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BRIDGING ECONOMIC SYSTEMS: A COMPARATIVE STUDY OF TAX STRUCTURES IN UZBEKISTAN AND JAPAN

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Abstract

This study undertakes a comparative analysis of the tax and economic systems of Uzbekistan and Japan, with a particular focus on their structural frameworks, fiscal strategies, and recent policy reforms. The paper systematically explores the major components of each country's taxation model, including corporate income tax, personal income tax, and consumption-based taxation, in order to understand how these mechanisms are employed to generate public revenue and maintain fiscal sustainability. By examining both countries' approaches to tax administration and economic planning, the study identifies key differences in complexity, efficiency, and responsiveness to contemporary socio-economic challenges such as informality in Uzbekistan and population aging in Japan. While the primary emphasis lies on economic and fiscal policy, the paper also briefly touches upon the role of language education as a supportive tool for interpreting and teaching economic content, particularly in multilingual academic contexts. The findings of this research aim to provide valuable insights for economic educators, policy-makers, and researchers interested in international taxation and comparative public finance.

Keywords: Tax policy in Uzbekistan and Japan; Comparative tax systems; Corporate income tax; Personal income tax; Value-added tax (VAT); Economic development strategies; Fiscal sustainability; Tax reform; Informal economy; Revenue generation mechanisms; Public finance management; Tax administration efficiency; Cross-national economic analysis; Tax incentives and



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investment policy; Tax burden distribution; Demographic impacts on taxation; Flat tax system vs. progressive taxation; Education and tax literacy; Digitalization of tax systems; Economic education through real-case analysis.

INTRODUCTION

Tax systems are the cornerstone of national development, functioning as both a revenue-generating mechanism and a tool for socio-economic transformation. Effective tax policies are essential for promoting equity, sustainability, and economic growth. In this paper, we aim to conduct a comparative analysis of the economic and tax systems of Uzbekistan and Japan. While the two countries differ greatly in terms of development stage, size of economy, and historical background, their approaches to taxation reveal valuable lessons that can be integrated into economic education and policymaking.

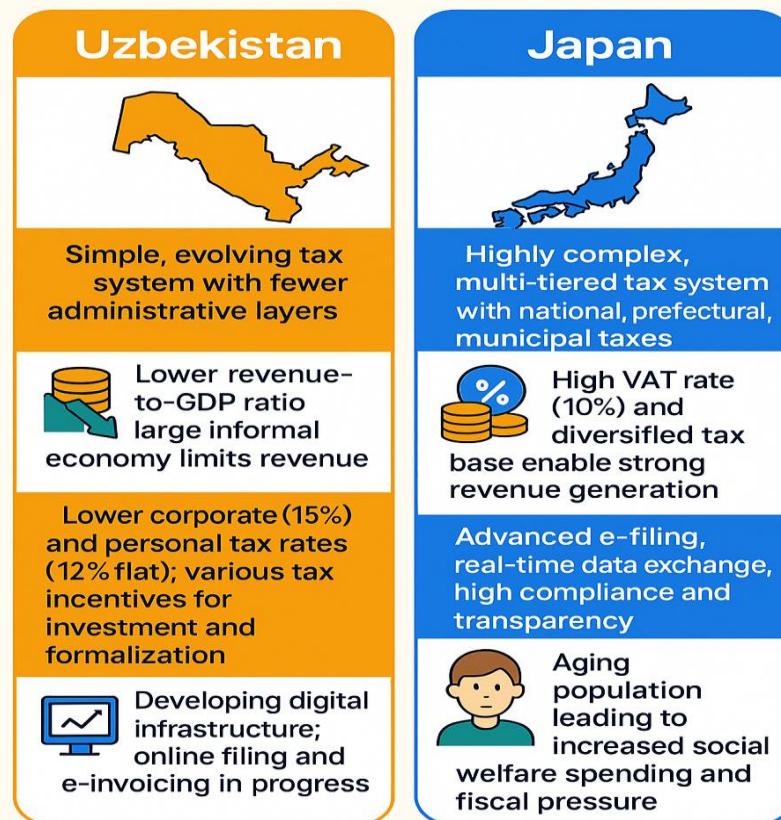
Taxation is more than a fiscal tool — it is a reflection of a nation's priorities, administrative capacity, and economic philosophy. Uzbekistan, a transition economy that gained independence in 1991, has been implementing wide-ranging economic reforms, including an overhaul of its tax system. In contrast, Japan is a highly developed nation with a long-established and complex tax structure, but it faces modern challenges such as a declining population, an aging society, and high public debt. By comparing these two systems, we seek to identify their similarities and differences, evaluate their effectiveness, and suggest ways these insights could be used in the development of tax-related teaching materials, policy frameworks, and research. Global and regional economic stability depends heavily on effective tax systems. Uzbekistan has recently undertaken reforms to boost revenue and streamline its structure, while Japan manages a complex, high-debt environment with heavy reliance on consumption and corporate taxes. This paper compares both systems, identifying key features, trends, and challenges that inform fiscal policy and economic education.

