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InTraders International Trade Academic Journal is a well-known international journal that publishes original and scientific research in the field of international trade in English. The journal has free and open access to all researchers. The language, science, legal and ethical responsibility of the articles published in the journals belong to the authors. Articles published in the journal can not be used without reference.

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In the Pre-Exam process, the article consists of three phases; formal, academic and written. In the formal review, the "similarity report", the keyword, the JEL code and the author information are checked. The preliminary examination is carried out by the secretariat board. At each stage, the writer is contacted and requested to complete the necessary transactions, and each subsequent step is passed to the next step. It is targeted to complete within 10 days according to the speed of the author.

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Appreciation

I am gratified to have the honor to put forward the vote of thanks to all the InTraders Journal

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In upcoming next issue, waiting your studies.

Wish to meet you all in this new international conferences...

Kürşat ÇAPRAZ

Director of InTraders Academic Platform

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The Association Between Healthcare Staff Personal Branding and Patients' Perceived

Service Quality: An Evidence-Based Research Of The Healthcare Sector In Pakistan

Hina ZAHOOR¹, Nasir MUSTAFA²

Abstract

Personal branding has become an important notion in health care management literature in the

current era. The healthcare staff should be recognized as members of the team who provide

quality care to patients. The present research examines the impact of personal branding of

radiologists on perceived service quality placing particular emphasis on the health care sector

in Pakistan. A convenience sampling method was used. The variables of personal branding are

communication, behavior, and appearance and the variables of Perceived Service quality are

responsiveness and reliability. The results of the study indicate that Communication

significantly correlated to responsiveness and reliability. Behavior was significantly correlated

to responsiveness while appearance significantly correlated to reliability. The finding of the

study affirms the significance of personal branding as one of the crucial components in

improving Perceived Service quality by health care units.

Keywords: Personal branding, behavior, appearance, communication, responsiveness,

perceived service quality, radiologists

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Introduction

The concept of a personal brand is closely related to, for example, quality of work,

communication, acceptance and rejection of rules, how to behave in certain situations, and so

on. It is some one's image, what he/she becomes known for. Personal branding is therefore the

sum of your experiences and activities that help you define your own personal brand. As in

business, a clear stance on important issues and a focus on quality differentiate brands in a

flocking market. A clear and stable personal brand usually benefits doctors and organizations.

The concept of personal branding in the field of radiology is crucial for professional

accomplishment and the skill to prosper in the new practice exemplar. Reliable brand is a

driving force which opens window of opportunity. Certainly, it is therefore in the interest of

radiologists to make diligent, intentional decision to impact their brands. By providing the

quality service and pleasant experience to patients may help to distinguish from one radiological

service provider to another and also be conducive to the continuous success of that individual

from both a patient care and financial stance. As it worth saying, branding can preponderate

and counter attempts by the competition to replace a method or wear away a practice's market

segment (Munden, 2015).

While quality is a subtle and indefinite variable (Parasuraman, Zeithaml, & Berry, 1985), the

service quality depicts a critical central point of competition. The quality of service has been

defined as a frame of mind toward the service proposed by an organization arising from

expectations' comparison with achievement (Carrillat, Jaramillo, & Mulki, 2007). As it has

been studied as an expectations' comparison with achievement, other studies have focused only

on evaluating perception of performance, supposing that participants provide their valuations

by spontaneously comparing perceptions of performance with expectations' performance

(Ghotbabadi, Feiz, & Baharun, 2015).

Analogously, past researches have also connected branding with customer satisfaction (Sondoh

Jr et al, 2007; Thakur & Singh, 2012). It has been argued that consumers develop positive

attitudes towards a brand or liking a brand as a result of satisfactory repetitive usage over time

(Sondoh Jr et al., 2007). Currently, personal branding has also been in limelight (Ternès,

Rostomyan, Gursc, & Gursch, 2014; Horvat, Kovačić, & Trojak, 2015). Arruda, (2002)

describes personal branding as to manage one's reputation, abilities and standards set in the

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similar manner as a marketing unit would brand a product in contemplation to distinct oneself

from his opponents or fellows.

Radiologist's personal branding is to shape his/her competent service not just to build

radiologist's positive image. Radiologist's personal branding results in self-fulfillment, self-

assertion, organizational commitment and success. Hence, the present study aims to gauge

personal branding using three attributes: communication; appearance and behaviour. The

purpose of the present study is to evaluate the impact of radiologists' personal branding on

perceived service quality of health care units. In a similar vein, this research presupposes that

personal branding (radiologist's communication; radiologist's appearance and radiologist's

behaviour) has a significant impact on service performance of health care units (reliability and

responsiveness).

Perceived Service quality

Kotler and Armstrong (2012) define Service as an action, gain, or fulfillment be on sale that is

primarily immaterial and does not result in the possession of anything, and impermanence,

intangibility, indivisibility and changeability are its features. Furthermore, they claimed that a

service organization can make a distinction by constantly providing premium quality than its

opponents deliver, and the service sector has now connected to the customer-relevant quality.

During a recent economic conditions which is accentuated by competitive modes, providing

quality service, by fulfilling existing clients' needs and also attracting new ones, is the essential

to boom a business (Murali, Pugazhendhi, & Muralidharan, 2016). Furthermore, to maintain

the service quality it is crucial to understand the clients as in the recent time the firms are facing

many challenges like rising competition, limitation of finance and resources.

Many attempts have been made to gauge perceived service quality in different domains. During

recent decades there have been several instruements of service quality measurement made for

instance; SERVQUAL (Parasuraman et al., 1985); EP instrument (Teas, 1993); and [E-S-

QUAL] (Parasuraman, Zeithaml, & Malhotra, 2005). For the present study the SERVPERF

model by Cronin and Taylor (1992, 1994) was adopted which supposes that participants give

their know-how by comparing spontaneously perceptions of performance with expectations of

performance. This SERVPERF instrument been documented to be a better option to measure

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service quality of health care organization and more important as being convenient to use and

getting accurate result in contrast to the SERVQUAL.

Personal Branding

According to López, G. B. (2017) Personal branding is an imperative obligation, the

embodiment of leadership. It is an expert public profile and impression one may build the value

to you are able to convey constantly. Simply put, it can be regarded as one's expert active

inclusion. Personal branding is the creative process of product identity adopting unique style or

signs (Burnett, Moriarty, & Wells, 1998). Branding builds emotional ties with clients which

raises the prospect of brand choice and boost client loyalty.

At personal level, personal branding is improving one's appearance and aspect; generating a

clear objective of an individual career or employment; boosting one's competitive capacity;

assisting one to grow into fields of activity; and also to increase one's self-awareness and self-

confidence. While at organizational level, firms usually hesitant to promote personal branding

among the workforce because of the fright of such worker becoming more fascinating to

opponents (Arruda, 2002; 2014). Despite that, staff are essential to establish relationships with

all firm interest group together with sustaining organizational ethics and objectives. These

employees play great role in building a corporate brand image. Eventually, the employee

interest in clients with his response and competence, the organization attain high reputation.

Employees are the blood of an organization and are crucial in building client relationship and

to engage them and also to collect their data and also to enhance client contentment and loyalty

and commitment to the brand (Yang, Wan, & Wu, 2015). The procedure of building strong

customer relationship lies with the staff who are liable for brand positioning (Harris, 2007).

Hence, it is the duty of the organization to make it sure that employees' brands are identical

with that of the company and this practice has generally been spoken as personal branding.

Personal branding in the context of health care service like radiology is crucial for the success

of profession and the competence to grow in the recent practice of value-based care model.

Effective brand create impulse, which serves to open ever further windows of possibility.

Certainly, it is for the benefit of all radiologists to make careful, intentional decision to impact

their brands in the consideration of their patients. Radiologist must make efforts to build a useful

and satisfying experience for patients and health service providers similarly as patients seek

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their services and proficiency. These activities can differentiate one radiologist from another

and also to promote the constant success of that individual, from both a medical assistance and

financial perspective. (Munden, 2015).

Variables of Personal Branding

The variables of personal branding are radiologist's communication, behaviour and appearance

Radiologist's Communication:

Communication is the core element of professional life. Effective communication has strong

impact on one's personal brand success and it also help in establishing a strong tie between the

providers of service and client. Many personal branding weblogs highlighted various elements

that can assist to create a personal brand such as use of effective communication skills at work

place. Furthermore, the style of communication of service provider is closely associated to

client satisfaction as the cooperative and non-commanding approach of communication result

in high satisfaction of clients while the commanding and authoritative communication style lead

to reduction in clients' satisfaction (Duron, 2013). Hence, it is safe to say that the effective

communication approach of radiologist such as intent listening, use of professional tone, clear

and slow speaking, self –confidence can influence the perception of patients regarding service

quality.

Radiologist's Appearance

Appearance is a key driver for the success of any brand. It reflects staff's best fit within the

culture of organization and in addition to this the staff with good quality work influences the

client perception regarding the service quality as the first impression is developed by the staff

proper dressing and his professional conduct. Moreover, the appropriate neat and clean dressing

boost the self-confidence of an employee too (Morgan, 2011). One of the research study also

affirms this assertion as the study researchers found that attendants of patients admitted to ICU

units of health care strongly in favor of doctors wearing white coat as they in conventional attire

were considered as the most informed, sincere and competent (Au, Khandwala and Stelfox's,

2013). Hence, it is safe to say that neat and clean and professional out look of radiologist can

influence the perception of patients regarding service quality.

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Radiologist's Behaviour

Staff behaviour refers to how one behaves in professional environment, business meeting and

also at daily work place activities. It also shows good manners, kindness and proper etiquette

for the circumstances (Heald, 2014). Staff behaviour is considered as a crucial factor of brand

personality image and it influences on the client's perception. Staff behaviour is considered as

the essential element of a strong personal brand as the attributes of personal branding also

includes accepting responsibility; being courteous; positive attitude; pay respect to others

(Careers Centre University of Wolverhampton, 2013). Research study also reveals that the

behaviour of staff has significant impact on the satisfaction of clients (Nam, Ekinci, and Whyatt

,2011). Hence, it is safe to say that radiologist behaviour can influence the perception of patients

regarding service quality.

Methodology

In order to attain the aims of the study, a survey was devised and conducted in the health care

units at Karachi, Pakistan. A structured questionnaire was used to collect the data from different

seven hospitals. The target population was the patients of the heath care units who were

conveniently sampled at the hospitals buildings. Firstly, a request letter was sent to the Human

Resource of the hospitals to invite them to take part in the research. After permission was

granted by hospital HR, the questionnaire was distributed by the researchers to hospital patients

just after receiving the service from different radiology department health care units. The

questionnaire was distributed to 65 participants. Sum of 50 questionnaires were collected from

the participants, response rate was 70%, while the rest 30 % were incomplete.

Research Instrument:

The research tool was composed of three sections.

Section A consisted of demographic factors: Gender, Experience, Educational level

Section B consisted of variables of Personal Branding.

(i) Radiologist's communication was measured by four items - use unambiguous

language; being informative; listening to patients; giving assurance to patients

(Duron, 2013; Schawbel, 2009).

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- (ii) Radiologist's appearance was measured by four items Proper dressing, skillfulness, workplace cleanliness; and kindness (Au et al., 2013; Lill & Wilkinson, 2005; McMillan, 2014).
- (iii) Radiologist's behaviour was measured by three items. treating patients with respect and politeness; valuing patients; praiseworthy behaviour (Canning, 2013; Careers Centre University of Wolverhampton, 2013)

Section C was measured by seven items adopted from the Service Performance model (Fang Meng et al., 2008; Rodrigues, Barkur, Varambally, & Motlagh, 2011; Zhao & Di Benedetto, 2013).

Participants were asked to evaluate the performance of the health managers who served them on 11 personal branding features using Likert-type scales 1-5 (1= strongly agree to 5 = strongly disagree). Participants were also asked to assess the performance of the health care units on seven Service Performance items using Likert-type scales 1-5 (1= strongly agree to 5 = strongly disagree).

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Sample attributes:

Table 1: Demographic factors of patients_

Population characteristics	Frequency	0/0
Gender		
Male	32	64.0
Female	18	36.0
Total	50	100.0
Experience		
> 1 year	6	12.0
1-6 years	15	30.0
7-10 years	25	50.0
> 10	4	8.0
Total	50	100.0
Education level		
Middle school	5	10
High school	8	16
Undergraduate	20	40
Graduate	15	30
Others	2	4
Total	50	100.0

Table 1 illustrates a summary of demographic factors and shows that 64% of the participants were male while 36% were female. Majority of them (92.0%) had working experience not more than ten years, with 70.0% of the participants having accomplished minimum an undergraduate degree.

Results of the Study

The present research examined the impact of personal branding of radiologists (communication, behavior, and appearance) on perceived service quality (responsiveness and reliability). The findings of the results have been discussed below:

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Personal Branding

Personal branding was measured through Exploratory factor analysis performing on the 11-item scale. Principal component analysis (PCA) with a Varimax rotation was used for Factor analysis and in the analysis only those variables with factor loading of 0.5 and above were employed and factors with Eigen values > 1.00 were used (Nunnally, Bernstein, & Berge, 1967; Nunnally, 1978). On the basis of above-mentioned measures, three factors with a cumulative variance of 72.498 were produced. The Bartlet's Test of Sphericity demonstrated a chi-square of 1695.277 (p < .000), and the Kaiser-Meyer-Olkin Measure of Sampling Adequacy (KMO) was .846. The Cronbach's alpha was also carried out on each of the factors and it is above the recommended value 0.8. The general rule of thumb is that a Cronbach's alpha of 0.7 and above is good, 0. 8 and above is better, and 0.90 and above is best (Pallant, 2010). Table 2 expresses all the three factors, (Communication, Appearance, and Behaviour).

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Table 2: Results of PCA with varimax for 11-item scale of personal branding

	Mean	SD	Eigen value	Cumulative % variance	Factor Loading	Cronbach α
Radiologist's communication			1.131	78.079		.845
He/she uses unambiguous language	1.74	.966			.561	
He/she is informative	1.91	.988			.815	
He/she listens to the clients	1.75	.764			.506	
He/she is self-confident	1.79	.974			.536	
Radiologist's appearance			1.805	72.498	.805	.903
He/she is appropriately dressed at healthcare unit	1.43	.631			.765	
He/she looks skillful & competent	1.75	.575			.812	
Work place is clean & tidy	1.69	.821			.679	
He/she looks kindly	1.69	.735			.559	
Radiologist's behaviour			15.298	61.409	.585	.945
He/she treats patients with respect and politeness	1.68	.849			.667	
He/she gives value to patients by responding their questions	1.75	.869			.663	
He/she has praiseworthy behaviour	1.82	.954			.732	

Radiologist's Communication: Table 2 shows that communications measuring four items were moderate in rank. Staff uses unambiguous language (M = 1.74, SD = .966), Staff is informative (M = 1.91, SD = .988), Staff listens to the clients (M = 1.75, SD = .764), and Staff is self-confident (M = 1.79, SD = .974).

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Radiologist's Appearance: Table 2 shows that Staff Appearance measuring four items were

high in rank. Staff is appropriately dressed at healthcare unit (M = 1.43, SD = .631), Staff looks

skillful & competent (M = 1.75, SD = .575), Work place of staff is clean & tidy (M = 1.69, SD

= .821), working in a tidy place (M = 1.65, SD = .726) and Staff looks kindly (M = 1.69, SD =

.735).

Radiologist's Behaviour: Table 2 shows that three items measured behaviour. The results

indicate that there is more focus on Staff treatment of patients with respect and politeness (M =

1.68, SD = .849); Staff giving value to patients by responding their questions (M = 1.75, SD = .849)

.869), and less focus on Staff praiseworthy behaviour (M = 1.82, SD = .954).

Perceived Service quality

Perceived Service quality was measured through exploratory factor analysis performing on the

11-item scale (Choe, Lee, & Kim, 2014). Principal component analysis (PCA) with a Varimax

rotation was used for Factor analysis and in the analysis only those variables with factor loading

of 0.5 and above were employed and factors with Eigen values > 1.00 were used (Nunnally,

Bernstein, & Berge, 1967; Nunnally, 1978). Using these criteria produced two factors with a

cumulative variance of 68.553. The Bartlet's Test of Sphericity showed a chi-square of

1165.398 (p < .000), and the Kaiser-Meyer-Olkin Measure of Sampling Adequacy (KMO) was

.851, above the recommended .6. The Cronbach's alpha was also performed on each of the

factors. Table 3 indicates that the Cronbach's alpha is above the recommended .7 for all factors,

(Pallant, 2010), ranging between .816 and .959.

The variables of Perceived Service quality

i) Responsiveness was made up of four items whose means ranged between 1.8 and

2.03.

ii) Reliability was made up three items with mean ranging between 1.9 and 2.08.

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Table 3: Results of PCA with varimax for 07-item scale of service performance

	Mean	SD	Eigen value	Cumulative % variance	Factor Loading	Cronbach a
Responsiveness			10.625	59.912		.959
The health care unit has the radiologists who give the patient individual attention	1.99	.989			.684	
Radiologists of the healthcare unit have the knowledge to respond to the patient questions	2.03	1.059			.784	
Radiologists of the healthcare unit are always ready to help the patient	1.82	.983			.776	
The healthcare unit has working hours convenient for all its patients	1.91	1.077			.808	
Reliability			1.690	68.553		.816
Radiologists give the patient prompt service	2.08	1.078			.767	
The healthcare unit gives give the patient individual attention	1.99	1.014			.630	
Radiologists understand patients' specific needs	2.05	.990			.529	

The present study adopted a two-step procedure: PCA with a Varimax rotation leading to standard multiple regression analysis. Two standard multiple regression analyses were run separately using three personal branding factor scores as independent variables i.e communication, appearance, and behaviour and two perceived Service quality factors scores as dependent variables i.e responsiveness and reliability.

The results show in Table 4 that there is impact of personal branding on perceived service quality The table shows the unstandardized coefficients, standardized coefficients, standard error, the t-test with its significant level, the AdjustedR2, and the F-test. Due to small sample size instead of R2 the Adjusted R2 was reported (Pallant, 2010).

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The standard multiple regression results show reliability was significantly predicted appearance; behaviour significantly affected by responsiveness and communication significantly affected by responsiveness and reliability.

Table 4: Results for Personal Branding influence on Service Performance, Standard Multiple Regression

				Mul	upic i	egi cs	31011					
Communication					Appearance					Behaviour		
	В	SE	В	β t	E	3 S	ЕВ	β	t	В	SE I	
Independent Variable												
Constant	.015	.103		149	.004	.139		018	027	.108		237
Responsiveness	.356	123	.293	-2.819**	.142	.159	.123	.896	.431	.129	.415	3.319**
Reliability	.479	.109	.455	4.329***	.295	.145	.275	2.017*	.085	.118	.085	751
Adjusted R2	.437 2	<u> </u>			<u> </u>	.068 2	<u> </u>				.21 2	7
F	14.552	2***				2.279)				5.84	1**

Notes: B = Unstandardised coefficients; β = Standardised coefficients; SE B = Standard Error; df = Degree of freedom; *p<0.05, **p<0.01 and ***p<0.00

Discussion

The aim of the present study is to evaluate the impact of radiologists' personal branding on perceived health care organizations' perceived service performance. The study results revealed that communication skill of radiologists has a great impact on the perceived service quality in terms of responsiveness and reliability. This result is consistent with Duron, (2013) who found that communication skill is strongly correlated with the personal brand's success. The recent study also revealed that appearance of radiologists has a positive impact on reliability but not on responsiveness. This result is consistent with Au, et al., (2013) who found that patient attendants strongly in favor of doctors wearing white coat as they in conventional attire were considered as the most informed, sincere and competent. Moreover, the study found that

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behaviour of radiologists positively impact on responsiveness but not on reliability which

illustrates that health care units' perceived readiness to help patients and provide prompt health

care service.

The present research study has a number of limitations. The first limitation is the small sample

size. Data was from collected from 50 participants instead of large samples commonly found in

quantitative research. This may exhibit negative impact as low sample size can affect the

reliability of the findings of research. Secondly, the current study is limited to the health care

units. For the generalizability of the results comprehensive studies are required. Thirdly, the

present personal branding scale has not been polished. Additional researches are required to

validate the present scale.

The present study has several implications. This paper has confirmed that radiologists'

communication has an effect on perceived service quality of health care units. The implication

of this finding is that health care units should conduct training sessions to the hospitals'

radiologists to develop more effective communication skills. The results of the present study

suggest that personal branding may be used to improve service performance of a health care

unit. Personal branding has been proved to work as a motivator to the staff enabling them to

carry out their responsibilities with more attentiveness, enthusiasm and commitment and it is

also the source to build trust which can strengthen the link between the patients and the health

care unit. Furthermore, it is clear from this study that administration in hospitals should reckon

personal branding as an important element in improving service quality health care. Personal

branding of radiologists must be observing and improved continuously. The results imply that

programs intending improving personal branding of staff must be conducted and staff must be

briefed of how their communication, behaviour, and appearance impact the perceived service

quality of hospitals. Moreover, the recent paper also has implications regarding analysis of the

concept of personal branding. Further research work is required as a means to apprehend the

constructs for personal branding. The present research study has built a construct to gauge

personal branding and it provides prospects of further scale development.

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The Competitiveness Position of The Republic Of North Macedonia: Opportunities And

Weaknesses1

Kristina Velichkovska², Nehat Ramadani³

Abstract

Competitive advantage is a prevalent concept and one of the essential tools for faster integration

of the national economy in the global market, which is projected to result in increased exports,

higher growth, improved living standards, and long-term prosperity. For small, open economies

like the Republic of North Macedonia, this global integration is crucial for domestic enterprises to

sell and compete on the global market. This study aims to analyze the Macedonian economy's

competitive position from 1996-2019 to identify weaknesses and potential bottlenecks that would

result in recommendations for policymakers. This study used two indicators – the real effective

exchange rate (REER) and the WEF global competitiveness index (GCI) – to give a descriptive

analysis of the Macedonian economy's competitive status. Looking at the REER statistics, one

may infer that movements are mostly balanced.

The second indicator, the WEF's global competitiveness index (GCI), as a multidimensional

indicator, measures various aspects of competitiveness. This index shows that the Republic of

North Macedonia has the lowest score in innovation capability and needs to work on that part to

improve its ranking. To put it another way, REER does not show any notable improvements or

declines in the Macedonian economy's competitive position between 1999 and 2020, even though

the REER index is slightly declining.

Keywords: competitiveness, competitive advantage, REER, GCI, external trade.

JEL Codes: F10, O24, P45

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Introduction

The disintegration of the Yugoslavian Federation resulted in new smaller economies that needed

to pay closer attention to external openness and successful integration in the international

movements of labor and international trade. To do so, the economies had to transform into open

national economies with free movement mechanisms into the international goods, services,

technology, and capital markets. According to the economic theory and its realistic representation,

the external openness of small open economies significantly impacts their growth performance.

Economic agents must be self-sufficient in their operations, have market flexibility, and accept

responsibility for their success or failure.

The Republic of North Macedonia, one of those small former Yugoslavian economies with a

population of around 2 million, cannot benefit from economies of scale (Petkovska & Jovanovic,

2015). Therefore, it needs to pursue an export-based growth strategy to improve growth and

prosperity. Furthermore, only the foreign market can provide an accurate picture of the national

economy's efficiency and competitiveness. The export expansion improves domestic company

performance, increases flexibility, and supports external debt payments by increasing foreign

capital inflows.

This research paper first provides definitions of competitiveness and competitive advantages. It

then looks at the Macedonian economy's competitiveness using the real effective exchange rate

(REER) and the global competitiveness index (GCI) for 1996-2019. Additionally, it compares the

other local economies' export and import trends with the Macedonian economy and looks closely

at the export potential to identify opportunities and weaknesses. The analysis of these variables

provides a solid basis for future recommendations for policymakers when creating competition

policies and future improvements in the Macedonian economy's competitive position.

This study aims to provide insight into the Macedonian economy's competitive position, identify

some of the country's weaknesses, and provide policymakers with some recommendations. The

motivation for this research comes from the lack of available literature on the country of North

Macedonia. The existing literature usually takes only one or a few aspects of competitiveness and

needs to look at the overall competitiveness level of the country. For instance, Eftimovski and

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Milenkovski (2012) focus on the Knowledge Index for the years 1995 and 2009/10, while Tuna, Georgiev, and Nacka (2013) focus on the tobacco industry for the period 2005-2010.

1. Competitiveness and Competitive Advantage

Competitiveness has many definitions, so according to the IMD World Competitiveness Center, competitiveness "analyzes the facts and policies that shape the ability of a nation to create and maintain an environment that sustains more value creation for its enterprises and more prosperity for its people" (S. Garelli, IMD World Competitiveness Yearbook 2009). According to OECD, competitiveness measures a country's advantage or disadvantage in producing and selling its products in international markets to maintain or improve the population's real income. According to Velloso (1991), international competitiveness is defined as a country's capacity to maintain and increase its market share in the global market by adhering to international standards for production efficiency and quality. The World Economic Forum, also one of the most cited definitions, defines competitiveness as "a set of institutions, policies, and factors that determine the level of productivity of a country," which in turn "sets the level of prosperity that an economy can earn." Competitiveness is closely tied to the economy's ability to generate and sustain long-term growth when defined in this way. To put it another way, more competitive economies are predicted to have more excellent growth rates.

When talking about competitiveness, Michael Porter's and Porter's diamond are inevitably to be mentioned. According to him, every national economy's primary economic purpose should be to improve long-term growth and offer its citizens a more excellent quality of life. Long-term growth can be achieved only through the efficient use of resources, such as labor and capital (Petkovska & Jovanovic, 2015). He goes on to say that defining competitiveness at a national level is incorrect. Instead, one should examine the economy's various sectors, as well as their sub-sectors. Porter proposes the idea of competitive advantages, sometimes known as Porter's "diamond" of competitiveness, to explain why one firm has a competitive advantage over other local and foreign enterprises. This "diamond" is formed from four fundamental factors: factor conditions; demand conditions; related or supporting industries; and firm strategy, structure, and rivalry. Companies can obtain a competitive advantage using the right combination of those factors.

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Competitiveness can be observed at three levels: macro, mezzo, and micro. On a macro level,

competitiveness refers to a country's ability to manufacture and distribute goods and services on

worldwide markets and compete with goods and services produced by other countries to raise its

population's living standards. The micro aspects of competitiveness concern domestic enterprises'

ability to compete, grow and gain profitability in the market. In contrast, the mezzo aspects are

concerned with the competitiveness between economic sectors in a country. These three levels are,

in essence, linked. More substantial company competitiveness leads to higher sector

competitiveness and a better overall competitive position for the economy. The opposite is also

true. In some ways, competitiveness is an aggregate indicator of a country's international rating; it

is a mix of the performances of enterprises, sectors, and the economy as a whole (Petkovska &

Jovanovic, 2015).

This paper will use two of the most common indicators when analyzing competitiveness: the real

effective exchange rate (REER) and the global competitiveness index (GCI), to observe the

competitive advantage of the Macedonian economy and its competitive position concerning other

local economies.

2. The Real Effective Exchange Rate (REER)

The actual exchange rate measures the national currency's undervaluation or overvaluation. If the

national currency is undervalued, it will boost competitiveness by making domestic items more

affordable to foreigners, boosting exports and GDP. On the other side, an inflated domestic

currency will negatively impact competitiveness. The real exchange rate is the domestic and

foreign prices ratio of saleable goods. The consumer price index is commonly used to estimate the

domestic prices of tradable goods.

Regarding competitiveness, the real effective exchange rate (REER), defined as the ratio between

domestic prices and the prices of the country's most important trading partners, is a more

informative metric. REER is defined as a ratio of domestic to foreign prices; thus, an increasing

trend indicates a genuine appreciation of the home currency, which reduces competitiveness

(Јовановиќ, 2015). Figure 1 depicts the REER trend in the Republic of North Macedonia from

1999 to 2020. Between 1999 and 2020, there was a slight downward trend, with the REER index

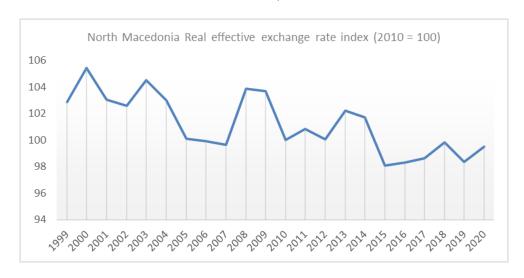
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decreasing from 103 to 100. Regarding growth rates, the average rate of change is almost zero, which shows that REER movements were substantially balanced during the study period. In economic terms, this indicates that REER does not show any substantial advances or deterioration in the Macedonian economy's competitive position between 1999 and 2020.

Figure 1. Real effective exchange rate index in the Republic of North Macedonia (1999-2020)



Source: https://data.worldbank.org/indicator/PX.REX.REER?locations=MK

Even though REER is one of the most used indices of an economy's competitive standing, one cannot exclusively rely on one indicator to conclude a country's competitive position, mainly since REER only provides data on one component - price competitiveness. Prices are a key competitive factor, particularly in economies with lower per capita incomes, where the market is more sensitive to price fluctuations, and in marketplaces with standardized products (such as the commodity markets). When it comes to more sophisticated items (items with a higher degree of finalization), however, the relevance of price as a competitiveness factor decreases, while the influence of so-called non-price competitiveness variables increases. Non-price competitiveness elements such as product quality, shape, use, certainty, reliability, delivery time, guarantees, servicing, and so on have become increasingly relevant in the previous three decades, according to the empirical

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literature. Using non-price competitiveness variables allows organizations to be more flexible in their business plans, influence buyer preferences, and create demand for targeted items.

3. Global Competitiveness Index (GCI)

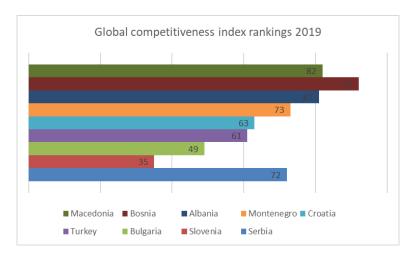
Since competitiveness is a complicated mixture of numerous aspects of a country's economy, it cannot be measured solely by one indicator, as previously stated. This explains why many institutions have developed a variety of methodologies, models, and indicators targeted at measuring, estimating, and comparing competitiveness between countries. The World Economic Forum created one of the most widely used methodologies for determining competitiveness (WEF). The WEF methodology considers various elements that influence a country's competitiveness. Unlike other techniques, it begins at the micro-level, i.e., a country's economy is competitive if its enterprises are competitive on the global market (Schwab, 2019).

