TAXATION OF WEALTH AND INCOMES

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Above the line...

- Nowadays the tax burden of Irpef and of Imu places Italy above the european average
- While only in 2012, following the 'Save Italy' decree, IMU saw a marked jump in the yield from indirect taxes, the overall trend towards steeper progression in personal income tax started in the 90's.
- The tax burden on labour (PIT) accounts for roughly one third of the total revenue: about 30% of tax revenue
- IMU yields in 2012 about 0,9% of GDP in extra revenue.

Income and wealth taxation in Italy: rethinking the *tax mix*?

Why a PIT and wealth taxation reform? Personal Income taxation

Wealth taxation in fiscal consolidation times

Looking forward: reforming income and wealth taxation in Italy?

Why a Personal Income tax reform?

- Today, the personal income tax is only formally a levy on five brackets and rates (23, 27, 38, 41 and 43). In practice, it is characterised by only two (and half) marginal tax rates (i.e. 30% up to about € 55,000 and 41-43% for more than the € 55,000 for an employee without dependants).
- High elasticity of the tax system, especially on low and average income earners and too high marginal tax rates (low labour force participation rates, widespread underreporting of earnings)
- Much of the redistribution of Irpef is achieved through tax credits for employment. Allowances and tax credits followed the pre-existing structure, within a not logically coherent system.
- The system does not provide for any monetary benefit for taxpayers when the sum of allowable deductions is higher than gross income tax payable (the so-called phenomenon of *"incapienza"*, i.e. the final balance being insufficient to recoup the deductions to which the taxpayer would be entitled).

Alternative PIT design proposals...

- Nens proposals (Libro Bianco 2008).
- Forum delle associazioni familiari proposal: from 'quoziente' to 'fattore famiglia'.
- Proposals inspired to optimal taxation: gender taxation.
- Budgetary cost of the proposals ranges from one to two pp of GDP
- Only few measures have been recently adopted with an impact on personal incomes:
 - Taxing rental income from buildings for residential purposes at a separate, flat rate from 19% to 21% rather than including it in the PIT tax base
 - Detaxing wage increases linked to productivity
 - Introducing a solidarity contribution on high incomes (3% of income above € 300,000) for 2011-13 and on high pensions (5% of pension income above € 90,000; 10% of pension income above € 150,000) for 2011-14

A comprehensive wealth tax?...pros and...

Wealth taxes:

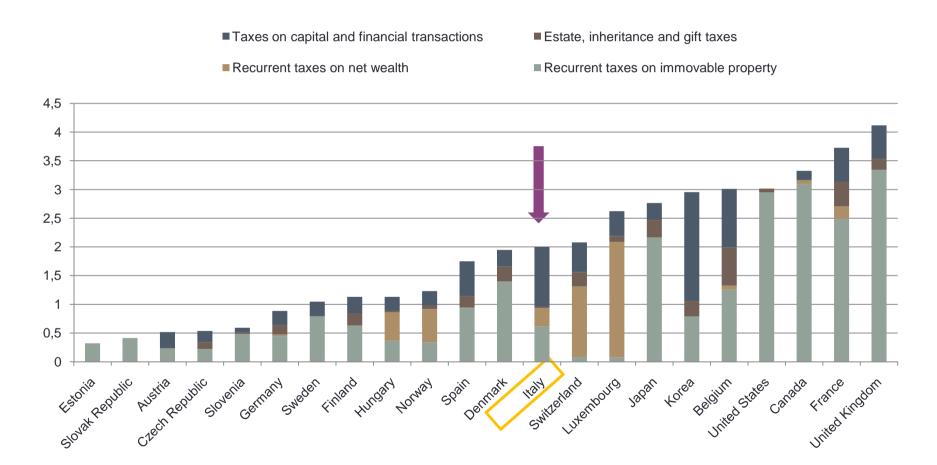
- raise substantial revenues while correcting some forms of horizontal and intergenerational inequity
- help improve the progressivity and achieve the redistributive objectives of the tax system, by allowing to reduce the personal income tax rates
- may supplement capital income taxation (or substitute tax on capital income when this is constrained by policy design (e.g. low flat rate under the DIT system)
- may discriminate capital income from labour income
- may induce individuals to reallocate their assets from less to more productive uses
- in case of taxes on immovable properties, ideal tax base for local governments, being the immobility of property clearly associated with location.

