



Constitutional and legal aspects of tax benefits for the elderly: A comparative international analysis

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Suggested Citation:

Kubatov, I., Sagynalieva, V., Shalpykova, A., Alimbekov, A., & Satymkulov, M. (2026). Constitutional and legal aspects of tax benefits for the elderly: A comparative international analysis. *Law. Human. Environment*, 17(2), 97-116. doi: 10.31548/law/2.2026.97.



Article's History:**Abstract**

Received: 24.12.2025

Revised: 30.03.2026

Accepted: 21.05.2026

Published: 29.05.2026

The purpose of the study was to conduct a comparative international analysis of the legal regulation of tax benefits for the elderly, identify key challenges and differences in national approaches, and develop recommendations for optimising the legal mechanisms used to provide such benefits. The study conducted a comparative analysis of tax legislation and examined relevant

legal frameworks. A systemic approach applied in the study enabled the consideration of legal, economic, and demographic factors affecting the effectiveness of tax incentives. The study demonstrated that Germany, Japan, and Kyrgyzstan applied different forms of tax relief for the elderly, including deductions for medical expenses, exemptions from property tax, reductions in taxable income, and tax incentives for caregiving. Notable differences were identified in the scale and implementation mechanisms of these measures. In Germany and Japan, tax benefits were closely integrated with social protection systems and consider demographic realities related to an ageing population. In contrast, Kyrgyzstan applied a more limited approach due to economic and administrative constraints. The findings highlighted the importance of a comprehensive and adaptive approach to granting tax relief, including the development of transparent implementation mechanisms, improved access to information for citizens, and regular monitoring of benefit effectiveness. International experience from Germany and Japan demonstrated the need to align tax policy with broader social protection strategies, including support for family-based care and the promotion of economic participation among older citizens. The practical value of the research lies in its recommendations for improving tax relief for elderly citizens through simpler procedures, better access to benefits, and stronger links with social protection policy

Keywords: economic security; social policy; economic stability; demographic challenges; population ageing; economic context

Introduction

With the growing number of elderly individuals in many countries and the increasing complexity of their socio-economic conditions, the issue of tax benefits for pensioners had become particularly urgent. Pensioners represented one of the most vulnerable segments of the population. Governments introduced tax exemptions and relief schemes to ensure their social welfare and alleviate their economic burden. However, the legal aspects surrounding the provision of tax benefits to pensioners remained underexplored, and legislative gaps often hindered the effective implementation of such measures in practice. The

challenges that required resolution include the wide variation in national approaches to granting tax benefits, which may result in unequal conditions for pensioners from different social groups. In addition, issues such as the accessibility of benefits for low-income individuals, the complexity of application procedures, and the lack of awareness among pensioners about their rights persist. Nevertheless, international organisations were attempting to establish common standards of social protection for the elderly, though the effectiveness of such initiatives requires detailed analysis of national practices (Kurylo *et al.*, 2026).

Tax benefits for elderly individuals were central to many contemporary studies, which explored aspects of fiscal incentives, social justice, and economic security for people of retirement age. B. Brewer *et al.* (2021) looked at whether income tax breaks for senior citizens have an impact on economic growth, considering these benefits as more than just a specific welfare tool. The study took into account the widespread tax breaks for senior citizens, which may have an impact on growth through labour-market behaviour, migration, consumption, and other economic decisions. This source was pertinent to the current study because it backed the notion that tax benefits for senior citizens should be examined as a tool for economic policy as well as a social safety net. A. Dada (2024) examined Poland's tax relief programme for working seniors and evaluated whether it offered enough tax and contribution benefits to support ongoing employment. The authors concluded that, while the relief may help some groups, especially those with lower pension entitlements, it cannot be considered a clearly significant incentive for all working seniors using a case-study approach, source analysis, legal acts, and inductive reasoning. This source was pertinent because it demonstrated that the effectiveness of tax benefits for senior citizens depended on both their actual financial and motivational impact as well as their legal existence.

A. Andrejovska & J. Glova (2022) examined the Slovak Republic's effective average tax rate in relation to EU nations as a component of tax competitiveness. In order to investigate the connection between tax burden, foreign direct investment, and competitiveness, the authors computed effective average tax rates for cross-border investments and employed cluster analysis. This source was pertinent because it clarified how tax benefits fit into a larger fiscal system where tax preferences must strike a balance between social

goals, economic competitiveness, and budgetary sustainability. D. Miles (2026) looked at the social and financial strain that ageing populations put on society, particularly with regard to pensions and the viability of retirement systems. This study was important because it demonstrated that public finance, pension stability, and demographic adaptation should all be taken into account, when determining tax policy for senior citizens. B.A. Nayebi *et al.* (2025) highlighted the need for sustainable mechanisms to finance the healthcare needs of older adults by comparing health financing policies for ageing populations across seven countries. Their findings were relevant to this study because healthcare access, medical deductions, and the decrease in financial vulnerability in old age were all strongly linked to tax benefits for senior citizens.