The WEF's global competitiveness index is a multidimensional indicator that measures various aspects of competitiveness (unlike the REER index, which is focused solely on price competitiveness). In some ways, the WEF index describes a country's various stages of development through the dynamics of economic growth. Every country begins at stage one, when essential factors determine growth, then moves on to stage two, when the country develops and invests, and finally, stage three, when the country focuses on stimulating innovation and research to sustain and enhance growth. Following this logic, the WEF index divides economies into three stages: factor-driven, efficiency-driven, and innovation-driven, with each stage reflecting a higher level of economic complexity. The overall index is a weighted average of three sub-indices: basic requirements, efficiency enhancers, and innovation and sophistication elements. The weights of these sub-indices are different for every country; the country's development level determines them. For example, suppose a country is defined as being in the factor-driven stage, where fundamental elements drive growth. In that case, the sub-index of basic requirements will have the highest weight in the total index and, as a result, the most significant impact on the country's competitive position.

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Figure 2. Global competitiveness index rankings (2019)



https://tcdata360.worldbank.org/indicators/gci?country=BRA&indicator=632&viz=line chart&years=2007,2017

Figure 2 depicts the GCI in the Balkan countries (and Turkey) in 2019. The results placed Bosnia and Herzegovina at the 92nd position, followed by North Macedonia at the 82nd position and Albania at the 81st position, then Montenegro and Serbia at the 73rd and 72nd position, Croatia at the 63rd, Turkey at the 61st, Bulgaria at the 49th position, and finally Slovenia at the best 35th position. With an all-time high GCI of 57.33 and a second-to-last competitive position compared to other countries in the region, the Republic of North Macedonia is struggling with its competitive level.

Looking at the period prior to 2019, the situation is not much different. Figure 3 represents the competitive position of North Macedonia and the selected local economies over the period 2007 - 2017. The world median ranking is also there for better comparison. When looking at the competitive position of the Macedonian economy over time, the global competitiveness index shows that it has been improving over time and deteriorating over the last few years. The index's value has risen from 94th in 2007 to the all-time lowest 60th in 2015 to 68th in 2016 from 137 countries. There is no information for North Macedonia for 2017. This was a prosperous decade for North Macedonia since the country climbed the ladder to 26 places.

Similar results witnessed Bulgaria and Albania improving their rankings on the ladder of world GCI rankings. Bulgaria, from the 79th position in 2007, went down to the 49th position in 2017,

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jumping by 30 in rank. Albania, from the 109th position in 2007, improved its position to 75th place in 2017, jumping in rank by 34 places. Serbia and Montenegro also made slightly less impressive improvements. Serbia went from 91st place in 2007 to 78th place in 2017, going up by 13 places on the ladder of 137 countries, while Montenegro improved by five places in rank from the 82nd in 2007 to 77th position in 2017. Turkey is the only country in the region that, despite the slight fluctuations during 2007-2017, managed to stay in the same 53rd position. On the other side, Slovenia and Croatia went down for several ladders. Slovenia went down by 9 in rank for the Global Competitiveness Index from 2007 to 2017. From the 39th position in 2007, the country went down to the 48th position in 2017. From the 57th position in 2007, Croatia ranked 74 out of 137 countries in 2017. The country that performed worse in the region during that decade was Croatia which went down by 17 in rank.

Compared to the world median of 70, all countries in the region, except for Slovenia and Turkey, were above the world median, which signifies the need for further improvement in all six Balkan countries.

2007 2017 Slovenia [39] 🗪 [48] (-9) Slovenia Turkey [53] ■ [53] (+0) Turkey Croatia [57] [74] (-17) Croatia [75] (+34) Albania [77] (+5) Montenegro Montenegro [82] [78] (+13) Serbia Serbia [91] o Macedonia, FYR [94] • [103] (+3) Bosnia and Herzegovina Bosnia and Herzegovina [106] Albania [109]

Figure 3. Global competitiveness index rankings 2007-2017

https://tcdata360.worldbank.org/indicators/gci?country=BRA&indicator=632&viz=line_chart&years=2007,2017

Following, the study observes the sub-indices from 2019, which show that the Republic of North Macedonia has the best ranking in the Enabling environment, i.e., the basic requirements, whereas InTraders International Trade Academic Journal, Volume 5, Issue 2, e-ISSN-2667-4408 www.intraders.org

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the worst in the area of Innovation Ecosystem, i.e., the innovation and sophistication factors (Figure 4). This is an expected result given that North Macedonia has moved from the first stage, when growth is determined by primary factors, to the second, efficiency-driven stage, when the country develops and invests. The country needs to prepare to transition from the second stage to finally reach stage three of development when it focuses on stimulating innovation and research to sustain and enhance growth.

The weakest performance in innovation is not expected. Still, it is essential to start preparing for the transition by investing in policies promoting sophisticated business practices and innovation. This result also implies that competition policies must be focused on promoting competitiveness and growth in the second stage of development, such as investing in health, education and skills, product and labor market efficiency, financial market development, and market size.

Figure 4. Performance overview of the global competitiveness index and the sub-indices (2019)



Sources: http://www3.weforum.org/docs/WEF TheGlobalCompetitivenessReport2019.pdf

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4. External Trade

Competitiveness and external trade are intertwined: a country's competitive position affects its exports, affecting its trade balance and current account deficit. This explains why increases in competitiveness are critical for small and open economies with a negative trade deficit like the Republic of North Macedonia. Following is a descriptive analysis of the external sector's movements in the Republic of North Macedonia, the export and import trends of the country compared to other selected local economies, as well as the structure of the exports.

During 1996-2019, the Republic of North Macedonia's average current account deficit amounted to 4.2% of GDP (Figure 5). The negative trade balance, which accounts for over 18 percent of GDP simultaneously, explains most of the deficit (average value for the period). As a result, of these features, the external sector is highly vulnerable to major external shocks, which can result in massive external imbalances. For example, as can be observed from the figure, a significant widening of the current account deficit and a considerable increase in the negative trade balance in 2008, the year before the global financial and economic crisis began. In 2008, the trade balance accounted for 26% of GDP, which was explained by increased domestic demand. This resulted in an increase in imports that was not matched by an equal export gain. This circumstance demonstrates how critical competitiveness and external trade structure improvements are for the current account balance's long-term sustainability and the country's overall economic stability and growth.

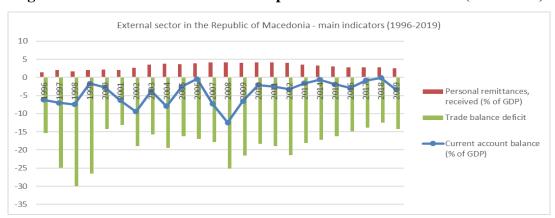


Figure 5. External indicators in the Republic of North Macedonia (1996-2019)

Source: Author's calculations with data from the World Bank and macro trends databases InTraders International Trade Academic Journal, Volume 5, Issue 2, e-ISSN-2667-4408 www.intraders.org

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From 1996 to 2018, the average growth rate of goods exports was roughly 4.7% (WITS, 2020). Macedonian businesses mainly export to EU nations and the area. Table 1 below is represented the top five export and import partner countries of the Republic of North Macedonia from the last available data in 2019.

Table 1. Exports in the Republic of North Macedonia, five top countries (2019)

North Macedonia top 5 Export and Import partners					
Trade (US\$ Mil)	Partner share(%)				
3,502 🕰	48.73				
611 🕰	8.50				
351 🕰	4.89				
239 🖧	3.32				
195 🕰	2.71				
	3,502 ATA 611 ATA 351 ATA 239 ATA				

Source: https://wits.worldbank.org/countrysnapshot/en/MKD

Germany is North Macedonia's biggest partner in terms of export and import, encompassing almost half of the country's total trade. In terms of US\$, the two countries exchanged goods worth 3,502 million US\$ in 2019. The following four biggest North Macedonia trade partners in terms of 2019 were Serbia, FR. (8.5%), Bulgaria (4.89%), Belgium (3.32%), and Italy (2.71%). Looking at the trends of the exports of all these countries, they have an increasing trend through the years.

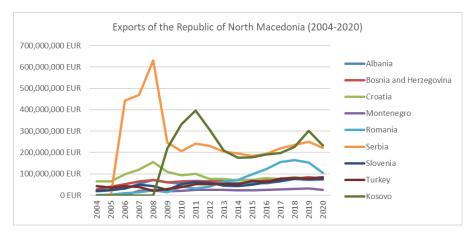
Of the regional countries, during the period 2004-2020, the Republic of North Macedonia exported the most to Serbia and Kosovo (Figure 6). The export to Serbia was explicitly high during the period2006-2009, reaching the highest pick point in 2008, amounting to around 631.5 million EUR. In 2009 when the country noticed a decrease in exports to Serbia, the same year noticed an increase in exports to Kosovo. For the next several years, from 2009 – 2013, Kosovo became the first on the list of regional countries that imported Macedonian products. From 2013 until 2020, Serbia and Kosovo are close to being top regional importers of Macedonian goods. Croatia held third place from 2004 -2014, replaced by Albania in 2014.

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Figure 6. Exports of the Republic of North Macedonia (2004-2020)

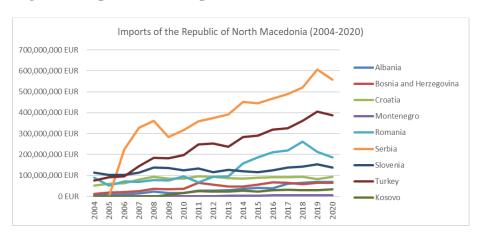
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Source: State Statistical Office

Looking at Figure 7 showing the imports of North Macedonia, it is noticed that Serbia is once again undoubtedly on the top. Serbia's exports to North Macedonia have continued to increase throughout 2005-2020 with the same tendency. Next in line is Turkey, which is also witnessing an increase in exporting Turkish goods to North Macedonia. The third place of biggest regional importers to North Macedonia was held by Slovenia in the period 2004 – 2013, being surpassed by Romania from 2014 to 2020. In Figures 6 and 7 in 2020, a decrease in imports and exports from all regional partner countries of North Macedonia can be noticed. This decrease was due to the situation with the Covid19 pandemic crisis and the closing of the borders.

Figure 7. Imports of the Republic of North Macedonia (2004-2020)



Source: State Statistical Office

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To better compare the exports as a percentage of the GDP, the study compares the Republic of North Macedonia with the other selected regional countries for 1996 – 2019 (Figure 8). All the selected countries from the region notice increasing trends of exports as a percentage of the GDP, with Slovenia leading the group, followed by Bulgaria. The steep rise in Slovenia started in 2003 when Slovenia entered the EU. The same situation happened with Bulgaria entering a trend of increase since 2007 when Bulgaria became a member of the EU. North Macedonia is currently in third place among the region's countries in terms of exports as a percentage of the GDP.

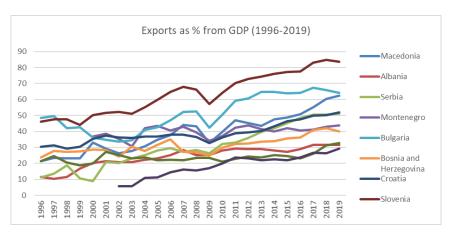


Figure 8. Exports as % of the GDP (1996-2019)

Source: https://data.worldbank.org/indicator/NE.EXP.GNFS.ZS?locations=MK

The Republic of North Macedonia exports a variety of commodities and manufactured goods, including iron and steel, chemical products, apparel, machinery, electrical equipment and electronics, and tobacco. To identify the potential export opportunities by-product of the Republic of North Macedonia, as well as the weaknesses such as low productive capacity, underdeveloped transport infrastructure, concentrated markets, and an inadequate business environment, Table 2 represents the following data:

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Table 2. Export potential of the Republic of North Macedonia

		What is the product's export potential in?									tion
Product group code / description	Exports (US\$ thousand)	Europe and Central Asia		non-OECD	Unrealized potential	OECD	Unrealized potential	Technology level	Price stability	Prominence of SMEs	Female labour participation
381512 Supportd catalysts, w precious metal/compds thereof as the activ subs	409,548		27%		O 100%		21%	0	0	0	
720260 Ferro-nickel	283,083		31%		0%		30%				
7306Xc Other welded tubes and pipes, of a kind used for oil or gas pipelines, of i	58,621		● 60%		54%		70%				
720851 Hot roll iron/steel, not coil >600mm x >10mm	121,328		49%		50%		54%				
M2139 Filtering or purifying machinery and apparatus for gases nes	113,766		59%		O 100%		51%				
720221 Ferro-silicon, containing by weight more than 55% of silicon	48,734		• 66%		46%		71%				
220429 Grape wines nes,incl fort&grape must,unfermntd by add alc,in ctnr > 21	41,856		54%		● 60%		50%				
720852 Hot roll iron/steel, not coil >600mm x 4.75-10mm	47,459		52%		● 56%		● 48%				
520520 Mens/boys shirts, of cotton, not knitted	94,666		44%		85%		34%				
353710 Boards,panels,includg numerical control panels,for a voltage <=1000 V	58,191		67%		O 89%		64%				
721070 Flat rolled prod,i/nas,painted,varnished or plast coated,>/=600mm wide	46,629		50%		→ 28%		O 89%				
640610 Uppers and parts thereof, other than stiffeners	22,345		61%		O 96%		32%				
300490 Medicaments nes, in dosage	48,278		78%		20%		O 97%				
730630 Tubes,pipe & hollow profiles,iron or nas, welded, of circ cross sect, nes	25,096		47%		18%		→ 72%				
720230 Ferro-silico-manganese	30,892		77%		47%		85%				
60100 Sausage∼ prod of meat, meat offal/blood&food prep based on these pro	12,060		68%		54%		O 100%				
520630 Womens/girls blouses and shirts, of cotton, not knitted	47,063		23%		52%		21%				
151219 Sunflower-sed/safflower oil&their fractions refind but nt chem modifid	10,596		75%		67%		O 98%				
20410 Lamb carcasses and half carcasses, fresh or chilled	18,541		55%		46%		57%				
6403XX Other footwear, outer soles of rubber/plastics uppers of leather	38,740		59%		61%		● 60%				

Notes: Top 20 products listed in decreasing order of their export potential to the world. Development indicators are relative to the country's current situation, green indicating performance above its trade-weighted median and red otherwise. A blank cell indicates that data are not available. A blank cell in export potential means that the product was not consistently demanded over five years by any country in the respective region. Exports (US\$ thousand) correspond to average exports to the world over the period 2009-2013.

Source: https://www.intracen.org/country/the-former-yugoslav-republic-of-macedonia/

The table above shows that the Republic of North Macedonia concentrates its export on mainly supported catalysts. It has more than 50% unused export potential in almost all other industries. As a small country with an open economy, the changes in the country's domestic economy are heavily influenced by external markets and changes in world prices. This high degree of export concentration in only a few critical industries, whose proportion of global export is declining, and the high levels of unused export potential for all other industries for most of the markets, are two significant vulnerabilities in the Macedonian economy. Suppose the Republic of North Macedonia wants to boost economic growth and raise citizens' living standards. In that case, it will be critical to consider the links between competitiveness, the external sector, economic growth policies that

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promote export diversification, improvements in the energy sector (to reduce reliance on energy imports), and increased competition.

Conclusion

This study used two indicators – the real effective exchange rate (REER) and the WEF global competitiveness index (GCI) – to give a descriptive analysis of the Macedonian economy's competitive status. Looking at the REER statistics, one may infer that movements are primarily balanced. To put it another way, REER does not show any notable improvements or worsening in the Macedonian economy's competitive position between 1999 and 2020, even though the REER index is slightly declining. However, as a result of the complexity of the competitiveness, the REER index is not sufficient when measuring the country's competitive status purely, as it only provides data on one side of competitiveness — price competitiveness. Price competitiveness refers to the ability of enterprises (or countries) to sell lower-cost goods. Non-price competition criteria, such as product quality, shape, usability, certainty, reliability, delivery speed, guarantees, and services, are becoming increasingly relevant today.

The WEF's global competitiveness index (GCI) is a multidimensional indicator that measures various aspects of competitiveness. The study concludes that the Republic of North Macedonia has the lowest score in innovation capability and needs to work on that part to improve its ranking. However, this is expected since the country is in the second stage of development, i.e., the efficiency-driven stage. Suppose the country wants to improve its competitive position in the medium term. In that case, competition policies should focus on developing human capital capacity, increasing products and labor market efficiency, and developing financial markets and market size. In order to prepare for the transition from the second to the third stage of growth, the Republic of North Macedonia will also need to invest in policies that support advanced business practices and innovation.

External trade is another concept intertwined with competitiveness. The Macedonian economy is highly reliant on exports in a few industries, making the Macedonian economy more vulnerable to adverse external shocks. The negative trade balance accounts for about 26% of GDP, while the average growth rate of goods exports was roughly 4.7% (1996-2019). Macedonian businesses were

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mainly exported to Germany, followed by Serbia, Bulgaria, Belgium, and Greece. Of the regional

countries, the Republic of North Macedonia exports the most to Serbia and Kosovo while

importing most goods and services from Serbia and Turkey. Analyzing the unused export potential,

the opportunities and the weaknesses were also recognized.

Long-term economic growth relies heavily on competitiveness. Competitiveness gains are

contingent on adopting a "healthy," business-oriented economic policy, responsible and

accountable behavior by all economic agents, and a stable political and economic environment.

Attitudes toward competitiveness as a critical factor in the Macedonian economy's integration into

global economic trends should be reflected at all levels of the economic and political system.

Competition policies and policies that promote exports should receive special attention and support

to reduce the degree of concentration, increase the competitiveness of Macedonian companies on

the global market, attract new foreign direct investment, and improve long-term economic growth

and the standard of living in the economy.

Finally, it is clear that although North Macedonia still has a long way to go before it can compete

with innovation-based economies, it is showing a slight inclination to move in that direction. In

general, Macedonia should step up its efforts to provide better high education and training, new

infrastructure, more sophisticated corporate practices, and more innovations to increase its

competitiveness.

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The Importance of Scenario Planning Functions for Company's Performance in The Contemporary Environment¹

Andrijana BOJADJIEVSKA DANEVSKA²

Abstract

Today's turbulent environment delivered through the global complexity and dynamic change requires from companies to develop the ability for researching the factors that initiate changes and capacity for anticipating the possible solutions to potential problems. Throughout history, the methods of forecasting and later the strategic planning, as way of establishing a vital link between the organization's future and the environment, are continuously applied. They complement themselves, but the strategic actions and business models they point out are limited only to the known events, factors and actors. With the scenario planning, companies develop plans for different alternative futures that may unfold and contain significant changes in the environment for which they otherwise have limited data. Through narratives and graphically presenting number of alternative stories about the future environment, companies actually include structurally different and unexpected future events, factors and actors in their plans and prepare adequate courses of actions for them. The purpose of this research paper is to emphasize the role that scenario planning has in dealing with uncertainty in the environment as the only certain element of the future, and thus to expose its functions it offers to managers to test their alternatives in dealing with potential constraints or seizing future opportunities. For the research, empirical research was conducted among 52 Macedonian companies by distributing questionnaires (online and physically) for determining the degree of application of scenario planning method and its functions.

Keywords: Scenario planning, Scenario, Turbulent environment

JEL Code: M2

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Introduction

Modern companies are open systems. They collaborate, communicate, exchange information, goods and services on each day in a very fully interconnected system, in order that any change within the chain affects each of them. Any change within the industry, legislation or political power affects its internal organizational processes. In other words, changes are the foremost certain element within the environment. Theoretically, this is often well-known to several managers, but their brooding about the longer term and therefore the changes that might occur is rigid and proof against acting in accordance with the emerging conditions within the environment. This happens as a result of them, being passive, avoiding the signals given by the environment and moving along the road of less resistance to learning and spreading knowledge throughout the corporate or ignorance of the way to act in conditions of uncertainty.

Today, the standard or usual conditions in industry, markets and corporations are literally translated into turbulent environment, which is ruled by chaos, risk and uncertainty (Kotler& Caslione, 2009). The turbulent environment, defined by academicians, is an expanded and upgraded uncertainty within the environment. it's conditioned by the amount of complexity within the environment and also the degree of its dynamics (Glassman et al., 2005, p.6). The greater the quantity and variety of external and internal forces or pressures that affect the corporate the more complex is that the environment and also the tougher it's to predict or control. Dynamics refers to the degree of change within the factors within the environment and therefore the probability with which the factors will change. Dynamic environment occurs when factors within the environment change rapidly and / or suddenly, without or with little warning. So, when several factors suffer rapid change at the identical time, then the organizational environment is turbulent. The turbulent environment may have impact over companies in two manners, i.e. in some companies will cause a defensive reaction and vulnerability (by cutting costs), while in others, conditions are going to be recognized as a chance, from which the corporate will benefit. During this context, managers can ask themselves the subsequent questions: Does the company want to follow the conditions in the industry or will it be the one who determines them? Will the environment impose changes that the corporate will adapt to, or will it consider them ahead, develop appropriate plans and techniques, and be a market leader, or can it introduce them by itself?

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If a company within the contemporary turbulent environment has to constantly monitor and anticipate change, and at the identical time to adapt, how will it do all this, if it's already deeply specialized and arranged in accordance with a call made within the past? As already known, within the new economy, companies depend on resources, skills and knowledge that are valuable, rare, difficult to imitate and that there are not any substitutes. And yes, this refers to assembling a competitive strategy, which needs plenty of effort and investment in developing competitive advantages, but successively it makes the corporate less flexible. How long will it reckon the corporate to adopt to new technological advances, to implement sudden changes in legislation, or to retort to inflation or recession? This suggests that in the long term, using identical or similar resources and capabilities increases the chance of reducing a company's adaptability and organizational profitability. Collins and Porras (1996) stated that companies that enjoy everlasting success have long-lasting and unchanging core values and clear intentions, while their business strategies and activities are infinitely adaptable to a changing world. Once created, a competitive advantage does not last forever. Competitive advantages have to be constantly changed and improved resulting in higher levels of proactivity and uniqueness. In this way, companies create the longer term by themselves. By continuously asking the question "What if?" managers can constantly review their long-term plans and goals, looking to the long run and also the opportunities or threats it'll bring. This implies that today's activities are initiated and performed in terms of possible future events. Finally, this presents the essence of scenario thinking.

Scenario planning as a technique of effective planning within the enterprise may be a key technique for addressing uncertainty. In fact, through scenario planning, managers begin to think systematically about the longer-term global business environment and anticipate the changes that will occur, the issues related to them, and also the alternatives to deal with them. Thus, in keeping with Schwartz (1991), scenario thinking is an art within which macro environment scenarios allow managers to gauge the answers to a good array of possible futures.

Scenario planning as a method of effective planning in the enterprise is a key technique for dealing with uncertainty. In fact, through scenario planning, managers begin to think systematically about the future global business environment and anticipate the changes that may occur, the problems associated with them, and the alternatives to address them. Thus,

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according to Schwartz (1991), scenario thinking is an art in which macro environment scenarios

allow managers to evaluate the answers to a wide array of possible futures.

Based on the previous discussion trends, the paper will attempt to answer the following research

questions:

a) Which are the scenario planning functions?

b) Are these functions of scenario planning applicable in Macedonian companies?

d) Where does the scenario planning derive its importance?

These research questions will be answered with the help of theoretical and practical literature

on scenario planning, like journals, reviews, e-books, and published scenarios from private and

public sector. Additionally, data from empirical research conducted by the author and other

authors related to the application of scenario planning and its impact over company's

performance will be used.

Literature Review

Although scenario planning began as a method of planning in the defense system of the United

States in the 1940s, scenario planning is experiencing its renaissance with its rapid application

in the corporate sector due to the increasing complexity of the external environment. Planning

in a dynamic and turbulent environment faces systemic thinking, building new mental models,

and continuous organizational learning to define organizational goals, policies, and plans. The

overall research in this area so far, which belongs to the practical and academic papers, strives

to emphasize the importance of scenario planning. In fact, there has been a great deal of interest

in applying this method of planning especially in times of declining economic activity, i.e. when

companies face changes that are incomprehensible and unpredictable.

Traditional planning is based on continuous monitoring and analysis of past trends and their

extrapolation into the future. That is, by using such planning methods, managers complete their

picture of the future only on the basis of past events and thus are unprepared to welcome the

future. On the other hand, scenario planning as a method of effective planning in the company

is a key technique for dealing with uncertainty. In fact, through scenario planning, managers

begin to think systematically about the future global business environment where they have

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embodied the uncertainty, thus anticipate the changes that may occur, the problems associated with them, and test alternative responses to address them.

The question of scenario planning is addressed by a number of authors and the sources that are used when defining it, the methodological explanation, and practical utility arise from articles written by practitioners of scenario planning in the private and public sector, literature dedicated to future research and empirical research on scenario planning as a long-term planning technique. Table 1 shows summed up literature review of different definitions of the term scenario planning, from which it can be concluded that there is no single, or precise and clear definition that shows the true meaning of scenario planning.

Table 1. Definitions of Scenario planning

A .1	T 7	D. C. L.
Author	Year	Definition
Porter	1985	Scenario planning represents the organizational view of the future
		environment.
Huss &	1987	Scenario planning is a mixture of many disciplines that encourages planners
Honton		and managers to think broadly about the future.
Schwar	1991	Scenario planning is a methodological thinking about the unthinkable.
tz		Not always being right about the future is a better solution than sometimes
		defining the future accurately.
Simpso	1992	The process of constructing alternative futures for the external business
n		environment.
Bloom	1994	Description of a possible or probable future.
and		
Menefe		
e		
Collyns	1994	Imaginative leap into the future.
Thoma	1994	Scenario planning is an inherent learning process that challenges current
S		comfortable and ordinary organizational thinking by focusing on the question
		of how the future can be different from the present.
Schoe	1995	Strictly defined methodology for creating possible futures in which
maker		organizational decisions are made.
Heijden	1997	1) External scenarios are "internally consistent descriptions of possible
3		futures;
		2) Internal scenario is "causal connection of discussions and connection of
		activities with the goal", or "path through the individual cognitive map.
De	1997	Prediction techniques - discussions and documents whose purpose is not to
Geus		predict or plan, but to change the attitudes of the individuals who use them.
Ringlan	1998	Part of strategic planning related to techniques and technologies for managing
d		future uncertainties.

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Bawde	1998	Scenario planning is one of the many forecasting techniques used in the
n		strategic development of companies, which depletes the individual's ability to
		imagine and learn what is intended.
Fahey	1998	Scenarios are descriptive narratives of credible alternative projections of a
&		specific part of the future.
Randall		
Alexan	1998	Scenario planning is an effective futuristic technique that allows planners to
der &		examine the probability of an event occurring or not, knowing that the
Serfass		probability is zero for those elements that determine organizational success.
Ogilvy	1998	Creation of narratives or stories about alternative future environments in
&		which today's decisions are made.
Schwar		
tz		
Tucker	1999	Creating stories of an equally credible future and planning for advancement.
Kahane	1999	An effective method of identifying critical future uncertainties and exploring "blind spots" in the company.
Kloss	1999	Scenarios are literal stories of the future and they are credible and based on the analysis of the interaction of a number of variables in the environment.
Wilson	2000	Scenarios are a management technique used to improve the quality of decision-making among top managers and to make solid strategic decisions.
Godet	2001	Simply put, the scenario presents the future reality with the intention of
		clarifying current activities in terms of possible and probable futures.
KPMG	2010	Scenario planning covers the capabilities, processes, resources, and techniques
		involved in identifying, analyzing, and communicating selected scenarios.

Source: Adapted and expanded with author's additional findings from Chermak, T.J. (2011), *Scenario Planning in Organizations: How to create, use, and assess scenarios*, Berrett-Koehler Publishers Inc.,San Francisco, p.15.

However, from the above presented definitions of scenario planning, the reviewed articles and the practical uses of scenario planning it can be deducted that the ultimate purpose of scenario planning is for the company to understand the dynamics and the complexity of the industry and the wider environment in which it operates in order to respond as best it can to the changes that may occur or to encourage the occurrence of the desired situation. Thus, the ultimate purpose is realized through the scenario planning functions. Scenario planning functions at the same present and the link between scenario planning and strategic planning. In practice, scenario planning *integrates with the forecasting and strategic planning methods and constitutes a complete planning framework*. Uncertainty in the environment and its impact on the overall organizational performance represents one of the biggest strategic challenges that business faces. In a turbulent environment, scenario planning supports the overall process of strategic planning, by providing basis for strategy development, evaluation and opportunity to test and

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improve the strategy. According to Azalia and Stein (2017), Lindgren and Bandhold (2009),

Ramirez and Wilkinson (2016) organizations have used scenario planning as an integral part of

strategic planning process.

In this manner, scenario planning fulfills its basic functions of gathering different types of

information about the future, researching the future and identifying future opportunities and

threats from the environment, and of evaluating and selecting strategies. By fulfilling these core

functions, scenario planning furthermore expands managers' mental models, fosters managerial

awareness of uncertainty in the environment, encourages and accelerates the continuous

organizational learning process, serves as a testing platform for business models, and finally,

creates a flexible company which is robust to sudden radical changes.

Functions of Scenario Planning

According to Schwartz (1991) with the usage of the scenario planning method, the company's

manager exercises the future environment. Scenario planning uses a holistic approach for

integrating all the possible future events, factors, and actors, which contribute to the creation of

different pictures of the future environment. Taking into consideration that scenario planning

results in the creation of multiple scenarios (and this is only one phase in the planning process)

it enables managers to be prepared with full artillery of alternative strategies. When conducting

the process of scenario planning it can be noted that by itself it performs several functions,

where some of them are visible and clear, while others are blurred and cannot be seen, but this

does not mean that they do not contribute to the increased significance that is given to the

scenario planning method. In the table below 2, these functions are shown.

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Table 2 Scenario Planning Functions

1. Assessment and evaluation of strategies. 2. Integration of different types of data for the future. 3. Thorough research of the future and identifying future opportunities. Modern/Contemporary Functions 4. Encouraging managerial awareness of environment uncertainty. 5. Expanding managers' mental models.

- 6. Encouraging and accelerating continuous organizational learning.
- 7. Platform for business model testing.

Core Functions

8. Creating flexible company which is robust to sudden radical changes.

Source: Adapted and expanded with author's additional findings from Chermak, T.J. (2011), Scenario Planning in Organizations: How to create, use, and assess scenarios, Berrett-Koehler Publishers Inc., San Francisco, p.15.

Scenario planning functions were investigated in a qualitative study conducted by the author, in 52 Macedonian companies from nine different industrial sectors, where companies were asked to assign a degree (on a Likert Scale from 1 to 7) to which they are exercised. According to the same study, the degree of application of scenario planning was determined which showed that the average degree to which scenario planning is applied is 4,98, i.e. high intensity of moderate degree towards a significant degree.