A comprehensive wealth tax?... cons

Wealth taxes:

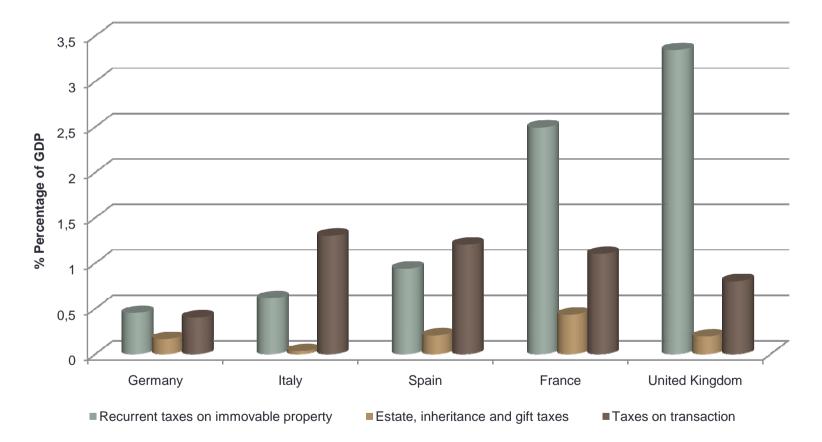
- not particularly efficient in the historical experience as tool to achieve redistributive objectives (inheritance and gift taxes can enhance progressivity but may have marginal redistributive effects because the yield is typically low)
- detrimental for growth, because inequalities discourage work and human capital accumulation (but their implications in terms of efficiency are not clear-cut, see *Annual Growth Survey*, EU Commission, 2013, Johansson et al., 2008)
- negative effects on accumulation of capital and intertemporal allocation of savings
- regressivity (as property taxes translate on rents and may be capitalised on market values)
- high *compliance* and administrative costs for taxpayers and incentives to tax evasion (practical problems arise in ascertaining wealth ownership, assigning it to particular taxpayers and valuing ownership interests)
- internationa practices: several countries (Austria, Finland, Germany, the Netherlands and Sweden) repealed wealth taxes in the last 15 years, also for efficiency considerations (high mobility of financial capital).

Taxes on wealth in OECD economies, 2011 (in percent of GDP)



Source: OECD, Revenue Statistics 2013

Taxes on real property in advanced economies, 2011 (in percent of GDP)...



Taxes on property in Italy (2010-2012)

	2010	2011	2012
Taxes on income (1)	9,41	8,18	6,64
PIT	8,77	7,54	6,00
CIT	0,64	0,64	0,64
Taxes on real assets (2)	9,20	9,20	23,80
IMU/ICI	9,20	9,20	23,80
Taxes on transactions (3)	13,11	12,89	12,67
VAT	7,98	8,00	8,00
Registration fee and stamp duty	2,88	2,70	2,52
Mortgage and cadastral taxes	1,78	1,70	1,63
Estate, inheritance and gift taxes	0,47	0,49	0,52
Taxes on lease contracts (4)	1,20	2,06	1,77
<i>Registration fee and stamp duty on lease contract</i>	1,20	1,09	0,80
Cedolare secca	-	0,97	0,97
Total (1)+(2)+(3)+(4)	32,92	32,33	44,88

(in billions of euros)

Wealth taxes and the international best practices

• France

- *Impôt de Solidarité sur la Fortune (IFS)* linked since 1989 to RMI (Revenu Minimum d'Insertion). Before the 2011 reform, tax rates ranged from 0.55% to 1.80% (6 marginal rates) on assets exceeding 800,000 euro (0.25-0.50% with 2 flat rates in 2012 on assets exceeding 1,300,000 euro ; primary residence value reduced by 30%).
- *Contribution économique territoriale* in 2010 replaced the *Taxe professionelle* (levied on real assets cadastral rents and on value added).
- Taxe Foncière levied on real assets cadastral rents, yearly revalued at market values)
- *Taxe d'habitation* levied on cadastral rents revalued; basic allowances for owner-occupied dwellings, taking into account the family composition, such as dependants and earnings. The *Taxe d'habitation is linked to the income tax*.
- United Kingdom
 - *Council tax (local tax)* is charged to all occupiers of domestic properties and is based on the estimated market value of the property. Properties are assigned to nine bands according to their capital value and to the tax rate set by local authorities. Low income families are eligible for the Council Tax Benefit.

• Canada

- *property taxes* levied on the property's value in use (tax revenue for local government), normally linked to the property's current market value and periodically revalued. .
- United States
 - *property taxes* differentiated among federal States, with a total tax threshold linked to income and to the value of the property.

Alternative proposals in the wealth and income taxation...

