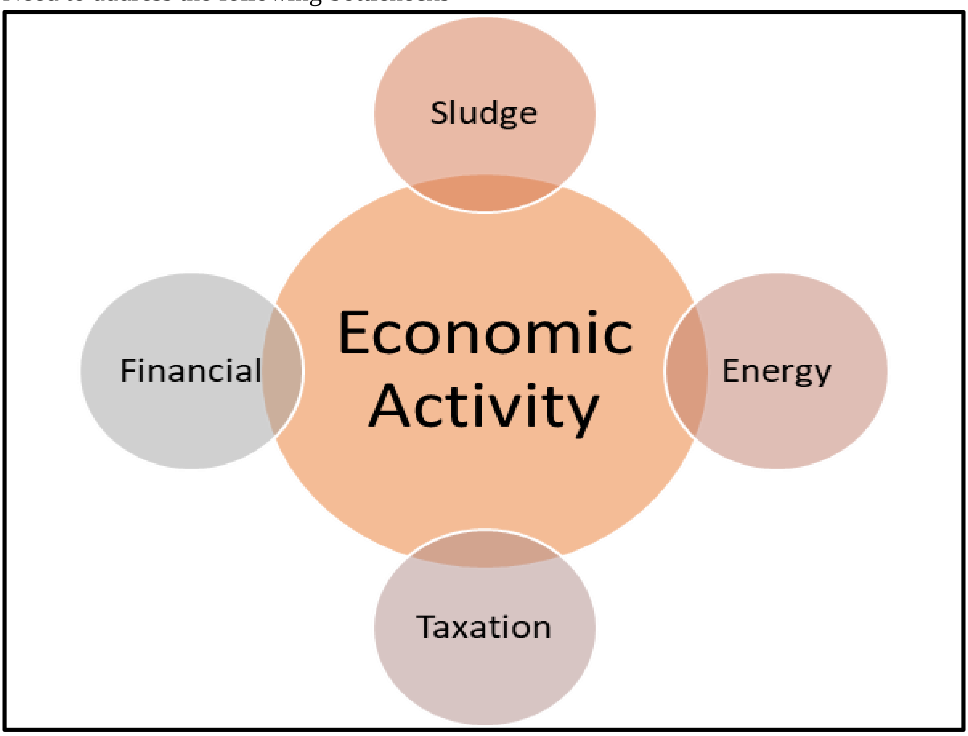
In short, the available policy choices are limited

TIME TO CHANGE PRIORITIES

Historically, taxation has been the priority and growth has been low on the list. Need to make growth a top priority and for that focus on investment, productivity, and exports.



Need to address the following bottlenecks



SLUDGE: THE COST OF REGULATIONS

The government footprint is 60%–80% of the GDP

(1) Pakistan is a permission economy
(2) There are122 regulatory bodies under the Federal Government
(3) Regulations permission NOCs cost more than 39 % of GDP in three sectors alone

PIDE Sludge Audit Vol. I

- *Permission process takes 1 – 4 years*
- *Multiple approvals from different agencies are required to set up a business*
- *A plethora of documents*
- *Multiple site visits/inspections.*