Using Vietnam as a case study, H.O. Nguyen *et al.* (2023) examined the impact of population ageing on personal income tax revenue. This source backed up the claim that as the population ages, tax revenue structures change and governments must modify tax laws to preserve fiscal balance and safeguard senior citizens. R. Jaimes & E. Westerhout (2023) examined retirement patterns and demographic shifts in order to determine the best social security policies for an ageing population. Their research was crucial to the current analysis because it connected social security design, labour income, taxes, and retirement choices in the context of population ageing. Despite the abundance of research, considerable gaps remained. There was insufficient analysis of the long-term financial impact of tax benefits on pensioners. No unified methodology existed for evaluating the effectiveness of tax relief in a comparative international context. Studies on the adaptation of successful international practices to national frameworks were extremely limited. The purpose of this study was to conduct a comparative legal analysis of tax benefit

regulation for elderly individuals in different countries (specifically Germany, Kyrgyzstan, and Japan), to identify key problems in this domain, and to develop recommendations for enhancing the effectiveness of legal mechanisms in the implementation of such benefits. The objectives of the study include:

- 1) to analyse the features of legal regulation regarding tax benefits for elderly individuals in selected countries;
- 2) to identify key differences and commonalities in the approaches to the application of tax benefits in Germany, Kyrgyzstan, and Japan;
- 3) to propose recommendations for improving the legal regulation of tax benefits for elderly individuals in Kyrgyzstan, drawing on international experience.

Materials and Methods

Research methodology ensured a systematic and comprehensive approach to examining the legal aspects of tax benefits granted to elderly individuals. This enabled the identification of key features and differences in national approaches and the most effective implementation mechanisms. The study involved a comparative analysis of legislation in countries with varying levels of economic development, socio-demographic characteristics, and legal traditions. This approach allowed for the consideration of diverse factors influencing the design and implementation of tax benefits, including economic stability, the level of state funding for social policy, and the degree of responsiveness to demographic challenges. The main stages of the study were schematically presented in Figure 1.

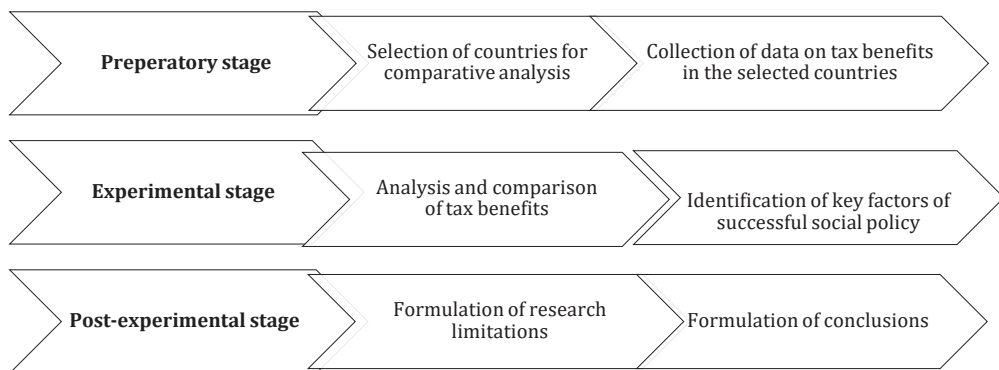


Figure 1. Research design

Source: developed by the authors

The study also included an analysis of existing issues such as the accessibility of benefits for beneficiaries, the transparency of procedures, and their overall effectiveness. This made it possible to identify legal and practical gaps that required further refinement and to formulate recommendations aimed at optimising tax regulation in an international context. Three countries were selected for the study based on their differing approaches to providing tax benefits to elderly individuals

within the framework of social protection. The sample included Germany, Kyrgyzstan, and Japan. Germany was known for its well-developed social protection system and effective use of tax instruments to support elderly individuals. The German model was focused on offering tax deductions, reducing the taxable base, and applying progressive tax rates to minimise the financial burden on pensioners. Kyrgyzstan represented a transitional economy, where tax benefits were more limited in

scope and often concentrate on basic taxes, such as property or income tax. Kyrgyzstan provided an opportunity to analyse the characteristics of tax relief in a context of constrained budgetary resources and to identify barriers to their effective allocation. Japan was selected as a country with a unique demographic profile, characterised by a high proportion of elderly citizens. In Japan, tax benefits were integrated into a broad spectrum of social policies, including special deductions for older individuals, incentives for continued employment, and additional support for those caring for elderly relatives.

The analysis of these countries across selected indicators enabled the identification of the primary factors influencing the development and implementation of tax relief. Each country was analysed for the period 2020-2024 with regard to the application of key tax benefit instruments. These instruments included deductions from taxable income, exemptions from specific types of taxes, tax credits, rate reductions, and special support programmes for pensioners delivered through the tax system. The following research methods were employed in the study. The comparative method was used to examine the differences and similarities in the legal regulation of tax benefits for elderly individuals in Germany, Kyrgyzstan, and Japan. This approach enabled the identification of the specific features of each country's system, consideration of their economic and demographic distinctions, and evaluation of the effectiveness of the instruments used. The systems method was employed for a comprehensive analysis of the interrelationships between tax policy, social protection, and demographic trends. This method facilitated a view of tax benefits as part of a broader framework of social support for elderly populations. The legal method was used to analyse tax relief regulations and international agreements and recommendations concerning the social protection of elderly individuals.