According to the results from the research, the following findings related to scenario planning functions are discussed:

1. Assessment and evaluation of strategies. Scenarios serve as a basis for evaluating and selecting strategies (Kahn&Wiener, 1967). Furthermore, Leemhuis and Porter (1985) have suggested developing a matrix in which the results of each strategy are calculated in different scenarios. Because no strategy often fits best in every scenario, Porter (1985) formulates a strategy selection guide, such as "bet on the most likely scenario" or "save flexibility". With this scenario planning function managers are encouraged to evaluate strategic decisions by using multiple scenarios, by which they may appreciate the importance of choosing more flexible assets or alternatives — even if doing so is not the most optimal choice for present-day conditions. (Phadnis et al., 2016). Regarding this function when asked, Macedonian companies noted average to significant degree of using scenario planning for the purpose of testing current and/or newly proposed strategies in terms of different scenarios, i.e. the weighted average grade

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was 4,54. 25% answered that with a moderate degree they test their strategies in terms of multiple scenarios, 23% with a significant degree, 17% with a high degree, and 12% with a very high degree, while 13%, 4% and 6% answered that they test their strategies in terms of multiple scenarios with low, very low degree and do not test at all, respectively.

- 2. Integration of different types of data for the future. Scenarios, better than any other future-oriented technique, allow the integration of different types of data. In addition to quantitative data, scenarios include qualitative data, results from other forecasting techniques, and soft and fuzzy variables (Linneman & Klein, 1985). This feature is especially useful as an important part of the knowledge and information used to formulate strategies. Macedonian companies assigned a significant degree of including not only quantitative data but also qualitative data in the planning process and formulating strategies, i.e. the weighted average was 5,31. Additionally, when asked about the types of data they use in the process, 19% used intuition, 31% used information obtained from informal sources; 65% used detailed elaborated data and reports from authoritative institutions, such as the Chamber of Commerce, State Statistical Office, private consulting companies; and 77% used detailed elaborated data and reports prepared by the planning department and 4% used data from different sources.
- 3. Thorough research of the future and identifying future opportunities. The third function of scenario planning is directed toward exploring the future and identifying what might happen and how the company might react or respond to future developments. This enables anticipation of the unexpected and provides creation of an early warning system (Wack, 1985). According to the author's study, when participants were asked about the degree to which scenario planning provides them with early warning signs about upcoming threats or opportunities, 6% assigned a moderate degree, 31% assigned significant degree, 25% assigned high degree and 13% assigned very high degree, 13% assigned low degree, 8% very low degree, while 4% answered that there isn't any early warning system. In this manner, companies develop several plans in the event of a crisis based on scenarios (Raubitschek, 1988) or a system for monitoring the environment (Reibnitz, 1988). By researching and anticipating the future, the scenarios help in identifying the massive huge changes and strategic problems that the company will face in the future and in generating strategic alternatives for effectively dealing with them. Additionally, when Macedonian companies were asked about the degree to which scenario planning enables

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them to discover new opportunities, with a weighted average grade of 5,04 (significant degree), Macedonian companies accessed that scenario planning significantly enables them to discover new potential areas of business, product, or market.

- **4. Encouraging managerial awareness about environmental uncertainty.** Scenario planning enables managers to better cope with uncertainty by helping them to understand the environment and its systems. (O'Brien&Meadows, 2013; Heijden, 1996) The degree to which managers observe the future environment of the company as complex and uncertain was 4,38, i.e. average. By all means, scenario planning brings uncertainty to Macedonian managers by confronting them with fundamentally different future situations.
- 5. Expanding managers' mental models. Scenarios challenge managers' existing mental models and confirm corporate beliefs (Millett, 1988). Mental models embody how individuals see the world, how individuals know and think about the world, and how individuals act in the world (Chermack, 2003). The turbulent environment asks companies to be flexible and adaptable to changing conditions, but it is commonly believed that mental models are difficult to change (Chermack, 2003). However, according to Heijden et al. (2002) scenarios help individuals repeatedly to see reality from multiple perspectives, so that they can think creatively and use the scenarios as a communication tool. In other words, when creating scenarios different individuals, groups of employees, and managers are included which results in thorough discussions that reveal and align, different pictures of the future, and in building consensus about the future environment of the company. By providing the managers with these expanded or/and more mental models scenario planning enables organizations to foster dynamic capabilities to respond to the environmental changes and adapt to them (Ramirez&Wilkinson, 2016). In the surveyed Macedonian companies, scenarios are formulated with the inclusion of different groups of employees, managers and experts. According to the results from the research, 42% of the surveyed companies regularly involve employees from different business units who have specialized knowledge and experience in the process of building scenarios, 56% regularly involve the board of directors or other top management bodies, 37% regularly include middle-level managers of the management hierarchy (managers of departments or business functions), 19% regularly, and 27% periodically include lower-level managers of the management hierarchy (managers of smaller organizational units operating within separate

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departments or business functions), 13% regularly and 23% periodically include external experts and consulting companies and 21% regularly and 23% periodically include working groups composed of employees from different departments, functional managers and external experts. Additionally, when asked about the changing assumptions, beliefs, and experiences they include when conducting scenario planning, 80% answered that scenario planning significantly enables Macedonian companies to continuously revise and update their assumptions about the future in order to implement them in the formal process of planning. 6% answered that there isn't any update or change in the assumptions they use when scenario planning, 2% have assigned a very low degree of including updated assumptions, 4% have assigned a low degree, while 8% have assigned a moderate degree.

6. Encouraging and accelerating continuous organizational learning. As a continuation of the previous function, scenario planning allows for employees to collectively act according to the observed future events, to collectively develop new theories for them and act together, which in the end means that the process of organizational learning takes place (Kolb, 1984). In order to achieve shared mental models, changes in knowledge and/or behaviors of team members must occur (Glick et al., 2012). The model of continuous learning is based on the idea of continuous company development. Alike scenario planning, the continuous learning model considers multiple futures that are equally likely to occur and that represent the inseparable uncertainty of the environment. The results from the research have shown that 19% of managers assigned a moderate degree to which they continuously learn and together create a "common language", 21% assigned a significant degree, 23% assigned high degree, 17% extremely high degree, while 20% assigned very low and low degree of continuous learning and creating a common language. In total, when weighted average grade was calculated, Macedonian companies stated that the degree to which they continuously learn and create a "common language" together was 4,96, i.e. nearly significant.

7. Platform for business model testing. Scenario planning allows the assessment of possible changes and outputs from various events in the environment and how they would affect the business model. Environmental, political, socio-cultural and economic changes will consolidate and create new opportunities or threats and change existing markets. Within the proposed macroeconomic changes different alternative scenarios are created which allow to be used as

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platform, or wind tunnel where companies' business models are tested, i.e. opposed. This allows for continuous business model update in relation to the changing conditions in the environment. When evaluating business models, and particularly their revenue streams, it can be stated that they are subject to high volatility and uncertainty due to the turbulence in the environment. Traditional strategy tools, such as Porter's generic competitive strategies, five forces, experience curves, and portfolio analysis, are becoming increasingly unreliable due to today's high volatility, shortened product lifecycles, and increased complexity of organizational networks (Westerlund et al., 2014). Therefore, scenario planning is a prominent tool in corporate strategy that is often used to systematically depict possible outcomes of strategic decisions and thus provide measures for reducing risks (Amer et al., 2013). According to the results from the research, 17% assigned a moderate degree of business model testing in multiple scenarios, 31% assigned a significant degree, and 15% extremely high degree, while 6% answered that there isn't any business model testing when scenario planning, 4% assigned very low degree, and 12% assigned low degree. In general, Macedonian companies responded that the average degree of business model testing in multiple scenarios is 4,88.

8. Creating a flexible company that is robust to sudden radical changes. According to Peter Senge (2014), the company that continuously learn, has presented the disciplines of system thinking, personal development, mental models, shared vision and team learning. All of these disciplines are present and inseparable from the scenario development process (Wright, 2000, p.437). Hence, scenario planning improves the organizational condition and ability in the long run, in terms of creating a robust organizational system that better copes with unexpected radical changes. And in the short term, it increases the organizational ability to adapt by more skillful monitoring of the environment. In fact, scenario planning allows organizations to act on a new situation, or even disrupt the current flow of events, rather than react to it. This is a result of selecting a robust strategy in the scenario planning process across a variety of futures (Ramirez&Wilkinson, 2016; Heijden, 1996). According to the results from the conducted research, 15% answered that with a moderate degree scenario planning allows them to better anticipate the future and to be ready with appropriate activities and strategies for the sudden changes in the environment, 29% assigned a significant degree, 15% assigned high degree and 23% assigned extremely high degree, while 14% assigned low (10%), and very low degree (4%) and 4% stated that there isn't any improvement in anticipating in the future or in the InTraders International Trade Academic Journal, Volume 5, Issue 2, e-ISSN-2667-4408

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readiness with appropriate activities or strategies for the sudden changes in the environment.

Macedonian companies, in general, noted that scenario planning significantly allows them to

better anticipate the future and to be ready with appropriate activities and strategies for the

sudden changes in the environment, i.e. weighted average 5.

By integrating scenario planning into the organizational planning framework companies are

able to aggregate and prepare for a number of scenarios that can drastically affect their

operations and performance. In this manner, companies are fully aware that today's competition

in a turbulent environment sets new rules in strategy building and in the way economic, social,

political, and industrial trends interact. In other words, developed and integrated scenarios in

the entire organizational planning process keep the company awake and alert to any new sudden

and radical changes. Therefore, in a turbulent environment scenario planning is of particular

importance (Bielinska-Dusza, 2013, p.147) and the application of the scenario planning method

is an optimal response to the increased turbulence in the environment.

Functions of Scenario Planning

In the modern business world, the concept of strategy and strategic planning is different from

that concept of the 1980s of the 20th century. Strategy is constantly revised, due to the

uncertainty that dominates the real world. That is, when there is increased uncertainty in the

decision-making context, scenario planning is a necessary integral part of strategic planning. It

encourages the company to think about the future, in terms of the probability of certain events

from the external and internal environment, the diversity of those events, as well as thinking

about the "unthinkable".

The importance of scenario planning functions is that it allows managers to be aware of the

reality that they live in an uncertain world and that it is possible to think about this uncertainty

in structured ways. Each generated scenario contains a hypothetical, but also an explicit picture

of the future, which is used for thinking and discussing the consequences of strategic

alternatives or for formulating strategies and ultimately for performance improvement. In this

manner, scenarios are explicitly integrated into the strategic planning process. By

complementing the strategic planning, scenario planning allows and /or contributes to the

creation of resilient companies with flexible strategies that are prepared for future challenges.

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At the empirical level, numerous case studies are published by companies that apply scenario planning as an integrated part of strategic planning, but there is only a limited amount of research on the application and effects of scenario planning on company performance. Several authors have conducted studies related to this link between scenario planning and organizational performance. However, there is a difference in the literature regarding authors' metrics for a company's performance.

Performance evaluation comprises of usage of objective or subjective measures for assessing companies' successes, provided that accurate information is provided (Chow& Stede, 2006; Panigyrakis & Theodoridis, 2009). Objective measures include financial data, such as net profit, turnover, return on investment, return on capital employed, and inventory turnover, while subjective measures tend to rely on managers' and key role players' (owner) perceptions of business performance (Phillips et al., 1999). However, Kaplan and Norton (1992) proposed the balanced scorecard model, involving measurement of four main aspects of businesses and is considered as a mission-related output, meaning that its goals will define the appropriate performance outputs (Swanson&Holton, 2001). The balanced scorecard model focuses on both financial and non-financial performance, as well as, takes into account the organization's vision and strategies. Briefly, a balanced scorecard as a strategic management performance tool evaluates business performance from four different perspectives, financial performance, customer perspective, internal business perspective, and innovation and learning perspective.

According to Phelps et al. (2001) there is a positive relationship between financial performance (faster growth, higher return on capital, and higher profitability) and scenario planning. Furthermore, their results have confirmed that scenario planning can be used as a tool to improve financial performance (Phelps et al., 2001). Moreover, empirical results of the research conducted by Chermack et al. (2017), Chermack et al. (2006), and Inayatullah (2009) indicated that the practice of scenario planning promotes organizational learning practices and thus leads to better financial performance (Aliya&Maheen, 2017; Kim et al., 2017; Prieto& Revilla, 2006).

Regarding the aspect of customer performance, which was measured by: market share, customer retention, acquisition, satisfaction and profitability, empirical results from the research conducted by Kuye and Oghojafor (2011) showed that scenario planning leads to an

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increase in the sales level and market share of the companies by introducing the unique services/products. Furthermore, Sarpong and Maclean (2011) have found that scenario planning leads to increase in innovation capabilities, which leads to an increase in the level of customer satisfaction and customer value (Abdulai et al., 2018; Weng et al., 2012).

According to Drew (2006), scenario planning contributes to the improvement of internal business processes, which actually refer to the organization's ability to innovate, employ creativity, utilize the appropriate technology, and enhance adaptability in order to excel at activities that create value (Kaplan&Norton, 2004). Scenario planning enhances creativity and thus provides a useful tool in identifying new technologies, discovering new possible alternative development paths, and preparing the company for the new upcoming opportunities which have aroused due to new technologies. Therefore, scenario planning allows organizations to act on a new situation rather than react to it, thus, enhance its ability to manage emergencies (Ramirez&Wilkinson, 2016; Heijden, 1996).

If measuring a company's performance from the fourth aspect of learning and growth Kaplan and Norton suggested focusing on employees' efficiency, problem solving abilities, and skills development through training. According to Glick et al. (2012), scenario planning can be considered as a training tool that contributes to increasing the skills of employees and development of human resources in general. Furthermore, it can be stated that scenario planning enables finding innovative and robust solutions to address complex problems and solve it in effective manner. (Arafet&Ali, 2018; Bennett et al., 2016; Burt et al., 2017; Schwartz, 1996; Heijden, 1996).

Abuzaid (2018), in a qualitative study conducted among 121 multinational companies, found that there is a positive and statistically significant relationship between scenario planning and the four components of strategic performance: financial performance, customer performance, learning and growth, and internal business processes.

According to Visser and Chermack (2009), who investigated the link between scenario planning and 7 multinational companies' performance from a qualitative perspective, found that scenario planning is interwoven in the process of strategic planning and it has a great impact over managerial decisions. Overall, interviewed participants regarded scenario planning as an effective intervention with a positive contribution to the firms' performance. More precisely,

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they have revealed that scenario planning was useful in exploring the business environment and

future risks, isolating trends, understanding interdependent forces, and considering the

implications of strategic decision-making.

Conclusion and Recommendations for Further Research

Scenario planning has been adopted by a number of companies from Western economies, the

application of which is most frequent in conditions of increased turbulence in the global market,

such as the last economic crisis in early 2008 and recent developments related to COVID 19

pandemic and conflict in Ukraine, which many analysts and experts categorize as warning

signals for the outbreak of World War III. At the same time, political upheavals, sudden changes

in global value chains and turmoil are taking place around the world, affecting overall economic

growth and development. Given these dynamic and changing conditions, the need arises for

companies to monitor, forecast and anticipate changes in order to remain competitive and

maintain or improve their performance.

The importance of scenario planning is not in finding one or the true picture of the future

environment, but it is about exercising its functions for the ultimate purpose of creating a highly

flexible company that is robust to turbulent environments. This is done through scenario

planning integration into the strategic planning framework, which, finally, has positive impact

on a company's performance.

This research paper showed that the level of application of scenario planning and its functions

among 52 companies in Republic of North Macedonia is moderated with intensity towards

significant, i.e. 4.89 and that the participants are acknowledging and practicing its functions.

However, the author's empirical study does not offer additional research and data regarding the

relationship between the scenario planning application and company's performance, which is

considered as a limitation of this study. This asks for further investigation of how scenario

planning might influence the performance of Macedonian companies.

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The Innovation Development of the European Union: Regional Clustering¹

Ekaterina Panina²

Abstract

Innovative development is one of the political priorities of the European Union countries. The

Commission of the European Communities recommends that countries pursue innovation

policies at the regional level. The regional development of innovations is possible only in

conditions of openness. It is important to understand in which conditions the regions will

support each other, and in which they will become competitors pulling over limited resources.

The strength of mutual influence is determined by economic, technological and geographical

distances. In this paper the goal is to understand how patent activity in one region effects the

number of patents of other neighboring territories in the European Union regions. The research

methodology of this study consists of the calculation of spatial autocorrelation (global and local

Moran index I) by the number of patents in 2018-2021 in 169 regions of Europe.

Among the regions four groups were identified: innovation cluster centers, innovation

agglomerations, the neighbors of innovative cores and the territories outside the influence. The

dynamics of development is also analyzed. Among the results, it is shown that most regions of

the EU regions have the low level of patent activity. However, in some cases regions form

technological clusters (in Germany, Belgium, the Netherlands) or pull assets from neighbors to

more innovative regions (in France, Austria, Denmark). Moreover, it is obtained that there are

potential innovation centers such as Castile-Leon (Spain), Masovian voivodeship (Poland).

Understanding the emerging innovation blocs in the European Union will allow to implement

more focused and effective policy.

Keywords: regional innovation development, regional clustering, the European Union, global

and local Moran I

JEL Codes: R11, R12, O31, O5, C21

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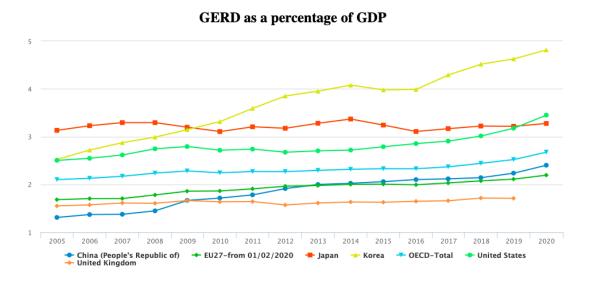
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Introduction

Nowadays the European Union has lost the significant share of the innovation on the world market (Leijten, 2019). Figure 1 shows that China, Japan, South Korea, United States have taken the leading positions in the gross domestic expenditure on R&D as a percentage of GDP in recent years and have displaced the European countries and regions.

Figure 1. The gross domestic expenditure on R&D as a percentage of GDP in 2005-2020



But science and innovation are still main factors contributing to the development of technological and organizational conditions (Leijten, 2019). Innovation development is one of the key drivers of economic competition, which significantly affects the employment rate and national and regional economic prosperity. Furthermore, innovations influence the advancement of the knowledge economics, an economics where knowledge is the main component of the growth and development of countries where new information is actively included in production (Rosario et al., 2019).

The innovation engine in the spatial context is formed under the influence of above-mentioned factors not only within the region, but also outside its area. The resulting external effects depend on technological, economic, and geographical distances between firms and regions (Moreno et al., 2005). A significant role is also played by the regional innovation system, which creates an upward spiral of the technological process "research-production", leading to the growth in the efficiency and the quality of products and services (Kolesnikova, 2012).

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As a result, innovative ecosystems, clusters, megaregions with high research costs, large

companies, research centers and universities, where highly qualified human capital is

concentrated, become factors influencing the spread of innovative agglomeration and

polarization (Moreno et al., 2005).

To assess this impact, it is important to consider the relationship between the territorial

concentration of innovations and spatial dependence. In other words, the research goal is to find

out how technological innovation activity in one region is related to activities in neighboring

ones.

Literature review

Urbanization is an important condition that stimulates not only economic development of

regions, but also innovation activity of them (Chen et al., 2020). The relationship between

economic growth, urbanization and technological development is doubtless (Baldwin & Martin,

2004). Urbanization, as well as the concentration of innovations in a certain area, contributes

to the accumulation of resources such as labor and capital, and therefore creates profitable

conditions for rapid economic growth.

Innovation activity is even more prone to concentration than manufacturing, and the

technological concentration of companies is observed in or around large cities (Audretsch &

Feldman, 1996). For city residents, company employees, scientists, researchers, teachers and

officials, there are more opportunities for direct informal communication, which enhances the

dissemination of new ideas, deepens accumulated knowledge. The concentration of economic

and especially innovative activity in a city or region leads to positive technological externalities,

further rapid knowledge and information dissemination.

Urban development through secondary (not primary) knowledge dissemination (Wang & Sun,

2009) contributes to the creation of new innovative behaviors (Rosenthal & Strange, 2004).

Urbanization increases the regional innovation potential, but negatively affects innovation

activity in neighboring territories (Chen et al., 2020). The ideas that spatial agglomerations

contribute to more effective innovative behavior take place in the works of Krugman, Fujita

and other economic geographers (Krugman, 1991; Fujita et al., 1999).

From the companies' point of view, the relationship between urbanization and innovation

development is not so unambiguous. In this regard, the concentration occurs up to a certain

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point, and then disperse. Such ideas were studied by different researchers (since Krugman,

1999), but without an obvious conclusion. According to the concept of differentiation, direct

competition separates companies from their competitors, while the benefit of complementary

differences brings organizations closer to their dissimilar competitors. Nowadays the number

of inter-firm technological alliances soars not only in the regional economy, but also in

international business (e.g., Nooteboom et al., 2007). However, firms are still reluctant to share

their key competencies with others as there is a serious risk of knowledge leakage to

competitors. But, in accordance with the provisions of new economic geography, the

externalities of concentrating competitors in one place bring more benefits than companies'

costs and risks. We believe that the power balance largely depends on the economic sector

because innovative companies in some industries receive more effects from agglomeration than

others. Depending on the nature of innovation, organizations in some industries tend to

concentrate, while others prefer to keep their distance from competitors.

Another interesting block of research on the causes of regional innovative development is to

assess the endowment of the territory with natural resources and, more importantly, the policy

of using this factor of production. Regions are different in the availability of natural factors.

Moreover, their presence or nature does not guarantee successful economic and even more

innovation development. The rent cycle theory states that when the ratio of "rent to the share

of natural resources in GDP" is high, the country's political aims will be to distribute rent, not

to achieve economic prosperity (Auty, 2005). This state of affairs definitely does not contribute

to regional innovative development. Empirical evidence of the negative relationship between

natural resources and regional innovation is observed in several papers (e.g., Zhang & Wu,

2017, the example of China; Papyrakis & Gerlagh, 2007, the example of the USA).

Dependence on natural resources displaces physical and human capital, thereby hindering

innovation. At the same time, rich natural resources do not directly hinder economic growth,

but cause the redistribution of capital through the management of a resource-based economy,

displacing investments in technological innovations. It is obvious that the problem is more

political, so proper management aimed at long-term development and achieving economic

prosperity can solve it.

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Based on the study of European regions, such a phenomenon as "cluster agglomeration of

innovation activity" has emerged. In other words, technologically specialized clusters are

emerging in certain territories (Moreno et al., 2005). Moreover, radical changes in IT,

innovations create the preconditions for the regional clustering as a competitive advantage of

the territories. The tasks of researchers here include determining the factors, conditions, and

other incentives for the emergence of such a concentration of innovation activity.

There is a high differentiation among the regions of the European Union, both in terms of the

level of innovation activity (by the total number of patent applications) and by spheres of

activity. An important stage in the analysis of innovative development is the determination of

spatial correlation to assess the mutual influence of regional innovation potential.

Thus, in 175 European regions in 1978-2001, it was revealed that innovation specialization

positively and strongly depends on the specialization of the region in production activities. At

the same time, innovation activity is more likely to be concentrated in those regions that are

adjacent to highly technological specialized regions (Moreno et al., 2005). A significant impact

on regional innovation potential was proved by the example of 30 regions of China in 2005-

2018 (Chen et al., 2020).

Methodology

Based on the literature review, most researchers have concentrated on the investigation of

spatial distribution of innovation in the regions of Europe until the 1990s (Paci & Usai, 1999)

and until 2001 (Moreno et al., 2005). However, there are fewer papers focused on the spatial

distribution of innovations in the European Union regions in 2018–2021. To address this gap

in the literature review, the purpose of this study is to analyze the spatial distribution of patent

activity in the European Union in 2018-2021.

14 courtiers of the European Union, including Switzerland, and their 169 regions were selected

for the research. The database was the accumulated statistics of the European Patent Office.

The key indicator for assessing regional innovation activity was the number of European patent

applications. The "technological output indicator" included direct European applications

(resident) and international applications (non-resident, PCT), which entered the European phase

in 2018-2021.

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The degree of regional innovation interdependence can be estimated due to spatial autocorrelation (global Moran index I), defined as:

$$I = \frac{N}{S_0} \frac{\sum_{i}^{N} \sum_{j}^{N} w_{ij} (x_i - \bar{x}) (x_j - \bar{x})}{\sum_{i=1}^{N} (x_i - x)^2}$$

where x_i and x_j are the number of patent applications in regions i and j, x is the average number of applications, N is the number of selected regions, $S_0 = \sum_i \sum_j w_{ij}$ is a standardized value – a matrix of spatial weights.

The land border of adjacent regions was taken as an element of the spatial matrix, where 1 is its presence and 0 is its absence. Then, the data was standardized, each element was divided into the total number of rows because there are more borders than the number of analyzed regions.

The spatial interdependence assumptions are made based on the comparison of the expected value of Moran index I (E(I)) defined as $\frac{-1}{n-1}$, and the actual Moran index I.

When the actual I is more than E(I), positive spatial autocorrelation is observed. It indicates the similarity of the values of observations in neighboring analyzed territories.

When the actual I is less than E(I), negative spatial autocorrelation is observed. It indicates a difference in the values of observations in neighboring analyzed regions.

When the actual I is equal to E(I), there are no correlations. The values of observations in adjacent regions are randomly located.

To assess the mutual influence, the scattering map in 169 regions and its changes during the 4 years should be also analyzed. This map shows how the regions are divided into 4 groups.

The first group includes areas that have a low number of patent applications, but are adjacent to regions with high values. It is called the LH (low-high) group. There is a negative local spatial autocorrelation (local Moran index I (LISA))³ because regions with high values influence the neighbors with low indicator values. Therefore, this group is called the "periphery – zone of influence".

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³It allows to assess the mutual influence between the area and its neighbors.

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The second group includes areas that have a high number of patent applications and are

neighbors of regions also with high values of PA. It is called the HH (high-high) group. Positive

LISA is observed. This group can be called "counterbalance satellites" as there is a mutual

influence on the cores.

The third group includes areas that have a low number of patent applications and are neighbors

of regions with low values of the indicator. It is called the LL (low-low) group. Positive local

autocorrelation is observed. This group can be called "territories that are not affected". If these

regions have a significant number of the patent applications and LISA which are comparable in

modulus with the values of the cores, it can be concluded that there are new "points of growth"

– potential centers of innovation clusters.

The fourth group includes areas that have a high number of patents and are adjacent to regions

with low values of the indicator. It is called the HL (high-low) group. There is a negative local

spatial autocorrelation. This group can be called "cores" as there are centers of innovation

clusters.

Findings

The analysis of Global Moran I revealed positive spatial autocorrelation in 2018, 2019, 2020

and 2021: with E(I) = -0.005952 and I = 0.7704, 0.6564, 0.2544 and 0.2273, respectively. It is

obvious that the global Moran I index has declined over 4 years. It indicates a divergence trend

in the innovation development and activity of the EU regions.

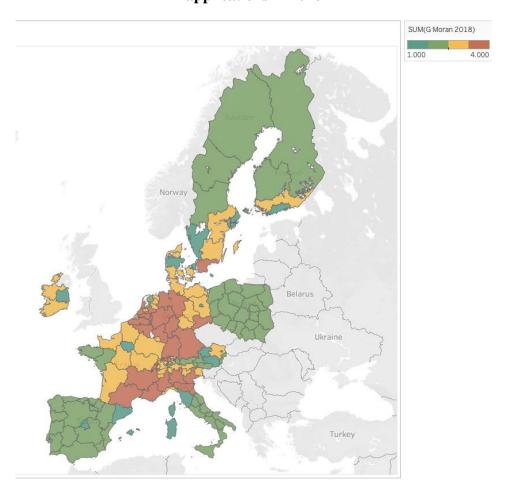
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Figure 2. Map of innovation clusters in European regions by number of patent applications in 2018



According to the above-mentioned grouping, 14 "cores" (the current centers of innovation clusters) were observed in 2018. Most regions with high values of PA and the adjacent regions with low values are located in Austria, Denmark, Spain and Sweden. There is the main innovation cluster center of France, it is Ile-de-France, the number of patents of which is much higher compared to neighboring areas and other cores of the European Union. The high mutual influence of this region demonstrates that innovative activity "flows over", so Ile-de-France becomes a kind of innovative agglomerate. "Counterbalance satellites" became 33 regions, mainly in Belgium, Germany, the Netherlands and Switzerland. The German regions such as Bavaria, Baden-Württemberg and North Rhine-Westphalia have the highest number of patent applications. They strongly influence the neighboring areas, stimulating them to create and develop innovations and increase innovation activity. The "periphery-zone of influence" includes 42 regions, which are located in those countries where "counterbalance satellites" predominate. Centre Val-de-Loire (France), Thuringen (Germany), Burgundy-Franche-Comté

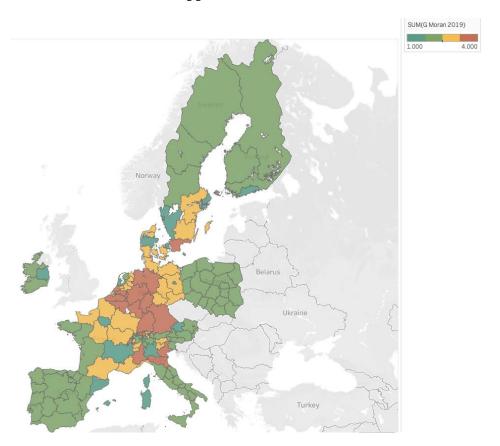
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(France), Zealand (Netherlands) and Thurgau (Switzerland) are the regions strongly influenced by counterbalance satellites or cores. 66 regions became "territories outside the influence". However, there are new "points of growth" among them. It is Polish regions (Masovian, Greater Poland, Świętokrzyskie, Lodz, Kuyavian-Pomeranian voivodeships) and Spanish ones (Castile-Leon, Castile-La Mancha and Extremadura). They have the potential to become "cores" or "counterbalance satellites". It means that a high number of patent applications and, furthermore, a high level of technological activity can be concentrated in these EU regions.

