1992 [redacted]

9. CORPORATE TAXATION

A. INTRODUCTORY NOTE

1. The tables in this section are derived mainly from data on corporation tax assessments and payments, and on returns of qualifying distributions, franked investment income and annual payments. Two tables (table 9.14 and 9.15) are based on petroleum revenue tax assessments.

B. CORPORATION TAX

2. Corporation tax is charged on the income and chargeable gains (collectively the "profits") of companies. A company means any body corporate (including public corporations) or unincorporated association (including industrial and provident societies, clubs and trade associations) but not a partnership, a local authority or local authority association. Corporation tax, which was introduced by the Finance Act 1965, is payable 9 months after the end of the company's accounting period or within one month of the issue of an assessment, whichever is the later. Companies which have been carrying on the same trade since before April 1965 were, until recently, able to keep the due date of 1 January in the year following the financial year in which their accounting period ended. The provisions of the Finance Act 1987 brought the due dates of these companies into line with the majority over a three year period. Special provisions have also applied for most building societies but they have been phased out. In very broad terms the 9-month lag applies to all accounting periods ending in financial year 1990-91 and subsequently. The various rates of corporation tax and capital gains relief since April 1968 are shown at Appendix A.4.

3. The Finance Act 1972 introduced an imputation system of corporation tax with effect from April 1973 (paragraph 6 of the notes on Section 1 describes the system in operation prior to this). This ensures that the same rate of corporation tax applies to their total profits, whether retained or distributed. Income tax is not charged on dividends but when any qualifying distribution (normally a dividend) is made, advance corporation tax (ACT) is payable by the company and this serves as a tax credit to the shareholders. The ACT payment may be set against the corporation tax liability of the company, initially for the accounting period in which the distribution was made or, if that is inadequate, against the liability of another year. The rates of ACT are shown in Appendix A.4.

4. Double taxation relief. A company resident in the United Kingdom is entitled to claim credit on income or chargeable gains from any foreign source for foreign tax paid on the same income or gains. The relief may be due either under a double taxation agreement or under unilateral relief provisions. More details are given in the Board's booklets *Corporation Tax* (pamphlet IR18) and the supplements, and *Double Taxation Relief* (pamphlet IR6).

5. A fuller description of corporation tax as originally enacted in 1965 appears on pages 85 to 88 of the *112th Report of the Commissioners of Inland Revenue* (Cmnd 4262) and the change to the "imputation" system made by Finance Act 1972 is explained on pages 5 and 6 of the *115th Report* (Cmnd 5168). The system is also described in the *Green Paper on Corporation Tax* (Cmnd 8456). For a description of other taxes on profits, see *Inland Revenue Statistics 1975* paragraphs 30-40.

C. PETROLEUM REVENUE TAX

6. Petroleum revenue tax (PRT) is charged on the profits of winning oil and gas under licence in the United Kingdom, its territorial waters and designated areas of its continental shelf. The charge is on the landed value of oil and gas, less royalties, supplementary petroleum duty, the expenses incurred in finding, extracting, landing it and putting it into a saleable condition, and other reliefs described below. The allowable PRT expenses are operating costs for the field including capital expenditure but not interest. The tax is charged on profits arising in each 6 month chargeable period and advance payments of PRT (see paragraph 9) are creditable in full against PRT. PRT is charged on each field separately and in general a company cannot defer paying tax on the profits of one field by off-setting against those profits the development costs of another field. However, certain types of exploration and appraisal expenditure are allowed immediate PRT relief and following the 1987 Budget 10 per cent of development expenditure in new offshore fields outside the Southern Basin of the North Sea can be set against PRT liabilities in other fields. A further reform in the same Budget was relief for research expenditure from 16 March 1987. It caters for expenditure of a type that would qualify as expenditure for PRT if it related to a specific field, but it is not covered under normal expenditure rules nor as exploration and appraisal expenditure. The relief does not become due until three years have elapsed and so the first relief appears in assessments on 1990 half 1. The rates at which PRT has been charged are:

1975 - 1978	45 per cent
1979	60 per cent
1980 - 1982	70 per cent
1983 - 1992	75 per cent