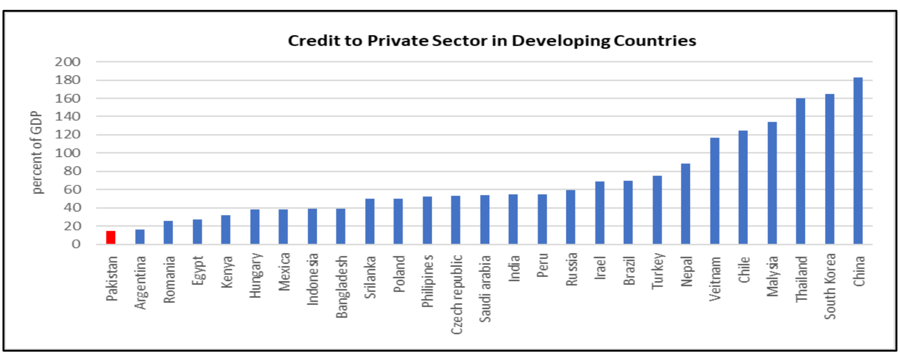
Way Forward

- Choice -1: Regulatory Audit
  - Authorities should initiate a regulatory audit in collaboration with the Board of Investment and the Competition Commission of Pakistan
  - The regulatory audit must be based on the regulatory guillotine strategy
  - Regulations retained after the assessment must be rule-based
  - Authorities must present a plan to achieve automation in the regulatory permission processes
  - Deemed approval: once the application along with the required documents is submitted to the authority and the authority has not taken any action within 15 days of submission, then the application must be considered approved
  - Ensure strict implementation of rules and regulations. employ professional bodies, such as the Pakistan Engineering Council, for monitoring

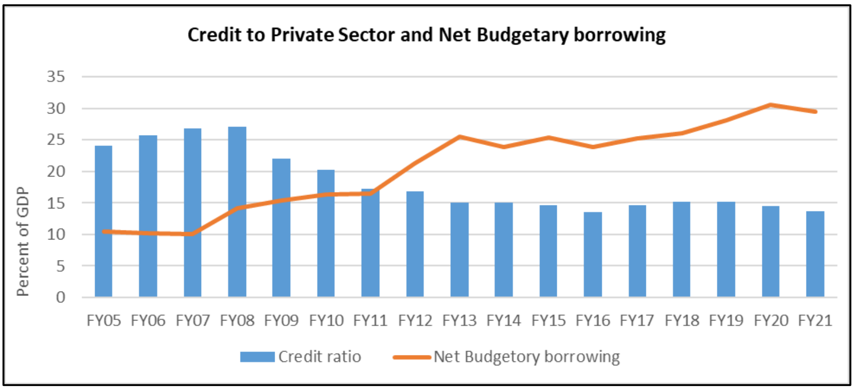
- Choice -2: Remove of all permissions
  - Remove all Registrations, Licenses, Certificates, and Other Permissions (RLCOs) within 15 days, except for prohibited activities
  - Ask Authorities to prepare a case for RLCOs on the basis of a cost-benefit analysis
  - Cabinet approval: Authorities must seek cabinet approval to implement a regulation within 3 months

FINANCIAL: MORE CREDIT FOR INVESTMENT

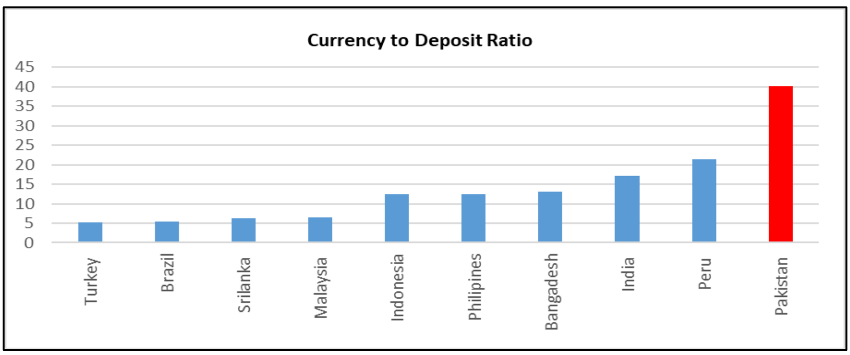
- Pakistan has the lowest ratio of credit to the private sector among the Developing Countries



- loanable funds are heavily tied up in Government securities (52 % investment in securities and an additional 15 % in government guarantee loans)



- This led to domestic advances to deposit ratio drop from 75 % to 40 % from 2008 to 2020
- Moreover, Pakistan has the highest currency in circulation (40 % as compared to the maximum of 20 % in other countries), which also impacts the banking multiplier by limiting liquidity available for the private sector



