

## TABLE OF CONTENTS

Foreword. . . . .	3
<b>INTRODUCTION AND SUMMARY</b>	
INTRODUCTION. . . . .	11
COVERAGE. . . . .	13
A BRIEF SUMMARY OF THE ARGUMENTS FOR AND AGAINST TAXING CAPITAL. . . . .	15
Social Considerations. . . . .	16
Economic Considerations. . . . .	18
Potential Revenue Yield. . . . .	20
Administrative Considerations. . . . .	21
Summary. . . . .	22
SUMMARY OF EXISTING TAXES . . . . .	23
CONTRIBUTION TO REVENUE . . . . .	23
STRUCTURE AND LAYOUT OF THE REPORT. . . . .	24
<b>TABLES</b>	
0.1 Forms of capital taxation in OECD Member countries, 1/4/86. . . . .	26
0.2 Revenue from taxes on capital and property in OECD Member countries as percentage of total tax revenue 1985. . . . .	27
0.3 Revenue from taxes on capital and property in OECD Member countries as percentage of GDP at market prices 1985 . . . . .	28
Annex to Introduction . . . . .	29
<b>Chapter I</b>	
<b>NET WEALTH TAXES</b>	
SUMMARY OF NET WEALTH TAXES IN OECD COUNTRIES . . . . .	30
POLICY ISSUES . . . . .	31
Why was a Net Wealth Tax Adopted? . . . . .	31
Why was a Net Wealth Tax Abolished . . . . .	32
Why No Net Wealth Tax? . . . . .	32
STRUCTURE . . . . .	33
Rates and Thresholds . . . . .	33
Treatment of Residents and non-Residents . . . . .	38
The Tax Unit . . . . .	39
Ceilings . . . . .	40
Debts. . . . .	43
EXEMPTIONS AND RELIEFS. . . . .	44
General. . . . .	44
Household and Personal Effects and Other Chattels. . . . .	46
Reliefs for Savings. . . . .	48
Small savings . . . . .	48
Pension rights. . . . .	51
Life Assurance Policies . . . . .	54

Works of Art and Collections . . . . .	55
Owner-occupied Houses. . . . .	58
Historic Houses. . . . .	59
Patent Rights, Copyright and Goodwill. . . . .	60
Human Capital in the Form of Future Earning Power. . . . .	61
<b>VALUATION . . . . .</b>	<b>61</b>
General. . . . .	61
Frequency of Assessment and Valuation. . . . .	62
Immovable Property . . . . .	63
Agricultural Property . . . . .	70
Forestry. . . . .	71
Unincorporated Businesses and Unquoted Shares. . . . .	71

## TABLES

1.1 Countries with and without a net wealth tax on individuals as at April 1, 1986. . . . .	30
1.2 Rates of Net Wealth Tax at 1/4/86. . . . .	34
(a) Single Rate Taxes. . . . .	34
(b) Graduated Taxes. . . . .	35
1.3 Summary of Treatment of Household and Personal Effects and Other Chattels at 1/4/86. . . . .	49
1.4 Summary of Treatment of Various Forms of Saving at 1/4/86. . . . .	52
1.5 Summary of Treatment of Various Assets at 1/4/86 -- Works of Art, Collections, Owner-occupied Houses, Patents, Goodwill . . . . .	56
1.6 Frequency of Assessment and Summary of Valuation Methods at 1/4/86. . . . .	64
(a) Non-Business Assets. . . . .	64
(b) Business Assets. . . . .	67
<b>Figure 1.1. . . . .</b>	<b>75</b>

## Chapter II

### TAXES AT DEATH AND ON GIFTS

A Note on Terminology . . . . .	76
SUMMARY OF TAXES AT DEATH AND ON GIFTS IN OECD COUNTRIES. . . . .	77
POLICY ISSUES . . . . .	78
Why a Death and Gift Tax was Adopted . . . . .	78
Why a Death and Gift Tax was Abolished . . . . .	78
Estate or Inheritance Tax. . . . .	79
STRUCTURE . . . . .	81
Tax Rates and Thresholds . . . . .	81
Integration and Aggregation. . . . .	94
Reliefs for Spouses and Relatives. . . . .	100
Treatment of Residents and non-Residents . . . . .	108
The Tax Unit . . . . .	109
Revenue Considerations . . . . .	110
Relationship with Other Taxes. . . . .	110
Debts. . . . .	111

EXEMPTIONS AND RELIEFS. . . . .	112
Transfers to the State, etc. . . . .	112
Charities, etc . . . . .	113
Political Parties. . . . .	113
Death on Active Service. . . . .	113
Relief for Classes of Assets . . . . .	114
Household Effects. . . . .	114
Works of Art, Collections, etc . . . . .	114
Pension etc. Rights and Life Assurance . . . . .	115
Productive Assets. . . . .	116
Exempted Gifts . . . . .	117
VALUATION . . . . .	118