7. Apart from the 100 per cent relief for expenditure and certain loss relief provisions, the following additional reliefs are currently given:

i. Uplift-a supplement of 35 per cent is given on qualifying expenditure (broadly, initial exploration and development expenditures) up to the "pay-back" period for each field: that is the period in which cumulative field income first exceeds cumulative allowable expenditure (including uplift), royalty, supplementary petroleum duty and advance petroleum revenue tax. The restriction does not apply to any expenditure incurred before 1 January 1981 or incurred before 1 January 1983 in pursuance of a contract entered into before 1 January 1981. A supplement of 75 per cent was given for chargeable periods ending before January 1979 and there was a transitional rate of $66^{2}/_{3}$ per cent for certain expenditure incurred after 1 January 1979. Uplift is intended to compensate for the fact that interest and other costs of financing are not deductible for PRT purposes.

ii. Oil Allowance-an oil allowance currently equal in value to 0.25 million tonnes of oil (or to the PRT profits for the field if less) is given to each field for each 6 month chargeable period, subject to a cumulative limit of 5 million tonnes per field. This allowance has been doubled for offshore fields outside the Southern Basin of the North Sea which were approved on or after 1 April 1982 (ie 0.5 million tonnes per chargeable period up to a cumulative limit of 10 million tonnes per field). The allowance for Southern Basin and onshore fields approved on or after 1 April 1982 was reduced to 0.125 million tonnes, with a cumulative limit of 2.5 million tonnes in the Finance Act 1988. For chargeable periods ending before January 1979 the oil allowance was 0.5 million tons, for all fields, with a cumulative limit of 10 million tons.

iii. Safeguard-there is a provision which gives automatic protection for the periods up to "pay-back" and for half as many periods again. In any of these periods, if the PRT charge would otherwise reduce the return on a field before corporation tax to less than 15 per cent of cumulative "upliftable" expenditure measured on the basis of historical cost, the charge is cancelled. A tapering provision ensures that the PRT charge will not be more than 80 per cent of the amount (if any) by which the return exceeds 15 per cent of the capital expenditure to date.

8. Supplementary petroleum duty (SPD) was charged from 1 January 1981 until 31 December 1982 at a rate of 20 per cent on gross revenues from oil and gas won under licence in the United Kingdom or on the United Kingdom Continental Shelf, less an allowance equal to the value of 0.5 million tonnes of oil per field per 6 month chargeable period. The duty is refundable at the end of field life if the field has not reached profitability.

9. Advance petroleum revenue tax (APRT) was charged from 1 January 1983 until 31 December 1986. The charge was based on gross profits and calculated in a similar way to SPD but with the following tax rates:

1 January 1983 - 30 June 1983	20 per cent
1 July 1983 - 31 December 1984	15 per cent
1 January 1985 - 31 December 1985	10 per cent
1 January 1986 - 31 December 1986	5 per cent

10. Payments of APRT were credited pound for pound against any PRT liability due or carried forward to be credited against future PRT. Any payments which had not been offset against PRT after 5 years from the first APRT payment were repaid. However, the Advance Petroleum Revenue Tax Act 1986 introduced earlier repayments for fields which had not reached "pay-back" before 1 July 1986, subject to a limit of £15 million for each participator in the field.

D. NOTES ON TABLES

11. Tables 9.1 to 9.13 relate to cases within the scope of corporation tax, as defined in paragraph 2 above.

12. The analyses by industry conform as far as possible with the Standard Industrial Classification (SIC) of 1980. However, it does not follow that the figures for each industry are directly comparable with statistics produced by other departments (eg production statistics) where the unit of classification may be different (eg the establishment as opposed to the company which may cover more than one establishment). A table showing the definition of the industries used in this publication in terms of the Divisions and Classes of the 1980 SIC is given in Appendix B.

Tables 9.1 and 9.2

13. Table 9.1 is a summary of the accrual of mainstream corporation tax and corporation tax receipts (both ACT and mainstream). The top section of the table gives estimates of the accrual of mainstream tax for accounting periods ending in each financial year. This broadly approximates to tax accruing in the calendar year. As most mainstream tax is paid in the financial year following the year in which the accounting period ended, the receipts of tax in the lower section of the table are shown in the same column as the accrual relating to most of the receipts. Advance corporation tax is normally paid in the quarter following the dividend payment.

14. Although levels of receipts in past years are known, the figures for the accrual of tax are uncertain and subject to substantial revision as more information becomes available.

15. Table 9.2 shows the latest estimates of the tax determinants giving rise to the accrual of mainstream tax for the two main sub-sectors of the corporate sector. Figures, particularly for the latest year, are subject to substantial revision. The estimates may differ from those in other tables as they have been constrained to national accounts information and the receipts of tax.