Way Forward

- Create a ***National Debt Management Office (NDMO)***
  - National Savings merged with Debt Policy Coordination Office along with state bank debt functions
    - Domestic and external public debt management and government guarantees
    - New debt instrument
    - Managing yield curves
    - Provide treasury management functions to the Ministry of Finance reducing cost and better portfolio management
    - Ensuring Fiscal Responsibility
  - Weighted Average cost publicly available and NDMO answerable to parliament

   - Capital market will also develop by going beyond banks for bonds markets such as pension funds, institutional investors, NBFIs, and international capital markets

- Increase the fiscal space for credit to the private sector through:
   - Government securities (currently, banks hold around 75 % (Rs. 10.5 trillion) and non-banking institutions only 25 % (Rs. 3.5 trillion))
   - If the bank holding is cut back to 60 %, then a release of Rs. 2 trillion could be put into the private sector
   - If the ratio of currency to deposit can be reduced from 40 to 33 %, then it will add another Rs. 1.5 trillion to the private sector
   - With the added multiplier, these initiatives will provide a strong stimulus for growth

ENERGY: A CHRONIC PROBLEM

- Circular Debt Rs. 2.5 trillion (April 26, 2022)
- Cumulative Losses of Rs.5.4 trillion (since FY 2007)
   - Huge Transmission and Distribution Losses
      - In FY 2021, a loss of Rs. 473 billion – Rs. 402 billion was recovered through tariff, and Rs. 71 billion was added to circular debt
   - Low Bill Recoveries
      - In FY 2021, a financial loss of Rs. 39 billion
   - DISCO Mismanagement
      - Centralized billing system and meter irregularities
   - Capacity Payments Burden
      - In FY 2021, invoiced capacity charges of Rs. 793 billion
   - Unaffordable Tariff and Cross-subsidy
      - Industry and commercial subsidizing household and agriculture

Way Forward

- Billing and Metering
   - Pre-paid meters, linked to DISCO billing
   - Consumer pay for pre-paid meters
- B2B and Wheeling
   - Long-term contracts—Competitive Trading Bilateral Contract Market (CTBCM) not possible
   - Bilateral contracts, such as B2B, between bulk consumers or DISCOs and generators
   - Facilitate wheeling, wheeling charges equal to marginal costs

TAXATION: A PERENNIAL PROBLEM

- Complicated and Distorted Tax Structure
  - Forced to set elusive tax-to-GDP targets and chasing it through arbitrary measures, while growth and employment is left primarily to some PSDP funded projects
  - Policy does not follow principles of fairness, certainty, efficiency, and convenience
  - Higher taxes, narrow base, differential treatments, and exemption hinder growth and flow of revenue
  - Tax policy complex and killing transactions in pursuing tax targets
- Running for Targets

Way Forward

- Withholding Tax (WHT)
  - Eliminate 45 revenue non-spinners with a combined contribution of less than 1% of collections (Rs. 11 billion only)
- Mandatory tax filing
  - Abolish the distinction between filers and non-filers. The distinction just creates a nuisance and does not contribute to improving the tax net (the number of filers was 2.28 million in 2020 and 2.29 million in 2021)
  - Introduce joint return filling instead of individual
- Income tax should be universal and not segmented. The division of income based on agriculture, dividends, and so on must be abolished
- Integrated, fair value single VAT-based system of Sales Tax
- No distinction between services and commodities (FBR-GST on goods 17, Provinces-GST on services 15%-19.5%)
- Tax exemptions
  - Restrict and rationalize
- Point of Sale (POS)
  - Get the POS Tier-1 done in 30 days
  - Outsource the installation
  - More than 6000 identified retailers not integrated yet
  - Outsource monitoring and compliance
  - Provincial to implement in their jurisdiction
  - Implement POS on doctors and other professional services like doctors and lawyers for sales tax and income tax presumption
    - Consider Hedonic income estimation for lawyers for income tax collection

MARKETS AND EXPORTS

(1) Real Estate Market

(2) Cities
(3) Internet for All
(4) Street vending as employment
(5) Sports
(6) Agriculture Market
(7) Export Sector
(8) Setting up Sports Market