- Ambitious reform proposals in the '70s (US and UK) suggested combinations of a:
 - progressive income tax (moderate or flat rate tax)
 - supplementary consumption tax
 - annual wealth tax with high exemption thresholds
- Difficult to adopt in the OECD economies
- In Italy:
 - Formal adherence to the *comprehensive income* (SHS) but gradual shifting to dual taxation systems, with capital income taxed at a low single rate (equal to the profit tax rate) and labour income under a progressive schedule (Dual Income Tax, Dit)
 - Major role attributed to consumption-based taxation
 - Modest role of wealth taxation (i.e. ICI imposta comunale sugli immobili as recently replaced by IMU)

Rethinking the *tax mix* in Italy?

- The personal income tax and social security contributions represent 59% of total revenue (58% on average in the EU17). The PIT reforms (2003, 2005, 2007) have only marginally reduced the tax burden on the low income earners. Tax wedge in Italy slightly decreased in the last decade only for single-family households and married couples.
- The tax mix in Italy is heavily biased on personal income tax and relies in particular on employees and retirees that cover almost 80% of the revenue from PIT (high effective marginal income tax rates varying between employees, retirees, self-employed (i.e, a single worker with income from 8,000 to 28,000 euro has a rate slightly above 30 per cent, high elasticity of the tax, and therefore fiscal drag)
- Before the introduction of the IMU in 2012, recurrent taxes on immovable property were lower than in the advanced OECD economies. Following the introduction of IMU, revenue is not out of line with other EU countries
- Extra-revenue from increases in property tax might allow to redesign the income tax (and transfer) structure to minimize the disincentive to work and to redistribute resources from high income/wealth individuals to lower income earners, ie towards citizens with a highest propensity to consume.

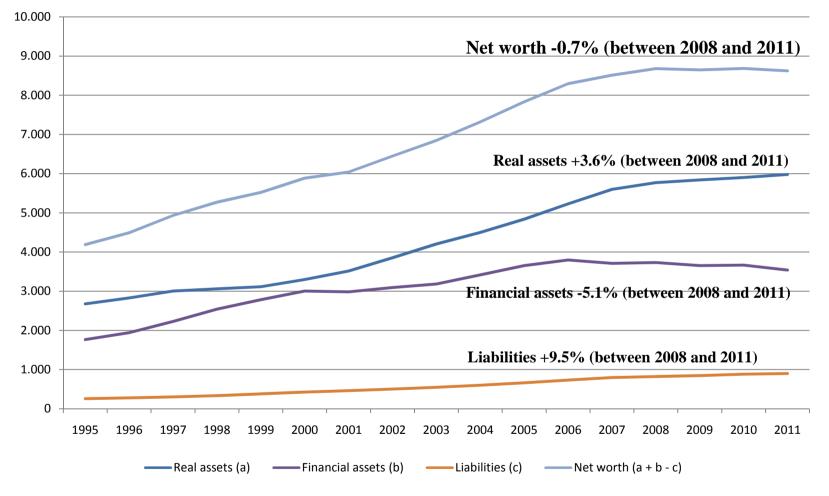
Income and wealth taxation in Italy: rethinking the *tax mix*?

Why taxing wealth in consolidation times? Personal Income taxation

Wealth taxation in consolidation times

Looking forward: reforming income and wealth taxation in Italy?

The portfolio composition over the last decade...



Source: Bank of Italy

Households and individual wealth composition in Italy

	Н	ousehold wealth	Individual wealth			
Household wealth (euro)	% Wealth holders	Share of wealth held (in percent of total wealth)	Average wealth (euro)	% Weath holders	Share of wealth held (in percent of total wealth	Average wealth (euro
10.000 or less	12,36%	0,07%	2.092	45,78%	0,24%	707
10.000-50.000	6,77%	0,52%	27.378	9,25%	2,00%	28.661
50.000-500.000	63,14%	38,80%	219.052	39,16%	49,93%	169.226
500.000-5.000.000	17,28%	50,86%	1.048.771	5,68%	41,92%	979.578
Over 5.000.000	0,45%	9,75%	7.705.388	0,12%	5,91%	6.499.530
Total	100%	100%	356.442	100%	100%	132.724

Source: Own elaboration based on 'Indagine sui bilanci delle famiglie italiane', Bank of Italy

Shifting the tax burden on wealth...