Tables 9.3 and 9.4

16. These tables provide figures for the latest years for which reasonably reliable information is available. The tables are based on a sample representing all cases for which an assessment has been or is expected to be made. The sample data are from 3 separate sources:

i. tax assessments where they have been agreed with HM Inspector of Taxes;

ii. taxpayers' own tax computations as submitted to HM Inspector of Taxes and provisionally amended pending final agreement;

iii. extrapolation from agreed assessments for past years or for related cases;

The first two of these sources are used where possible and are more reliable than the third. Large cases are covered more than proportionately by the first two sources.

17. These tables include figures relating to the assessing period, usually a 12-month period, ending in the financial year shown. The tables include the trading profits, other income (including gains), allowances and reliefs of cases within the scope of corporation tax. Gross trading losses are not shown in the table. Where losses made in the current or an earlier period are set against income of the current period those losses are included in deductions.

18. The figures for capital allowances are the amounts which the taxpayer may claim in the period, less balancing charges. For any one case this figure may exceed the gross trading profit, leading to a loss for tax purposes. In these cases a zero is included in the net trading profits column rather than a negative figure.

19. The column 'number of cases' in these tables includes only those cases with positive amounts of income (gross trading income, or other income or gains). Cases with gross trading losses and no other income are excluded as are companies still regarded by the district as, in some sense, 'live' although without any reported income for the year. The total number of both these types of cases in 1989-90 was about 355,000. The privatisation, in December 1989, of the former water authorities (which were not within the scope of corporation tax) has an impact on the figures in these tables.

Tables 9.5 to 9.7

20. Tables 9.5 and 9.6 present analyses of mainstream corporation tax payments made in recent years. These are payments made during the course of the financial year shown, in respect of liabilities arising in earlier periods. The bulk of these payments relate to liabilities arising in the immediately preceding calendar years. The figures shown are gross of repayments so that the total differs from that shown in table 1.2 by the value of repayments made during the year and by any errors arising from the use of sample data. The figures for 1991-92 are provisional. The provisions of the Finance Act, 1987 concerning due dates (referred to in para. 2 above) have some effect on the figures in these tables. The change in building societies' payment dates meant that some of them had no payment date in 1990-91. Taxpayers are included under the memorandum item in table 9.6 if they had the status shown for most of the period in which the liability to tax accrued.

21. Table 9.7 shows the changes in the incidence of payments between 2 years. There is a considerable amount of movement into and out of tax liability in any one year and this table gives an indication of that movement. Tables 9.5 to 9.7 have been produced by grossing up information on the sample of corporation tax cases referred to in paragraph 16 above.

Tables 9.8 and 9.9

22. In these tables estimates are given of the capital allowances claimed against trading income by all cases within the scope of corporation tax. The totals differ from those given in tables 9.3 and 9.4 because they include allowances claimed by companies incurring trading losses in the period (see paragraph 19 above). Although claimed in the year they may not necessarily be set against profits in the tax assessment for that year. Unused capital allowances may be set against profits in earlier or later years but these movements between years are not reflected in these tables. The estimates of totals are based upon the same sample used for tables 9.3 and 9.4. The breakdown into different types of asset are based upon a smaller sample of companies.

23. Capital allowances provide reliefs from corporation tax in respect of expenditure on certain types of capital asset incurred for the purposes of carrying on a trade. The types of capital asset which qualify for relief and the rates of allowances since 1965 are given in Appendix A.3.

Tables 9.10 to 9.13

24. These tables show companies' franked payments and franked investment income (ie receipts of franked payments), annual payments made and received, and the tax thereon - advance corporation tax and income tax. Franked payments are the total value of distributions made by companies plus the advance corporation tax due on those distributions. The major item classed as a distribution is a company's dividends (including capital dividends). Annual payments, from which income tax has to be deducted, include yearly interest and patent royalties, annuities, certain rents and easements, and payments under deed of covenant.

25. Distributions are not subject to corporation tax in the hands of a recipient company. Franked investment income may be set off against franked payments by a company before calculating the amount of advance corporation tax payable. Similarly where a company receives income from which income tax has been deducted in any accounting period, it may set off that income tax against its own liability to income tax on annual payments. Unlike distributions, income from which income tax has been deducted forms part of the company's corporation tax assessment and the income tax deduction may be set off against the corporation tax liability on the total income, provided it has not already been used to reduce the company's income tax liability on annual payments.