National legislation from Germany, Kyrgyzstan, and Japan was analysed, alongside international standards and practices. Analysis of Germany was based on documents and reports by European Commission (2018; 2023), OECD (2023). It was analysed data from Federal Ministry of Labour and Social Affairs (2022; 2023; n.d.). The legal analysis also included a detailed examination of the German regulatory acts, including Property Tax Act (1973), Wealth Tax Act (1974), and Germany Income Tax Act (2009). Additional attention was given to Inheritance Tax and Gift Tax Act (1974), Social Code (SGB) Book V – Statutory Health Insurance (1988), and Motor Vehicle Tax Act (2002). Investment Tax Act (2018) was also analysed as part of the legal framework regulating tax preferences related to investment income. The study analysed Japanese legislation governing income taxation, pension insurance, inheritance taxation, healthcare-related deductions, property taxation, local taxation, employment of older persons, and social security contributions. The principal legal sources included Employees' Pension Insurance Act (1941), Inheritance Tax Act No. 73 (1950), and Income Tax Act No. 33 (1965). The Health Insurance Act No. 70 (1922), the Act on Stabilisation of Employment of Elderly Persons No. 68 (1971), and social security legislation were also examined. The analysis of Kyrgyzstan relied on the Kyrgyz Republic. Multi-annual Indicative Programme 2021-2027 (2021) and The World Bank (2023). The main legal sources included Law of the Kyrgyz Republic No. 57 (1997) and Tax Code of the Kyrgyz Republic (2022). Civil Code of the Kyrgyz Republic (1996) and Land Code of the Kyrgyz Republic No. 45 (1999) were also analysed as part of the national legal framework governing property- and land-related tax provisions. Demographic and contextual indicators were considered using data from Statista (2026a; 2026b; 2026c). The comparative analysis of Germany, Japan, and Kyrgyzstan enabled an inspection, of

which approaches have proven most effective, what barriers remained to their implementation, and how successful practices might be adapted for use in an international context.

Results

The results of research highlight a comparison of tax relief programmes for senior citizens in Kyrgyzstan, Germany, and Japan. Attention is drawn to the legal basis, types of benefits, the extent of financial support, and the administrative accessibility of tax relief measures. This perspective

allows for the identification of both universal principles of social protection and national variations shaped by institutional, economic, and demographic factors. The tax relief system for elderly individuals in Germany is among the most developed and detailed in Europe (Table 1). It is based on a range of legal instruments, with the German Income Tax Act (2009) playing a central role in regulating personal taxation, including the provision of tax benefits. This system is designed in accordance with demographic changes, economic sustainability, and social equity.

Table 1. Tax relief system for elderly individuals in Germany

Type of tax relief	Legal framework	Amount of relief (as a percentage or fixed amount)
Reduction of income tax for pensioners	Germany Income Tax Act (2009)	Reduction of taxable base by EUR 1,000 for single pensioners (if annual income is below EUR 20,000)
Property tax relief for elderly people	Property Tax Act (1973) and Wealth Tax Act (1974)	Exemption from property tax for pensioners aged 65+ with an annual income below EUR 35,000
Medical expense deduction	Social Code (SGB) Book V – Statutory Health Insurance (1988)	Deduction of up to 7.5% of income for medical expenses (if total exceeds EUR 1,000)
Inheritance tax relief for elderly individuals	Inheritance Tax and Gift Tax Act (1974)	Exemption of EUR 500,000 for spouses and EUR 400,000 per heir (for pensioners aged 70+)
Transport tax reduction for elderly citizens	Motor Vehicle Tax Act (2002)	Discount of 20-30% on vehicle tax for individuals aged 65+, depending on the region
Property tax exemption for elderly individuals	Property Tax Act (1973)	Exemption from land tax on real estate valued below EUR 100,000
Income tax reduction for employed pensioners	Germany Income Tax Act (2009)	5% reduction in income tax for employed pensioners with annual income under EUR 30,000
Investment income tax relief for pensioners	Investment Tax Act (2018)	Exemption from tax on investment income up to EUR 10,000 per year

Source: European Commission (2018), M. Haisch & S. Arlich (2023), Federal Ministry of Labour and Social Affairs (2023), PwC (2024)

One of the defining features of the German pension system is the gradual increase in the taxable portion of pension income, introduced with the 2005 reform. For individuals retiring in 2020, 80% of pension income is subject to taxation. The taxable share increases annually. For example, individuals retiring in 2025 will see approximately

83.5% of their pension income taxed. This gradual increase will continue until 2058, when pension income is expected to become fully taxable (SteuerGo, n.d.). The reform reflects efforts to ensure the long-term sustainability of the pension system amid demographic changes, including increased life expectancy. In 2023, average

life expectancy in Germany was approximately 78.5 years for men and 83.2 years for women (German Federal Statistical Office, 2026). Moreover, a mechanism of tax relief for elderly taxpayers exists in Germany, known as the Altersentlastungsbetrag, which applies to individuals aged 64 and over. In 2023, this deduction amounted to 15.2% of income, capped at EUR 722 per year. However, this relief is gradually being phased out for new pensioners to maintain a balanced tax burden over time. More specifically, recent reforms include the 2025 increase and nationwide unification of the contribution assessment ceiling for statutory pension insurance to EUR 8,050 per month, or EUR 96,600 per year, which eliminated the previous distinction between eastern and western Germany (Federal Ministry of Labour and Social Affairs, n.d.). In addition, the 2025 pension package aims to stabilise the pension level at 48% until 2031 and to expand pension credits for child-rearing periods (The Federal Government, 2025). These reforms aim to ensure the financial sustainability of the pension system without drastically raising the retirement age or reducing benefits.