Figure 3. Map of innovation clusters in European regions by number of patent applications in 2019



It can be observed that 15 regions became innovative "cores" in 2019. Among these regions, Auvergne-Rhone-Alpes (France), Lombardy (Italy), North Holland (Netherlands) and Neuchatel (Switzerland) were added to the group with a high number of patent applications that have neighboring regions with low values of the indicator. These EU regions were in the high-high stimulating innovation development group. Due to the overall increase in the average number of PA the values of the indicator declined among the neighbors of the group, as a result 15 territories became the members of the HL group. Such "cores" as Styria (Austria), Tuscany

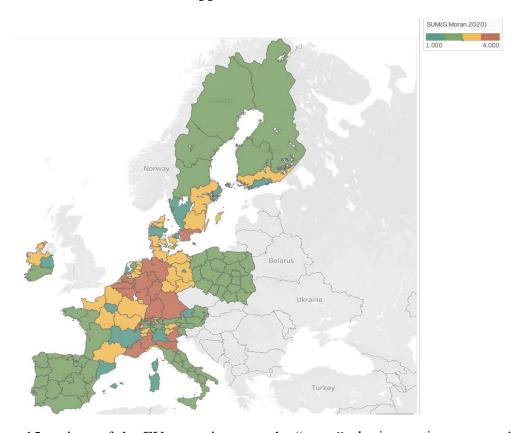
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(Italy), Madrid (Spain), became "periphery – zone of influence" due to a decline in eigenvalues. Ille-de-France has maintained a leading position relative to the "cores" of other countries. The number of regions with their own high values of patent applications and a high number of neighboring territories decreased to 22. The majority of regions moved to the low-high group, in which the number of the EU regions also declined to 36. The main reason for the transition is that the number of patent applications from neighboring territories has decreased, so these 36 regions have become low-low territories. Besides, it is worth noting that the group of low-high regions, which are strongly influenced by "cores" and "counterbalance satellites", remained unchanged, only the Grand Est (France) was added. Finally, the number of LL regions has increased to 82 due to a decrease in the number of patent applications both from themselves and from their neighbors. The territories "points of growth" are still the same regions of Spain and Poland.

Figure 4. Map of innovation clusters in European regions by number of patent applications in 2020



The same 15 regions of the EU countries were the "cores", the innovation centers, in 2020. Despite the significant superiority of the Ile de France in this group, Lombardy and Stockholm (Sweden) also have a high number of patent applications. The number of "counterbalance InTraders International Trade Academic Journal, Volume 5, Issue 2, e-ISSN-2667-4408 www.intraders.org

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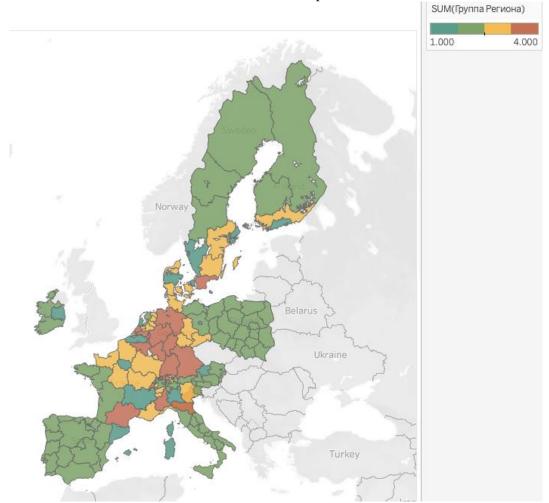
satellites" has increased to 23 territories, where Provence-Alpes-Côte d'Azur (France) has become a new member of the group. The main transition reason is an increase in the number of patent applications of the neighboring core, Auvergne-Rhône-Alpes. The group of regions "periphery-zone of influence" expanded to 37, where Southern Finland and Northern and Western Ireland were added. In both cases, the reason is an increase in the number of patents of neighbors, Helsinki-Uusimma and Eastern and Central (Middle) Ireland. The regions "zones of strong influence" have not changed, but the indicator of mutual influence (LISA) has become smaller. Finally, the number of "territories-outside the influence" has declined to 80 regions, which is due to the transition of one region of Finland and one region of Ireland to the low-high group. The areas, new "points of growth", still the regions of Spain (Castile-Leon, Castile-La Mancha and Extremadura) and Poland (Masovian, Greater Poland, Świętokrzyskie, Lodz, Kuyavian-Pomeranian voivodeships).

Figure 5. Map of innovation clusters in European regions by number of patent applications in 2021

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New data showed that in 2021 the group of 15 regions of the "core" expanded to 16. The Flemish region (Belgium) from the HH group was added. The Ile-de-France remains the leader in the number of patent applications in this group. The number of "counterbalance satellites" decreased to 22, where Provence-Alpes-Cote d'Azur (France) moved to the "periphery - zone of influence" group due to a reduction in the number of patents. However, the group of regions "periphery-zone of influence" decreased by 3 territories to 34 due to the transition of Occitania (France), Brandenburg (Germany), Northern and Western Ireland to other groups. The number of "territories-outside the influence" has increased to 83 because of the transition of Brandenburg (Germany), Mecklenburg-Vorpommern (Germany), Northern and Western Ireland. The reason is a reduction in the number of patent applications of neighboring regions. The territories "points of growth" still include the regions of Spain (Castile-Leon, Castile-La Mancha and Extemadura) and Poland (Masovian, Greater Poland, Sventoshish, Lodz, Kuyavian-Pomeranian voivodeships). However, during 2018-2021, their own value, the InTraders International Trade Academic Journal, Volume 5, Issue 2, e-ISSN-2667-4408

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number of patent applications, fluctuated, as well as the values of mutual influence with neighboring territories (LISA), which does not allow us to unambiguously conclude about their development as future innovative "cores" or "counterbalance satellites".

Based on the results of calculating spatial autocorrelation (global and local Moran I indices), it can be concluded that most regions of Europe have low innovation activity, ceasing to be in a zone of strong influence or being completely outside it from the centers of innovative development, cores that form innovation clusters, or counterbalance satellites that technologically stimulate neighbors. Moreover, most regions with low number of patent applications are located in the south of the European Union that correspond with the results of Moreno R., Paci R., & Usai S. (2005).

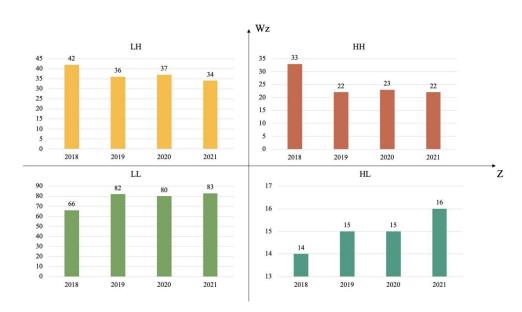


Figure 6. The distribution of the EU regions according to their patent activity

The potential innovative clustering of "growth points" depends on the development of companies located in the regions. In Castile-Leon, the institute registering a sufficient number of patent applications is the University of Valladolid, in the Masovian voivodeship it is the transport company "Babik", the supplier of audio and video equipment "HEM". In Kuyavian-Pomeranian voivodeship it is the manufacturer and supplier of hygienic, cosmetic and medical products "Materialow Opatrunkowych Spolka Akcyjna", agro-industrial company "ANWIL", cosmetic company "La Rive Spolka Akcyjna". In Lodz voivodeship, it is the pharmaceutical company "Aflofarm Farmacja Polska". In Velikopoljska voivodeship there is the Pepco Poland trading network. The growth of these companies and an increase in the number of goods and

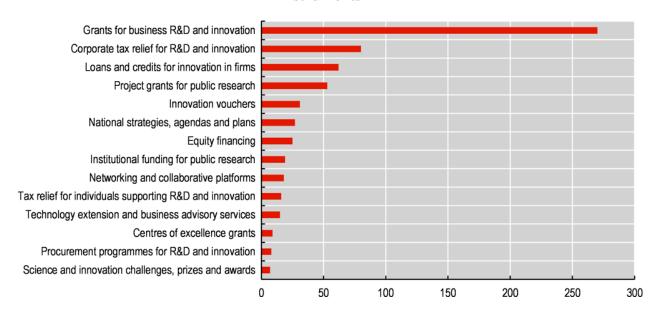
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Received: November 13, 2022 & Accepted: December 19, 2022 services patented by them, can directly affect the innovation development of clusters in the European Union countries and regions.

Furthermore, regional clustering and the development of "points of growth" will depend on the policy instruments providing financial support for business R&D and innovations. Figure 7 shows financial policy tools supporting R&D in the private sector in OECD countries. One of the most popular tools is grants for business R&D and innovation as the public direct forms of support. Specifically, today in Poland two tools are used. There is the deduction of R&D expenditures (200% of R&D expenditures can be deducted) and R&D grants (Deloitte, 2020). In Spain the national authorities provide companies with R&D grants, R&D tax credit, partial exemption of withholding tax and social security contributions for R&D staff and patent box (Deloitte, 2020). Thus, we can see that Spanish "points of growth" can have more potential to become the centers of innovation clusters than Polish voivodeships as more policy instruments providing financial support for R&D and innovations are introduced.

Figure 7. Number of active policy initiatives reported by OECD countries, top 14 instruments



Conclusion

Innovations are still one of the main factors that influence economic and technological prosperity not only in the private sector, but also in the public one, in regions and nations. Particularly regions do not innovatively grow or decline in isolation. It can be outlined that

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there is some influence of territories on each other, and the strength of this impact depends on

economic, technological and geographical distance.

Based on the results of calculating spatial autocorrelation (global and local Moran I indices), it

is observed a divergence trend in the regional innovation development of the European Union

countries and regions.

Moreover, the scattering maps of the EU regions according to their high or low number of

patent applications in 2018-2021 show that most regions of Europe have low innovation

activity, ceasing to be in a zone of strong influence or being completely outside it from the

centers of innovative development, cores that form innovation clusters, or counterbalance

satellites that technologically stimulate neighbors.

However, among the zones outside of influence, a group of regions stands out. It is new "growth

points", which in the future (that cannot be unambiguously estimated in 4 years) can become

innovation clusters.

These clusters can increase the level of technological activity in the countries of the European

Union. Their development will depend on the organizations and businesses which patent

innovation products and services in the regions. Besides, new "points of growth" will have more

potential to become the centers of new innovation clusters where regional, and national

innovation policy and financial incentives offered by the governments are introduced and

expanded.

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Has the Great Recession and the Pandemic been one of the Triggers for the rise in Unemployment? A Comparative Analysis: Türkiye & EU27¹

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Abstract

In 1999 the European Council celebrated in Helsinki, on a proposal by the Commission, made Türkiye a candidate country for EU membership. To make further progress in the process, several reforms, both political and economic, had to be implemented. The aim of this paper is twofold. First, to study the evolution of one of the leading macroeconomic indicators: unemployment. Secondly, through the estimation of dynamic econometric models, to analyze the possible differences in the evolution of unemployment in Türkiye and the EU27, depending on variables such as per capita income, population, inflation, investment, or public debt. Furthermore, what has been the effect that relevant events such as the Great Depression of 2008 and the pandemic have had on unemployment?

Keywords: Unemployment rate; Great Recession, COVID-19, macroeconomic variables, labor market policies.

JEL Codes: E20, E24, J08, J40

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Introduction

According to the latest United Nations Human Development Report, Türkiye ranks 48th among the world's economies in terms of human development index (HDI), being part of the group of nations with the highest level of human development. This position has not changed since 2021 (UNDP, 2022:272). Its Gross National Income per capita in 2021 was 31.033 (2017 PPP \$), ranking 45th in the world. It is also the 19th largest economy in the world, with a GDP of roughly US\$720 billion (World Bank, 2022). As a result, Türkiye is now considered one of the world's leading emerging economies. Related to data from Harvard University's Atlas of Economic Complexity, in 2020 it ranked 55th out of 133 in terms of GDP pc of the economies studied⁶. As can be seen in Figure 1, Harvard analysts estimate that the Turkish economy will grow at a rate of 4.34% per annum in the coming years, allowing it to improve its ranking, possibly reaching 20th place in the next decade.



Figure 1. Evolution of Türkiye 's GDP pc and ECI (1995-2020)

Source: Atlas Economic Complexity (2021)

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⁶ As they explain on their web page, the Atlas of Economic Complexity is a data visualization tool that allows people to explore global trade flows across markets, track these dynamics over time and discover new growth opportunities for every country. Built at the Harvard Kennedy School of Government, the Atlas places a country's industrial capabilities and know-how at the heart of its growth prospects, where the diversity and complexity of existing capabilities heavily influence how growth happens.

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This good outlook is partly explained by the improved sophistication of the Turkish economy. Compared to the previous decade, and according to ECI ranking data, it has improved by one place, thanks to the diversification of its exports. The Turkish economy is more complex than expected, given its per capita income level.

However, Türkiye and its economy still have room for improvement. This paper aims to present a model that explains the evolution of the unemployment rate in the Turkish economy over the 21st century and to compare it with the European case. To this end, this paper has been divided into three sections. The first section analyses the evolution of the Turkish economy in the European context. Secondly, the econometric model that explains the evolution of unemployment based on a series of macroeconomic variables, both in Turkey and in the EU27, is presented⁷. Finally, based on the results obtained, an explanation of the model for the Turkish case and recommendations for improving the evolution of unemployment are offered.

Türkiye and the EU27: a 21st-century economic analysis

The process of Turkey's accession to the EU27, apart from the geostrategic and political issues, requires the fulfillment of a series of political, economic, and administrative requirements. These are known as the accession criteria or Copenhagen criteria⁸:

- Political criteria: stability of institutions guaranteeing democracy, the rule of law, human rights, and respect for and protection of minorities.
- Economic criteria: a functioning market economy and the capacity to cope with competition and market forces.
- Administrative and institutional capacity to effectively implement the EU acquis (body of common rights) and ability to take on the obligations of EU membership.

For this reason, and before developing the model on the evolution of unemployment in Turkey, we wanted to analyze some relevant variables that give us a clearer picture of its capacity to function in a market economy, more specifically, how its economic evolution has affected Türkiye's unemployment rate, as an indicator of real convergence with the Member States.

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⁷All data have been obtained from EUROSTAT.

⁸ European Council, Copenhagen 21, 22 June 1993.

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The analysis of GDP per capita is among the variables that determine this real convergence. Figure 2 shows the low level of per capita income in 2000 for all the candidate countries. However, unlike the others, Türkiye has maintained an average growth rate of 2.7% over the last 21 years, almost half that of the other countries that have applied for EU membership. However, its growth capacity is not comparable to that of the Eastern European countries, which have grown at 6.4%, showing a more substantial beta convergence than Turkey and the other candidate countries.

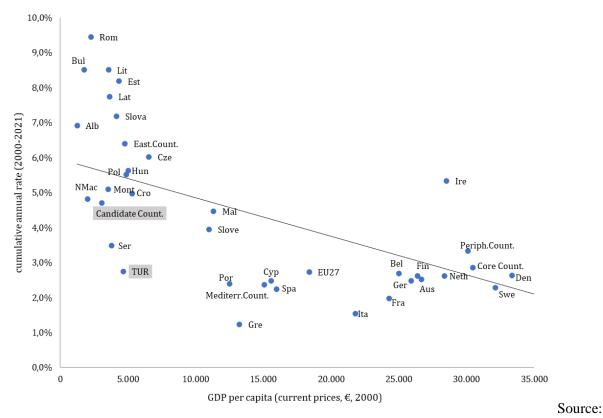


Figure 2. Real beta convergence in GDP per capita (current euros, 2000-2021)

Own elaboration based on Eurostat database (2022)⁹.

Luxembourg had 52.600€ in 2000 and grew at a rate of 3,7% in those 21 years.

⁹ Mediterranean countries (Mediterr.Count.): Greece, Spain, Italy, Cyprus, Malta, Portugal.

Eastern countries (East.Count.): Bulgaria, Czechia, Estonia, Croatia, Latvia, Lithuania, Hungary, Poland, Romania, Slovenia, Slovakia

Core Countries (Core Count.): Belgium, Germany, France, Luxembourg, Netherlands, Austria

Peripheral Countries (Periph.Count.): Denmark, Ireland, Finland, Sweden

Candidate Countries (Candidate Count.): Montenegro, North Macedonia, Albania, Serbia, Turkey

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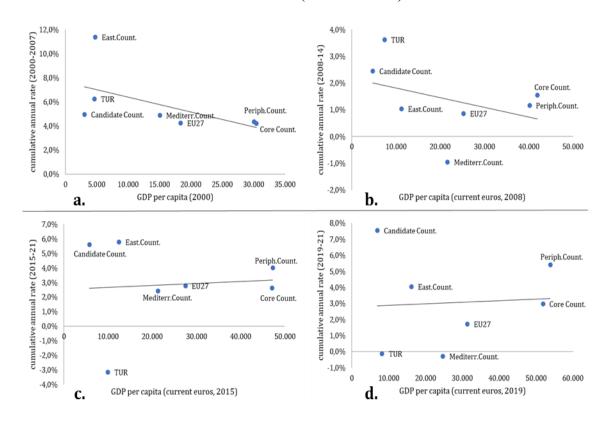
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In the first years of the 21st century, even during the Great Recession, Türkiye maintained high GDP per capita growth rates (Figures 3a and 3b). Between 2008 and 2014, it achieved growth rates of 3.6%, higher than the other candidates and even the Eastern European countries (which were the best performers in the EU between 2000 and 2007). However, since 2015 the Turkish economy has experienced negative growth of -3.2% between 2015 and 2021. In the pandemic years (2019-21), it has been - 0.1%. This has reduced Turkish GDP per capita from &8,210 in 2019 to &8,190 in 2021, as shown in graphs 3c and 3d. Only the Mediterranean economies performed worse between 2019 and 2021 (Figure 2d).

Figure 3. Real beta convergence in GDP per capita of Türkiye with the main groups of EU countries (current euros)



Source: Own elaboration based on Eurostat data, 2022.

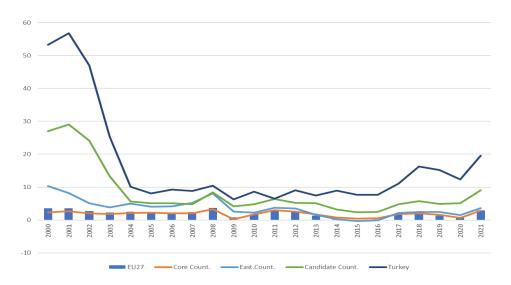
This slow process of real convergence has been accompanied by insufficient nominal convergence, as shown by the case of the harmonized index of consumer prices. While it is true that Türkiye has abandoned the price growth levels of the beginning of the century, close to 60%, rapidly approaching European standards, since 2017, it exceeded double digits and in 2021, it stood at 19.6% (Figure 4).

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Figure 4. Harmonized Index of Consumer Prices (annual percentage changes,

%)



Source: Own elaboration based on Eurostat data, 2022.

However, high unemployment rates have not been accompanied by high inflation rates. Throughout the period under review, Türkiye's unemployment levels have remained close to those of the EU27, even lower between 2011 and 2014. Since 2014, however, they have been moving further apart, reaching a differential of 7 percentage points in 2019 (Figure 5). Despite the economic recovery since 2021, inflation is affecting lower-income households the most, as they spend a larger share of their income on commodity purchases (World Bank, 2022).

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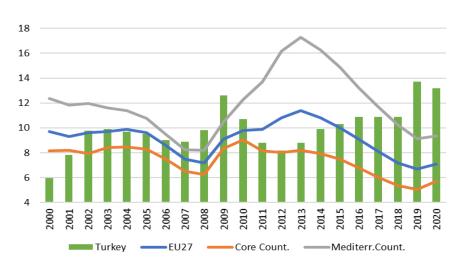


Figure 5. Unemployment rate (percentage of the labor force)

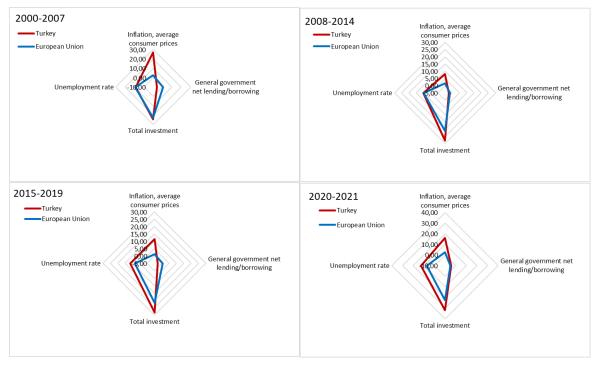
Source: Own elaboration based on Eurostat data, 2022.

Based on the data analyzed, we want to compare nominal and real convergence in the different stages of these two decades of the 21st century. In Figure 6, we have differentiated the 4 periods into which we can divide these twenty years: 2000-07, characterized by economic expansion in the EU; 2008-2014, the years of the Great Recession; 2015-2019, when economic recovery begins in almost all Member States; and 2020-21, the years of the pandemic.

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Figure 6. Nominal versus real convergence



Source: Own elaboration based on Eurostat data, 2022.

From Figure 6, it is possible to observe a greater real convergence of Türkiye between 2000 and 2008 in unemployment and investment¹⁰. However, since then, the nominal convergence variables - inflation and public deficit - have been moving away from the EU average, as have the actual convergence variables - unemployment and investment - apart from the behavior of unemployment during the Great Recession and of the public deficit in the years of the collapse of the pandemic.

Given this performance, the fundamental question is whether Turkey is ready to join the most ambitious integration bloc. With the increased pressure of competition between domestic firms and foreign direct investment. With the need to accelerate the process of integration into the euro monetary framework by the candidate states. Moreover, the exercise of a market made up of large competitive economies can ultimately damage the growth process necessary for the new candidates.

¹⁰ The choice of the investment variable is determined by its influence on employment generation and economic growth in the country. In turn, it allows us to analyze whether it leads to a higher government deficit (as it is mainly public investment) and whether it leads to price growth or not.

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Unemployment rate modeling for EU27 and Türkiye. Results

There are other studies to analyze unemployment using other macroeconomic variables (Aktar & Öztürk, 2009; Berument *et al.* 2009; Doğan, 2012). However, in this case, to establish which are the main variables that are influencing both the unemployment rate in EU27 and Türkiye, as well as the possible similarities and differences between them, the following model is going to be estimated:

$$\begin{split} Unemployment \ rate_{ti} &= \beta_{0i} + \beta_{1i} Unemployment \ rate_{(t-1)i} + \beta_{2i} LGDPpc_{ti} + \ \beta_{3i} Inflation_{ti} + \\ &+ \beta_{4i} LPopulation_{ti} + \beta_{5i} Investment_{ti} + \beta_{6i} Gross \ debt_{ti} + \beta_{7i} Crisis_{ti} + \\ &+ \beta_{8i} COVID_{ti} + \ u_t \\ &\qquad \qquad u_{t \sim iid} \ (0, \ \sigma^2) \end{split}$$

Where:

- β_0 is the constant of the model, β_j (j=1,...,8) is the parameter used to indicate how each explanatory variable influences the unemployment rate in EU27 or Türkiye, *ceteris* paribus.
- i=1,2; depending on EU27 or Türkiye.
- Crisis is a dummy variable included in the model to estimate how unemployment rates have been affected by the Great Recession. It is a variable that takes a value 1 in 2008, 2009 and 2010 and zero in the rest of the years.
- COVID is a dummy variable included in the model to determine whether COVID-19 has influenced the unemployment rate in EU27 and Türkiye. This variable takes value 1 in the years 2020 and 2021 and zero in the rest of the cases.
- Finally, the term reflects the stochastic nature of the relationship between the unemployment rate and the explanatory variables. It is assumed to be independent and identically distributed with zero mean and constant variance (σ^2).

The model has been estimated with generalized least squares to correct the autocorrelation and heteroskedasticity problems. The estimation has been realized using the PcGive module of Oxmetrics (Doornik & Hendry, 2013; Wooldridge, 2009).

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Table 1. Estimated results for the Unemployment rate in UE27 and Türkiye

	UE27			TÜRKIYE		
	Estimated Parameter	t-value	p-value	Estimated Parameter	t-value	p-value
Unemploym. rate_1	0.7030	8.30	0.0000	0.21140	0.856	0.4087
Constant	26.110	1.39	0.1912	25.4971	1.41	0.1846
LGDPpc	-19.824	-3.12	0.0089	-0.3909	-0.07	0.9381
Inflation	0.437084	4.36	0.0009	-0.05542	-1.41	0.1846
LPopulation	79.4204	1.92	0.0794	17.0403	0.988	0.3426
Investment	-0.69946	-6.05	0.0001	-0.2684	-2.17	0.0506
GB _Gross debt	-0.05575	-1.38	0.0916	0.0373	0.576	0.5754
Crisis	0.030803	0.121	0.9054	1.07996	1.73	0.1091
COVID	0.958237	2.91	0.0130	1.41894	1.56	0.1450
	R ² =0.9861				R ² =0.8668	
	AR 1-2 test: F(2,10)=2.0913 [0.1743]			AR 1-2 test: F(2,10)=0.2267 [0.8011]		
	ARCH 1-1 test:F(1,19)=0.3213 [0.577]			ARCH 1-1 test:F(1,19)=8.7e-05 [0.99]		
Statistics	Normality test:Chi^2(2)= 0.072 [0.96]			Normality test:Chi^2(2)= 1.21 [0.5439]		
	Hetero test:F(14,6)= 0.29668 [0.9714]			Hetero test: $F(14,6) = 0.62388 [0.7815]$		
	RESET23 tes	t:F(2,10)=0	0.667 [0.5345]	RESET23 test:F(2,10)= 1.204 [0.3398]		

The p-value is in brackets.

Source: Own elaboration based on Eurostat data.

These results show that, for a significance level of 5%, there are no problems of heteroscedasticity (Hetero test) or autocorrelation (AR 1-2) since the p-value (shown in square brackets in each of the statistics) is more significant than the significance level. Therefore, the null hypothesis of the absence of both problems is accepted, and the parameter estimates will be efficient.

The reliability of the estimated model is excellent since both coefficients of determination (R²) and adjusted coefficient of determination are high and close to one, respectively, 0.98 and 0.97 for EU27; 0.86 and 0.77 for Türkiye. This implies that the estimated model fits the unemployment rate quite well (see Figures 6 and 7); therefore, the residuals or errors (differences between the observed and estimated unemployment rate) are tiny.

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Figure 6. Observed vs. estimated unemployment rate for EU27. Residuals

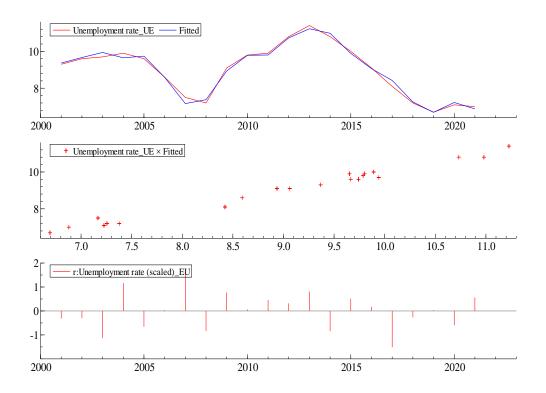
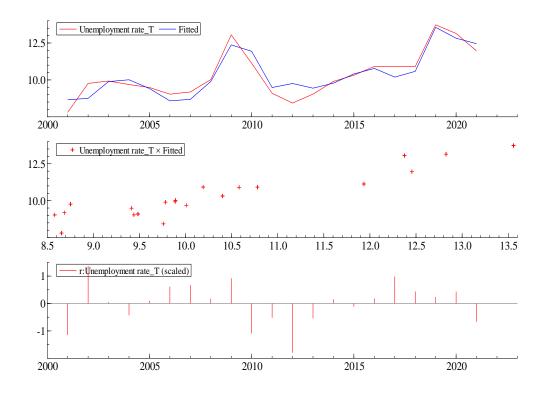


Figure 7. Observed vs. estimated unemployment rate for Türkiye. Residuals



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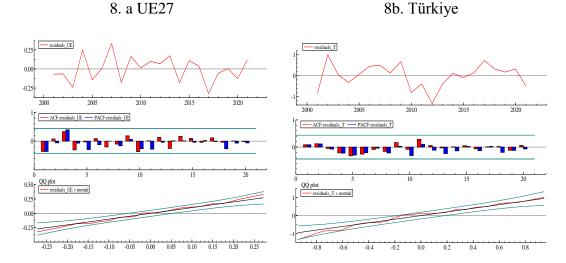
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Furthermore, the analysis of simple autocorrelation functions (ACF) and partial autocorrelation functions (PACF) estimated for residuals (see Figure 8) show that they are white noise since, for a significance level (α) of 5%, there is no statistically significant value.

On the other hand, observing the graphs corresponding to the histogram of the residuals and the QQ-plot, it can be stated that the residuals follow a normal distribution. Moreover, the Jarque Bera statistic (for EU: Normality test: $Chi^2(2) = 0.072941$ [0. 9642] and for Türkiye: $Chi^2(2) = 1.2181$ [0.5439]) confirms these results, since the p-value (0.96 and 0.54 respectively) is more significant than $0.05=\alpha$, and therefore, the null hypothesis of normality of the residuals is accepted. This implies that the contrast statistics used to analyze the significance of the explanatory variables follow a t-Student distribution and are correct.

Figure 8. Residual plots of the estimated model for the EU and $T\ddot{u}rkiye$



Analyzing the obtained results for the explanatory variables of the model, for a significance level of 10%, it can be said that, while for the EU27, all the explanatory variables of the model (except crisis) are statistically significant; in the case of Türkiye, only investment and crisis are statistically significant.

A detailed analysis of the variables included in the model allows us to group them into those that are influencing the decrease in the unemployment rate in both the EU27 and Türkiye; those that are contributing to its increase; and, finally, those that have different behavior for the EU27 and Türkiye.

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The population is one of the most critical variables causing the unemployment rate to rise in EU27. In the case of Türkiye, it is not statistically significant. This implies that the larger the population, the higher the unemployment rate in EU27. It should be noted that this increase is considerably higher in the EU27 than in Türkiye. This may be due to the different population growth rates in the sample period analyzed since, although both have increased, this increase has been more significant in the EU27. Moreover, this increase has not increased access to the labor market, which implies an increase in the number of people out of work and, therefore, in the unemployment rate.

- On the contrary, among the variables contributing to a decrease in the unemployment rate in both countries, GDP pc and investment stand out since these variables have a negative estimated parameter. This may be because growth in both implies a greater possibility of work and, therefore, a decrease in the unemployment rate. In both cases, the influence has been more significant in the case of EU27 than in Türkiye.
- Regarding those with a different influence in both cases, inflation and Gross debt can be highlighted. Regarding inflation, it should be noted that in the case of the EU27, it contributes to an increase in the unemployment rate (since the estimated parameter is positive and significant). While in the case of Türkiye, the opposite is true since the estimated parameter is negative (although not statistically significant).