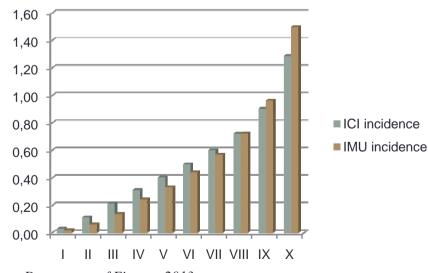
- European Commission policy recommendation (AGS, 2012): Shift away from personal and corporate income taxes to consumption and property taxes in order to increase GDP per capita in the long run
- Recent measures adopted in 2012 (Save Italy to decree) followed EU commission recommendations :

- Taxation of real estate and financial assets (IMU, new stamp duty on securities deposit accounts and tax shielded capitals, taxation on luxury goods)

- Allowance for Corporate Equity for new investment
- Deductibility from direct taxes of IRAP
- Increase in excise duties on energy
- Overall taxation of wealth:
 - improved the fairness and the progressivity of the Italian tax system: because wealth is so highly concentrated (i.e. the top 5% of holders own 25% of the total marketable residential properties), a wealth tax - paid mainly by the wealthiest taxpayers - grants a gain in vertical equity
 - had desirable secondary redistributive effects by increasing intergenerational equity and horizontal equity

The IMU on owner-occupied dwellings...

Payments (in euro)	% of tax payers	% of total payments
less than 50	18,0	2,2
50-100	18,1	6,0
100-150	14,8	8,1
150-200	11,3	8,7
200-300	14,8	16,0
300-400	8,3	12,7
400-500	5,0	9,8
500-600	3,1	7,5
more than 600	6,8	29,0
Total	100,0	100,0

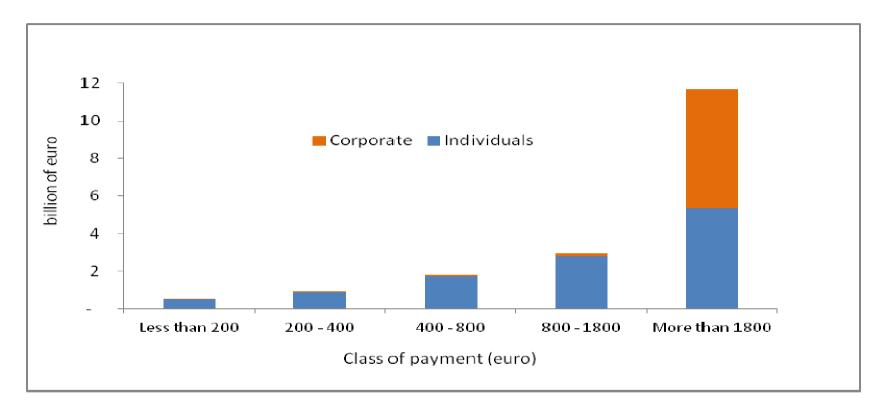


- 17,8 millions of owner-occupied dwellings payed IMU (average: € 225)
- 85% of taxpayers payed less than 400 euro ond only 10% more than €500
- IMU is more progressive than ICI 2007 (before the exemption of main residences), because of the lowest rates and highest basic deductions

[•] In 2012 the new Single Municipal Tax (IMU) replaced the old wealth tax (ICI) on real estate.

Source: Department of Finance 2013

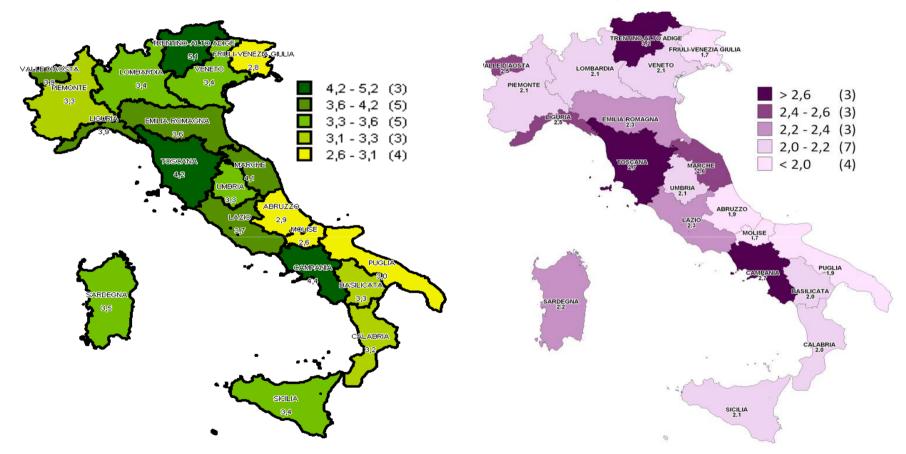
The IMU on other dwellings...