THE MAIN FINDINGS AND RESULTS

1. Uzbekistan's Tax and Economic System: Reform in Progress

Uzbekistan has made notable progress in reforming its tax system over the last decade. In 2020, a new Tax Code was introduced to simplify taxation, broaden the tax base, and reduce excessive tax incentives that had previously favored certain sectors disproportionately. The current structure includes corporate income tax (CIT), personal income tax (PIT), value-added tax (VAT), property taxes, and customs duties. As of 2024, the CIT rate is 15%, while the PIT is a flat rate of 12%, designed to encourage formal employment and reduce administrative burdens.

Comparison of Tax and Economic Systems



Picture 1. Comparison of Tax and Economic Systems: Uzbekistan vs. Japan



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As we can see in the Picture 1, the infographic illustrates key differences between Uzbekistan and Japan in terms of their tax structures, revenue systems, and economic challenges, emphasizing Japan's complexity and aging population versus Uzbekistan's simpler system and youthful demographic potential.

Uzbekistan's tax system has been intentionally streamlined since the 2020 Tax Code reform, reducing VAT rates, eliminating redundant exemptions, and professionalizing the private sector. Despite being simpler than Japan's, this ongoing modernization reflects an evolving structure adapting to economic diversification. Tax-to-GDP ratio dropped by approximately 2 percentage points since 2020, underscoring the need for revenue mobilization. The informal economy remains large; studies suggest Uzbekistan captures only about 45% of potential tax revenue, pointing to significant inefficiencies. The flat corporate (15%) and personal (12%) tax rates are coupled with targeted incentives for sectors like IT. The establishment of IT Park Uzbekistan, with generous tax holidays and support for startups, demonstrates the government's strategy to attract digital economy investment.

VAT in Uzbekistan is currently set at 12%, a figure that was reduced from 15% as part of recent reforms. This tax is applied on most goods and services, including digital services, which shows the government's attempt to adapt to the modern economy. However, one of the major challenges remains the high level of informality, estimated at around 45–50% of GDP. Many businesses and individuals operate outside the official tax net, leading to significant revenue losses.

The government has tried to address this issue by promoting digitalization of tax administration, improving audit procedures, and reducing opportunities for tax evasion. Still, the heavy use of tax incentives—particularly for foreign investors and exporters—creates imbalances and reduces the effectiveness of the tax system. International institutions like the IMF and World Bank have recommended a more targeted and transparent use of incentives to avoid unnecessary revenue leakage.



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2. Japan's Tax and Economic System: Structure, Stability, and Strain

Japan, as the third-largest economy in the world, operates a sophisticated and multilayered tax system. Its key revenue sources include personal income tax, corporate income tax, consumption tax (a form of VAT), inheritance tax, and various local taxes. Japan's economic strength lies in its industrial and technological sectors, but it faces substantial fiscal pressure due to demographic shifts and a public debt that exceeds 200% of GDP. The **corporate income tax** in Japan is more complex than in Uzbekistan. For large corporations, the effective tax rate is around 30–38%, when national, local, and enterprise taxes are combined. Small and medium-sized enterprises (SMEs), on the other hand, benefit from reduced rates, including a 15% rate on the first ¥8 million of taxable income. This differential treatment is intended to support small businesses, which form the backbone of Japan's economy.