26. Whilst liability to corporation tax is assessed annually in accordance with a company's own accounting period, notification of distributions and annual payments, and payment of the associated advance corporation tax and income tax, is dealt with quarterly. The return period for the notification of these payments is normally a calendar quarter but provision is made for other return periods where the company's accounting period does not commence immediately after or end with a calendar quarter. The figures in these tables relate to payments made (and tax due on those payments) in the 12 months ending on 31 March. There are therefore timing differences between these figures and those provided in previous tables. Franked investment income and income under deduction of income tax received in a return period need not be reported if there is no liability to tax against which it can be set off. Income in a period may therefore be understated in the quarterly returns.

27. Intra Group Dividends. A parent company and its subsidiary (if both are resident in the United Kingdom) may elect jointly that the subsidiary shall pay dividends to the parent or to fellow subsidiaries without accounting for advance corporation tax. A similar but more restricted election is available for members of a consortium. Where dividends are paid in accordance with such an election the amounts are not included in these tables. If a company chooses to account for advance corporation tax despite this election the related franked payments and franked investment income are included in the tables.

28. Tax Credit Paid to Non-residents (table 9.10). Where dividends are paid to non-residents who are covered by a double taxation agreement the company may pay a lower rate of tax on the complete franked payment than the United Kingdom rate. In these cases the company may be authorised to pay to the non-resident the difference between the tax at the full rate and the tax at the reduced rate applying under the double taxation agreement.

29. Repayments (tables 9.10 and 9.11) arise in three ways. Advance corporation tax and income tax must be accounted for quarterly rather than annually. If in a return period franked payments exceed franked investment income, or income tax on payments made exceeds income tax on payments received, a payment of tax is due to the Inland Revenue in respect of that return period. If the position is reversed in a later return period within the same accounting period of the company, the company is entitled to a repayment of tax. An entitlement to repayment of advance corporation tax also arises if a company's liability for a return period is exceeded by its tax payment and the tax credits paid to non-residents. Finally, a repayment of advance corporation tax is due to the extent that liability to PRT or supplementary petroleum duty reduces the amount of advance corporation tax which can be set off against a corporation tax liability.

30. Annual Payments to Non-residents (table 9.11). Income tax is deducted from annual payments at source and accounted for to the Inland Revenue. Where the annual payment is made to a non-resident the deduction is often at a reduced rate under the terms of a double taxation agreement.

Tables 9.14 and 9.15

31. These tables relate to petroleum revenue tax assessments made by 30 June 1992 for chargeable periods ending on or after 30 June 1986, including estimated assessments which may subsequently be revised. The figures do not include fields in production which have not yet been assessed to petroleum revenue tax.

32. The levels of PRT payable shown in tables 9.14 and 9.15 do not correspond closely with the receipts shown in Section 1 largely because of tax repayments. Generally, the tax payable on the two reporting periods in a calendar year is paid in the financial year ending in the following March. However, some payments are made later and repayments may also be made. These may be the result of changes to assessments when final figures are agreed or losses being carried back to reduce previous liabilities. Repayments in 1991-92 were higher than the levels of receipts, resulting in an aggregate tax repayment in the year.

33. In table 9.14, "gross profit" consists of the proceeds of sale (the market value of oil is used in certain circumstances) with an adjustment for the change over the period in market value of oil held in stock. "Other chargeable receipts" include tariff receipts (net of tariff receipts allowance) and receipts from the disposal or loss of certain assets.

34. The licence debit is the element in the PRT computation which broadly allows for royalty payments to the Secretary of State for Energy. There is a preliminary deduction for the royalties payable in respect of each chargeable period and this is adjusted in subsequent periods to the amounts actually paid. The deduction only takes into account cash payments, royalty taken in kind is already deducted in the determination of gross profits. For chargeable periods covered by the table it also includes any licence payments other than royalties covered by Section 118 of the Finance Act 1981. The category "expenditure and allowable losses" consists of field expenditure including uplift, exploration and appraisal relief, cross-field allowance and research relief in the period and field losses brought forward from earlier periods or carried back from later periods.

35. Gross profits from oil and gas production in the chargeable periods up to the end of 1985 were £95 billion and net petroleum revenue tax payable was £22.5 billion.