Analyzing gross debt, although in the case of the EU27, the estimated value of the parameter is negative (approximately -0.05) and in the case of Türkiye, it is positive (approximately 0.03), neither is statistically significant. This would imply that it would not influence the two unemployment rates analyzed.

- Regarding how the Great Recession (crisis) has affected both unemployment rates, it can be affirmed that, although in neither case has it been statistically significant, observing the estimated values of the parameters, the influence has been more significant in the case of Türkiye than in the case of the EU27. In the first case, there has been an average unemployment rate increase of 1.07%, while in the EU27, it has been 0.03%.
- Concerning COVID, it can be stated that while in the case of the EU27, it has been positive and statistically significant (which has implied an average unemployment rate increase of 0.95%), in the case of Türkiye, it has not been statistically significant. Perhaps the reason

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Received: November 10, 2022 & Accepted: December 10, 2022 is the importance of the informal economy in the Turkish case. It will be analysed in more detail in the following section.

- Finally, it should be noted that there is inertia between the unemployment rate between two consecutive periods since, in both cases, the estimated parameter of the unemployment rate in (t-1) is positive and significant. However, this inertia is greater in the case of the EU27 than in the case of Türkiye.

In short, the dynamic models estimated for the EU27 and Türkiye show the causal relationship between certain macroeconomic variables and the unemployment rate in the sample period analyzed.

Analyzing the Turkish case: Labor market weaknesses and recommendations

The Turkish labor market has been affected by two major shocks in the period under analysis: the 2009 crisis and COVID-19, reaching the highest unemployment rates in recent years with the pandemic. Undoubtedly, the economic slowdown that Turkey has suffered in the last 3 years because of COVID-19 has led to a reversal of the progress achieved in its labor market in the years prior to the pandemic with respect to the creation of higher quality jobs and an improvement in welfare and social cohesion.

The pandemic increased structural challenges related to Türkiye's high unemployment, low labor force participation and the informal sector. As mentioned in the previous section, this could explain why it was not statistically significant in the estimated model. Even so, measures implemented by the Turkish government to retain employment, such as encouraging short-time work and government-paid leave arrangements, succeeded in maintaining employment above what it would have been without these government policies. Also, online work and e-commerce, especially in export and retail activities, allowed for relative maintenance of employment ¹¹.

Among the groups most affected by the pandemic are workers employed in small informal activities and the self-employed. Also, the COVID-19 crisis has contributed to an increase in the gender gap in the Turkish labor market, as well as in youth unemployment (World Bank, 2022).

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¹¹ Telework has helped maintain employment in Türkiye during the pandemic, although it varies considerably across Turkish regions, ranging from 14% in Anatolia to 30% in Istanbul (OECD, 2020).

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The high rate of informal employment in the Turkish labor market can be explained by two reasons. First, high labor costs result from high taxes on labor. This fact causes the minimum wage/average wage ratio to be among the highest in the OECD. Secondly, due to high firing costs and Türkiye's rigid labor regulations, both for temporary and permanent workers, which are also among the most rigid in the OECD.

In addition, the pandemic primarily affected young people, such that the proportion of young people neither studying nor working increased from 24% in May 2019 to 29% in September 2020. This increase highlights the necessary adoption of active policies by the Turkish government focused on reducing labor costs on less skilled workers, vocational training, and entrepreneurship so that young people have more significant opportunities to access the labor market (OECD, 2021a).

Another group severely affected by the crisis was women. The pandemic drastically reduced the sharp increase in women's labor force participation, driven by various policy initiatives in previous years, to 32% in 2020 compared to 70% for men, according to the Turkish Statistical Institute (TurkStat). This has resulted in most women remaining inactive or working as unpaid family employees. The low participation rate of women in the labor force and employment is due to cultural customs¹², as well as a lack of adequacy of women's training with respect to labor requirements, a shortage of childcare facilities and minimal maternity leave conditions. The pandemic affected women's employment to a greater extent than men's, in contrast to the 2008 crisis, which resulted in greater job losses among men because it was a crisis that mainly affected construction¹³. The health crisis affected Turkish women more than men because they were more present in service sectors and in so-called informal employment, in addition to assuming their responsibilities of caring for children and the elderly during confinement.

All these weaknesses in the Turkish labor market must be corrected by adopting structural reforms that are key to recovery and increasing future welfare¹⁴. First, reforms should be undertaken to increase flexibility in the labor market, reducing the enormous non-wage labor costs that many companies suffer from and that prevent net job creation. Also, the legal

¹² The low participation of women in the Turkish labor market is due to the low education of women and the fact that they are engaged in housekeeping and childcare (Berument *et al*, 2009; Bildirici *et al*, 2012).

¹³ See a detailed study of the impact of the 2008 crisis on the Turkish economy and labor market in OECD (2017). ¹⁴ The latest OECD report on Turkey presents a full chapter on the economic policies needed to make the Turkish labor market more flexible (OECD 2021b).

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minimum wage should be reduced to facilitate job creation in the formal sector, and labor regulations and social protection for permanent and temporary workers should be modernized. In addition, the pandemic has highlighted the lag in the digitization of many Turkish companies, so the Turkish government should encourage digital transformation and reduce the digital divide between large and small companies, as well as strengthen adult learning in digital applications.

Finally, there is a need to boost education and skills among the Turkish population. Despite the significant progress made in recent years in secondary and tertiary education, the Turkish government should allocate more public spending to education. It is necessary to improve the quality of education at all levels with a greater allocation of resources per student, to strengthen the relationship between universities and companies to improve the employability of young people in higher productivity activities, and to promote training for women to increase their participation in the Turkish labor market.

Conclusion

The enormous potential of the Turkish economy has been weighed down in recent years by the outbreak of the COVID 19 pandemic. In this paper, an explanatory model of the evolution of unemployment in Türkiye in the 21st century has been developed, comparing it with that experienced by the EU27. Considering quantitative variables such as population, inflation, per capita income, investment, or public expenditure, as well as two dummy variables such as the Great Recession or COVID 19.

The results show that in both cases, the EU27 and Türkiye, the unemployment rate has undergone a process of hysteresis. The estimated model shows that both the European and Turkish economies have not been able to create employment at the same level as population growth. On the other hand, GDP pc or investment has contributed to lower unemployment, and the influence of inflation is different in both cases (in the EU, the higher the inflation, the higher the unemployment and in Türkiye, the opposite, although the parameter is not significant).

However, there are differences since, on the one hand, in the EU27, the influence of the variables used to explain unemployment is more significant than in Türkiye. On the other hand, while European unemployment has been more affected by the pandemic, Turkish unemployment has suffered more from the consequences of the 2008 crisis. It is worth noting

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Received: November 10, 2022 & Accepted: December 10, 2022 the great weight of the informal economy in Türkiye, which could explain why COVID has not been statistically significant in that country.

Finally, it will be seen whether structural differences in the two labor markets may have influenced both unemployment rates. To summarize, active employment spending policies must be implemented to encourage job creation, reduce informal work, incentivize employment, and penalize existing employment inequalities. As the 2001 Nobel laureate in economics, George Akerlof, says: "For me, unemployment has always been a terrible thing (...). A jobless person loses not only income but often also the sense of fulfilling his or her duty as a human being" (Loungani, 2011: pp. 3).

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Uçak Etkinliğinin Operasyonel ve Finansal Göstergeler Açısından Analitik Olarak İncelenmesi

Yaşar Köse¹, Ceyda Aktan²

Özet

Bu çalışmada dar gövdeli Boeing B737-700 ve Airbus A319 uçakları ile geniş gövdeli Boeing B777-200 ve Airbus A330-300 uçaklarının örnek veriler üzerinden karşılaştırmalı etkinlik analizlerinin finansal ve operasyonel göstergeler kullanılarak yapılması amaçlanmaktadır. Bu çalışmada TOPSİS yöntemi kullanılarak yapılan analitik çalışmada kullanılan veriler esas alındığında; bölgesel uçuşların gerçekleştirildiği dar gövdeli uçaklardan B737-700'ün, A319'a göre; uzun mesafeli ve kıtalar arası uçuşların gerçekleştirildiği geniş gövdeli uçaklardan A330-300 uçağının, B777-200 uçağına göre maliyet avantajına sahip olduğu belirlenmiştir. Çalışmada ayrıca kullanılan radar grafik yöntemine göre; A319 dar gövdeli uçağın B737-700 dar gövdeli uçağa göre genel olarak daha üstün operasyonel özellikler gösterdiği; B777-200 geniş gövdeli uçağın ise A330-300 geniş gövdeli uçağa göre genel olarak daha üstün operasyonel özellikler gösterdikleri belirlenmiştir.

Anahtar Kelimeler: Dar-Gövde Uçaklar, Geniş-Gövde Uçaklar, Operasyonel Özellikler, Finansal Özellikler, Topsis Yöntemi

JEL Kodları: CO1, G11, L91, L93

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Analytical Investigation Of Aircraft Efficiency In Terms Of Operational And Financial

Indicators

Abstract

In this study, it is aimed to make comparative efficiency analysis of narrow-body aircrafts

Boeing B737-700 and Airbus A319 as well as of wide-body aircrafts Boeing B777-200 and

Airbus A330-300 using financial and operational indicators. Based on the data used in the

analytical study, using the TOPSIS method, the results show that in regional flights where the

narrow-body aircrafts operate, the B737-700 aircraft compared to A319; and where the wide-

body aircrafts are utilized in long-haul and intercontinental flights, the A330-300 aircraft

compared to the B777-200 aircraft was determined to have a cost advantage. According to the

radar graphic method used in the study; the A319 narrow-body aircraft generally showed

superior operational characteristics compared to the B737-700 narrow-body aircraft; and the

B777-200 wide-body aircraft was determined to have superior operational characteristics

compared to the A330-300 wide-body aircraft.

Keywords: Narrow-Body Aircraft, Wide-Body Aircraft, Operational Characteristics, Financial

Characteristics, Topsis Method

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1. Giriş

Bir hava yolu şirketinin en önemli ve temel varlığı olan uçakların satın alınması veya

kiralanması, onların verimli bir şekilde kullanılarak şirkete ekonomik katma değer yaratılması,

şirket değerinin maksimizasyonu ve sürdürülebilirliği için hayati öneme sahiptir. Bu amaçla

hava yolu şirketlerinin sahip olduğu veya kiraladığı uçakların teknik, operasyonel ve finansal

açıdan analiz edilerek performansının belirlenmesi gereklidir.

Diğer varlıklarda olduğu gibi bir uçağın değeri iki faktöre bağlıdır: teknik etkinlik ve kaynak

dağılım etkinliği. Teknik etkinlik; uçağın kalkış ağırlığı, yakıt tüketimi, blok saat başına bakım

harcamaları, sarf edilebilir yedek parçaları, amortismanı, seyir hızı ve uçtuğu mil veya

kilometre gibi faktörlere bağlıdır. Kaynak dağılım veya tahsis etkinliği; yakıt tüketimi, uçulan

saat, ortalama koltuk sayısı, uçuş ekip maliyeti gibi bir girdi ve çıktıya dayanan ölçümlerdir.

Bu ölçüm veya metrikler; teknik, operasyonel ve finansal olarak üç grupta incelenmektedir.

2. Kavramsal Çerçeve

Kavramsal çerçeve içerisinde bir uçağın teknik, operasyonel ve finansal göstergeler ve bunların

uçak performansının ölçümünde nasıl kullanılabileceği açıklanacaktır.

2.1. Uçak Teknik Performans Göstergeleri

Uçağı karakterize eden teknik özellikleri uçağın ve hava yolu şirketinin maliyetini ve karlılığını

etkilemektedir. Hava yolu şirketi uçağı temin ederken teknik etkinlik faktörlerini dikkate

almakta ve süreç tamamlandıktan sonra hava yolu şirketinin bu faktörler üzerinde herhangi bir

etkisi olamamakta veya çok az olmaktadır. Teknik faktörler; uçağın ortalama koltuk sayısı,

kargo kapasitesi, yakıt kapasitesi, uçuş menzili ve maksimum kalkış ağırlığıdır. Genel olarak

hava yolu sektöründe Boeing ve Airbus olmak üzere iki büyük uçak üreticisi şirket

bulunmaktadır. Her iki uçak üreticisi şirket dar ve geniş gövde olmak üzere iki ana türde ticari

uçak üretmektedir. Bu her iki ana tür uçaklarda koltuk kapasitesi, uçuş menzili gibi özellikler

de farklılaşmaktadır.

Uçak üretkenliğinin en önemli ölçüsü, koltuk yoğunluğu ve uçağın günlük ortalama uçuş

süresidir. Uçak edinimi ve filo planlaması kararları verilirken operasyonlara uygun olarak

koltuk kapasitesi dikkate alınmaktadır. Dar gövde uçaklar, geniş gövdeli uçaklara göre daha

düşük koltuk kapasitesine sahipken koridor alanı daha azdır. Bu uçaklar pazarları sınırlıdır ve

kısa mesafeli uçuşlar için daha uygundur. Koltuk konfigürasyonları; düşük maliyetli hava yolu InTraders International Trade Academic Journal, Volume 5, Issue 2, e-ISSN-2667-4408

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(LCC) şirketlerinin kullandığı tek sınıf, koltuk genişlikleri farklı olan iki sınıf ve birinci sınıf

ekonomi sınıflarından oluşan üç sınıf şeklindedir. Örnek olarak ülkemizde Pegasus AS. ve

Anadolu Jet tek sınıf (ekonomi sınıfı), Türk Hava Yolları hem birinci sınıf hem de ekonomi

olarak iki sınıf koltuk konfigürasyonu kullanmaktadır.

Koltuk kapasitesi belirli bir uçağın gelir elde edebilme veteneğinin göstergesidir. Bir uçağın

koltuk sayısı arttıkca koltuk basına maliyet azalacaktır. Öte yandan koltuk sayısının artması

yolcu konforunu azaltabilecek ve geliri azaltabilecektir. Koltuk sayısının artmasıyla koltuk

maliyeti azalırken koltuk başına elde edilen verimi dengeleyecektir. İşletme maliyet profili ve

ürün yerleşimi göz önüne alındığında, bir hava yolu şirketi en uygun koltuk konfigürasyonunu

seçer. Bununla birlikte Covid-19 pandemisinde yolcu miktarının azalması nedeniyle Türk Hava

Yolları'nda bazı yolcu uçakları içerisindeki koltuklar sökülerek kargo uçağına

dönüştürülmüştür.

Kargo kapasitesi diğer bir önemli teknik etkinlik faktörüdür. Kargo kapasitesi sadece kargo

uçakları için değil, aynı zamanda yolcu bagajlarından kaynaklanan yan gelir yaratılması

açısından yolcu uçakları için de önem arz etmektedir. Yolcu uçakları yolcu bagajlarını aldıktan

sonra kalan boşlukları ticari kargo amacıyla kullanmaktadır. Geniş gövdeli uçaklara kargo

yüklemesinde paletler kullanılarak daha etkin bir yükleme yapılabilmektedir. Yolcu

uçaklarında kargo taşınması, yolcu taşımasına göre genellikle daha verimli olduğu için büyük

önem kazanmaktadır.

Bir uçağın menzili, kalkış ağırlığı ile dengeli olmalıdır. Hava yolu şirketleri, uzun menzilli

uçuşları uluşlararası ticaretin gelişmesi ve liberizasyonu ve filo planlamasına esneklik getirdiği

için tercih etmektedirler. 4000 mil menzilli bir uçak, orta ve uzun mesafeli uçuşlarda

görevlendirilirken 2000 mil menzilli bir uçak kısa mesafeli uçuşlarda görevlendirilmektedir.

Bununla birlikte uzun mesafeli uçuşlar daha büyük motor gereksinimi ve daha fazla yakıt

tüketmesi nedeniyle daha fazla maliyete sahip olup uçakların bu maliyeti karşılayabilmesi için

uzun mesafeli uçuşlarda kullanılması gerekmektedir. Kısa mesafeli uçuşlar kısa menzilli

uçaklar tarafından sağlanmakta ve genellikle yerel ve LCC şirketleri tarafından

kullanılmaktadır. Geniş gövdeli uçaklar geleneksel hava yolu şirketleri tarafından uluslararası

ve kıtalararası destinasyonlarda kullanılmaktadır.

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Maksimum kalkış ağırlığı (MTOW), bir uçağın güvenlikle kalkış pistinden kalkabileceği ağırlığı göstermektedir. Maksimum kalkış ağırlığı, ulusal havacılık otoriteleri tarafından düzenlenir ve uçak üreticileri tarafından açıkça belirtilir. Federal Havacılık İdaresi (FAA) ve Ortak Havacılık Otoriteleri (JAA) dâhil olmak üzere düzenleyici kurumlar, maksimum kalkış ağırlığını temel girdi olarak kullanarak türbülanslı hava ve yan rüzgâr kısıtlamalarında yapısal ve performans gereksinimleri olarak belirlenir. Maksimum kalkış ağırlığı, belirli bir uçağın yolcu sayısını ve hava yollarının güvenle taşıyabileceği kargo miktarını sınırlamaktadır.

2.2. Uçak Operasyonel Performans Göstergeleri

Uçakların operasyonel özellikleri hava yolu şirketleri operasyonlarını çeşitli şekillerde etkilemektedir. Bunlar, uçağın günlük uçuş süresi (aircraft utilization), yakıt etkinliği ve ortalama bacak uzunluğu (average stage length) olarak sıralanabilir. Operasyonel özellikler, uçağın değerinin belirlenmesinde teknik ve finansal faktörlerin temelini oluşturur.

Yakıt verimliliği, bir uçağın ortalama bir hızla ve teknik faktörler kapsamında yakıt tüketimidir. Yakıt verimliliği hava yolu taşıyıcı şirket operasyonları için çok önemlidir. Yakıt maliyetlerinin bir hava yolu şirketinin maliyetlerinin yaklaşık % 30'unu oluşturduğu düşünüldüğünde, birçok hava yolu şirketinin finansal açıdan sürdürülebilirliğinin temel faktörüdür. Yakıt verimliliği, blok saat başına tüketilen galonun, her bir uçak kategorisi için ortalama koltuk sayısı ve ortalama etap uzunluğuna bölünmesiyle hesaplanır. Yolcu uçakları için kabin yerleşimi ve koltuk doluluğu yakıt maliyeti için önemli bir faktördür. Bir uçağın kalkışı, seyir yüksekliğine tırmanması, alçalması ve inişi esnasında fazla yakıt tüketmesi nedeniyle uçağın bacak uzunluğunun yüksek olması, yakıt verimliliğine bağlı olacaktır. Uzun uçuş mesafesi ile yapılan yüksek süratli uçuşlar yakıt tüketimini artıracaktır. Ortalama koltuk sayısı ve bacak uzunluğu arttıkça ortalama yakıt tüketimi azalacaktır. Diğer yönden, daha yeni teknoloji ve modellerde aerodinamik açıdan yakıt verimliliği artacaktır.

Uçağın günlük ortalama uçuş süresi, ortalama bacak uzunluğu ile ilişkilidir. Yüksek derecede günlük ortalama uçuş süresi, sabit maliyetlerin daha uzun sürelere yayılmasına ve minimizasyonuna yardımcı olacaktır. Uçağın ortalama uçuş süresi, etkinliğin bir ölçüsüdür. Aynı zamanda maliyetler, bakım zamanları ve diğer faaliyetler için de kullanılan bir ölçüdür. Bazı hava yolu şirketleri, günlük olarak çok sayıda kısa uçuşlar yaparak uçağın yerde boş bekleme sürelerini azaltmaktadır.

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Ortalama bacak uzunluğu bir hava yolu şirketinin uçuş planlamasına bağlı olacaktır ve genel olarak uzun bacak uzunluğu, daha çok kullanılabilir koltuk mili (ASM) ve daha düşük toplam mil başına koltuk maliyetini sağlayacaktır.

2.3. Finansal Performans Göstergeleri

Finansal oranlar veya göstergeler uçak etkinliğini analiz etmede kullanılır. Bu göstergeler yöneticinin hedeflerine ulaşmak için kullandıkları araçlardır. Örneğin yöneticiler bir Boeing uçak satın alma durumunda benzer özelliklerde diğer üreticilerinin ürettikleri uçakların finansal performansları ile karşılaştırma yaparlar. Finansal göstergelerin önemli unsurları; personel maliyetleri, amortisman ve kira maliyetleri, bakım maliyetleri ve destekleyen diğer unsurların maliyetlerdir.

Havacılık sektöründe yakıt maliyeti, değişken petrol fiyatları, ekonomik krizler veya diğer sistematik olaylardan dolayı personel giderleri ile en yüksek maliyet unsurudur. Örneğin 2019, 2020 ve 2021 yıllarında Türk Hava Yolları T.A.Ş.'nin yakıt maliyetleri sırasıyla tüm maliyetleri içeresinde oransal olarak %30,63, %22,55 ve %29,2 olarak gerçekleşmiştir (Türk Hava Yolları, 2020). Bu nedenle hava yolu şirketleri, maliyetlerini minimize etmek açısından envanterlerinde bulunan uçaklarda ve yapılan uçuşlarda yakıt verimliliğini artırmak ve maliyetleri düşürmek çabasındadır. Maliyetleri düşürmek ve verimliliği artırmak için çeşitli operasyonel ve teknik tedbirler alınırken finansal açıdan çeşitli vadeli işlemlerle yakıt hedging'i de yapılmaktadır.

Uçuş ekibi maliyetleri; pilot, uçuş mürettebatı, uçuş mühendisi, test, yedek ve eğitmen pilot maliyetleri gibi uçak türüne göre değişen maliyetlerdir. Uçuş ekibi maliyetleri, bakım veya uçuş idaresi ile görevli personel maliyetlerini kapsamaz. Bu maliyetler idari maliyetler içerisinde hesaplanır. İki kişilik bir kokpit ekibi, ekip maliyetlerini azaltmaktadır ve birden fazla uçak türünde uzmanlaşan pilot tipi, birden fazla uçak tipine sahip taşıyıcılara daha fazla ekip planlama esnekliği ve verimliliği sağlamaktadır. Bununla birlikte eğitim ve bakım maliyetlerinin minimizasyonu için hava yolu şirketleri genellikle aynı üreticinin uçaklarını filolarında bulundurmaktadır. Örneğin Pegasus AŞ. filosunda daha çok Airbus tipi uçaklara yer vermektedir.

Amortisman ve kira maliyetleri, hava yolu şirket yöneticileri için önemli bir karar ölçütüdür. Amortisman ve kiralama, şirket sahipleri için sermaye maliyetini temsil eder. Hava yolu şirketinin maliyet yapısının önemli bir kesimini amortisman oluşturur. Amortisman kullanılan

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uçağın ekonomik ömrüne bağlı olarak hesaplanır ve uçağın sahibi olan şirketin uçak maliyetini

ekonomik ömre yaymasını sağlar. Kira ödemeleri, havayolu şirketinin serbest nakit akışını

etkiler. Hava yolu finansmanı, şirketlerin yüksek derecede faaliyet kaldıracı kullanması

nedeniyle karmaşıktır. Taleplerdeki dalgalanmalar, artan yakıt maliyetleri ve sermaye maliyeti

ve iflaslar sektördeki karlılığı olumsuz yönde etkilemektedir. Hava yolu şirketlerinin

uyguladıkları amortisman politikaları, artık değer uygulamaları ve amortisman ömürleri de

değişkenlik göstermektedir.

Bakım maliyetleri; rutin ve rutin olmayan parça, malzeme ve bakım işçilik maliyetlerini

kapsamaktadır. Bakım maliyetleri sadece gerçekleşen bakım maliyetlerini değil, aynı zamanda

tahakkuk eden periyodik kontrol maliyetlerini kapsamaktadır. Bakım maliyetleri sökme, takma,

kontrol şeklinde bakım işçilikleri ve sarf edilebilir, sarf edilemez parça ve materyal maliyetleri

seklinde iki ana kategoriye ayrılmaktadır. Bakımın direkt maliyetleri bir uçuş saati olarak ifade

edilebilir. Bakım maliyetleri dar gövde veya geniş gövdeli uçaklara göre değişkenlik

göstermektedir. Diğer destekleyen maliyetler; sigorta, navigasyon gibi yakıt, bakım,

mürettebat, amortisman ve kiralama maliyetleri dışında kalan maliyetlerdir.

3. Literatür İncelemesi

Hava volu isletmeleri her ne kadar hizmet sektörü içerisinde ifade edilse de sundukları hizmetin

içerisinde hem somut hem de soyut bileşenler bulunmaktadır. Bütün bileşenleri bir araya

getirerek de kendi müşterilerinin taleplerini karşılamaktadır (Gerede, 2015). Somut bileşenleri

arasında yer alan uçaklar, çalışmanın başında da ifade edildiği gibi, hava yollarının en önemli

ve kritik bileşenlerinden bir tanesidir. Küresel olarak oluşan rekabet ortamı, günümüzde

havacılık alanında daha da derinleşmektedir (Özer, 2008) ve bu sektörde yer alan hava yolları

da sundukları ürünler ile rekabet içerisinde yer almaktadır. Bahsi geçen bu ürünler, genel olarak

havayolu işletmesinin sunduğu hizmetler olarak ifade edildiğinde bu hizmetin gerçekleşmesi

için gerekli olan uçak gibi bileşenler ve bileşenlerin özellikleri talebi doğrudan etkileyen

faktörler olarak da literatürde ver almaktadır (Gerede, 2015).

1900'lü yıllarda uçak üretiminin hız alması ile beraber havacılık sektörünün, özellikle hava

taşımacılığının gelişimini de tetiklenmiştir. Ulaştırma sistemlerinin uzun vadeli evrimi,

herhangi bir zamanda ekonomik ve toplumsal ihtiyaçlara daha iyi uyan ulaştırma modlarının

sürekli ikame edilmesiyle karakterize edilmektedir. Bu ikame modelinin ortak bir özelliği, yeni

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bir modun ortalama kapıdan kapıya hızının, daha önce baskın olan modun hızını aşmasıdır (Lee

vd., 2001). Örneğin, yolcu taşımacılığında, düşük hızlı demiryollarının yerini zamanla daha

hızlı otobüsler ve daha hızlı otomobiller almıştır. Günümüzde ise şehirler arası seyahat için,

otomobillerin yerini, hâlihazırda baskın ulaşım modu olan uçaklar olmak üzere yüksek hızlı

ulaşım sistemleri almaktadır.

McLean (2006) yaptığı çalışmada, ticari uçakların operasyonel etkinliğini incelemiş olup ilk

olarak etkinlik kavramının havacılık sektöründe çok farklı anlamlara gelebileceğini ve doğru

şekilde ifade edilmesi gerektiğini ifade etmektedir.

Bir uçağın operasyonel kullanılabilirliğini etkileyen birçok faktör bulunmakta olup bunlara

örnek olarak o uçağın tasarımı, bakım altyapısı ve operasyonel ortamı gösterilmektedir. Geçmiş

veriler analiz edildiğinde, organizasyon düzeyinde plansız yapılmış bir bakımın, depo

bakımında yaşanan aksaklıkların ve tedarikteki gecikmelerin uzun menzilli uçakların atıl olarak

durdukları süreleri tetiklediği ifade edilmektedir. Yapılan bir çalışmada, özgün durum

simülasyonu (discrete event simulation) kullanılarak hangi teknik ve/veya süreç

iyileştirmelerine odaklanılması gerektiği konusunda fikir sağlamak adına ilgili metrikler

modellenmiştir. Bu modellemenin sonuçlarına göre, insan gücü ve yedek parça temini gibi

bakım altyapısı parametrelerinin, uzun menzilli uçak kullanılabilirliği için temel itici bir güç

oluşturduğu bahsedilmektedir (Andresen ve Williams, 2011).

Nangia (2006) çalışmasında uçakların mevcut ve gelecekteki eğilimlerinden bahsederek ilgili

verileri analiz edilmiştir. Veriler; yük miktarı, menzil, tüketilen yakıt ve birim maliyetlerin bir

ölçüsü gibi çeşitli verimlilik terimleri üzerinden yorumlanmıştır. Artan menzil ile maliyetin

önemli ölçüde azaldığı gösterilmiştir.

Son dönemlerde uçak etkinliği konusunda yapılan çalışmalarda enerjinin büyük rolü

olmaktadır. Hava yolu ile taşımacılık, kara yolu, deniz yolu gibi diğer taşımacılık türlerinden

çok daha hızlı gelişmekte ve bu gelişme ile beraberinde daha fazla enerji tüketimini

tetiklemektedir. 1980'lerden itibaren yapılan çalışmalarda gelişen teknoloji ve operasyonlardan

bahsedilerek hava taşımacılığında enerji etkinliğinin sağlanması konusuna daha çok

odaklanıldığı görülmektedir (Lee, 2010).

Günümüzde uçak yakıtı fiyatlarının artmasıyla uçak etkinliğinin önemi daha da artmıştır.

Ayrıca, yüksek yakıt fiyatları ve çevresel kaygıları gidermeye yönelik zorlayıcı baskılar

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nedeniyle, son yıllarda farklı uçak konseptleri dikkate alınmıştır. Bu kavramlar sadece çeşitli

yakıt türlerinin kullanımını değil, aynı zamanda daha fazla elektrik kullanımını da

desteklemektedir (Baharozu vd., 2017).

Yakıt fiyatları büyük olasılıkla artmaya devam edeceğinden, yakıtın uçak işletme

maliyetlerinde giderek daha büyük bir unsur haline gelmesi kaçınılmazdır ve bu nedenle enerji

kullanımı, büyük olasılıkla yeni nesil uçakların tasarımında önem kazanacaktır (Verstraete,

2015).

Ancak, hava trafiğindeki artış, birçok endüstride görülen ortak bir eğilim olan enerji

kullanımının daha etkin hale gelmesi adına yapılan hem operasyonel hem de teknolojik

gelişmeleri geride bırakmıştır. Her ne kadar yeni modeller piyasaya sürülse de uçaklar zamanla

daha fazla yakıt etkin olma eğiliminde olsa da uçuş trafiğinden kaynaklanan toplam

emisyonların arttığı görülmektedir. Etkinlik iyileştirmeleri uzun vadede ekonomik olarak

faydalı olabilse de bütçe önceliklerinin kısıtlamaları altında bu tür değişikliklerin maliyetleri

genellikle iyileştirmeler için kısıt niteliğindedir (Lee vd., 2001).