## TABLES

2.1     Form of Wealth Transfer Taxes in OECD Member Countries at 1/4/86. . . . .	78
2.2     Estate Type Death Taxes: Thresholds and Rates at 1/4/86. . . . .	83
2.3     Gift Taxes in Countries with Estate-type Death Taxes at 1/4/86. . . . .	84
2.4     Inheritance-type Death Taxes: Thresholds and Rates. . . . .	85
2.5     Gift Taxes in Countries with Inheritance-type Death Taxes at 1/4/86. . . . .	96
2.6     Summary of Treatment of Surviving Spouse under Death Tax Provisions at 1/4/86 . . . . .	104
2.7     Summary of Treatment of Children under Death Tax Provisions at 1/4/86 . . . . .	105

## Chapter III

### THE TAXATION OF CAPITAL GAINS

SUMMARY OF CAPITAL GAINS TAXES IN OECD COUNTRIES. . . . .	121
POLICY ISSUES . . . . .	122
Why Was A Capital Gains Tax Adopted? . . . . .	122
Why Was A Capital Gains Tax Rejected?. . . . .	124
Treatment of Short- and Long-Term Gains. . . . .	125
STRUCTURE . . . . .	128
General. . . . .	128
Treatment of Losses. . . . .	128
Averaging. . . . .	130
Rates and Thresholds . . . . .	130
Revenue Considerations . . . . .	134
Treatment of Residents and non-Residents . . . . .	135
The Tax Unit . . . . .	137
Relationship with other Taxes. . . . .	137
Deemed Realisation . . . . .	138
Treatment of Gains at Death and on Gifts . . . . .	138
EXEMPTIONS AND RELIEFS. . . . .	141
Principal Private Residence. . . . .	142
Chattels . . . . .	147

Bonds, etc . . . . .	148
Productive Assets. . . . .	149
Retirement Relief. . . . .	150
<b>VALUATION . . . . .</b>	<b>151</b>
General Principles . . . . .	151
The Problems with New Taxes. . . . .	153
<b>TABLES</b>	
3.1 Main Method of Taxing the Capital Gains of Private Persons at 1/4/1986. . . . .	123
3.2 Rates and Thresholds at 1/4/86 . . . . .	131
(a) Countries with Separate Capital Gains Tax. . . . .	131
(b) Countries with Comprehensive Coverage within Income Tax . . . . .	132
3.3 Capital Gains Tax Treatment: Death and Gifts 1/4/86 . . . . .	140
3.4 Summary of Capital Gains Tax Treatment of Some Specific Assets at 1/4/86. . . . .	143
(a) Countries with Separate Capital Gains Tax. . . . .	143
(b) Countries with Comprehensive Coverage within Income Tax . . . . .	144
Chapter IV	
ADMINISTRATIVE ASPECTS	
<b>ADMINISTRATIVE LINKS BETWEEN TAXES. . . . .</b>	<b>155</b>
Net Wealth Tax and Income Tax. . . . .	155
Net Wealth Tax and Other Capital Taxes . . . . .	155
Transfer Taxes and Income Tax. . . . .	156
Capital Gains Tax and Income Tax . . . . .	156
Links with Other Taxes . . . . .	156
<b>METHODS OF PAYMENT. . . . .</b>	<b>156</b>
Net Wealth Tax . . . . .	156
Transfer Taxes . . . . .	157
Capital Gains Tax. . . . .	158
Interest on Overdue Tax. . . . .	159
<b>ADMINISTRATIVE AND COMPLIANCE COSTS . . . . .</b>	<b>160</b>
<b>EVASION AND AVOIDANCE . . . . .</b>	<b>161</b>
Evasion. . . . .	161
Avoidance. . . . .	161
Penalties. . . . .	162
<b>EASE OF ADMINISTRATION. . . . .</b>	<b>163</b>
<b>INFLATION ADJUSTMENTS . . . . .</b>	<b>163</b>
Net Wealth Tax . . . . .	164
Wealth Transfer Taxes. . . . .	164
Capital Gains Tax. . . . .	164

## Chapter V

### PATTERNS OF CHANGE

INTRODUCTION . . . . .	166
REVENUE CONTRIBUTION . . . . .	166
NEW TAXES AND ABOLISHED TAXES . . . . .	169
Decline in Estate Duty Form . . . . .	170
Capital Gains Taxes . . . . .	170
SIMPLIFICATION OF TAX STRUCTURE . . . . .	170

### TABLES

5.1 Combined Revenue from Net Wealth Taxes on Individuals and Capital Transfer Taxes, as a Percentage of Total Tax Revenue in 1985, 1976 and 1965 . . . . .	167
5.2 Combined Revenue from Net Wealth Taxes on Individuals and Capital Transfer Taxes, as a Percentage of GDP at Market Prices in 1985, 1976 and 1965 . . . . .	168

### ANNEXES

I. Outline of the systems of the taxation of net wealth, capital transfers and capital gains of individuals in Member countries as at 1st April, 1986. . . . .	172
II. Summary of main changes to capital taxes between 1st April, 1986 and November 1987. . . . .	270
III. Selected Bibliography. . . . .	278