The **personal income tax** system in Japan is progressive, with tax rates ranging from 5% to 45%. In addition, inhabitants' taxes and social insurance contributions increase the effective burden on salaried individuals. One important aspect of Japan's tax philosophy is the emphasis on self-declaration and tax filing, which encourages transparency and responsibility among taxpayers. Perhaps the most debated component of the Japanese tax structure is the **consumption tax**, introduced in 1989 and gradually increased to its current rate of 10%. To mitigate its regressive impact, Japan maintains a reduced rate of 8% on food items and non-alcoholic beverages. In recent years, further tax increases have been proposed to fund growing public spending, particularly in defense and healthcare. Inheritance and capital gains taxes also form a significant part of Japan's tax system. Inheritance tax can reach as high as 55% for large estates, reflecting Japan's commitment to income redistribution. Capital gains on securities are generally taxed at around 20.3%, while those on real estate may be taxed up to 39.6%, depending on holding period and property value.

3. Main points in comparison and Key Insights

When comparing the tax systems of Uzbekistan and Japan, several important distinctions and insights emerge that shed light on the economic realities and fiscal policies of these two countries.



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a) Structural Complexity: Japan's tax system is characterized by its high degree of complexity and diversity. It operates on multiple administrative levels including national, prefectoral, and municipal taxes, each with its own rates and rules. This multi-tiered structure includes detailed classifications of income, differentiated corporate tax rates, and various consumption taxes. In contrast, Uzbekistan's tax system is comparatively simpler but rapidly evolving. As a transition economy, Uzbekistan has been steadily reforming its tax code to modernize its administration and expand its tax base. Although simpler, Uzbekistan's system is still growing in complexity as it attempts to meet the needs of a diversifying economy and improve compliance.

b) Revenue Generation: Japan's strong revenue generation capacity largely stems from its high value-added tax (VAT) rate of 10% and its broad, diversified tax base. Despite this, Japan faces significant fiscal challenges due to public spending on social welfare and debt servicing that exceed revenue growth. Uzbekistan, on the other hand, has a lower revenue-to-GDP ratio, reflecting several structural and administrative challenges. One of the biggest obstacles to effective revenue mobilization in Uzbekistan is the large informal sector, estimated to account for nearly half of the country's economic activity. This informality limits tax collection and reduces the government's fiscal capacity. However, recent reforms and digitalization efforts aim to reduce informality by incentivizing formal registration and improving tax compliance.

c) Tax Rates and Incentives: Uzbekistan employs relatively lower corporate and personal income tax rates compared to Japan, partly as a strategic move to attract foreign investment and stimulate formal employment. For example, Uzbekistan's corporate income tax rate is set at 15%, while its flat personal income tax rate is 12%. Additionally, Uzbekistan provides a variety of tax incentives, especially for industries like manufacturing, export, and IT, to encourage economic diversification and growth. In contrast, Japan relies on a progressive tax system with higher personal income tax rates that can reach up to 45%, and corporate tax rates that can exceed 30% for larger firms. Japan's approach minimizes tax incentives and instead emphasizes broad-based taxation to ensure a stable revenue stream.



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Japan's aging population and low birth rates create considerable fiscal pressure, driving up social security and healthcare costs. This demographic challenge requires Japan to consider future tax increases or social spending reforms to maintain fiscal balance.

Conversely, Uzbekistan benefits from a young and growing population, which offers a potential demographic dividend if accompanied by appropriate economic and tax reforms. A youthful labor force can expand the taxable base and stimulate economic growth, provided that employment opportunities increase and the informal economy shrinks. Uzbekistan's government must continue reforms aimed at formalizing businesses, enhancing tax compliance, and investing in human capital to fully realize this potential. Both Uzbekistan and Japan recognize the importance of modernizing tax administration through digital technologies. Japan is significantly ahead in this area, with advanced e-filing systems, comprehensive electronic tax payment infrastructure, and real-time data exchange between tax authorities and financial institutions. This digital sophistication helps Japan maintain high compliance rates and transparency.