Some German federal states introduced additional tax benefits for senior citizens. For instance, in Bavaria and North Rhine-Westphalia, older individuals may benefit from reduced property taxes, provided they reside in their own home or flat. This encourages senior citizens to maintain financial independence and reduces the burden on the state social protection system. The demographic structure of Germany greatly influences

its tax policy. As of 2023, individuals aged over 65 comprised 22.3% of the total population. Furthermore, projections indicate that this share will increase to 28% by 2040, driven by high life expectancy and a low birth rate of 1.5 children per woman in 2023 (European Commission, 2023). These trends place increasing pressure on the pension system and necessitate the redistribution of tax resources. The economic stability of Germany enables the funding of extensive social programmes. In 2022, the social expenditure budget totalled approximately EUR 1,178.5 billion, a substantial part of which was allocated to support for elderly citizens (Federal Ministry of Labour and Social Affairs, 2022). Nevertheless, the growing number of pensioners requires continued optimisation of the tax system. The tax relief system for older adults in Japan forms an integral part of the broader social protection framework, which is adapted to the country's unique demographic and economic conditions. Japan is one of the most aged societies in the world; according to the Ministry of Internal Affairs and Communications (2023), more than 29% of the population is aged over 65, the highest proportion globally. This demographic pressure prompted the government to develop measures supporting older citizens, including through targeted tax relief. The taxation system of Japan is governed by several legal instruments, including the Income Tax Act No. 33 (1965) and the Employees' Pension Insurance Act (1941). These statutes provide for a range of reliefs and deductions aimed at reducing the tax burden on elderly individuals (Table 2).

Table 2. Tax relief system for older adults in Japan

Type of tax relief	Legal framework	Amount of relief (as a percentage or fixed amount)
Reduction in personal income tax for pensioners	Income Tax Act No. 33 (1965)	Exemption of up to ¥1.2 million from the taxable base; tax rate reduced from 10% to 5%
Exemption from tax on pension payments	Employees' Pension Insurance Act (1941)	Exemption of up to ¥4 million per year for pension income
Inheritance tax relief for elderly individuals	Inheritance Tax Act No. 73 (1950)	Exemption of ¥20 million for spouses, and ¥6 million for each heir

Table 2. Continued

Type of tax relief	Legal framework	Amount of relief (as a percentage or fixed amount)
Medical expense deduction	Health Insurance Act No. 70 (1922)	Deduction for expenses exceeding 7.5% of annual income
Property tax exemption for older adults	Income Tax Act No. 33 (1965)	Exemption of up to 50% on one property
Local tax subsidies for older residents	Municipal regulations	Exemption of up to 50% on local taxes for low-income elderly citizens
Reduction in transportation tax	Legislation on transportation expenses for older adults	30-50% discount on public transport costs
Exemption from investment income tax	Income Tax Act No. 33 (1965)	Exemption of up to ¥1.5 million on annual investment income
Tax relief for employed older adults	Act on Stabilisation of Employment of Elderly Persons No. 68 (1971)	Income tax rate reduced to 5% for earnings not exceeding ¥2 million
Reduction in social insurance tax for the elderly	Social security legislation	30-50% exemption from contributions for citizens over the age of 70

Source: N. Yoshino *et al.* (2019), J.J. Pérez *et al.* (2021), KPMG Tax Corporation (2024)

A key component of the tax regime in Japan for older individuals is the income tax exemption for those whose annual earnings do not exceed a specific threshold. In 2023, this threshold stood at ¥1.03 million (approximately USD 7,500) for single pensioners (National Tax Agency, 2025). This provision supports a basic standard of living for low-income elderly individuals, including those solely reliant on state pensions. Individuals aged over 65 are also entitled to a special tax deduction known as the Elderly Deduction. In 2023, this deduction amounted to ¥480,000 (approximately USD 3,500) for single elderly persons, and ¥380,000 (approximately USD 2,800) for those living with family. This deduction applies to the overall taxable base, significantly reducing the tax burden (OECD, 2023). The tax system of Japan also includes inheritance tax relief under the Inheritance Tax Act No. 73 (1950). Older adults transferring assets to their heirs benefit from enhanced exemptions. In 2023, the basic tax-free threshold for inheritance was ¥30 million (approximately USD 218,000), plus ¥6 million (around USD 44,000) per heir. These provisions aim to support intergenerational wealth transfer

and promote family values. Elderly citizens may also claim deductions on medical expenses exceeding 5% of their annual income. In an ageing society, this is particularly crucial, given that older individuals typically allocate a substantial portion of their income to healthcare (Moretto *et al.*, 2008; Fedenko *et al.*, 2025). According to the Ministry of Health, Labour and Welfare, the average annual medical expenses for an elderly individual in 2022 amounted to approximately ¥800,000 (around USD 5,800) (Statista, 2026b).

Local authorities in Japan also provide supplementary benefits for older citizens. In prefectures such as Hokkaido and Okinawa, for instance, low-income elderly individuals are either exempt from paying housing tax or receive substantial reductions. These measures reduce the financial burden on pensioners, particularly in regions with a high cost of living. The demographic situation in Japan directly influences the development of tax policy. According to projections by Statista, by 2040, individuals over the age of 65 will comprise 35% of the total population (Statista, 2026a). In 2023, the life expectancy was 81.6 years for men and 87.3 years for women, necessitating increased

expenditure on pensions and healthcare. Economically, Japan faces growing pressure on its pension fund and a shrinking tax base due to a declining working-age population (Fukuda & Okumura, 2021). In response, the government introduced measures aimed at encouraging employment among older citizens. Individuals who continue working beyond retirement age (65 years) receive income tax relief and pension bonuses. In 2023, the proportion of employed pensioners reached 25%, representing a record high.