Aslında hava taşımacılığını, arz ve talep olmak üzere iki farklı açıdan incelemek doğru

olacaktır. Talep tarafında bu hizmeti kullanmak isteyen müşteriler varken arz tarafında ise

talebe karşılık kapasite bulunmaktadır. Dolayısıyla, hem iş gücü, enerji ve sermaye kapasitesi,

hem de uçakların kapasitesi arz tarafını oluşturmaktadır. Buradan da anlaşılmaktadır ki

uçakların teknik, operasyonel ve finansal performansları, bir başka ifade ile uçak etkinliği, hava

yolu işletmelerinin performansı ile doğru orantılıdır.

İşletmelerin karar verme mekanizmalarının doğru oluşturulması, başarı oranlarının arttırılması

ve amaçlarına ulaşabilmeleri için performans değerlendirmeleri önemlidir. Ayrıca eksikliklerin

görülüp bunları giderici önlemler alınmasında, performanslarını etkileyen faktörlerin ortaya

çıkarılması ve daha gerçekçi temellere dayalı hedefler belirlenmesi gerekmektedir. Dolayısıyla,

performans değerlendirmelerinin hava yollarına birçok sürecin yürütülmesini kolaylaştırmak

gibi faydalar sağladığı söylenebilir. Performans değerlendirmeleri aynı zamanda hava

yollarının stratejik planlarını ve hedeflerini destekleyerek, yöneticilerin birtakım sorunları

belirlemekten süreçleri ve kaliteyi iyileştirmeye kadar birçok yönden objektif kararlar

vermelerini sağlamaktadır. Bu nedenle hava yolları, çevrelerindeki değişimlere ayak uydurmak

ve rekabet avantajı elde etmek için performanslarını ölçerken kendi iç performanslarını

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değerlendirebilir ve sektörel bir içgörü geliştirebilirler (Gökdalay ve Evren, 2009; Bakir vd.,

2020).

Kiracı ve Yaşar (2020) tarafından yapılan çalışmada; hava yolu şirketlerinin operasyonel

performansını belirleyen faktörler ampirik olarak incelenmiş, 1990 ve 2017 yılları arasında 52

hava yolu sirketinin operasyonel verileri panel veri analizi kullanılarak analiz edilmiştir.

Araştırmada, taşınan yolcu sayısının, doluluk oranının, hava yollarının yaptığı uçuş sayısının,

uçağın kullanım oranının ve taşınan kargo miktarının operasyonel performansı anlamlı olarak

etkilediği belirlenmiştir.

Lee (2019), havayolu endüstrisinde rekabet eden şirketleri analiz ederek, operasyonel

performansların hava yolu şirketlerinin finansal performansı üzerindeki etkisini analiz etmek

için yatırılan sermaye getirisi (ROIC) ağacı modelinin nasıl kullanılacağını ve ardından hava

yolu şirketlerinin finansal performansı üzerindeki etkisini nasıl artıracağını ele almış; finansal

açıdan güçlü şirketlerde opersyonel performansın finansal performans üzerinde olumlu etkileri

olduğu belirlemiştir.

Sarsour ve Adalaou (2021), yaptıkları çalışmada; Türk hava yolu şirketlerinde kapasite

kullanımı, yolcu verimi, işçilik maliyeti, işçilik verimliliği ve yakıt maliyeti gibi operasyonel

performans faktörleri ele alınarak bunların şirketin karlılığına etkisi ortaya konulmuştur.

Kalemba ve Planas (2019) yaptıkları çalışmada; hava yolu şirketlerinde emniyet faktörünün

ekonomik ve finansal göstergeler arasındaki ilişkiyi incelemişler, emniyetin karlılık üzerinde

anlamlı bir etkisinin olmadığı ancak gelirler üzerinde bir etkisinin olduğunu belirlemişlerdir.

Mahtani ve Garg (2020), yaptıkları çalışmalarında; Hindistan'daki bir hava yolu şirketi için

finansal sıkıntının değerlendirilmesinde; performans, işletim ve finansal faktörlerin yalnızca

finansal faktörlerden oluşan modellere kıyasla daha yüksek bir doğruluğu olduğunu

belirlemişlerdir.

Hansen ve Zou (2013), havalimanı operasyonel performansının hava yolu maliyetleri

üzerindeki etkilerine ilişkin yaptıkları çalışmada; operasyonel performansın programa göre

gecikme, uçuş süresi değişkenliği ve uçuş iptalleri dâhil olmak üzere farklı yönleri içerdiği ve

oluşan maliyetlerin geliştirdikleri modelle tahmin edilebileceğini belirtmişlerdir.

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4. Araştırma Yöntemi

Bu çalışmada, dar gövdeli Boeing B737-700 ve Airbus A319 uçakları ile geniş gövdeli Boeing B777-200 ve Airbus A330-300 uçaklarının örnek veriler üzerinden karşılaştırmalı etkinlik analizlerinin finansal ve operasyonel göstergeler kullanılarak yapılması amaçlanmaktadır. Araştırmada ele alınan uçaklar, hava yolu işletmeleri tarafından uzak mesafeler için geniş gövdeli ve yakın mesafelerde kullanılmak için ise dar gövdeli uçaklar olarak envanterlerinde önemli yer verdikleri uçaklardan oluşmaktadır. Aynı zamanda Airbus ve Boeing arasında kıyaslama yapmaya da fırsat tanımaktadır. Kullanılan veriler "Form 41" olarak bilinen Amerikan Havacılık sektöründe kullanılan finansal ve operasyonel verileri kapsamaktadır. Amerikan Federal Yasası gereği hava yolu şirketlerinin yayınlama zorunluluğu olan "Form 41" adıyla anılan veriler; şirketlerin bilançolarını, gelir tablolarını, diğer finansal tablolarıyla birlikte, işletme veya trafik istatistiklerini içermektedir (Durso, 2007:3). Hava yolu şirketleri arasında karşılaştırmada kolaylık sağlaması açısından "Form 41" verileri finans, ekonomi ve endüstri analizinde ve rekabetci kıvaslamada yaygın olarak kullanılmaktadır. Calısmada kullanılan veriler, 2006 yılına ait Form 41'den elde edilmiş (Vasigh vd, 2012: 118-133) olup çok kriterli karar verme (TOPSİS - Tecnique for Order Preference by Similarity to Ideal Solution) vöntemiyle analiz edilmistir. Arastırmaya konu olan dar ve genis gövde ucakların finansal performansları belirlenmiş ve değerlendirilmiştir. Yine her iki tür uçakların operasyonel analizi de grafiksel yöntemle belirlenerek değerlendirilmiştir.

TOPSİS Yöntemine Göre Uçakların Finansal Analizinin Yapılması ve Değerlendirilmesi

İşletmelerde finansal performans anlamında yapılan karşılaştırmalarda ve değerlendirmelerde kullanılan yöntemlerden birisi TOPSİS yöntemidir (Akyüz vd., 2011,77; Akt. Ömürbek ve Kınay, 2013). Yöntemde, ilk olarak finansal açıdan performanları karşılaştırılacak olan uçakların finansal göstergelerine bakılarak bunların arasından belirleyici olanlar ayrılmaktadır. Seçilen göstergelerin ağırlıkları ise farklı uygulamalarla belirlenmekte olup bunlara örnek anket kullanımı, uzmanlardan görüs talebi, faaliyet raporlarındaki bilgilerden faydalanma olmaktadır. Sonrasında sırasıyla Tablo 1 ile Tablo 8 aralarındaki tablolarda gösterilen karar matrisi oluşturulması ve normalize edilmesi, ağırlıklandırılmış karar matrisinin oluşturulması, pozitif ve negatif ideal çözümlerin belirlenmesi, ayırım ölçütlerinin hesaplanması ve son olarak ideal çözüme göreli yakınlığın hesaplanması ve elde edilen sonuçların değerlendirilmesi ve

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yorumlanması yapılmıştır. Bu aşamalara göre yapılan çalışmada kullanılan finansal parametreler ve ağırlıkları Tablo 1'de verilmektedir.

4.1.1. Dar Gövdeli Uçakların Finansal Analizi

Tablo 1. Finansal Parametreler ve Ağırlıkları

Finansal Parametreler	Kısaltılmış Kodları	Ağırlıklar (%)
Uçak Kirası	Rent	15
Amortisman	Depr	15
Uçuş Ekibi Ücreti	Crew	20
Bakım	Main	15
Yakıt	Oil	20
Diğer	Othr	15
Toplam		100

Tablo 2. Dar Gövde Karar Matrisi (Blok Saat Başına Maliyetleri)

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)
Boeing 737-700	58	242	555	296	1721	108
Airbus 319	609	52	383	276	2237	162

Tablo 3. Karar Matrisinin Normalize Edilmesi

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)
Boeing 737-700	3364	58.564	308.025	87.616	2.961.841	11.664
Airbus 319	370.881	2704	146.689	76.176	5.004.169	26.244
Toplam	374.245	61.268	457.714	163.792	7.966.010	37.908
Karekök	611,75	247,52	674,32	404,71	2822,41	194,67

Tablo 4. Normalize Edilmiş Karar Matrisi

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)
Boeing 737-700	0,095	0,977	0,823	0,731	0,754	0,554
Airbus 319	0,995	0,210	0,568	0,682	0,792	0,832

Tablo 5. Ağırlıklı Karar Matrisi

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)
Boeing 737-700	0,01425	0,14995	0,1646	0,10965	0,1508	0,0831
Airbus 319	0,14925	0,0315	0,1136	0,1023	0,1584	0,1248

Tablo 6. Pozitif ve Negatif İdeal Çözüm Setleri

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)
Boeing 737-700	0,01425	0,14995	0,1646	0,10965	0,1508	0,0831
Airbus 319	0,14925	0,0315	0,1136	0,1023	0,1584	0,1248

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Tablo 7. Pozitif İdeal Çözüme Uzaklık Değerleri

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)	Toplam	Karekök	S*
Boeing 737-700	0	0,014	0,026	0	0	0	0,0166	0,129	S1
Airbus 319	0,018	0	0	0	0	0,0017	0,0197	1,14	S2

Tablo 8. Negatif İdeal Çözüme Uzaklık Değerleri

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)	Toplam	Karekök	S-
Boeing 737-700	0,018	0	0	0	0	0,0017	0,0197	0,129	S1
Airbus 319	0	0,014	0,026	0	0	0	0,0166	1,14	S2

Son basamakta yapılan hesaplamada ideal çözüme yakınlığa bakılmıştır. Hesaplamada alternatifin negatif ve pozitif ideal çözüm değerleri ele alınmakta olup kullanılan formül Denklem (1)'de gösterilmiştir.

$$C_i^* = \frac{s_i^-}{s_i^- + s_i^*} \tag{1}$$

$$C*_{Boeing} = \frac{0.14}{0.14 + 0.129} = 0.5204$$

$$C*_{Airbus} = \frac{0,129}{0,129+0.14} = 0,4795$$

 C^* Boeing > C^* Airbus

Bulunan bu sonuca göre; dar gövdeli Boeing B737-700 uçağı, dar gövdeli Airbus A319 uçağına göre ele alınan finansal parametreler bakımından daha üstün olduğu belirlenmiştir.

4.1.2. Geniş Gövdeli Uçakların Finansal Analizi

Geniş gövdeli uçakların finansal analizinde de yukarıda dar gövde uçakların analizinde olduğu gibi, sırasıyla Tablo 9 ile Tablo 15 aralarındaki tablolarda gösterilen karar matrisi oluşturulması ve normalize edilmesi, ağırlıklandırılmış karar matrisinin oluşturulması, pozitif ve negatif ideal çözümlerin belirlenmesi, ayırım ölçütlerinin hesaplanması ve son olarak ideal çözüme göreli yakınlığın hesaplanması ve elde edilen sonuçların değerlendirilmesi ve yorumlanması yapılmıştır.

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Tablo 9. Geniş Gövde Karar Matrisi (Blok Saat Başına Maliyetleri)

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oıl (\$)	Othr (\$)
Boeing 777-200	224	690	1122	1431	6711	457
Airbus 330-300	497	468	983	672	6380	18

Tablo 10. Karar Matrisinin Normalize Edilmesi

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oıl (\$)	Othr (\$)
Boeing 777-200	50.176	476.100	1.258.884	2.047.761	45.037.521	208.849
Airbus 330-300	247.009	219.024	966.289	451.584	40.704.400	324
Toplam	297.185	695.124	2.225.173	2.449.345	85.741.921	209.173
Karekök	545,14	833,74	1491,7	1580,93	9259,61	457,35

Tablo 11. Normalize Edilmiş Karar Matrisi

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oıl (\$)	Othr (\$)
Boeing 777-200	0,4109	0,8275	0,752	0,7731	0,7247	0,999
Airbus 330-300	0,9116	0,5613	0,6589	0,425	0,689	0,0393

Tablo 12. Ağırlıklı Karar Matrisi

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oıl (\$)	Othr (\$)
Boeing 777-200	0,0616	0,12412	0,1504	0,1159	0,14494	0,14985
Airbus 330-300	0,13674	0,084195	0,13178	0.06375	0,1378	0,0059

Tablo 13. Pozitif ve Negatif İdeal Çözüm Setleri

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)
Boeing 777-200	0,0616	0,12412	0,1504	0,1159	0,14494	0,14985
Airbus 330-300	0,13674	0,08419	0,1318	0,06375	0,1378	0,0059

Tablo 14. Pozitif İdeal Çözüme Uzaklık Değerleri

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oıl (\$)	Othr (\$)	Toplam	Karekök	S*
Boeing 777-200	0	0,0016	0,00034	0,0027	0	0,02	0,02194	0,148	S^1
Airbus 330-300	0,0056	0	0	0	0	0	0,0056	0,074	S^2

Tablo 15. Negatif İdeal Çözüme Uzaklık Değerleri

	Rent (\$)	Depr (\$)	Crew (\$)	Main (\$)	Oil (\$)	Othr (\$)	Toplam	Karekök	S-
Boeing 777-200	0,0056	0	0	0	0	0	0	0,074	S^1
Airbus 330-300	0	0,0016	0,00034	0,0027	0	0,02	0,02194	0,148	S^2

Yukarıda da ifade edildiği gibi, son basamakta yapılan hesaplamada ideal çözüme yakınlığa bakılmıştır. Hesaplamada alternatifin negatif ve pozitif ideal çözüm değerleri ele alınmakta olup Denklem (1)'deki formül kullanılmıştır.

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$$C*_{Boeing} = \frac{0.074}{0.074 + 0.148} = 0.333$$

$$C*_{Airbus} = \frac{0.148}{0.148 + 0.074} = 0.667$$

 C^* Airbus > C^* Boeing

Bulunan bu sonuca göre; geniş gövdeli Airbus A330-300 uçağı, geniş gövdeli Boeing B777-200 uçağına göre ele alınan finansal parametreler bakımından daha üstün olduğu belirlenmiştir.

4.2. Uçakların Operasyonel Analizlerinin Yapılması ve Değerlendirilmesi

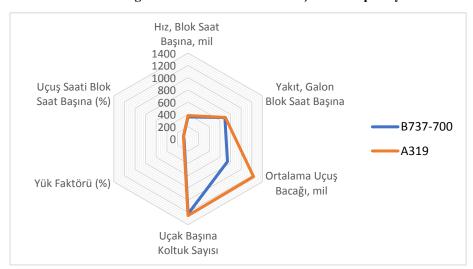
4.2.1. Dar Gövde Boeing B737-700 ve Airbus A319 Uçaklarının Analizi

Belirlenen uçakların operasyonel verileri, finansal değerler olmadığı için bu verilerin kıyaslanabilmesi için grafiksel bir analiz yapılmasının uygun olacağı değerlendirilmiştir. Her iki uçağın teknik özellikleri ve blok saat maliyetleri Tablo 16 ve Tablo 17'de açıklanmıştır.

Tablo 16. Dar Gövde Uçakların Operasyonel Özellikleri

	Hız, Blok Saat	Yakıt, Galon Blok	Ortalama Uçuş	Yük Faktörü	i Uçuş Saati Blok	
	Başına, mil	Saat Başına	Bacağı, mil	(%)	Saat Başına (%)	
B737-700	359	694	743	73	86	
A319	381	703	1234	82	87	

Şekil 1. Dar Gövde Boeing B737-700 ve Airbus A319 Uçakların Operasyonel Özellikleri



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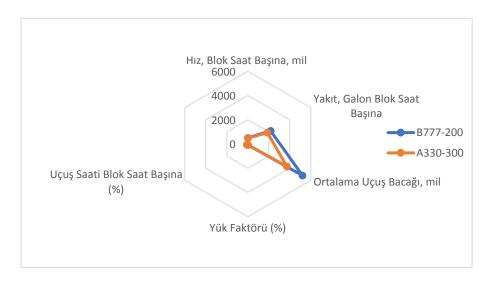
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Şekil 1'deki radar grafiğine göre; A319 dar gövdeli uçağının özelliklerini temsil eden çokgen B737-700 uçağının özelliklerini temsil eden çokgeni kapsadığı için genel olarak A319'un B737'ye göre daha üstün teknik ve operasyonel özellikler gösterdiği değerlendirilebilir.

Hız, Blok Saat Yakıt, Galon Blok Ortalama Uçuş Yük Faktörü Uçuş Saati Blok Başına, mil Saat Başına Bacağı, mil (%) Saat Başına (%) B777-200 497 2164 5201 80 94 A330-300 473 1867 3714 81 93

Tablo 17. Geniş Gövde Uçaklarının Operasyonel Özellikleri

Şekil 2. Geniş Gövde Boeing B777-200 ve Airbus A330-300 Uçaklarının Operasyonel Özellikleri



Şekil 2'deki radar grafiğine göre; 777-200'ün A330-300'e göre daha üstün teknik ve operasyonel özellikler gösterdiği değerlendirilebilir.

5. Bulgular ve Tartışma

Günümüzde maliyetlerin minimize edilmesi yaklaşımının hâkim olduğu havacılık sektöründe maliyet parametreleri açısından karşılaştırılarak daha rasyonel olan seçeneğin belirlenmesi önem kazanmaktadır. Topsis yöntemi kullanılarak yapılan analitik çalışmada kullanılan veriler esas alındığında; bölgesel uçuşların gerçekleştirildiği dar gövdeli uçaklardan B737-700'ün, A319'a göre; uzun mesafeli ve kıtalar arası uçuşların gerçekleştirildiği geniş gövdeli uçaklardan A330-300 uçağının, B777-200 uçağına göre maliyet avantajına sahip olduğu belirlenmiştir.

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Finansal etkinliğin analiz edilmesinde ele alınan parametreler; uçak kirası, amortisman, uçuş

ekibi ücreti, bakım, yakıt ve diğer maliyetlerden oluşmaktadır. Bir uçağın diğerinden üstün

olması ise bu parametreleri daha etkin kullanıyor olması anlamına gelmektedir.

Çalışmada ayrıca kullanılan radar grafik yöntemine göre; A319 dar gövdeli uçağın B737-700

dar gövdeli uçağa göre genel olarak daha üstün operasyonel özellikler gösterdiği; B777-200

geniş gövdeli uçağın ise A330-300 geniş gövdeli uçağa göre genel olarak daha üstün

operasyonel özellikler gösterdikleri belirlenmiştir. Dünyanın en büyük uçak üretici firmaları

olan Boeing ve Airbus firmalarının günümüz uçak üretim teknolojisi ve yazılımında

yapacakları yenilikleri barındıran uçak üretimi veya güncellemeler nedeniyle değişen teknik ve

operasyonel karakteristikler baz alındığında yapılacak analiz sonucu da değişebilecektir. Hava

yolu şirketleri kısmen kontrolü altında bulunan çok farklı teknik, operasyonel ve finansal

kriterler çerçevesinde faaliyette bulunacağı uçağı belirleyerek uçuş filolarını oluşturacaklardır.

6. Sonuç ve Öneriler

Diğer şirketlerde olduğu gibi hava yolu şirketlerinde de varlıkların temin edilmesi ve

kullanılması, şirket amaçlarına hizmet etmek ve şirket değerini maksimizasyonuna katkı

sağlamak durumundadır. Hava yolu şirketlerinin en önemli ve pahalı varlıkları olan uçakların

satın alınması ve kiralanması sürecinden bu varlıkların şirket amaçlarına hizmet edecek şekilde

verimli kullanımı, şirketin sürdürülebilirliği ve finansal başarısı açısından önemlidir.

Günümüzde hava yolu sektörü küresel düzeyde ekonomik ve siyasal krizler, salgınlar,

katastrofik felaketler gibi makro faktörlerden en yüksek düzeyde etkilenmekte ve bu etkiler

sektörde ver alan sirketlere hızlı bir sekilde yayılmaktadır. Bu durum hava yolu sirketlerinin

filolarında bulunan uçakların teknik özelliklerini, operasyonel kullanımlarını ve ortaya çıkan

maliyetlerin ve finansal durumun üzerinde hassasiyetle durulmasını ve analiz edilmesini

gerektirmektedir.

Yüksek düzeyde regülasyonlar, artan ulusal ve küresel rekabet baskıları ve artan yakıt ve

personel maliyetleri gibi sistematik ve sistematik olmayan riskleri yönetmek zorunda olmaları

nedenleriyle hava yolu şirketleri; çok yönlü kısıtlar altında stratejik ve operasyonel amaçlarını

gerçekleştirmek durumundadırlar. Bu maksatla ellerinde bulunan büyük uçak üreticisi firmalar

tarafından üretilmiş Boeing veya Airbus, dar gövde ve geniş gövde uçaklarının sahip oldukları

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özelliklere göre kullanımlarını planlaması ve optimizasyonunun yapılması hayati öneme sahiptir.

Bu çalışmada farklı uçak üreticisi şirketler tarafından üretilen dar gövdeli ve geniş gövdeli uçakların teknik, operasyonel ve finansal açıdan analiz edilmesi ve değerlendirilmesi amaçlanmıştır. Yapılan literatür taraması sonucunda bu çalışmanın; Verstraete (2015), Gökdalay ve Evren (2009), Bakır vd. (2020), Mahtani ve Garg (2020)'ın çalışmaları ile genel olarak uyumlu olduğu; bir hava yolu şirketinin uçak ediniminde kısmen kontrolü altında olan teknik, operasyonel ve finansal kriterlere göre karar vereceği, bu kriterlere göre uçağın etkinliğinin belirlenebileceği ve filosunu oluşturabileceği belirlenmiştir.

Bu çalışmada örnek veriler üzerinden farklı uçak üreticisi firmalar tarafından üretilen dar ve geniş gövdeli uçakların teknik, operasyonel ve finansal analizi yapılmış ve genel anlamda uçak etkinliği hesaplanmıştır. Bu tür bir analizin uçakların satın alma-kiralama kararlarında, filo ve uçuş planlamalarında, uçak değerlemesinde bir karar destek sistemi olarak hava yolu şirket yöneticilerine karar verme sürecinde yardımcı olabileceği değerlendirilmektedir. Boeing ve Airbus firmalarının günümüz uçak üretim teknolojisi ve yazılımında yapacakları yenilikleri barındıran uçak üretimi veya güncellemeler nedeniyle değişen teknik ve operasyonel karakteristikler baz alındığında yapılacak analiz sonucu da değişebilecektir. Bu nedenle yapılan bu çalışma farklı uçak modellerine de uygulanıp, ileride yaşanan gelişmelerle güncel tutulmalıdır. Etkinliğin nasıl arttırılabileceği konuları da farklı çalışmalarda ele alınabilir.

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Uluslararası Vergileme İş Birliğinde Güncel Eğilimler

Yunus KÖSE¹

Özet

Neoliberal iktisat politikalarının geniş ölçüde güç bulduğu ve farklı uluslararası mali mevzuatların ve çifte vergilendirmeyi önleme anlaşmaları (ÇVÖA) nın yürütüldüğü geniş bir coğrafyada faaliyet gösteren çok uluslu şirketler (ÇUŞ) agresif vergi planlaması motivasyonu ile önemli bir maliyet bileşeni olan verginin grup içerisinde optimum dağılımını sağlamak maksadıyla gerçekleştirdikleri vergi arbitrajları ile düşürdükleri efektif vergi oranları bir çok ülkenin vergi gelirlerinin aşınmasına sebep olmuştur. Uluslararası vergilendirmede iş birliği doğduğu dönemlerde temel argüman çifte vergilendirme veya vergilendirmeme iken, ÇUŞ'in gerçekleştirdikleri vergi arbitrajları ile ortaya çıkan vergi kaçırma ve vergiden kaçınma olguları uluslararası vergilendirme iş birliğinin yeni argümanları haline gelmistir. Bu calısma özellikle batılı devletlerin basını cektiği ve uluslararası örgütlerin yürüttüğü önleyici nitelikteki iş birliği hareketlerini inceleyerek bu iş birliklerinin ulusal vergi gelir kayıplarını önemli ölçüde azaltan arbitraj fırsatlarının paralize

Anahtar Kelimeler: Çok Uluslu Şirketler (ÇUS), Uluslararası Vergilemede İş Birliği, Vergiden Kaçınma, Vergi Kaçırma

edilip uluslararası vergi ikliminin geleceğini nasıl değiştireceğini ortaya koymaktadır.

JEL Kodları: F23, F38

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Current Trends in International Tax Cooparation

Abstract

Multinational companies (MNCs) operating in a wide geography, where neoliberal economic

policies find great strength and where different international financial regulations and double

taxation agreements are carried out, with the motivation of aggressive tax planning, in order

to ensure the optimum distribution of tax, which is an important cost component, within the

group. The effective tax rates they reduced with the tax arbitrages they carried out caused the

tax revenues of many countries to erode. While the main argument was double taxation or

non-double taxation in the periods when the need for cooperation in international taxation

arose, the tax evasion and tax avoidance phenomena that emerged with the tax arbitrages

carried out by the MNC have become the new arguments for international taxation

cooperation. This study examines the preventive cooperation movements led by western states

and carried out by international organizations and reveals how these cooperations will change

the future of the international tax climate by paralyzing arbitrage opportunities that

significantly reduce national tax revenue losses.

Keywords: Multinational Companies (MNCs), Cooperation in International Taxation, Tax

Avoidance, Tax Evasion

JEL Codes: F23, F38

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1. Giriş

Küreselleşme ve teknolojinin gelişmesiyle birlikte ekonomi, maliye ve dolayısıyla mükellefler

ile idare arasındaki ilişkiler hızlı bir değişim dönemine girmiştir. Buna karşılık mali

mevzuatlar aynı hızla değişmemiştir. Neoliberalizmin dünya ekonomisine hediye ettiği çok

uluslu şirketler (CUŞ) gelişen teknolojinin de etkisiyle vergi dünyasının ötesine geçmişlerdir.

CUŞ'lerin sermayeleri uluslararası vergi uygulamalarındaki farklılıklar ve çifte

vergilendirmeyi önleme anlaşmalarındaki (ÇVÖA) yasal boşlukların cazibesiyle geniş bir

coğrafyada hareket etmekteydi. Birçok vergi idaresinin CUŞ'lere ait karları düşük

vergilendirmesi veya hiç vergilendirmemesi "agresif vergi planlaması" kavramını ortaya

çıkardı. ÇUŞ agresif vergi planlaması motivasyonu ile yerel mevzuatlardaki ve çifte

vergilendirmeyi önleme anlaşmalarındaki farklılıkları fırsata çevirerek kurdukları uluslararası

şirketler vasıtası ile kazançlarını vergilemenin olmadığı veya çok düşük olduğu ekonomilere

transfer etmekteydiler.

Son yıllarda kamuoyunun vergiye bakışının değiştiği görülmektedir. Özellikle Batı

toplumlarında vergi, topluma yapılan bir yatırım olarak görülmekte ve bu kaynakta meydana

gelen bir kaybı, refahlarından calınan bir parca olarak algılamaktadırlar. Dolayısıyla CUS'in

gerçekleştirdikleri vergi arbitrajları ile düşürdükleri efektif vergi oranlarının vergi gelirlerinde

meydana getirdikleri erozyon medya ve kamuoyu tarafından sorgulanır hale gelmiştir².

Uluslararası vergilendirmede iş birliği (international tax cooperation) ihtiyacının ortaya

çıkmaya başladığı dönemlerde temel argüman "cifte vergilendirmenin önlenmesi" idi.

Ancak küresel ölçekte yürütülen neoliberal iktisat politikalarının serbestleştirici etkileri,

"vergiden kaçınma" ve "vergi kaçırma" olgularını da uluslararası vergilendirme iş

birliğinin argümanları haline getirmiştir.

Bugün uluslararası vergilemede iş birliği hususunda daha önce hiç olmadığı kadar kapsamlı

ve esas kabul edilebilecek gelişmeler yaşanmaktadır. Uluslararası kuruluşlar ülkelerin kontrol

ettiği matrahları aşındıran her zayıf alanı tespit edilerek üzerlerinde yoğun çalışmalara

girişmişler ve değerli hükümlerle bu çalışmalarını sonlandırmışlardır. Matrah aşındırmaya

.

² PwC şirketinin iki eski çalışanı, 340 küresel şirketin Lüksemburg hükumeti ile gizli vergi anlaşmaları imzaladığını ve milyonlarca Euro vergi kaçırdıklarını belgeleyen 28 bin sayfalık belgeyi 2012 yılında kamuoyu ile paylaşmıştı. Skandal İkea, Pepsi, Burberry, Procter and Gamble gibi dünya devi şirketleri kapsıyordu. AB, OECD'nin vergi kaçakçılığı ile mücadele ikazını dikkate alarak vergi kaçakçılığı ile mücadele etme sözü vermisti. https://tr.euronews.com/2016/04/26/luksleaks-skandali-nedir

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neden olan fırsatları ortadan kaldırmaya yönelik en önemli gelişmelerden bir tanesi otomatik

bilgi değişiminin en gelişmiş halini ortaya koymak olmuştur.

Birden fazla ülkenin mükellefi durumunda olan ÇUŞ'lerin yasalara uygun olarak vergi

matrahlarını azaltmaları ve kazançlarını kolaylıkla avantajlı ülkelere kaydırabilmeleri, söz

konusu ülkelerin ortak endişesi haline gelmiştir. Kendi mali egemenlik alanlarında toplaması

gereken vergi gelirlerini korumak ve mükelleflerinin vurt dısında elde ettikleri gelirler

hakkında bilgi sahibi olabilmek için kapsamlı bir küresel projenin hayata geçirilmesi

gerekliliğini hisseden ülkeler iletişim, iş birliği ve etkileşim içerisine girerek uluslararası vergi

konjonktüründe önemli değişikliklere zemin hazırlamışlardır.