36. Table 9.15 shows the numbers of oil and gas fields and tax assessed by liability to petroleum revenue tax and size of assessment in each chargeable period. An oil and/or gas field, as used in the table, means a "single petroleum geological structure". The extent of a field is determined by the Secretary of State for Energy and only covers areas licensed for petroleum production; for an off-shore field, it excludes portions outside the United Kingdom Continental Shelf. The tax assessed on the field is the sum of assessments on all companies with an interest in the field; these assessments are sometimes reduced by expenditure outside the field (see paragraph 6). Some of the ranges in the table have been aggregated to preserve taxpayer confidentiality. PRT assessments are sometimes made late when there is no tax liability, so the total number of fields assessed for any chargeable period may be higher in versions of the table in future years. This is especially likely for the more recent periods.

9.1

Corporation tax
Mainstream corporation tax accruals and total corporation tax receipts, 1987-88 to 1991-92

Amounts: £ million

Onshore mainstream corporation tax - accrual	1986	1987	1988	1989	1990
Company sector					
Industrial and commercial	7,945	9,150	11,637	10,688	9,251
Financial	2,200	2,200	2,700	2,300	1,900
Overseas	40	50	60	50	50
Total	10,185	11,400	14,397	13,038	11,201

Corporation tax receipts	1987-88	1988-89	1989-90	1990-91	1991-92
Mainstream corporation tax					
Onshore companies					
Gross payments	10,528	12,312	14,728	13,906	11,276
Repayments	507	596	886	1,330	2,002
Net receipts	10,021	11,716	13,842	12,576	9,274
Public Corporations	149	108	138	756	784
North Sea companies	617	510	248	484	269
Total	10,787	12,334	14,228	13,816	10,327
Advance corporation tax					
Gross payments	5,087	6,323	7,517	8,100	8,400
Repayments	140	120	250	421	464
Net receipts	4,947	6,203	7,267	7,679	7,936
Total net receipts of corporation tax	15,734	18,537	21,495	21,495	18,263
Memorandum item: Tax on capital gains	495	549	472	471	374

9.2

Corporation tax
Income, allowances, deductions and tax accruals, by company sector, 1988 to 1990

Amounts: £ million

	Home industrial and commercial companies excluding North Sea oil and gas			Financial companies		
	1988	1989	1990	1988	1989	1990
Gross Case 1 profits	68,291	69,187	65,737	20,362	22,925	20,998
Capital allowances used	16,643	18,963	21,273	5,051	5,644	5,906
Balancing charges	582	826	806	56	26	22
Losses brought forward and used	5,333	4,360	3,056	547	498	392
Net Case 1 profit	46,897	46,690	42,214	14,820	16,809	14,722
Other income and gains	23,370	30,846	29,496	8,316	10,788	11,554
Losses used against other income	2,278	3,012	3,538	880	1,176	1,259
Charges paid and relieved	7,541	10,097	10,637	3,806	7,460	7,754
Group relief received	6,838	8,862	8,959	3,343	3,737	3,523
Other deductions	1,559	1,689	1,714	3,227	4,345	3,011
Profits chargeable to corporation tax	52,051	53,876	46,862	11,880	10,879	10,729
Charge to corporation tax	18,228	18,857	16,041	4,158	3,808	3,675
Small company relief	482	580	660	41	46	42
Advance corporation tax set off	4,450	5,389	4,830	924	925	1,174
Double taxation relief	1,402	2,000	1,100	296	365	319
Income tax set off	257	200	200	197	172	240
Mainstream corporation tax	11,637	10,688	9,251	2,700	2,300	1,900

9.3

Corporation tax
Computation of liability: financial year 1988-89[1]
Number, income, allowances, deductions and tax, by industry

Numbers: actual; Amounts: £ million

Industry	Number of cases	Gross trading profits	Capital allowances[2]	Net trading profits	Other income & gains
Agriculture, forestry, fishing	11,071	417	164	288	205
Energy, water supply	1,695	8,839	4,569	4,998	2,671
Extraction, metal mfg,chemicals	12,118	7,045	2,039	5,151	1,793
Metal goods and engineering	55,205	11,664	2,863	9,260	2,012
Other manufacturing	46,068	10,428	2,617	8,094	2,768
Construction	65,316	5,011	854	4,225	876
Distribution and repairs	107,761	12,651	2,887	10,176	3,929
Hotels and catering	26,901	1,320	507	937	494
Transport and communication	22,950	8,064	3,060	5,196	1,366
Banking, finance and insurance	33,435	17,497	5,875	13,737	8,786
Business services	119,397	7,687	2,142	6,071	5,516
Other services	52,306	2,484	657	1,915	789
Overseas activities	1,197	1,776	322	1,568	1,557
Not classified	9,358	305	97	246	200
All industries	564,778	95,188	28,653	71,862	32,962
Percentage of sample data from agreed assessments or tax computations.	86%	94%	92%	95%	90%