The tax relief system of Japan for older citizens reflects a high level of adaptation to the demographic and economic conditions. It aims to reduce the tax burden, maintain a basic standard of living, and stimulate economic activity among older people. Nevertheless, in the context of ongoing population ageing and rising social expenditure, continuous revision and modernisation of tax policy remain necessary (Efremov, 2026). The experience of Japan is valuable for other nations

facing similar demographic challenges and may serve as a model for the development of effective systems of social support. The system of tax relief in Japan for older people forms part of a comprehensive government policy aimed at supporting employment and social welfare for the elderly. In a context of demographic ageing, where those aged over 65 accounted for approximately 29% of the population in 2023, the Japanese government took steps to ensure an adequate standard of living and promote active participation by older citizens in economic life (Statista, 2026c). However, given the constraints on public finances, the tax relief system in Japan has specific features and notable limitations. Kyrgyzstan, as a developing economy, faces a range of challenges, including low income levels, insufficient public funding, and a high degree of dependency among vulnerable social groups on state support. These conditions shape the tax policy aimed at supporting older citizens (Table 3).

Table 3. Tax relief system for older people in the Kyrgyz Republic

Type of tax relief	Legal framework	Amount of relief (as a percentage or fixed amount)
Reduction in personal income tax for pensioners	Tax Code of the Kyrgyz Republic (2022)	Reduction of the income tax rate for pensioners by 10%
Exemption from tax on pension payments	Law of the Kyrgyz Republic No. 57 (1997)	Full exemption from tax on all pension payments up to 100,000 som per year
Property tax relief for older people	Tax Code of the Kyrgyz Republic (2022)	Exemption from property tax for pensioners over the age of 60
Reduction in vehicle tax	Tax Code of the Kyrgyz Republic (2022)	50% discount on vehicle tax for pensioners
Property tax exemption on inherited property	Tax Code of the Kyrgyz Republic (2022)	Exemption from property tax when property is inherited by older individuals
Exemption from tax on gifts from close relatives	Civil Code of The Kyrgyz Republic (1996)	Exemption from tax on gifts from close relatives up to 200,000 som
Land tax relief for older citizens	Land Code of the Kyrgyz Republic No. 45 (1999)	Exemption from land tax for pensioners over the age of 65
Subsidies on local taxes for pensioners	Tax Code of the Kyrgyz Republic (2022)	Subsidy on local taxes for pensioners with an annual income below 30,000 som
Income tax reduction for working pensioners	Tax Code of the Kyrgyz Republic (2022)	Reduction of income tax rate by 15% for working pensioners

Source: Kyrgyz Republic. Multi-annual Indicative Programme 2021-2027 (2021), World Bank (2023)

The tax relief system in the Kyrgyz Republic is based on the provisions of the Tax Code of the Kyrgyz Republic (2022), along with a number of subordinate regulations governing tax preferences and exemptions. The primary focus lies in supporting individuals with low incomes and ensuring a minimum level of social protection for older people. According to Article 208 of the Tax Code of the Kyrgyz Republic (2022), older citizens whose income does not exceed the established non-taxable minimum are exempt from paying personal income tax. In 2023, this threshold was set at 200,000 soms per year (approximately USD 2,300). This measure is intended to safeguard older people with limited financial resources, particularly those who rely on pensions and other social benefits. Men aged 63 and above, and women aged 58 and above, may benefit from property tax relief. As stipulated by Article 342 of the Tax Code of the Kyrgyz Republic (2022), such citizens are exempt from property tax on their sole residence, provided it does not exceed 80 square metres for flats and 120 square metres for detached houses. This provision is particularly relevant for single pensioners, who often lack alternative sources of income.

Pension-age citizens are also exempt from land tax, provided the land is used for subsistence farming (Demi *et al.*, 2021). This preferential regime is intended to support older residents in rural areas, where a significant proportion of the population is engaged in agriculture. Older citizens living in remote and high-altitude regions benefit from partial exemption from excise duties on fuel used for heating (Teta *et al.*, 2025). These relief measures are governed by government decrees and vary according to the region's climatic conditions. Older people in the Kyrgyz Republic face a number of challenges, including low pension levels and limited access to healthcare services (Chipegin, 2024). In 2023, the average pension amounted to approximately 7,500 soms (around

USD 87), one of the lowest figures among Central Asian countries. This compels many older individuals to continue working, particularly in rural areas. The country's demographic structure also influences its tax policy (Koumpias *et al.*, 2021). Although the proportion of older citizens in Kyrgyzstan is lower than in more developed countries, population ageing is progressing. According to The World Bank (2023), the life expectancy in 2023 was 67 years for men and 75 years for women.