Ulusal vergi mevzuatları arasındaki farklılıklar bir mükellef ya da matrah ile ilgili iki sorun

ortaya çıkarabilir. Ya vergilenebilir bir olay iki veya daha fazla ülkenin vergileme yetkisine

dahil olur (vergileme yetkisinde çatışma) ve çifte vergilendirme ortaya çıkar. Ya da

vergilenebilir bir olayın vergi dışı kalmasına (vergileme yetkisi boşluğu) neden olabilir. Yani

her iki durumun temelinde ulusal vergi mevzuatları arasındaki uyuşmazlıklar yatmaktadır.

Her iki yönüyle sorunun çözümü mutlak surette iş birliği gerektirir (Çevik, 2013:7-8).

ABD finansal bilgilerin otomatik değisimi konusunda genel politikanın fitilini ateslevince

G20'nin siyasi himayesinde, teknik altyapısını Ekonomik Kalkınma ve İş Birliği Örgütü

(OECD)'nün gerçekleştirdiği küresel ölçekli bilgi değişimi çalışmaları ile eş zamanlı

yürütülen "Kazanç Aktarımı Yoluyla Matrah Aşındırılmasının Önlenmesi Eylem Planı

(BEPS)" kapsamında önemli ilerlemeler kaydedilmiştir (Erdem, 2016:102).

2. Vergi Rekabeti ve Zararlı Vergi Uygulamaları

Uluslararası vergi mevzuatlarındaki farklılarının en önemli sebebi "uluslararası vergi

rekabeti"dir. Uluslararası vergi rekabetinden dolayı vergi idarelerinin hâkim oldukları

matrahların aşınması ve vergileme kapasitelerinin azalması uluslararası vergilemede iş birliği

ihtiyacını artırmıştır.

Modern dönem ekonomi sistemlerinde vergi politikaları ülkenin kendi sosyo-ekonomik iç

dinamiklerine göre dizayn edilmiştir. Ortaya çıkabilecek vergisel sorunlara müdahil olan

çözümlemeler de yine bu iç dinamiklere göre şekil almıştır. Ancak küresel ekonominin

günümüz itibariyle aldığı boyutu düşündüğümüzde, bu ekonomilerin ortaya çıkardığı vergi

problemlerine karşı ulusal çözümlerin yeterli olmayacağı aşikardır. Ulusal vergi politikaları,

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yalnızca uygulandığı ülkenin mükelleflerini değil, o ülkenin dışında faaliyet gösteren mükellefleri de yakından ilgilendirmeye başlamıştır.

Hükümetler artan küreselleşme hareketleri karşısında özellikle kurumlar vergisi oranlarını doğrudan azaltarak veya vergi teşvikleri ile uluslararası matrah oluşturabilecek sermayeyi çekerek ve kontrol ettiği matrahı mali egemenlikleri dışına çıkmasına izin vermeyerek bir rekabetin içerisine girerler. Mobil vergi matrahlarını vergilemedeki artan zorluğun bir sonucu olarak vergilerin kompozisyonu şu yönde değiştirilecektir; mobil olmayan vergi matrahları üzerindeki vergilerin artması beklenirken, sermaye ve vasıflı emek gibi mobil matrahları üzerindeki gelir vergilerinden ortaya çıkan bütün vergi yükü azalacaktır (Günaydın, 2003:424).

Vergi rekabetinin ortaya çıkardığı negatif mali dışsallığın ülkelerin vergi politikalarının, vergi sistemlerini olumsuz yönde etkilememesi için hükümetler üç yolla yanıt verebilirler (Owens, 2002:15-16); ilk secenek, ulusal sınırlar içerisine çekilebilirler ve küresel vergi sorunlarına karşı "izolasyoncu" bir yaklaşıma geri dönebilirler ki, bu günümüz küresel ortamında açıkça uygulanabilir değildir. Hiçbir ülke kendi vergi reformunun uluslararası kısıtlamalarını ve sonuçlarını görmezden gelecek kadar kendisini izole edemez ve bu arzu edilen bir durum değildir. İkinci seçenek, uluslararası vergi sistemlerinin uyumlaştırılması için baskı yapmaktır. Yani küresel bir vergi otoritesi tarafından yönetilen bir tür küresel vergi kanunu yapmak. Bu, vergi konularının artan uluslararasılaşmasına yönelik rasyonel bir yanıt gibi görünse de hükümetlerin vergileme gibi temel bir egemenlik hakkından vazgeçmesi anlamına gelir. Dolayısıyla bu seçenek ne arzu edilebilir ne de uygulanabilir bir politika olacaktır. Hükümetlerin egemenlik haklarına dayanarak yaptığı vergilendirme, her ülkenin kendi politik realiteleri, ekonomik gereksinimleri ve sosyo-kültürel yapısına göre düzenlenir ve hükümetler bundan vazgeçmeyecektir. Ekonomi-politik amaçlar doğrultusunda tesis edilmiş grup sistemlerin vergileme yapıları ortak hedefleri için uyumlaştırılmış bir tutarlılığı gerektirebilir. Ancak ulus devletlerin vergi sistemlerinin birbirleri ile uyumlu hale getirilmeleri için bir sebep olmadığı gibi bunun neye benzeyeceği konusunda da bir fikir birliği yoktur. Üçüncü seçenek ise, uluslararası bilgi paylaşımını da içeren şeffaf sistemler kurarak bir iş birliği oluşturmak. Bu seçenek küreselleşmenin artan baskılarına en uygun yanıt olacaktır. Zira ulusal hükümetler kendi vergi sistemlerini kendi iç dinamiklerine göre dizayn ederlerken bu dizaynın uluslararası vergi sistemlerini etkileyeceğini ve diğer sistemlerden de etkileneceğini

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bileceklerdir (Owens, 2002:15-16). Vergi cennetlerini kullanarak vergiden kaçınan mükellef

hakkında bilgi edinmek isteyen politika yapıcıları, aynı ihtiyaç doğrultusunda tesis edilen

uluslararası iş birlikleri kapsamında gerçekleştirilen kısıtlamaları görmezden

gelemeyeceklerdir.

Küreselleşen dünyada sosyal ilişkiler üzerindeki asıl belirleyici unsur, piyasa mekanizması ve

bu mekanizmanın bir numaralı aktörü de firmalardır. Bu sürecte ulusal ekonomilerin verini

ÇUŞ'in etkin olduğu ve uluslararası üretim ağlarından oluşan "küresel ekonomi" ve "küresel

payasalar" almaktadır. Küresel piyasaları yönlendiren ÇUŞ ile bu şirketlerin arkasındaki

birkaç güçlü ulus devlet, çıkarları doğrultusunda dünyanın geriye kalanına belirli politikaları

dayatarak, "geriye döndürülemez" ve "karşı konulamaz" şeklinde tanımladığı bu süreçte

boyun eğmekten başka yapacak bir şeyleri olmadığını iddia ederler. Bu koşullarda küresel

sermayenin taleplerine karşı direnemeyen ve sonuçta ulusal piyasalarını bu sermayeye açarak

"küresel rekabet" ile karşı karşıya bırakan ulus devletlerin vergi ve refah politikaları

konusunda "dibe doğru yarış" (race to the bottom) dışında bir alternatifleri kalmamaktadır

(Vural, 2006:92-93).

CUŞ'in domine ettiği küresel ekonomi içerisinde, bir ülke için yalnızca kendi mükelleflerini

ve sermayesini tutmak değil, aynı zamanda başka ülkelerin de mükellef ve sermayelerini

çekmek önem arzetmiştir. Uluslararası rekabet etme baskısı hükümetleri daha rekabetçi vergi

sistemlerini benimseme zorunluluğuna itmiş ve böylece hükümet operasyonları daha etkin ve

modern hale gelmiştir. Küreselleşme vergi politikası alanında yeni zorluklar ortaya

çıkarmıştır. Finansal ve coğrafi olarak serbest faaliyetleri amaçlayan vergi düzenlemeleri,

ülkelerarasında ve federal devletlerde eyaletler arasında zararlı vergi rekabetine sebep

olabilmekte; ticaret ve yatırımı rahatsız edici riskler taşıyabilmekte ve ulusal vergi

tabanlarının erozyonuna neden olabilmektedir (Pehlivan ve Öz, 2015:202).

Hükümetler finansal ve doğrudan yatırımları kendi ekonomilerine çekmek, özellikle de

yabancı sermaye akımlarını cezbetmek için bu kaynakları ya hiç vergilendirmemekte veya

çok düşük vergilendirmektedir. Bu uygulamalar diğer ülkelerin vergi tabanlarını, o ülkelerin

kamu hizmetlerini, maliye ve vergi politikalarını olumsuz etkileyecek şekilde kaynaklarını

erozyona uğratan haksız vergi rekabeti veya zararlı vergi uygulamalarıdır.

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Vergi, yatırım maliyetlerinin bileşenlerinden biri olduğu için, ÇUŞ vergi sonrası gelirlerini artırabilmek maksadıyla yatırımlarını düşük vergi oranlarının uygulandığı ekonomilerde gerçekleştirmeyi arzu ederler. Zira ÇUŞ için özellikle önemli olan doğrudan vergiler, yatırım maliyetlerini artırdığı için sermayenin marjinal etkinliğini olumsuz etkileyecektir. Aynı duruma bir ulus devlet ekonomisi açısından yaklaşırsak, ulusal ekonomi yönetimi, neoliberal iktisat politikalarının domine ettiği ekonomilerde yüksek vergi oranlarının ekonomik büyümeyi ve üretim kapasitesini ters yönde etkileyeceğini bildiği için finansal ve doğrudan yatırımları cezbetmek için düşük vergi oranları ile çalışmayı tercih edecektir. Bir ülkenin vergi politikalarını bu sekilde dizayn etmesi diğer ülkeleri de bu yönde hareket etmesi

Vergi rekabeti bir yandan kamu harcamalarında etkinliğin sağlanması ve kaynakların daha rasyonel kullanılması hususunda refah artırıcı etkiler meydana getirirken, diğer yandan uluslararası yatırım kararlarının sapması sonucunda kimi ülkelerin vergi gelirlerinde meydana gelen kayıplar yanlış kaynak dağıtımına neden olarak "haksız vergi rekabeti"ne sebebiyet verebilmektedir. Zira uluslararası alanda serbestçe hareket eden sermaye, kamusal hizmetlerinden en çok yararlandığı ülkeden ayrılıp, düşük oranlı vergi uygulanan ülkeye gitmek suretiyle geride kalan ve kamu hizmetlerinin finansmanı için daha fazla vergi ödeyen ancak haraketli olmayan sermaye sahipleri üzerinden bir nevi haksız kazanç elde etmiş olacaktır (Pehlivan ve Öz, 2015: 102-107).

Literatürde bazı çalışmalar vergi rekabetinin ekonomik büyümeyi hızlandıracağını³, mali sorumluluğu artırarak kamu harcamalarında etkinliği artıracağını ve toplum refahının yükselmesine katkı sağlayacağını⁴ iddia etse de uluslararası yatırım kararlarının sapması sonucunda bazı ülkelerin vergi gelirlerinde meydana getirdiği kayıplar nedeniyle yanlış kaynak dağılımına yol açarak "haksız vergi rekabeti"ne neden olduğu için başta Avrupa Birliği (AB) ve OECD olmak üzere çeşitli uluslararası kurum ve kuruluşlar önleme çalışmaları gerçekleştirmişlerdir.

Gerek çifte vergilemeden kaçınma gerekse uluslararası vergi kaçırma ve kaçınma faaliyetlerini önleme çabası, birbirleri ile etkileşim içerisinde olan *tek taraflı (ulusal)*

³ Daniel J. Mitchell, An OECD Proposal the Eliminate Tax Competition Would Mean Higher

Taxes and Less Privacy, Published by Heritage Foundation, 2000

hususunda baskılayacaktır.

⁴ Tiebout, C. M, "A Pure Theory of Local Expenditures", Journal of Political Economy, 1956

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düzenlemeler, iki taraflı (karşılıklı) anlaşmalar ve çok taraflı uluslararası girişimler şeklinde

üç sac ayağı üzerinde kurumsallaşmış bir uluslararası vergileme sistemi yaratmıştır (Çevik,

2013:39).

3. Uluslararası Vergileme Rejiminde İşbirliğine Yönelik Güncel Gelişmeler

Yirminci yüzyıl uluslararası vergileme rejiminin temel problematiği olan "cifte

vergilendirme" ve "vergilendirme yetkisinin tahsisi" sorunu, özellikle neoliberal iktisat

politiklarının küresel ekonomiye hâkim olması ile birlikte ortaya çıkan finansal serbestleşme,

finansal araçlardaki yenilikler, uluslararası ticaret ve yatırım hacminde meydana gelen

muazzam artış ile birlikte ortaya çıkan kompleks yapıların neden olduğu büyük vergi

kayıpları nedeniyle ikincil bir sorun haline gelmiştir.

Artık uluslararası vergileme rejiminin odaklandığı sorun vergi kaçırma/vergiden kaçınmadır

ve bunu ortaya çıkaran üç temel sebep bulunmaktadır. Birincisi, ÇUŞ tarafından yaratılan

potansiyel matrahın tamamına hâkim olamamak, ikincisi, sınır ötesi yatırımları cezbetmek

için gelişmekte olan ülkeler arasındaki rekabet ve üçüncüsü, vergi idarelerinin mükelleflerin

denizaşırı ülkelerdeki gelir ve mal varlıklarına ilişkin vergi tarh edememeleridir (Fitzgerald,

2002:2).

Yirminci yüzyıl uluslararası vergileme iş birliğinin kurumsal yapısının, vergi kaçırma ve

vergiden kaçınma ile ilgili kuralları çifte vergilendirmeyi önleme anlaşmalarındaki (ÇVÖA)

banka ve ticari sırlar gibi ulusal mevzuatlar ile etkisi kısıtlı kalmıştır. Hükümetler vergi

kaçırma ve agresif vergi planlamaları ile mücadele etmek için iç hukuklarında önlemler

almaya çalışmışlarsa da konunun "çok taraflı" olması ve iş birliği gerektirmesi bu tür

önlemlerin etkisini sınırlı kılmıştır (Rixen, 2008:13).

Uluslararası iş birliğinin en temel getirisi, mükellefin yurt dışında elde ettiği geliri tespit

etmeyi sağlayacak olan "bilgi paylaşımı"dır. Bu konuda da dikkat edilmesi gereken ve

beklenen husus, "kişisel mahremiyet" olacaktır. İdareler yalnızca vergi suçu kapsamına

girecek olan konularda bilgi paylaşımına başvurmalı ve kişisel mahremiyetin sağlanması için

bilgi değişimini demokratik ülkeler arasında gerçekleştirmelidirler (Rahn-Rugy, 2003:9).

Uluslararası vergileme rejiminde oluşturulacak potansiyel iş birliği çalışmaları vergi

idarelerini teknolojik bir adaptasyona zorlayacak ve modernize olmalarını sağlayacaktır.

Böylelikle küreselleşmenin getirdiği vergi sorunları ile mücadele daha da kolaylaşacaktır.

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Uluslararası iş birliğinin sağlayacağı bir diğer getiri, uluslararası vergi işlemlerini bir

yeknesaklığa kavuşturacak olan "vergi mevzuatlarının uyumlaştırılması" olacaktır (Günaydın

ve Benk, 2004:44-446).

Uluslararası vergi rejiminde işbirliğinin ilk ve temel öncüleri olarak faaliyet gösteren Dünya

Ticaret Örgütü (WTO), Birleşmiş Milletler Ekonomik ve Sosyal Konseyi, Birleşmiş Milletler

Ticaret ve Kalkınma Konferansı, Uluslararası Para Fonu ve Dünya Bankası, Dünya

Tüketiciler Örgütü, OECD, Ortak Pazar Vergi İdareleri Birliği, Amerika Vergi İdareleri

Merkezi, Asya-Pasifik Ekonomik İşbirliği Forumu, Vergi İdareleri Buluşma ve Araştırma

Merkezi, Avrupa Birliği (AB), Avrupa Vergi İdareleri Organizasyonu, Pasifik Vergi İdareleri

Birliği, Asya Vergi İdareleri ve Araştırma Grubu, İskandinav Grubu, Karaib Adaları Vergi

İdareleri Organizasyonu'nun uluslararası vergilendirmeye ilişkin olarak ortaya çıkan sorunlar

üzerinde etkili olabilmeleri için aralarında koordinasyonu sağlayan bir örgütün bulunması

gerekmektedir. Aksi halde adı geçen organizasyonların uluslararası vergi sorunlarını çözmede

sığ kalacaklardır (Günaydın ve Benk, 2004:48-449).

Model Vergi Anlaşmaları uzun müzakereleri gerektirmeden ortaya çıkabilecek uluslararası

vergi uyuşmazlıkları hususunda tarafları bir konsensüste buluşturup bu yönde hissedilen

ihtiyacı büyük ölçüde ortadan kaldıracaktır.

Hali hazırda karmaşık bir yapıda olduğunu gördüğümüz ulusal vergi mevzuatlarının

uluslararası düzeye taşınarak devletler arasında müzakere edilmesi, konuyu daha da karmaşık

hale getirmektedir. Politik, kültürel, ekonomik ve hukuksal farklılıkları olan iki devletin bu

kompleks yapı içerisinde bir anlaşma akdetmek için vergi mevzuatlarını müzakere edip ortak

bir yol bulmaları oldukça sıkıntılı bir süreç olacaktır. Model vergi anlaşmalarına olan temel

gereksinim, bu sıkıntılı süreci en mutedil hale getirmek olacaktır. Model vergi anlaşmaları

mali ve hukuki mevzuatları birbirlerinden oldukça farklı olan vergi idarelerinin

müzakerelerini kolaylaştırmak için taraflara hazır bir metin sunmaktadır. Bu metin sayesinde

uzun, yorucu ve içinden çıkılamaz hale gelen müzakere süreçleri mümkün olduğunca kolay

bir şekilde sonuca bağlanır (Bayar, 2006:53).

Çifte vergilendirmenin önlenmesine yönelik olarak model vergi anlaşması çalışması yapan ilk

uluslararası kuruluş Milletler Cemiyeti (MC) oluyor. 1921 yılında yayımladığı bir raporda,

çifte vergilendirmenin, uluslararası sermaye hareketleri ile ekonomik bütünleşmelerin

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önündeki en büyük engel olduğunu açıklayarak, bu çalışmalarını 1928 yılında hazırladığı bir anlaşma modeli ile somutlaştırmıştır (Pehlivan ve Öz, 2015:94). MC'den sonra model vergi anlaşmalarına ilişkin benzer çalışmaları OECD yapıyor. Bugün dünyada muteber olduğunu söyleyebileceğimiz OECD ve Birleşmiş Milletler (BM) tarafından hazırlanmış iki model vergi anlaşması vardır. Bu modellerin her ikisi de bir ulus devlet tarafından değil uluslararası örgütler tarafından hazırlanmıştır. Dolayısıyla modeller bir ulus devlet menfaatine yönelik değil, tarafsız bir pozisyon almaktadır (Bayar, 2006:54, Çevik, 2013:127).

BM ve OECD'nin çifte vergilemeyi önlemek maksadıyla tasarlamış oldukları model vergi anlaşmalarının çözüme kavuşturamadığı meselelerde mükellefler karşılıklı anlaşma usulü (KAU), ulusal ve uluslararası mahkemeler ve tahkim yoluna gidebilmektedirler. KAU ve tahkim yöntemleri BEPS Eylem Planı'nın 14. Aksiyonunda ele alınmıştır. 14. Aksiyon uluslararası vergisel uyuşmazlıkların çözümünde KAU'nün daha etkin bir şekilde kullanılmasını hedeflemektedir. Aynı şekilde uyuşmazlıklarda çözüm talep eden taraflar tahkim yolunun da bir seçenek olmasını amaçlamaktadırlar (Terzi, 2018:41).

Neoliberal iktisat politikalarının önünü açtığı sınır ötesi sermaye hareketleri ve dijital ticaret devletin vergilendirme konusundaki egemenlik haklarını kullanmanın önünde bir engel teşkil etmektedir. Vergi idarelerinin mükelleflerinin sınır ötesi faaliyetlerine ilişkin matrahları hakkında bir bilgi seti oluşturabilmesi için idareleri arası bir iş birliği ihtiyacı doğmuştur. Bu ihtiyaç daha ziyade bilgi paylaşımına ilişkindir ve çok taraflı bir mücadeleyi gerektirecektir.

Vergi kaçırma/kaçınma ile mücadele ülkelerin tek taraflı çalışmalarının yanı sıra iki taraflı (bilataral) mekanizmalar ve çok taraflı (multilateral)⁵ mekanizmalar ile yürütülmektedir (Çevik, 2013:204). Uluslararası vergileme iş birliği konusunu en çok domine eden mefhum olan "bilgi değişimi", konusundaki en önemli dayanak OECD tarafından 1963 yılında tasarlanan "Gelir ve Servet Vergilerinde Çifte Vergilendirmeyi Önleme Anlaşması Taslağı"

⁵ *Vergi Konularında Karşılıklı idari Yardımlaşma Sözleşmesi (KİYS) (Convention on Mutual Administrative Assistance in Tax Matters)

^{*}Uluslararası Gümrükler Suçlarının İncelenmesi, Önlenmesi ve Bastırılması Konusundaki Karşılıklı İdari Yardımlaşma Sözleşmesi (International Convention Mutual Administrative Assistance fort he Prevention,

^{*}Investigation ond Repression of Custom Offences)

^{*}Gümrük Meselelerinde Karşılıklı İdari Yardımlaşma Sözleşmesi (Mutual Administrative Assistance in Custom Matters)

^{*}Inter-Amerikan Vergi Daireleri Merkezi'nin 1999 tarihli model anlaşması

^{*}Vergi Konularında Karşılıklı Yardımlaşmaya Dair NORDIC Sözleşmesi

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isimli model anlaşması olmuştur. Bilgi değişimi hususu bu model anlaşmanın 26. Maddesinde geniş olarak ele alınmıştır (Özdemir, 2020:11).

OECD Model şerhi madde 26. Bilgi değişiminin üç yolla yapılabileceğini ifade eder (Çevik, 2013:210);

- İstek Üzerine Bilgi Değişimi: Vergileme prosedüründe olağan yollar tüketildikten sonra diğer devletten belirli, özel bir durum hakkında bilgi istenmesi,
- Otomatik Bilgi Değişimi: İki devlet arasında bir veya birden fazla gelir kategorisi ile ilgili sistematik bilgi akışının sağlanması
- Kendiliğinden Bilgi Değişimi: Belirli denetimlerden elde edilmiş ve diğer devletin ilgisine olabileceği tahmin edilen bilgilerin paylaşılması

Çifte vergilendirme anlaşmaları kapsamında en genel ve en çok kullanılan bilgi değişimi yönetimi talep üzerine bilgi değişimi olmuştur. Ancak, talep üzerine bilgi değişimi için getirilen mükellef bilgilerinin mahremiyeti hususu bilgi değişiminin etkinliğini azalttığı için siyasi ilgi otomatik bilgi değişimine üzerine odaklanmıştır (Ateş, 2015:673-674).

Uluslararası vergilemede iş birliğinin temeli, karşılıklı veya çok taraflı yapılan anlaşmalardan ziyade bu anlaşmaların hükümlerini uygulayabilmeyi sağlayacak olan karşılıklı veya çok taraflı bilgi değişimi olacaktır. Dolayısıyla günümüz maliyesinin en önemli konu başlıklarından birini oluşturan "vergilemede uluslararası iş birliği"ni gerçekleştirecek olan mefhum, anlaşmalardan daha çok bu anlaşmaları başarıyla uygulayabilmek için gerçekleştirilen bilgi değişimleridir.

Zararlı vergi rekabeti uygulayan ülkelerin kolaylaştırdığı vergi kaçırma ve vergiden kaçınma imkanlarını yönelik uluslararası iş birliği ve şeffaflığın artırılmasına yönelik yakın geçmişte yaşanan iki önemli gelişme var. Bunlardan ilki küresel ölçekte şeffaflığın artırılması ve uluslararası bilgi değişimini belirli standartlara kavuşturmak için vergi kaçırma/vergiden kaçınma faaliyetlerini sınırlandırmayı hedeflemektedir. Bu amaçla bir *eşdenetim* (*peer review*) *mekanizması* ve *notlandırma* (*raiting*) işlevi üstlenen "Vergi Amaçlarına Yönelik Şeffaflık ve Bilgi Değişimi Küresel Forumu" (Global Forum on Transparency and Exchange of Information for Tax Purposes) oluşturulmuştur (Erdem, 2016:91).

⁶ "Vergi Amaçlı Şeffaflık ve Bilgi Değişimi Küresel Forum" 2000 yılından bu yana "vergide şeffaflık ve bilgi değişimi" alanındaki çalışmaların merkezini oluşturur. Forumun maksadı OECD ve G20'nin de desteği ile vergi

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3.1. Yabancı Hesap Vergi Uyumu Anlaşması FATCA (Foreign Account Tax Compliance

Act)

Şeffaflık ve bilgi değişiminde uluslararası vergileme iş birliği alanında atılan önemli bir adım

Yabancı Hesap Vergi Uyumu Anlaşması FATCA (Foreign Account Tax Compliance Act)

dır. Bu anlaşma ABD'de vergi kaçakçılığı ile mücadele etmek için ABD Hazine Bakanlığı ve

ABD Gelir İdaresi tarafından 2010 yılında yürürlüğe konmuş bir mevzuattır. ABD bu yasa ile

yabancı finansal kuruluşlara kendi mukimlerinin beyan dışı bıraktıkları finansal varlıklarını

ABD Gelir İdaresine raporlama zorunluluğu getirmektedir.

FATCA uluslararası alanda büyük kabul görmüş ve kısa sürede uluslararası iş birliğine örnek

teşkil ederek matrah aşınmasını engellemeye yönelik otomatik bilgi değişimine dayalı yeni bir

mekanizma ortaya koymuştur (Kahriman ve Tepekule, 2014:98).

ABD vergi mevzuatına göre ABD vatandaşları dünyanın neresinde olurlarsa olsunlar her yıl

yıllık gelir beyannamelerini vermek zorundalardır. ABD bu anlaşma ile yıllık gelir

beyannamesini vermeyen mükellefleri tespit edebilmek için dünyadaki bankalara,

bünyelerindeki ABD vatandaşlarını tespit edip finansal varlıklarını kendilerine bildirme

talimatı veriyor.

Yasa hükümleri kapsamında, bildirim yükümlüğünü yerine getirmeyen finansal kuruluşlar ve

bireysel hesap sahipleri ile ortakları arasında ABD mükellefi olup olmadığı tespiti için gerekli

bilgileri Amerikan Gelir İdaresine (IRS) raporlamayan şirketler "FATCA Uyumsuz" olarak

sınıflandırılıp elde ettikleri ABD kaynaklı gelirleri (temettü geliri, her türlü portföy yatırımı

faiz geliri, ücret, maaş, kira gelirleri, lisans ücreti, telif hakkı ödemeleri vb.) üzerinden %30

oranında stopaj uygulandığı gibi uluslararası finans sisteminin dışında çıkarılması ve muhabir

banka ile işbirliklerinin sonlandırılması gibi yaptırımlar söz konusudur.

FATCA uyumlu finans kuruluşları ABD mukimi gerçek kişiler için 50000 USD ve üzeri,

tüzel kişiler için ise 250000 USD ve üzeri bakiyeleri Amerikan Gelir İdaresi'ne bildirmekle

yükümlüdürler (www.garantibbva.com).

şeffaflığı konusunda standartlar oluşturmaktır. 2009 yılında yeniden yapılanan Forum, vergi şeffaflığı konusunda uluslararası standartların uygulanması için çalışmalar yürüten önemli bir oluşum haline gelerek bilgi değişiminde "uluslararası ölçekte konsensüse varılmış standartların uygulanmasını teşvik etmektedir

(www.vergidegundem.com)

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ABD Gelir İdaresi, FATCA hükümlerini uygulayabilmek maksadıyla imzaladığı hükümetler

arası anlaşmaları (IGA) iki farklı şekilde modellemiştir. Model 1 uygulaması yabancı finansal

kuruluşların (FFI) FATCA gereği ABD Gelir İdaresine (IRS) bildirmekle yükümlü oldukları

bilgileri yetkili kılınmış yerel bir otorite aracılığı ile raporlama şeklinde yürütülürken, Model

2 uygulaması yabancı finansal kuruluşların aynı tür bilgileri doğrudan ABD Gelir İdaresine

raporlaması şeklinde yürütülür⁷ (OECD, 2013:15).

3.2. ABD Yeni Model Anlaşması

Uluslararası vergileme iş birliğinde son yıllarda yaşanan dönüşümün temel güdüsü şeffaflık

olunca ABD'nin FATCA ile atmış olduğu adımın bir benzerini AB ve OECD "Otomatik Bilgi

Değişimi" ile atıyor. Ancak ABD, OECD ve AB ülkelerinin sözleşmesine katılmamış ve

kendi anlaşmasını yürütmeyi tercih etmiştir.

ABD Hazine Bakanlığı kontrol etmiş olduğu matrah üzerindeki aşınmayı minimuma indirmek

maksadıyla, yine bu amaçla dizayn ettiği FATCA'nın ardından en son 2006 yılında

güncellemiş olduğu ABD Model Vergi Anlaşması'nı 17 Şubat 2016 tarihinde yeniden

güncelleyerek kamuoyuna duyurmuştur. ABD'nin ÇVÖ anlaşmaları ve otomatik bilgi

paylaşımı vizyonunu getirdiği son nokta olan güncellenmiş Model Vergi Anlaşması,

uluslararası vergi hukuku alanındaki mevcut kuralları ileri bir noktaya taşımış görünüyor.

ÇVÖ anlaşmalarının uluslararası vergi sorunlarına karşı genellikle iki aşamalı çözümü vardır.

İlk aşamada vergileme yetkisine sahip ülke belirlenerek bir verginin konusu veya bir

mükellefin mükerrer bir vergilendirmeve maruz kalması engellenir. Eğer çifte vergilendirme

engellenemediyse mahsup veya istisna yöntemleri ile telafi mekanizması işletilir.

ABD'nin güncellenmiş Model Vergi Anlaşmasındaki yeni eğilim çifte vergilendirme riskinin

bertaraf edilmesinin de ötesinde, çifte vergilendirmeme ve ülkelerin anlaşma yoluyla almış

oldukları vergilendirmeme yetkilerini kullanarak kendi ülkelerinde vergisel avantajlar

yaratmasının önüne geçmeye yöneliktir.