REAL ESTATE MARKET

Tax revenue lost due to DC and FBR rates:

- FBR rate estimated 35% less than Market Rate of Transaction, could be much lower in some cases
- At least Rs. 25-30 billion revenues lost in stamp duty due to collection on DC/FBR rate instead of actual market transaction rate
- Another Rs. 25 billion in revenues were lost in Federal CVT
- Real Estate can contribute over Rs. 50 billion more in tax revenues if transactions are recorded at actual value.
- Reduction of tax rates would increase the number of transactions

- Focus on the Real estate market, which has a huge potential to bring growth
- Deregulate the market

Develop an auction market

- Introduce an online bidding mechanism through the portal, where all contracts must be listed before registration
- Transaction to be completed once auction certified
- Market prices transaction revealed
- It will also help to eliminate DC and FBR rates

- Remove height/floor restrictions
  - Introduce zoning laws to allow for high-rise buildings
- Eliminate NOCs for the construction of high-rises
- Monitoring through insurance to ensure compliance with guidelines and zoning laws
  - Can help to evolve a building control monitoring industry in the economy
- Encourage the Private Sector to enter and offer services
- Merge all taxes collected at the time of property transfer into a single tax

RETHINKING CITIES

- Cities are the engine of growth
- Allow high-rise, dense, and walkable cities
- Replace rigid master plans with loose guidelines
- Value in regeneration

- Vibrant city centers with mixed-use
- Vertical Development - Flats as a dominant city unit
- City to be managed by a single authority
- Revise rental and multiple ownership laws

Unlock dead capital – Create a city wealth fund

Unlocking the dead capital - Case study: G-6/1

- 86 acres occupied by government houses
- 77 acres of land by constructing 6 high-rises to accommodate current residents
- Generate Rs. 52.2 billion in revenues
- Increase GDP by 0.09%

Remove car subsidy

- Remove car use subsidy to reduce the burden on city development, which is also a city's source of revenue
- Develop a 'Car Use Policy' with salient features such as congestion tolls and paid street parking
- Sell apartment parking separately from the apartment
- Alternative holistic, in-city mobility policies from public transport to walking

INTERNET FOR ALL

Internet is a basic right

- Make the Internet widely and cheaply accessible
- Don't hoard the spectrum instead release it
- Fiber rights and plans
- Internet taxation should be removed
- Ensure the availability of cheaper devices
- Introduce competition policies based on research and M&E
- Develop data storage, web hosting, etc. within Pakistan
- Need to study possible subsidies to students in disadvantaged sectors

STREET VENDING AS EMPLOYMENT

Large street economy operated by street vendors

- 1.22 % of the employed labor force (0.75 million people)
- Contribute around $ 6.69 billion to the national economy
- Financially excluded (only 11 % have a bank account)
- Without legal protection (only 2 % have a license)

Way Forward

- Provide legal protection

- Introduce work permits at the local administration level

- Promote financial inclusion
  - Reduce documentation
  - Encourage Micro Finance Institutions to use mobile accounts as security/collateral

- Formalize the income
  - Link renewal of work permit with the annual income statement

- Provide proper space for women to do street vending

SPORTS FACILITIES AND MARKETS

- Youth unemployment is high and salaries low
- Promote sports club culture
- Fund local sports clubs
- Promote indigenous sports
- Subsidy for local theaters and clubs
- Stated set of rules for hiring stadiums and halls
- Announce rental policy