Source: Department of Finance 2013

- > IMU on other dwellings (i.e. productive and commercial buildings and other residential properties) : \in 17,9 billions
- > 35% of taxpayers payed IMU up to € 200
- > 10,5% of taxpayers payed more than € 1.800

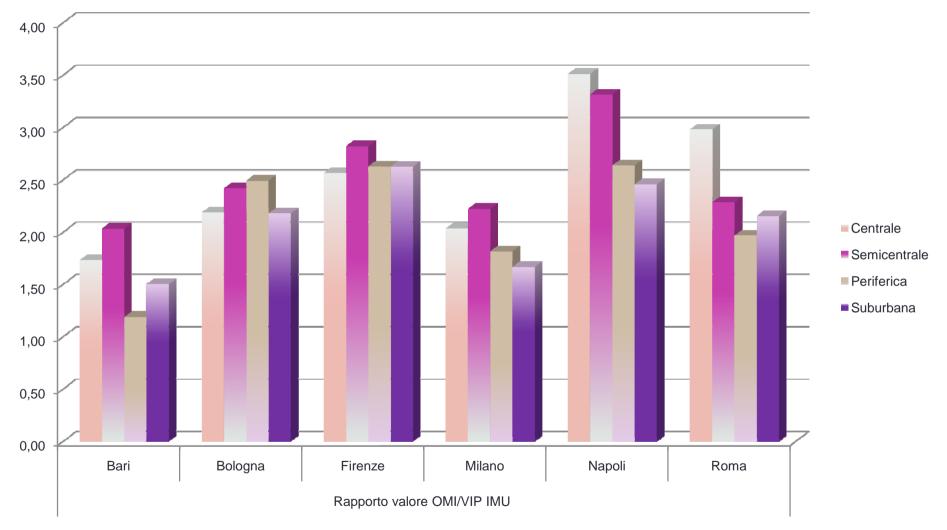
... the ratio between taxable values under IMU and market values widely differ across regions...



Source: 'Gli Immobili in Italia', Department of Finance 2011 e 2012; taxable values under IMU are obtained applying the adjustment factors to the cadastral values; market values are computed using OMI coefficients.

Following the introduction of IMU, the ratio between taxable value under IMU and market values has declined from **3**,**7** to **2**,**3**...but still there is high variability of this ratio over the different regions

... and across different urban areas....



Source: 'Gli immobili in Italia', Department of Finance 2012

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Designing a comprehensive tax on net wealth...

	Solidarity tax on wealth (pre Sarkozy scenario)			Solidarity	h (post Sarkozy)	
Household wealth (million of euro)	holders	Tax revenue (million of euro)		Wealth holders (%)	Tax revenue (million of euro)	Tax revenue (average)
0,8 or less	90,4%	0	0,0000	90,4%	0	0,0000
0,8-1,3	6,0%	1.095	0,0008	6,0%	0	0,0000
1,3-2,0	1,8%	1.968	0,0045	1,8%	1.421	0,0033
2,0-3,0	0,8%	1.939	0,0100	0,8%	1.065	0,0055
3,0-4,0	0,3%	1.331	0,0175	0,3%	814	0,0107
4,0-5,0	0,2%	1.217	0,0318			,
Over 5	0,5%	7.905	0,0736			,
Total	100%	15.455	0,0006			

Source: Own elaboration based on 'Indagine sui bilanci delle famiglie italiane', Bank of Italy

A solidarity tax on wealth could generate extra revenue between 0,5% and 1% of GDP

...would be feasible? ...there might be some difficulties in practical implementation

• International capital mobility and opportunities to expatriate in tax havens could discourage capital accumulation: recent trends indicate a decline in the total net wealth since the onset of the financial crisis (- 0,7% in 2011 and -0,5% in the I° semester 2012 with respect to last december (Bank of Italy, 2012)

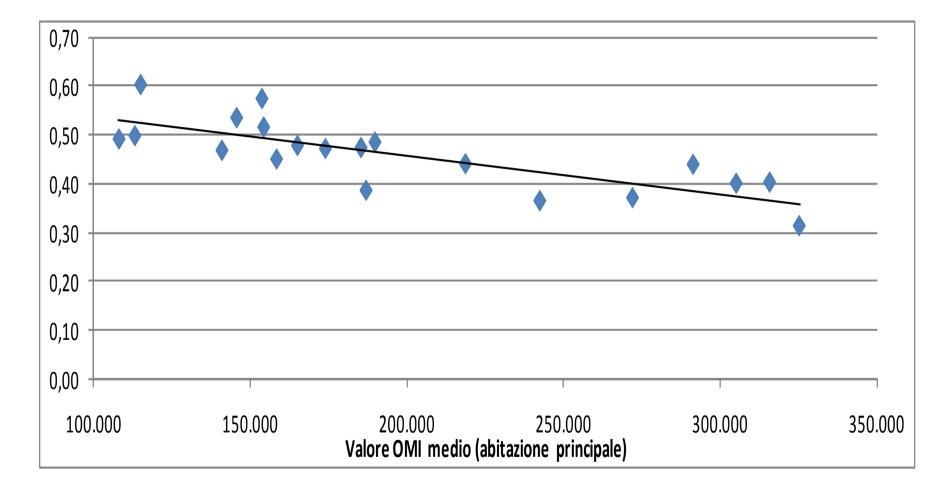
• Need to define the appropriate taxable unit of the net wealth tax. Individual or Household? Treating husband and wife as separate units would create incentives to split wealth among family members; defining a *foyer fiscale* (as in France) raises concerns for implementation