The application of tax relief measures in the Kyrgyz Republic varies across regions. In densely populated areas such as Chüy Region and the city of Bishkek, older citizens have greater access to tax benefits due to more developed infrastructure. In contrast, remote regions, including Naryn and Batken, face limited access to such entitlements, owing to low public awareness and insufficient engagement from local authorities (World Bank, 2023). The tax relief system for older citizens in Kyrgyzstan is designed to reduce poverty and provide basic social protection. Despite considerable economic constraints, the country seeks to support its most vulnerable populations through a flexible system of tax preferences. However, the effectiveness of these measures relies on the modernisation of the legal framework, improved public awareness, and increased funding for social support programmes. The Kyrgyz experience highlights the importance of accounting for regional and economic disparities when developing tax policy aimed at supporting the elderly (United Nations Development..., 2022).

A comparative analysis of tax relief schemes for older people in Germany, Kyrgyzstan, and Japan indicates both universal approaches to supporting ageing populations and significant differences arising from the economic, demographic, and cultural characteristics of each country. These differences are essential for understanding which strategies can be adapted or improved to mitigate the challenges of population ageing. In

all three countries, the primary aim of tax relief policies is to reduce the financial burden on older citizens and enhance their social protection. Germany's tax relief system encompasses a wide range of categories, including income, property, and inheritance (Link, 2019). For instance, pensioners with low incomes are eligible for medical expense deductions of up to 7.5 per cent of their income, while inheritance tax allowances permit exemptions of up to EUR 500,000 for transfers of property to close relatives. This approach reflects the country's strong fiscal capacity and its commitment to maintaining social stability in the face of demographic ageing, with those over 65 comprising 22 per cent of the population in 2023.

The tax relief system of Japan is more targeted, addressing challenges stemming from demographic shifts. With 30 per cent of citizens already over the age of 65, the country faces pressing demands for investment in long-term care and healthcare services (Zhou & Zhang, 2022). Tax deductions for caring for elderly relatives can reach ¥200,000, and tax relief on healthcare expenses ensures access to essential support. Unlike the German model, Japan places greater emphasis on family involvement, incentivising households to participate in caregiving for older family members. Kyrgyzstan, with limited fiscal resources, implements more modest tax relief schemes that aim to address the basic needs of older people. For example, pensioners earning less than KGS 150,000 annually are exempt from income tax, and individuals over 70 who own a single residence are not required to pay property tax. These measures aim to guarantee a minimum level of social protection, given the country's under-resourced pension system, which lacks the financial sustainability of those in Germany or Japan. Furthermore, unlike other countries, Kyrgyzstan's strong tradition of multigenerational households reduces the necessity for specific tax incentives to support caregiving within families.

The principal distinction between the countries lies in the scale and focus of their tax relief measures (Huff, 2022). Germany adopts a comprehensive approach, offering substantial tax reductions across various domains, including inheritance and property ownership. Japan concentrates on addressing demographic challenges by introducing incentives that encourage family-based care. Kyrgyzstan, constrained by its economic capacity, targets its support towards the most vulnerable segments of the population by granting exemptions from core taxes. The analysis demonstrates that all three countries acknowledge the importance of healthcare expenditure, housing accessibility, and the promotion of family-based support. However, approaches to the administration of tax relief differ. In Germany, tax relief is automatically factored into income tax declarations, increasing accessibility. The Japanese system requires a separate application, which may create barriers for low-income citizens. In Kyrgyzstan, procedures are also simplified yet hindered by the limited digitalisation of the tax system.

The findings indicate broader patterns in the design and implementation of tax relief systems across different socio-economic and demographic contexts. Japan, for example, could improve coverage by simplifying the procedures for accessing tax relief. Kyrgyzstan could expand the scope of available relief measures by leveraging international financial assistance or implementing targeted programmes. Germany may serve as a model for a comprehensive approach that integrates tax incentives with a robust system of social guarantees. Such measures would not only improve the well-being of older citizens but also help mitigate the effects of population ageing, easing pressure on state resources and enhancing the quality of life for older generations. A comparative assessment of tax relief systems for older people in Kyrgyzstan, Germany, and Japan highlights

several areas in which Kyrgyzstan's legal framework could be strengthened. Key recommendations are based on successful international practices, adapted to Kyrgyzstan's unique socio-economic and demographic context.

Expanding the range of tax relief measures for older citizens and making them more targeted remains essential. As of 2024, tax relief in Kyrgyzstan is largely limited to exemptions on income and property taxes for certain categories of individuals. Drawing on the German example, it would be feasible to introduce deductions related to healthcare and long-term care costs. In Germany, for instance, taxpayers may deduct up to 7.5 per cent of healthcare-related expenses from their taxable income. While Kyrgyzstan operates with more limited resources, it could implement a modified version of this approach, allowing modest deductions to help offset healthcare and medication costs for pensioners. It is necessary to promote family-based support for older people through tax mechanisms. The Japanese experience demonstrates that tax relief aimed at supporting households that care for elderly relatives can have a substantial impact in ageing societies. In Kyrgyzstan, where intergenerational family ties remain strong, such measures could receive broad public support. For example, tax deductions or exemptions for family members providing care may serve as an effective tool for reinforcing family-based care models (Arachi *et al.*, 2012).

A third key step involves the simplification and digitalisation of procedures for accessing tax relief. One of the main strengths of the German system lies in the automation of benefits through income tax declarations. Kyrgyzstan could adopt a similar model, allowing older citizens or their caregivers to receive eligible benefits automatically, without the burden of submitting numerous certificates and supporting documents. This is particularly relevant given the low level of digital literacy and the limited availability of administrative

services in rural areas. It is also worth considering the gradual introduction of inheritance tax relief, should such taxes be implemented in Kyrgyzstan in the future. In Germany, significant exemptions are granted for inherited property transferred to close relatives, enabling families to retain assets and maintain financial stability. In the Kyrgyz context, such a measure could serve as a long-term strategy to reduce wealth inequality and support families with older dependents.