AGRICULTURE MARKET

- Unnecessary delay in approving new varieties by Federal Seed Certification and Registration Department (FSCRD)
  - Limiting investment of the private sector in the seed market
  - Pakistan imported seeds worth USD 70 million in 2020
  - Hybrid maize was introduced in Pakistan in 2000--yield has increased from 17.6 mound/acre in 2000 to 56.8 mound/acre in 2020 (AMIS)
  - The process of approval should be reduced to 1 month
- Input subsidies (water, fertilizer) promote less profitable and water-intensive crops
  - farmers are reluctant to use water-saving technologies
  - Indirect fertilizer subsidy costs more than Rs.200 billion/annum but creates monetary benefits of only Rs.15 per month per person (PIDE knowledge brief)
  - Sugarcane consumes 3.5 times more water than cotton and each litter generates 4 times less monetary benefit than cotton
- Price support for wheat promotes undesirable results without benefiting the consumers and producers
  - Interference in the wheat market costs Rs. 60 billion/annum to the government
  - Created a circular debt of Rs. 800 billion—not sustainable
- Improve processing has the potential to increase agriculture-base export
  - Small proportion of agriculture output is processed
  - Less than 10 % of total milk production and a negligible number of fruits and vegetables are processed
  - Pakistan exported less than 2 % of its meat production in FY 2020
  - Pakistan exported mangos worth USD 1 billion in FY 2020 – the same volume of mangos could have a value of up to USD 5 billion if converted into mango pulp

Way Forward

- Investment in plant and animal breeding techniques needs to improve drastically in a targeted manner
- Promotion of branding and labeling in input-output markets can promote the high-quality product that can lead to increased exports
- Subsidy on inputs such as fertilizer and water have to be withdrawn
- Credit availability to install processing units at low-interest rates may boost the agriculture-based export
- Remove the license Raj that limits new entrants into the sugar industry and promotes centralization
- Set up an agriculture commodity market
  - Warehouse receipt trading
  - Investment in warehouses/storage

EXPORTS

- Key bottlenecks faced by the exporter are
  - Taxation
    - Domestic Taxation
- Complicated tax structure with time-taking refund processes
    - Tariff
- The average effective tariff rate (11.2 %) is the highest in the region
  - Uncompetitive Energy Tariffs
  - Human Capital: Mismatch in the Labor Market
  - Policy inconsistency: uncertainty and increasing transaction costs due to policy inconsistency have eroded the business environment
  - SRO culture and Sludge

Way Forward

- Simplify the taxation regime
- Remove cross-subsidization on energy tariffs
- Protection provided to the local industry should be time-bound with a clear sunset clause to discourage rent-seeking
- Align vocational training and specialized education with the demands of the industry by increasing industry's involvement in the training
- Ensure policy consistency
- Exemptions and concessions in import duties must be provided through tariff codes and not through SROs

Services Exports with a Great Potential: IT & Freelancing

- Upwards of USD 0.5 billion in earnings
- Mandate universities to conduct short courses on freelancing during the summer
- Any tax levied must be on net profits, not revenue
- PSEB registered freelancers to maintain dollar accounts in Pakistan banks (as currently 70 to 80 % of earnings are kept abroad in digital accounts)

- Link dollar accounts to digital accounts
- Require transaction clearing in 03 days
- Exchange rate for dollar-rupee conversion taken at the time of transaction

SETTING UP A SPORTS MARKET

- The sports market should be looked upon as an industry as it will create opportunities for the economy and employment, especially for youth
- The sports industry is a billion-dollar industry and Pakistan has not tapped the potential of this industry due to:
  - The existing sports industry is export-oriented, and industries are reluctant to engage in any league
  - Due to bureaucratic red tape, the private sector is reluctant to engage in organizing sports activities
- The Pakistan Super League (PSL) has broken the ice, and the PSL model should be emulated in other sports in Pakistan such as hockey, kabbadi, football, etc.
- PSL is currently worth around USD 250 to 500 million
- Major sports facilities are underutilized due to bureaucratic red tape

Way Forward

- The government should facilitate the industry through friendly legislation and allocations
- Remove hurdles faced by the private sector in getting permissions from various government departments to organize sporting events
- Introduce public-private partnership models in sporting events
- Promote sports club culture at the community level
- Promote indigenous sports
- Announce rental policy for sports facilities
- Bound managing authorities of the major sports facilities to produce detailed annual reports.

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