• Need to define the approriate taxable base for real estate property? Current cadastral value rent or market values? A wealth tax based on current cadastral rents does not appear a suitable option: 'confiscatory' tax rates would be necessary to ensure the expected revenue... taxing real property at market value may be a solution (the review of the immovable property cadastre takes 3-4 years but OMI coefficients already available)

The cadastral rental value is born 'old'

- The current property valuation system, based on estimates of market values was originally provided as regards as what the 'normal' rental value of property would be as of 1937-39 (i.e. average for similar properties in the same general location).
- In 1990 more than 50 years later the cadastral rental value updating was largely incomplete: it only affected the updating of the rates, leaving substantially unchanged the broad building classifications which are taxable and across areas.
- The inadequacy of the system stems from:
 - the category- and class-based system has not been changed since the creation of the property register.
 - the classification (i.e. the process of classifying an ordinary building asset within a category and a class) has remained at the initial classification and the only updates are related to the communications made by the persons involved, at the time of building restructuring or additions.
- A reform of the cadastral valuation system needs to be implemented in order to promote greater equity in the computation of taxable bases and to achieve actual equalization between the different urban areas.

... the average market value of housing and the ratio to taxable value show that as the market value of properties increases the effective average tax rate declines...



Reforming the Immovable Property tax...

- The immovable property cadastre requires updating to address equity concerns and overcome the asymmetry and variability across the country and between and within market areas and jurisdictions
- In perspective:
 - bringing the tax base (cadastral rents) in line with the market value of the property (if the tax is to function properly, that is to reflect the return on investment or rental value; the quality of the service received will depend on the building's location and its condition, which will be reflected in its value)
 - determining new values by using different valuation methods for 'ordinary' (i.e. residential properties) and 'special' (i.e. producing properties) real assets
 - earmarking of additional revenue to adjust tax rates, deductions and allowances so as to avoid increasing the tax burden (or to reducing the tax wedge on labour)

Income and wealth taxation in Italy: rethinking the *tax mix*?

What next?

Personal Income taxation

Wealth taxation in consolidation times

Looking forward: reforming income and wealth taxation in Italy?

What next? The 'delega fiscale' and the strategic orientation of tax reform

- In line with the Save Italy decree, the draft law concerning the powers delegated to the government to lay down provisions for a more equal, transparent and growth-oriented tax system
- Art. 2 of the 'delega fiscale' envisaged an update and reform of cadastral values
- The substantial increase in taxable values could finance a large reduction in IMU rates and could be used to partly reduce distortionary taxes on transactions related to real property
- Because of the early dissolution of Parliament last December, the adoption of measures related to the reform of property tax has been necessarily postponed the to the next legislature.

What next? Reforming the current immovable property tax ...

- A property tax generally conceived of as a levy based on the aggregate market value of all immovable properties
- A **favourable tax treatment for owner-occupied housing** with respect to all other properties (i.e. productive and commercial buildings and other residential properties)
- A tax base based upon the **market value of the property** (net of outstanding mortgage)
- A lowering of the tax due on owner-occupied housing:
 - Taxable base= market value allowances designed so as to reduce the tax debt by about one-third;
 - Tax rates would be reduced compared to the current ones, in a neutral revenue context;
 - An average allowance granted for each building unit increasing with the population of the municipality where the building is located- would reduce the inequity of the actual tax design which penalizes the owners living in large metropolitan areas
 - Or, alternatively, an allowance granted in percent of taxable value of properties (or a deduction from the taxable base) might go to the same direction, as average cadastral rents increase depending on the size of municipalities.

What next? Reforming the current owner-occupied property tax

- Increase basic IMU allowances or exemptions up to a given threshold?
 - Exemption of a significant number of properties below the threshold
 - Financing problem for small municipalities (but will also imply financing problems for small municipalities (i.e. 75% of the owner-occupied dwellings in the municipalities of less than 5,000 inhabitants with cadastral rents below 300 euros)
- Income-related IMU allowances?

. . .