Bu yaklaşıma göre ÇVÖ anlaşmalarını ülkelerin vergileme haklarını nasıl

kullanabileceklerine ilişkin sınırlamalar şekillendirmektedir. Başka bir ifadeyle ülkelerin

⁷ IRS, FATCA ile belirlenen IGA Model I ve Model II anlaşmaları, resmi olarak imzalamamış veya yürürlüğe girmemiş olan ülkeleri "agreed-in-substance" statüsü vererek takip edeceği ülkeler için oluşturduğu listesine ekledi. Türkiye de ABD ile hükümetler arası anlaşmayı Model 1 esasına göre imzalayarak karşılıklı bilgi değisimini kabul etmistir (Bulut, 2015:33).

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zararlı vergi rekabetine neden olacak ve anlaşmanın tarafı olan diğer ülkeyi olumsuz etkileyecek vergi politikalarına sınırlama getirmeyi önermektedir (Erdem, 2016:94).

2016 güncellemesi ile ABD Hazine Bakanlığı, vergi anlaşmalarının suiistimali sonucunda vergilendirme fırsatlarını azaltan veya yok eden koşulları ortadan kaldırmaya yönelik 3 önemli yeni hüküm koymuştur;

• Özel Vergi Rejimi (special tax regime, "STR"),

Vergi cennetleri mobilitesi yüksek olan gelirleri tercihli vergi rejimleri ile ya hiç vergilendirmeyerek veya çok az bir oranda vergi tahakkuk ederek kendi ekonomilerine çekmeye çalışırlar. ABD, model vergi anlaşmasındaki 2016 güncellemesi ile kaynak ülkede faaliyet gösteren bir mükellef, başka bir akit devlette mukim olan lehtarının faiz ödemesi, gayrimaddi hak bedelleri veya teminat ücretleri gibi diğer gelirlere ilişkin olarak özel bir vergi rejiminden faydalanması durumunda kaynak devletin iç mevzuatına göre vergilendirilecektir. Zira güncel Model Vergi Anlaşmaları klasik amaçlarının ötesinde çifte vergilendirilmeme veya vergi kaçırma/vergiden kaçınma fırsatları ile daha az vergi ödemeye olanak tanıyan koşulları ortadan kaldırmayı hedeflemektedir.

• Menfaatlerin Kısıtlanması Kuralı (limitation on benefits "LoB"),

Vergi anlaşmalarının amacı her ne kadar çifte vergilendirilmeme, vergi kaçırma veya vergiden kaçınma fırsatlarını ortadan kaldırmak olsa da bazen anlaşmaların bizatihi kendisi matrah aşınmasına alet edilebilmektedir. Mükellefler normal şartlar altında kapsamına girmediği bir anlaşmanın hükümlerinden faydalanmak maksadıyla yapay işlemlerle veya kanal kuruluşlardan yararlanarak vergi anlaşmalarını suiistimal edebilmektedirler (Soydan, 1995:307). Bu suiistimalin en yaygın biçimi; üçüncü ülke mukimlerinin, iki akit devletin birinde oluşturdukları bir aracı vasıtasıyla veya ikametlerini söz konusu iki akit devletten birine aldırarak tesis edilmiş olan vergi anlaşmasının hükümlerinden faydalanmak şeklindedir.

"Anlaşma alışverişi" (treaty shopping) olarak adlandırılan bu olgu özellikle pasif yatırım gelirlerinin dağılımı gerektiğinde bir finansal işlemin vergi yükünü optimize etmek için vergi anlaşmalarının lehte hükümlerinden gerçekte yararlanıcı olunmadığı halde yararlanılmasıdır (Çevik, 2013:171).

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Kar aktarımı yoluyla matrah aşınmasını önlemeye yönelik olarak OECD'nin dizayn ettiği ve

15 aksiyondan oluşan "BEPS Eylem Planı"nın 6. Eylemi anlaşmaların suiistimalini önlemeye

yönelik olmuştur. Bu kapsamda, ÇVÖA'nın çifte vergilendirmeme, vergi kaçırma veya

vergiden kaçınma niyetiyle kullanılamayacağının açıklığa kavuşturulması öngörülmektedir.

Bu yönde ÇVÖA'nın dibacesine, devletlerin anlaşma alışverişi düzenlemeleri de dahil olmak

üzere, vergi kaçırma ve vergiden kaçınma yöntemleri ile vergilendirmeme veya düşük oranda

vergilendirme fırsatlarını önlemek niyetiyle anlaşma imzaladıklarının açıkça belirtilmesi

kararlaştırılmaktadır (Erdem, 2016:99).

Menfaatlerin sınırlandırılması hükmü, anlaşma menfaatlerinden belirli şartları haiz olan

mükelleflerin yararlanmasını ifade eder. Suiistimalin ve kötüye kullanımın engellenmesine

yönelik olan menfaatlerin sınırlandırılması oldukça teknik, karışık ve detaylı olması nedeniyle

Japonya'nın önerisiyle OECD bünyesinde basitleştirilmiş versiyonu (simplyfied LoB)

şeklinde bir alternatifi üzerinde çalışılmıştır. ABD'nin model vergi anlaşması menfaatlerin

sınırlandırılması hususunu 22. maddesinde düzenlemiştir.

• Kanunda Yapılacak Müteakip Değişiklikler (Subsequent Changes in Law)'in yapılan

anlaşmalara etkileri (Ek 28. Madde)

Anlaşmaya taraf ülkelerin iç hukuklarında gelecekte gerçekleştirecekleri değişikliklerin

anlaşmalara etkileri (subsequent changes in law) güncellenmiş model vergi anlaşmasının 28.

maddesinde düzenlenmistir. Buna göre, anlasmanın imzalandığı tarihten sonra taraflardan

birinin iç hukukunda gerçekleştirdiği değişikliklerin söz konusu anlaşma müzakere edildiği

andaki anlaşma dengesini etkileyecek nitelikte olması halinde, anlaşmanın iç hukuk

değişikliklerine uygun bir şekilde güncellenebilmesi hususunda karşılıklı istişareye ve gerekli

görülen değişikliklerin yapılmasına olanak tanınmaktadır (Erdem, 2016:100).

3.3. Otomatik Bilgi Değişimi-CRS (Common Reporting Standarts)

Sermaye hareketliliğinin çok yoğun yaşandığı ekonomilerde özellikle yatırımcı mükellefler

mukimi oldukları ülkenin yüksek vergi maliyetlerinden kurtulmak için bu ülkelerde

yapacakları yatırımları yine kendilerinin yurt dışında oluşturdukları yabancı finansal kurumlar

aracılığı ile gerçekleştirmektedirler. Bu durum yatırımcının matrahının ikamet ülkesinin vergi

idaresi tarafından tam olarak kontrol edilememesine neden olmakta ve vergi kaybı

yaratmaktadır.

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FATCA'nın yabancı finansal araçlar vasıtasıyla vergi kaçırma/vergiden kaçınma faaliyetleri

sonucunda ortaya çıkan vergi geliri kayıplarını azaltma hususundaki küresel başarısı, otomatik

bilgi değişimi konusunda OECD ve G20'yi harekete geçirmiş ve uluslararası bilgi değişimine

yeni bir boyut kazandıran ve finansal kurumlara ek operasyonel yükler ve maliyetler getirecek

olan "Common Reporting Standards" (CRS) OECD tarafından kamuoyu ile paylaşılmıştır.

CRS'nin amacı, hükümetlerin vergiden kaçınmayı önlemek ve vergiye tabi gelirleri kayıt

altına alabilmek için finansal hesapların karşılıklı bilgi değişimini sağlamaktır. Buna göre

finansal kurumların, ülke hükümetlerince yürürlüğe konulan prosedürlerin özenle

uygulanması ve CRS doğrultusunda düzenli olarak bilgi paylaşımında bulunması gerekiyor

(https://www.pwc.com.tr).

OECD, G20'nin ve AB'nin uluslararası ölçekte vergi kayıp ve kaçağı ile mücadele çalışmaları

sonucunda, "Vergi Konularında Karşılıklı İdari Yardımlaşma Sözleşmesi" hazırlanmıştır. Bu

sözleşme, AB üyesi ülkelerin yanı sıra, İsviçre, Norveç, Brezilya, Hindistan gibi ülkelerin de

dahil olduğu bugün itibarıyla 141 ülke tarafından imzalanmıştır. Bu tarihten 6 yıl sonra,

uygulamayı düzenleyen ve bugün itibarıyla 110 ülkenin taraf olduğu "Finansal Hesap

Bilgilerinin Otomatik Değişimine İlişkin Çok Taraflı Yetkili Makam Anlaşması"nı da

Türkiye 21.04.2017 tarihinde imzalamış ve 31.12.2019 tarihinde onaylamıştır. Bu anlaşmaya

göre, imzacı ülkeler, mütekabiliyet esasında, ilgili ülkelerin mukimlerine ait finansal hesap

bilgilerini, finansal kuruluşlardan toplayıp ayrı bir talep gerekmeksizin otomatik olarak her yıl

ilgili ülkeyle paylaşacaktır (Gelir İdaresi Başkanlığı, 2021:7).

Otomatik bilgi değişiminin kapsamı; kişilerin, mukimi olduğu ülke dışındaki diğer ülkelerde

bulunan finansal hesap bilgilerinin, mukimi olunan ülkeye, her yıl diğer ülke vergi

idarelerince, vergisel amaçlarla kullanılmak üzere karşılıklı ve otomatik olarak elektronik

ortamda gönderilmesidir (Gelir İdaresi Başkanlığı, 2021:5).

Hali hazırda ÇVÖA uyarınca anlaşmaya taraf ülkeler karşılıklı bilgi değişimi yapıyor.

CRS'nin bu uygulamadan farkı (https://www.pwc.com.tr); CVÖA bilgi değişimini, taraf

ülkelerin yazılı isteği ile belirli mükelleflerin, belirli dönemlerde yapmış oldukları işlemler ve

belirli nitelikteki gelirleri için talep nedeni de belirterek yapıyor iken, CRS'de bilgi değişimi

herhangi bir yazılı talep ve dönem kısıtlaması olmaksızın bütün mükellefleri ve bütün gelirleri

esas alarak her yıl otomatik olarak yapıyor.

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Uluslararası vergilemede şeffaflığın artırılmasına yönelik idareler arası iş birliği ve bilgi paylaşımı açısından en faal olan ve en kapsamlı çalışmaları yürüten uluslararası organizasyon OECD'dir. OECD, kuruluşundan bu yana vergilemede uluslararası iş birliğine yönelik çok sayıda çalışma gerçekleştirmiştir. Bu çalışmaların neredeyse tamamı bilgi paylaşımı ile bir şekilde ilintilidir. Ancak OECD orijinli araçlar içerisinde uluslararası bilgi paylaşımına doğrudan hukuki dayanak teşkil eden düzenlemeler; OECD Model Vergi Anlaşması, OECD Vergi Konularında Bilgi Değişimi Anlaşması Modeli (Model TIEA) ve CoE/OECD Vergi Konularında Karşılıklı İdari Yardımlaşma Anlaşması'dır (Aktuğ ve ÖZ, 2020:142-143).

Otomatik bilgi paylaşımının diğer paylaşım türlerine göre daha çok tercih edilmesini sağlayan nedenlerden bir tanesi de talep üzerine bilgi paylaşımı hususunda prosedür kaynaklı gecikmeler veya ülkelerin politik nedenlerle bilgi paylaşmaktan imtina etmesi gibi menfi hallerdir (Ateş, 2021:132).

Ağustos 2022 itibariyle "Vergi Amaçlı Şeffaflık ve Bilgi Alışverişi Küresel Forumu"nda bilgi paylaşımında bulunan 95 üye ülke bulunmaktadır. ABD Küresel Forum'un bilgi paylaşan ülkeler listesinde yer almamaktadır. Bunun nedeni ABD'nin vergi konularında bilgi paylaşım sürecini "Yabancı Hesaplar Vergi Uyum Yasası-FATCA" ile sağlıyor olmasıdır. Burada tepki alan bir durum söz konusudur. Yabancı finans kuruluşları ABD mükelleflerine ait bilgileri karşılıklı değil tek taraflı olarak IRS'e (Amerikan Gelir İdaresi-Internal Revenue Service) sunması, bilgi güvenliği ve diğer ülkelerin anayasal haklarının çiğnendiği düşüncesiyle eleştirilere maruz kalmıştır (Aktuğ ve Öz, 2021:137).

OECD vergi konularında paylaşıma tabi olacak bilgilerin kapsamını devamlı artırmaktadır. Önceleri yalnızca vergileme ile doğrudan ilgilendiren bilgilerin paylaşılması esas iken zamanla dolaylı ilgilendiren bilgilerde kapsama alınmıştır. Daha sonraları vergileme ile alakalı olabileceği düşünülen bilgilerin paylaşılmasına da olanak tanınmıştır. Küresel vergi şeffaflığı açısından bakarsak uluslararası bilgi paylaşımının kapsamının bu kadar genişlemesi

 $^{^{8}\} https://www.oecd.org/tax/automatic-exchange/commitment-and-monitoring-process/AEOI-Exchanges-2018.pdf$

⁹ ABD bu eleştirileri gidermek adına FATCA konusunda bahsettiğimiz Model 1 ve Model 2 Hükümetlerarası Anlaşma Modelleri'ni (Intergovernmental Agreement, IGA) geliştirmiştir. Model 1 uygulamasına göre yabancı ülkelerin finans kuruluşları ABD mükelleflerine ait finansal verileri öncelikle kendi ülkelerinin yetkili otoritelerine iletmekte, söz konusu bilgiler idare tarafından IRS'ye sunulmaktadır. Model 2 uygulamasında ise ABD mükelleflerine ait bilgiler finans kuruluşları tarafından doğrudan IRS'ye sunulmaktadır.

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olumlu bir gelişme olarak görülebilir, ancak mahremiyet açısından ciddi sakıncalar içermektedir (Aktuğ ve Öz, 2021:143).

Mahremiyet hususuna ülkemiz açısından bakacak olursak; FATCA ve CRS kapsamında yapılan otomatik bilgi değişimlerindeki mahremiyet hususu 6698 sayılı Kişisel Verilerin Korunması Kanunu (KVKK)'nun 9. maddesi¹⁰ ile Anayasa'nın 90. maddesinde¹¹ düzenlenmektedir. Kişisel verilerin otomatik bilgi değişimi kapsamında ilgili kişinin açık rızası olmaksızın yurt dışına sunulması 6698 sayılı Kanunun 9. Maddesine göre mahremiyet ve gizlilik açısından sakınca gibi görünse de 5. maddenin 2. fıkrasının a. bendi¹² gereğince bu tip bir sakınca bulunmamaktadır.

2.4. Kar Aktarımı Yoluyla Matrah Aşındırma Eylem Planı-BEPS (Base Erosion and Profit Shifting)

Kurumlar Vergisinin (KV) kamu gelirleri içerisindeki payını düşündüğümüzde ÇUŞ'lerin agresif vergi planlamaları ile vergi idarelerinin kontrol ettikleri matrahları aşındırmaları ülkeler için büyük bir mali tehdit oluşturmaktadır. Böyle bir durumda kamu gelirinin aşınması tek sorun değildir. ÇUŞ'lerin vergi gelirlerini azaltması aynı zamanda ülkenin vergi yükünün adil dağılımını bozacaktır. Zira vergi gelirlerinin aşınması, sürdürülebilir bir kamu finansmanı için ücretlerin daha fazla vergilendirilmesine neden olacaktır (Prats, 2018:124-125)

ÇUŞ'in ÇVÖA ve mevzuatlar arasındaki farklılıkları kullanarak kazançlarını avantajlı ülkelere kaydırma fırsatları yakalayıp matrahlarını azaltmaları muhatap ülkelerin ortak endişesi haline gelmiştir. Kendi mali egemenlik alanlarında toplamaları gereken vergi gelirlerini muhafaza etmek ve mükelleflerinin yurt dışındaki kazançları hakkında bilgi sahibi olmak için kapsamlı ve küresel bir projenin hayata geçirilmesi gerekliliğini hisseden ülkeler, iletişim, iş birliği ve etkileşim içerisine girerek uluslararası vergi konjonktüründe önemli değisikliklere zemin hazırlamıştır.

¹⁰ 6698 Sayılı KVKK, Madde 9- Kişisel veriler, ilgili kişinin açık rızası olmaksızın yurt dışına aktarılamaz.

Anayasa Madde 90- Türkiye Cumhuriyeti adına Yabancı Devletlerle ve Milletlerarası Kuruluşlarla yapılacak andlaşmaların onaylanması, Türkiye Büyük Millet Meclisinin onaylanması bir kanunla uygun bulunmasına bağlıdır.

¹² 6698 sayılı Kanun Madde 5- Kişisel veriler ilgili kişinin açık rızası olmaksızın işlenemez. (2) Aşağıdaki şartlardan birinin varlığı halinde, ilgili kişinin açık rızası aranmaksızın kişisel verilerin işlenmesi mümkündür. a. Kanunla açıkça öngürülmesi.

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Borç stokları ve mali krizlerle mücadele ederken bir de ÇUŞ'in agresif vergi planlamaları ile

kamu gelirleri azaltılan birçok ülkede, toplumsal baskının da etkisiyle BEPS konusunda

önemli bir reform gereksinimi ortaya çıkarmıştır.

2008 küresel mali krizinin ardından G20 ülkeleri, yaşanan kamu finansmanı sorunlarını

inceleme altına alarak küresel ölçekli çalışmalar yürütmüşlerdir. Söz konusu çalışmalar,

uluslararası vergi gündemini meşgul eden "vergide şeffaflık ve bilgi değişimi (automatic

Exchange of information)" ile gerçek yararlanıcıların (beneficial ownership) tespiti

anabaşlıkları üzerinden yürütülmüştür (Kara ve ÖZ, 2016:173). Bu çalışmaların en önemlisi

G20 ülkelerinin talebi üzerine teknik altyapısı OECD tarafından hazırlanan "Kar Aktarımı

Yoluyla Matrah Aşındırma Eylem Planı-BEPS (Action Plan on Base Erosion and Profit

Shifting) dır.

BEPS Eylem Planı uluslararası vergilemede matrah asınmasına neden olan 15 sorunlu alanı

tespit ederek bu alanlara yönelik eylemler geliştirmiştir. Bu eylemlerin etkin bir şekilde

uygulanmasıyla ekonomik faaliyetlerin vergi cennetlerinden gelişmiş ülkelere kayması

beklenmektedir. Yalnızca vergi avantajı nedeniyle yatırım çeken ülkeler, bu avantajı

kaybettiklerinde topladıkları sermayeyi gelişmiş ülkelere kaptırma riski ile karşı karşıya

kalacaklardır. Eylem planına ait aksiyonların asıl maksadı bu olmakla birlikte, gelişmiş

ülkelerin etkisiyle tasarlanan bu projenin gelişmekte olan ülkelerin ihtiyaçlarını yeterince

dikkate almadan uygulanması endişesi eleştiri konusu yapılmaktadır (Diclehan, 2016:154).

Ekonomik büyümelerinin yavaşlaması ve cari açıklarının artmasından muzdarip olan

hükümetler ÇUŞ'in ekonomik altyapıları ile ekonomik faaliyetlerinin örtüşmesini

arzulamaktadırlar. Mücadelesini, hiçbir ekonomik altyapısı olmayan, yalnızca vergi avantajı

sağlamak maksadıyla kurulan finansal yapılara karşı oluşturulan BEPS Eylem Planı'nın

tanımı OECD tarafından şu şekilde yapılmaktadır¹³: BEPS Eylem Planı, vergi mevzuatları

arasındaki uyumsuzlukları ve boşlukları kullanarak kârın hiç vergilendirilmemesi ya da daha

az vergilendirilmesi için ekonomik faaliyetlerin hiç olmadığı veya az olduğu yerlere yapay bir

şekilde aktarılmasını önlemeye yönelik vergi planlama stratejileridir.

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¹³ https://www.oecd.org/tax/beps/beps-about.htm

Köse, Y. (2022). Uluslararası Vergileme İş Birliğinde Güncel Eğilimler. InTraders International Trade Academic Journal, 5 (2) 250-275 DOI: 10.55065/intraders.1199696

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BEPS Eylem Planı'nın temel felsefesi; kazancı ortaya çıkaran ekonomik faaliyet ve değer yaratımının hangi mali egemenlik alanında gerçekleştiğini tespit ederek orada vergilendirilmesi için, ülkelerin, matrah aşındırma sorununun ortaya çıkardığı ortak dili kullanarak BEPS kaynaklı gelir kayıplarına son vermektir.

BEPS Eylem Planı'nın üç ana amacı vardır. *Birincisi*, vergi matrahının ülkeler arasında daha adil bir şekilde paylaşılması. *İkincisi*, özellikle vergi cennetlerinde ÇUŞ için oluşturulan cazip vergi sistemlerinin uluslararası alanda yarattığı asimetriyi ortadan kaldırmak. *Üçüncüsü*, OECD'nin son 50 yıldır üzerinde çalıştığı, haksız vergi uygulamaları projesine yönelik kurguladığı oyunun kurallarını güncellemek (Owens, 2015:8). Eylem Planı bu amaçlara ulaşabilmek için uyum, özün önceliği ve şeffaflık olmak üzere üç sacayağı üzerine kurulmuştur.

Tablo 1. BEPS Eylem Planı'nın Temel İlkeleri ve Aksiyonları¹⁴



3.5. Çok Taraflı Vergi Anlaşması (Multilateral Instrument-MLI)

"Matrah Aşındırma ve Kar Aktarımından Korunmak İçin Vergi Anlaşmaları ile Bağlantılı Önlemlerin Uygulanması Hakkındaki Çok Taraflı Anlaşma (Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS) veya literatürdeki kullanımı ile kısaca **MLI**, 7 Haziran 2017 tarihinde Paris'te 68 ülke temsilcisi ile imzalanmıştır. 6 Ekim 2022 tarihi itibariyle MLI'ye 100 ülke imza atmış, 3 ülkenin yargı mercileri sözleşmenin

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¹⁴ Yazar tarafından oluşturulmuştur.

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imzalanmasına ilişkin olumlu görüşlerini bildirmiştir. MLI, OECD BEPS Eylem Planı'nın 2

nolu hibrit uyumsuzluk düzenlemelerinin etkisiz hale getirilmesi, 6 nolu vergi anlaşmalarının

suiistimalinin önlenmesi, 7 nolu daimî iş yeri statüsünden suni yollarla kaçınmanın

engellenmesi ve 14 nolu vergisel uyuşmazlıkları çözen mekanizmaların daha etkin hale

getirilmesi eylemlerine işlerlik kazandırmak için 15 nolu aksiyonun hedeflediği bir enstrüman

olarak geliştirilmiştir (www.oecd.org).

BEPS Eylem Planı'nın 15. Aksiyonunun doğal bir neticesi olarak doğan MLI vergi

anlaşmalarına dair politika ve uygulamalarına tutarlılık ve öngörülebilirlik sağlaması ve BEPS

Eylem Planı kazanımlarının uygulanması açısından önemi büyüktür. MLI, BEPS Eylem

Planı'na büyük ölçüde işlerlik kazandırarak gerçek ve tüzel kişilerin sınır ötesinde

gerçekleştirdikleri faaliyetleri ile ÇVÖA'nın lehe hükümlerinden faydalanma koşullarını

zorlaştırmak suretiyle vergi anlaşmaları kaynaklı sınır ötesi vergi uyuşmazlıklarının hızlı ve

etkin bir şekilde çözüme kavuşturulmasını sağlayacaktır.

MLI'nin iki önemli amacı vardır (www.gsghukuk.com);

• BEPS Eylem Planı kapsamında alınan anlaşma temelli önlemleri mevcut ikili ve çok taraflı

anlaşmalara aktarmak

• Cifte vergilendirme uyuşmazlıklarını çözmek maksadıyla zorunlu ve bağlayıcı yeni

düzenlemeler getirmek.

Bu maksatla OECD uluslararası vergi standartlarını içeren çok taraflı bir anlaşma hazırlayarak

bunu imzaya açtı ve 1200'den fazla ÇVÖA'nı bu doğrultuda revize etti. Zira Dünya genelinde

sayısı 3000'i bulan ÇVÖA'nın BEPS Eylem Planı aksiyonları çerçevesinde tekrar müzakere

edilmesi oldukça uzun ve zor bir süreç olacaktır.

ÇTVA neyin önüne geçiyor?

• Mükellefin bir ödemesinin ödemeyi yapan tarafın ülkesinde matrahtan indirilebiliyor iken,

ödemeyi alan tarafın ülkesinde kazanca dahil edilmemesi durumu olan hibrit uyumsuzlar

meselesinin,

• Mevcut uluslararası hukuk sistemine göre, kaynak ülkesinde yerleşik olmayan bir teşebbüsün

elde ettiği kazancın vergilendirilebilmesi için kazancın o ülkedeki bir işyeri vasıtası ile

kazanılmış olması gerekmektedir. Dolasıyla işyeri tanımının etrafından dolaşmayı

kolaylaştıracak her türlü olanağın,

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• Bir mükellefin normalde kapsamına girmediği vergi anlaşmalarının lehe olan hükümlerinden

faydalanmak maksadıyla akit devletlerden birinde yapay olarak oluşturduğu bir yapı ile

faaliyette bulunmasının.

MLI uluslararası vergi uyuşmazlıklarına esnek bir çözüm mekanizması sağlamakta ve bu

kapsamda belirlenen "minimum standartlar" akit devletlerce imzalanmış ÇVÖA ile hali

hazırda yürütülüyor ise akit devletlerin söz konusu maddeleri uygulamama hakları olduğu gibi

minimum standartların dışında kalan sözleşme maddelerine de çekince koyma hakları

bulunmaktadır. Sözleşme bunların dışında yalnızca seçilmesi halinde uygulanabilecek

alternatif düzenlemeler de içermektedir. Bu düzenlemeler her iki akit devletin de olumlu

görüşü halinde uygulanacaktır. Örneğin, "tahkim" alanında yapılmış bir alternatif

düzenlemenin uygulanabilmesi için her iki akit devletin bu yönde olumlu bir fikir birliği

ortaya koyması gerekmektedir. Fikir birliğine varılan hüküm veya hükümler başkaca bir

anlaşmaya gerek kalmadan mevcut ÇVÖA maddeleri ile aynı şekilde uygulanacaktır.

Bu çok taraflı enstrüman sınır ötesi operasyonlar gerçekleştiren ÇUŞ'in hareket alanlarını

daraltacağı için grup yapılarını etkileyecektir. Özellikle "Anlaşmaların Kötüye Kullanımı"

konusundaki anlaşma hükümleri ve "daimî işyeri" tanımının kapsamının daraltılması gibi

uluslararası mali mevzuat üzerinden yapılan temel değişiklikler, grup şirketlerin önemli bir

maliyet bileşeni olan verginin grup içerisinde optimum dağılımını sağlamak için operasyonel

olarak yeniden yapılanmalarını gerektirecektir.

"Nordic" 15, "Andean" 16 ve "Caraibbean" 17 gibi az sayıda çok taraflı ÇVÖA mevcuttur. Fakat

bunlar bölgesel kalmış ve dünya kamuoyunda geniş çapta bir tercih sebebi olmamıştır. Bunlar

hem bölgesel hem kapsamı dar hem de mevcut vergi anlaşmalarını modifiye etmekten daha

çok o anlaşmaların yerine geçen anlaşmalardır. MLI ise vergi anlaşmalarının yerine geçmeden

onlarla aynı anda varlığını devam ettirmek suretiyle onları yalnızca modifiye eden bir

sözleşme olmuştur. Bu anlaşma ile BEPS Eylem Planı kapsamında alınan tedbirler yüzlerce

vergi anlaşmasına aynı anda adapte edilebileceği için son derece önemlidir (Kara, 2018:47).

68 ülke ile Haziran 2017'de imzalanan bu çok taraflı enstrümanın Ekim 2022 tarihi itibari ile

100 imzacı ülkeye ulaşması, küresel vergi gelir kayıplarının giderek azalacağı noktasında

¹⁵ The Nordic Double Taxation Convention

¹⁶ The Agreement to Avoid Double Taxation Between The Member Countries of the Andean Cominitiy of

¹⁷ The Double Taxation Agreement of the Caraibbean Cominity (CARICOM)

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umut vericidir. Ancak halen ÇUŞ'in değişik vergi kaçırma senaryoları üretmeleri için ülkeler

ve yetki bölgeleri mevcuttur. Ülkelerin küresel vergi kayıplarını minimuma indirmek için söz

konusu ülke ve yetki bölgelerinin maksimum ölçüde bu çok taraflı enstrümanın bir parçası

olması gerekmektedir.

Sonuç

Sermayenin mobilitesinin gitgide artmasına neden olan neoliberal iktisat politikalarının

güdümünde gelişen ulusal vergi politikaları son 20 yılda büyük bir rekabet içerisine girerek

geniş bir coğrafyada hareket eden ÇUŞ'in sermayelerini kendi ülkelerine çekmeye

çalışmaktadırlar. Bu dönem içerisinde ÇUŞ'in devasa boyutlara ulaşan gelirleri birçok ulus

devletin bütçeleriyle boy ölçüşür hale gelmiştir. ÇUŞ'in ÇVÖA ve uluslararası mali

mevzuatlar arasındaki farklılıkları kullanarak gerçekleştirdikleri vergi arbitrajları ile

düşürdükleri efektif vergi oranlarının devletlerin vergi gelirlerinde meydana getirdiği erozyon,

medya, vergi idareleri ve kamuoyu tarafından sorgulanır hale gelmiştir.

Uluslararası vergilemede iş birliği ihtiyacının ortaya çıktığı dönemlerde temel argüman "çifte

vergilendirmenin önlenmesi" iken küreselleşen ekonominin ÇUŞ lehine ortaya çıkardığı vergi

arbitrajı fırsatları "vergiden kacınma" ve "vergi kacırma" mefhumlarını da uluslararası is

birliğinin argümanları haline getirmiştir. Zira çifte vergilendirmeme, vergiden kaçınma ve

vergi kaçırma olanakları, zaten büyük borç stokları ve mali krizlerle boğuşan ulus devletlerin

kamu finansmanını içinden çıkılamaz bir hale getirmiştir.

Uluslararası vergilemede yaşanan bu güncel sorunlara karşı ABD, AB ve OECD "vergide

şeffaflık ve bilgi değişimi" ile "gerçek yararlanıcılar"ın tespiti başlıkları üzerinden yürüttüğü

ve bu çalışmada bahsedilen önleyici projeler, uluslararası vergi iklimini büyük ölçüde

değiştireceğe benziyor. Bu kapsamda yürütülen çalışmalar ÇUŞ'in elde ettiği arbitraj

fırsatlarını büyük ölçüde paralize edip, adil bir şekilde vergilendirilmesi gereken sermayenin

vergi cennetleri olarak anılan ülkelerden, gerçekte kaynağı olduğu ülkelere dönmesini

sağlayacaktır.

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