Finally, improving public awareness of available tax benefits is of critical importance. One of the issues identified during the analysis is the insufficient awareness among older citizens regarding their rights and entitlements. In this regard, the implementation of educational programmes, similar to those conducted in Japan, would be appropriate. In Japan, local authorities regularly organise seminars and consultations, where older residents can receive guidance on tax matters and benefit entitlements. Kyrgyzstan could adapt this practice by engaging local government bodies and civil society organisations. The implementation of these recommendations would not only enhance the welfare of older citizens but also strengthen public trust in the tax system and the state more broadly. Nevertheless, it is essential to recognise that the proposed measures require legislative reform and adequate funding, which may be secured through international assistance and the optimisation of public spending.

Discussion

The study demonstrated differences and commonalities in approaches to tax benefits for elderly individuals in Germany, Kyrgyzstan, and Japan. These findings were of critical importance for understanding the impact of tax policy on the socio-economic status of elderly citizens and for formulating practical recommendations to improve such systems in countries with varying levels of economic development and demographic

characteristics. The results underscored the necessity of a comprehensive and balanced approach to the development of tax relief systems, which should consider not only modern social and economic conditions, but also future demographic trends. Germany and Japan were already experiencing the consequences of population ageing, with individuals over the age of 65 comprising approximately 22% of the population in Germany and over 28% in Japan. In these contexts, tax relief systems served not only as mechanisms of social support, but also as tools for encouraging economic participation among older adults. Kyrgyzstan, by contrast, was in the early stages of demographic ageing, with those over 65 accounting for approximately 6% of the population.

A. Carter & R. Breunig (2019) focused on the legal challenges associated with tax benefits. Researchers pointed to the absence of clear international standards in this area, which results in legal conflicts, when national tax systems interact. Furthermore, the authors emphasised the complexity of defining the categories of elderly individuals entitled to such benefits, which in some cases led to the exclusion or discrimination of certain groups. The findings of the present study corresponded with this position, as the comparison of Germany, Japan, and Kyrgyzstan showed that eligibility criteria, types of relief, and administrative procedures differed considerably across national systems. S.-H. Lee *et al.* (2023) examined the differences in approaches to taxing the elderly across countries with varying levels of economic development. Scientists noted that, in developed countries, tax benefits formed an integral part of social policy, whereas, in developing countries, their use was constrained by the lack of a systematic framework. The researchers stressed that developing countries often lacked effective monitoring mechanisms for the implementation of tax benefits, resulting in their uneven distribution. This conclusion was consistent with this study, which

found that Germany and Japan applied more comprehensive and institutionally coordinated tax relief systems, while Kyrgyzstan's approach was narrower and more dependent on basic exemptions. The comparison also showed that the limited digitalisation of administrative procedures in Kyrgyzstan reduced the accessibility of tax benefits, especially for elderly citizens in rural areas.

Researchers L. Calahorrano *et al.* (2018) and A. Neubert *et al.* (2019) focused on the demographic challenges associated with population ageing. The author's study demonstrated that the increasing proportion of elderly individuals within the general population necessitates the adaptation of tax systems to ensure the sustainability of public finances. Scientists emphasised that tax benefits must be integrated into broader strategies for pension reform and social protection. Study supported this conclusion with examples from Germany and Japan, where tax relief was closely linked to healthcare support, pension policy, and incentives for older people to continue participating in the economy. Kyrgyzstan, on the other hand, had not yet created such an integrated model, despite the fact that the country's population was gradually getting older, which suggested that earlier policy adaptation was necessary. M. Krajnák (2019) drew attention to the need to consider regional features, when developing a tax policy for the elderly. Researcher's findings showed that, in Eastern European countries, tax benefits were often granted without consideration of local economic conditions, which undermined their effectiveness. This study also found that access to tax benefits in Kyrgyzstan was impacted by regional differences, especially in rural areas, where senior citizens may have less access to digital services, administrative support, and information. While regional variation was still important in certain local tax and social support measures, Germany and Japan, in contrast, exhibited more structured mechanisms for implementing benefits.

N.R. Ureta-Baquezea & N.M. Palacios-Cedeño (2023) addressed the issue of transparency in tax systems. The authors argued that a lack of transparency in tax administration frequently obstructed the effective application of tax benefits. Researchers stressed the need for the development of clear procedures for submitting applications and for minimising bureaucratic barriers. The findings of the present study supported this argument, as accessibility and procedural clarity were identified as central factors influencing the effectiveness of tax relief for elderly citizens. Germany's more automated approach reduced administrative barriers, while Japan and Kyrgyzstan relied more heavily on application-based or less fully digitalised procedures, which may limit the actual use of available benefits. O. Zidar (2019) drew attention to issues of legal enforcement. Scientists observed that, in a number of countries, laws concerning the provision of tax benefits often remained declarative and lack effective implementation mechanisms. This results in the inefficient allocation of resources and infringed upon the rights of elderly citizens. The present study confirmed that the practical effectiveness of tax benefits depended not only on their formal recognition in legislation, but also on the existence of transparent procedures, monitoring mechanisms, and sufficient administrative capacity. This was particularly evident in Kyrgyzstan, where the legal framework provided certain exemptions, but their implementation remained less comprehensive than in Germany and Japan.