Industry	Deductions allowed	Income chargeable to tax	ACT set-off	Other reliefs set against tax	Tax payable
Agriculture, forestry, fishing	189	304	18	11	78
Energy, water supply	2,772	4,917	694	353	712
Extraction, metal mfg,chemicals	2,278	4,666	522	273	793
Metal goods and engineering	4,087	7,186	888	206	1,423
Other manufacturing	3,527	7,335	796	286	1,490
Construction	1,412	3,689	208	92	998
Distribution and repairs	3,852	10,254	744	610	2,243
Hotels and catering	520	911	113	22	190
Transport and communication	1,968	4,594	363	52	1,194
Banking, finance and insurance	11,279	11,244	674	567	2,725
Business services	4,858	6,729	545	186	1,660
Other services	925	1,778	115	67	442
Overseas activities	734	2,390	97	633	106
Not classified	225	221	13	10	55
All industries	38,626	66,218	5,790	3,368	14,109
Percentage of sample data from agreed assessments or tax computations.	91%	94%	92%	94%	94%

[1]The figures relate to the earnings of accounting periods ending in the financial year 1988-89.
In aggregate they correspond approximately to the earnings of the calendar year 1988.
[2]Capital allowances less balancing charges set off against trading profits.

9.4

Corporation tax

Computation of liability: financial year 1989-90[1]
Number, income, allowances, deductions and tax, by industry

Numbers: actual; Amounts: £ millions

Industry	Number of cases	Gross trading profits	Capital allowances[2]	Net trading profits	Other income & gains
Agriculture, forestry, fishing	10,872	431	181	293	218
Energy, water supply	1,736	14,052	5,642	9,412	3,504
Extraction, metal mfg,chemicals	12,239	7,442	2,263	5,306	2,184
Metal goods and engineering	55,756	11,155	3,809	8,511	2,661
Other manufacturing	45,130	10,589	3,134	7,869	3,223
Construction	65,759	4,873	1,066	3,937	1,328
Distribution and repairs	107,875	12,774	3,573	9,748	6,674
Hotels and catering	26,194	1,253	622	789	477
Transport and communication	22,943	9,123	3,731	5,642	1,401
Banking, finance and insurance	33,734	18,305	6,573	13,432	11,791
Business services	132,259	7,946	2,848	6,021	6,929
Other services	52,537	2,636	776	1,954	997
Overseas activities	1,119	1,594	375	1,380	1,380
Not classified	13,521	505	128	399	1,029
All industries	581,674	102,678	34,721	74,693	43,796
Percentage of sample data from agreed assessments or tax computations.	83%	80%	77%	81%	79%

Industry	Deductions allowed	Income chargeable to tax	ACT set-off	Other reliefs set against tax	Tax payable
Agriculture, forestry, fishing	212	299	16	13	75
Energy, water supply	5,956	6,961	687	508	1,241
Extraction, metal mfg,chemicals	2,445	5,045	463	244	1,011
Metal goods and engineering	4,140	7,032	865	137	1,540
Other manufacturing	3,875	7,216	820	228	1,479
Construction	1,728	3,537	271	117	848
Distribution and repairs	4,590	11,832	700	1,249	2,218
Hotels and catering	492	774	75	20	175
Transport and communication	1,836	5,207	642	57	1,137
Banking, finance and insurance	15,160	10,063	608	592	2,343
Business services	6,364	6,586	621	201	1,490
Other services	1,055	1,895	138	82	441
Overseas activities	933	1,827	33	549	58
Not classified	1,062	366	24	19	86
All industries	49,848	68,640	5,963	4,016	14,142
Percentage of sample data from agreed assessments or tax computations.	79%	81%	77%	88%	81%

[1]The figures relate to the earnings of accounting periods ending in the financial year 1989-90. In aggregate they correspond approximately to the earnings of the calendar year 1989.
[2]Capital allowances less balancing charges set off against trading profits.