- Mix direct/personal *vs* indirect tax (IMU taxes by its nature the value of dwellings in a proportional way without reference, except in particular cases, to the tax taxpaying capacity of the owner);
- Tax evaders will be benefited (i.e. 'rich assets' held by low-income declarants) San Lazzaro di Savena 'case'
- Opportunity for tax avoidance (i.e. incentives to split properties among family low-income members)

What next? Reforming the current owner-occupied property tax: housing as a charge for local services...

- Housing can be thought of as a <u>large consumer durable</u>
- As in the Mirrlees' proposal (2011), an *housing service tax* could be levied as a flat percentage of the rental value of each property, whether it is rented or owner-occupied
- The property tax would also be though of as a payment for local provision of public services (i.e. TARES could be designed so as to absorb IMU on primary residences):
 - Based on residency rather than ownership and differentiated between occupiers of domestic properties: property owners would be charged on the market value of property; tenants on the same value 'discounted'
 - Compatible with the assignment of revenue to local governments
 - Losers and winners: adverse social effects (i.e. low-income households living in expensive houses) might be mitigate by tax rate reductions (instead of detractions) so as to exempt about one-third of immovable properties and avoid funding problems for small municipalities.

What next? Reforming the current owner-occupied property tax: taxing imputed rents in PIT ...

- The homeownership can be considered as <u>a stream of in-kind income</u>
- The idea of taxing the imputed rents is to add this in-kind income to the personal income tax base
 - In a revenue-neutral context, one option is to tax imputed rent (and abolish current taxation of cadastral income) and to introduce a proportional rebate on personal income tax rates
 - The extra-revenues from taxing imputed rents are used to reduce the burden on PIT
 - Losers and winners: the benefit of personal income tax rebates only accrue to taxpayers with a positive personal income tax liability
 - As for fiscal federalism, turning the property tax into 'general revenue' may be difficult and undesirable and require to review intergovernmental revenue sharing mechanism between levels of governments
 - Experience shows that taxes on the return of residential property are politically difficult to sustain particularly in times of rising housing prices
 - Taxing imputed rent as part of the progressive personal income tax implies a comprehensive income tax system (instead of a dual income tax system)

What next? Reforming the current owner-occupied housing tax: the problem of 'asset rich-low income' ...

- Taxes on the value of owner-occupied housing pose liquidity constraints to lowincome home-owners, holding assets which do not generate current incomes. Forcing taxpayers to sell primary residences to pay taxes is not desirable and may be perceived as 'confiscatory' (infringing property rights)
- A *property tax deferment program* (i.e British columbia, Canada) offered by the municipalities to assist qualifying homeowners in paying annual property taxes on their main residence could in principle be associated with a system of meanstested benefits:
 - eligibility criteria (homeowners 'in difficult conditions' dependent on incomes or financial situation)
 - indexation of the mortgage debt (i.e the portion of the deferred tax with a certain interest rate)
 - repayment of the debt by the heir or the buyer at the time of the transfer of ownership (purchase, endowment, inheritance)
- The municipality gets less revenue in the transitional period but keeps holding assets in the form of mortgage credit that could be collected in the medium term.

Two more problems....

- Even at the time of ICI, tax payers failing to keep up with mortgage payments on their homes were protesting against their non-deductibility. When allowing the deductibility of the mortgage from IMU, however, the question of deductibility of interest expenses from the income tax arises.
- The favourable tax treatment granted to the the owner-occupied dwellings (with respect to other dwellings) poses also the question of the 'treatment' of tenants holding a home ownership in the same city.

Concluding remarks:

- The financial and economic crisis that started in 2008 has resulted in a significant deterioration of public finance across most EU MS. Due to the high public debt, in Italy fiscal reforms should be revenue neutral;
- In the PIT taxation, high marginal tax rates creates distortions, discouraging labour supply and investments;
- In terms of efficiency of the tax system, the increase in the property tax is a revenue neutral possible option to shift the tax burden towards growth-friendly forms of taxation and to gradually reduce the tax wedge on labour income;
- In terms of equity, the increase in the property tax reflects the adjustment of cadastral values by a common factor within each property classification; nonetheless the taxable values of many properties remain well below the market value and show a significant regressivity and inequalities across territories, properties of different values, areas within the cities;
- A reform of the real estate taxation should primarily address the revision of the cadastral system. Accordingly, taxation must be redesigned to ease the tax incidence on the owner-primary residences and to ensure the compatibility of revenue assignment to the local tiers of governments.