Japanese researchers, such as S. Fukuda & K. Okumura (2021), noted that tax relief for family-based elder care encourages relatives to participate in caregiving, thereby reducing the burden on public social services. The study confirmed that such measures, including tax deductions for family cared of up to ¥150,000 per year, had a positive impact on the sustainability of family ties and contributed to improved quality of life

for elderly individuals. Nevertheless, the findings diverged from those of certain other studies. For instance, J.J. Pérez *et al.* (2021) argued that in countries with limited economic resources, the implementation of tax relief may be ineffective due to low tax collection rates. However, this study demonstrated that even under such conditions, tax relief can play an important role if targeted at priority social groups and supported by automation and simplification measures. The findings showed that the effectiveness of tax relief for elderly citizens depended on its alignment with demographic, social, and economic conditions. Germany and Japan demonstrated more flexible and differentiated systems: Germany prioritised medical deductions, property-related relief, and incentives for continued employment, while Japan emphasised family-based support and care-related benefits. By contrast, Kyrgyzstan applied a more limited and less adaptive model, which weakened its capacity to respond to population ageing and regional disparities.

Conclusions

The analysis of the taxation systems in the countries under study demonstrated that each employs tax relief as a tool of social support for elderly citizens, adapted to their specific demographic and economic contexts. Germany demonstrated a high degree of systematisation and automation in its tax relief mechanisms. These reliefs aimed to ensure the financial independence of older individuals, maintain their access to healthcare services, and encourage family-based care. In Japan, tax relief also played a substantial role, with an emphasis on encouraging family involvement in elder care and ensuring financial stability in retirement. Examples included deductions for the care of elderly relatives and tax concessions for elderly small business owners. These measures helped to mitigate the consequences of an ageing population, while supporting continued economic

engagement among the elderly. In Kyrgyzstan, the tax relief system for elderly citizens was considerably less developed and was largely limited to exemptions from property and income taxes for specific categories of individuals. This limited scope reflected the country's economic constraints and the absence of a comprehensive strategy to address the challenges of population ageing.

The comparative analysis identified both shared and divergent approaches to tax relief for elderly citizens. All three countries recognised the importance of supporting older people through the tax system, yet Germany and Japan applied broader and more differentiated mechanisms, including deductions, exemptions, family-related benefits, and more accessible administrative procedures. Kyrgyzstan, by contrast, relied mainly on simplified reliefs that insufficiently reflected the diverse needs of elderly citizens and remained less accessible, especially in rural areas due to limited automation. The study recommended expanding tax relief in Kyrgyzstan through medical expense

deductions, supported for family caregivers, incentives for elderly entrepreneurs, simplified digital procedures, and improved public awareness, with the aim of reducing poverty, improving healthcare access, and strengthening social justice. The study was limited by its reliance on legal and comparative analysis, without empirical assessment of how elderly citizens actually access and use tax benefits in practice. Future research should include surveys or interviews with older people, tax officials, and social policy experts to evaluate the practical effectiveness, accessibility, and social impact of these benefits.

Acknowledgements

None.

Funding

None.

Conflict of Interest

None.

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Конституційні та правові аспекти податкових пільг для людей похилого віку: порівняльний міжнародний аналіз

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Анотація

Метою дослідження було проведення порівняльного міжнародного аналізу правового регулювання податкових пільг для людей похилого віку, виявлення основних проблем та відмінностей у національних підходах, а також розробка рекомендацій щодо оптимізації правових механізмів, що застосовувалися для надання таких пільг. У рамках дослідження було проведено порівняльний аналіз податкового законодавства та вивчено відповідні правові рамки. Системний підхід, застосований у дослідженні, дозволив врахувати правові, економічні

та демографічні фактори, що впливали на ефективність податкових стимулів. Дослідження продемонструвало, що Німеччина, Японія та Киргизстан застосовували різні форми податкових пільг для людей похилого віку, включаючи відрахування на медичні витрати, звільнення від податку на нерухомість, зменшення оподаткованого доходу та податкові стимули для догляду. Виявлено суттєві відмінності у масштабах та механізмах реалізації цих заходів. У Німеччині та Японії податкові пільги тісно інтегровані з системами соціального захисту та враховували демографічні реалії, пов'язані зі старінням населення. Натомість Киргизстан застосовував більш обмежений підхід через економічні та адміністративні обмеження. Результати дослідження підкреслили важливість комплексного та гнучкого підходу до надання податкових пільг, що включало розробку прозорих механізмів реалізації, покращення доступу громадян до інформації та регулярний моніторинг ефективності пільг. Міжнародний досвід Німеччини та Японії свідчив про необхідність узгодження податкової політики з більш широкими стратегіями соціального захисту, включаючи підтримку догляду в сім'ї та заохочення економічної активності серед літніх громадян. Практична цінність дослідження полягає в його рекомендаціях щодо вдосконалення податкових пільг для літніх громадян шляхом спрощення процедур, покращення доступу до пільг та зміцнення зв'язків із політикою соціального захисту.

Ключові слова: економічна безпека; соціальна політика; економічна стабільність; демографічні виклики; старіння населення; економічний контекст