Table 1. Comparative Overview of Tax and Economic Systems: Uzbekistan vs. Japan

Key Dimensions	Uzbekistan	Japan
Structural Complexity	Simple, evolving tax system with fewer administrative layers	Highly complex, multi-tiered tax system with national, prefectoral, municipal taxes
Revenue Generation	Lower revenue-to-GDP ratio; large informal economy limits revenue	High VAT rate (10%) and diversified tax base enable strong revenue generation
Tax Rates & Incentives	Lower corporate (15%) and personal tax rates (12% flat); various tax incentives for investment and formalization	Progressive tax system with personal income tax rates up to 45%; limited tax incentives
Digitalization & Transparency	Developing digital infrastructure; online filing and e-invoicing in progress	Advanced e-filing, real-time data exchange, high compliance and transparency
Demographics & Fiscal Pressure	Young, growing population with potential for labor force expansion	Aging population leading to increased social welfare spending and fiscal pressure



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Looking at the comparative table titled "Comparative Overview of Tax and Economic Systems: Uzbekistan vs. Japan", several important insights can be drawn regarding the fiscal structures and economic priorities of both countries. The comparison reveals that while Japan's tax system is mature, comprehensive, and technologically integrated, it also faces demographic challenges. Uzbekistan, with a more youthful population and reform-oriented agenda, holds promising potential if it continues to modernize its tax administration, formalize its economy, and invest in digital transformation.

Uzbekistan has also taken major steps toward digitalization by introducing online tax filing, electronic invoicing, and automated risk assessments. These efforts are crucial for combating tax evasion and increasing efficiency but are still in the process of widespread adoption. Improving digital infrastructure remains a priority for Uzbekistan to close the gap with developed economies.

CONCLUSION

Uzbekistan's system is marked by ongoing reform, high informality, and reliance on VAT and incentives. Japan's system, while diversified and layered, faces fiscal strain due to aging population and high debt, leading to policy pressures like tax increases and selective relief. Both experiences offer rich case studies for economic educators—highlighting how structural differences impact revenue generation, compliance, equity, and fiscal resilience.

The comparison between Uzbekistan and Japan reveals both countries' strengths and weaknesses in tax policy and economic planning. Uzbekistan is making bold strides in reforming its tax system but must address challenges such as informality, overuse of incentives, and limited digital infrastructure. Japan offers a model of structure and stability, but faces fiscal risks due to demographic decline and rising social spending.

For students and professionals in economics, especially in multilingual and international settings, such comparative studies are invaluable. They not only improve understanding of fiscal systems but also equip future economists with the analytical skills necessary to design and critique tax policy across different socio-economic environments. This comparative analysis provides a data-driven foundation for economic education materials, supporting a nuanced



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understanding of tax policy across different national contexts. Uzbekistan's economic and tax system is characterized by rapid evolution and a strong focus on reform. In recent years, the government has made significant efforts to modernize fiscal policies, simplify tax procedures, and encourage formalization of the economy. With a relatively young and growing population, Uzbekistan holds substantial potential for long-term economic growth. However, challenges remain — particularly in reducing the size of the informal sector, which continues to limit the government's revenue base. Strengthening digital infrastructure and improving tax administration remain key priorities to enhance transparency, compliance, and overall efficiency.

In contrast, Japan's tax and economic system is highly developed, structured, and technologically advanced. The country maintains a multi-tiered tax framework and a well-established fiscal infrastructure. However, Japan faces considerable fiscal pressure due to its aging population and substantial public debt. These demographic trends are increasing the burden on social welfare systems, demanding more strategic and sustainable policy responses. Japan's current focus lies in maintaining a stable revenue stream while carefully managing expenditures and implementing intelligent, data-driven interventions to uphold long-term fiscal sustainability.

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