Tables and Figures

Households' portfolio composition

	200	8	200	9	2010		201	1
	Value in billion of euro at current price	% of total	Value in billion of euro at current price	% of total	Value in billion of euro at current price	% of total	Value in billion of euro at current price	% of total
Real assets (a)	5.770	66,5	5.839	67,5	5.899	67,9	5.978	69,4
of which:								
Owner-occupied housing	4.842	55,8	4.914	56,8	4.962	57,1	5.027	58,3
Financial assets (b)	3.731	43,0	3.654	42,3	3.666	42,2	3.541	41,1
Total wealth (a + b)	9.501	109,5	9.493	109,8	9.564	110,2	9.519	110,4
Liabilities (c)	822	9,5	847	9,8	882	10,2	900	10,4
Net wealth (a + b - c)	8.679	100,0	8.646	100,0	8.683	100,0	8.619	100,0

Source: Bank of Italy, 2012

- Real assets: 69,4% of total net wealth in 2011, financial assets: 41,1% and liabilities only 10,4%; Household asset values play then a substantial role in the household portfolio (52.1% of total wealth in 2010)
- Owner -occupied housing: large share of households' wealth (3/4 of the wealth position)
- Financial assets: decrease by 3,4% from 2010 to 2011
- Italian households holds a wealth that is to 8.3 times disposable income, against 8 of UK, 7.5 of France, 7 of Japan, 5.5 of Canada, 4.9 of United States.

Households' portfolio composition across countries

Wealth	Canada	France	Germany	Italy	Japan	United Kingdom	USA
Year	2010	2010	2010	2010	2010	2010	2010
Net Wealth	546	815	625	871	776	826	533
Net Financial wealth	206	217	198	274	399	298	322
Non financial assets	340	597	427	598	377	527	211
Financial assets	357	317	295	363	525	465	445
of which: Equities	91	81	56	56	38	71	120
Liabilities	151	99	97	90	126	166	123
<i>of which:</i> Mortgages or Medium and long-term loans	94		66	55	65		91

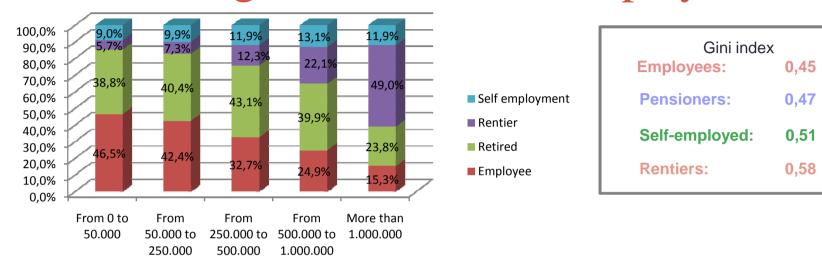
In per cent of nominal disposable income Source: OECD Economic Outlook no. 92

The distribution of net wealth in Italy

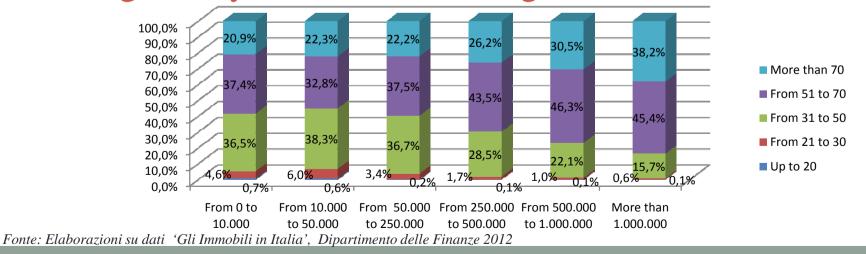
	2010
Percentage of wealth held by 10 percent of the richest families	45,9
Percentage of wealth held by 50 percent of the poorest families	9,4
Gini Index	
Net wealth	0,624
Real assets	0,628
Financial assets	0,779
Liabilities	0,911
Gini index of household income	0,351

Source: La ricchezza delle famiglie italliane, Banca d'Italia, 2012

Individual Housing Wealth is more unevenly distributed among rentiers and self-employed...



...and generally increases with the age of the householder....



Housing inequality and territories...: breakdown by wealth group

Geographical area	Gini index	Share Top 10%	Share Top 5%	Share Top 1%
North	0.48	36.8%	25.3%	10.1%
Centre	0.49	36.6%	24.9%	9.7%
South	0,52	38.7%	26.6%	10.5%
Poulation of the municipality	Gini index	Share Top 10%	Share Top 5%	Share Top 1%
Fino a 5.000	0.50	36.8%	24.8%	9.5%
5.000 e 50.000	0.48	35.7%	24.1%	9.3%
50.000 e 250.000	0.47	35.3%	23.8%	9.1%
Sopra i 250.000	0.50	38.4%	26.5%	10.4%

Source: Calculations on data 'Gli Immobili in Italia', Dipartimento delle Finanze 2012