

Public Policy 290 – Introduction to Tax Policy

Labor and Capital taxation

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Roadmap

1. What are capital taxes?
2. The history of capital taxes
3. Who pays capital taxes?
4. Labor taxes

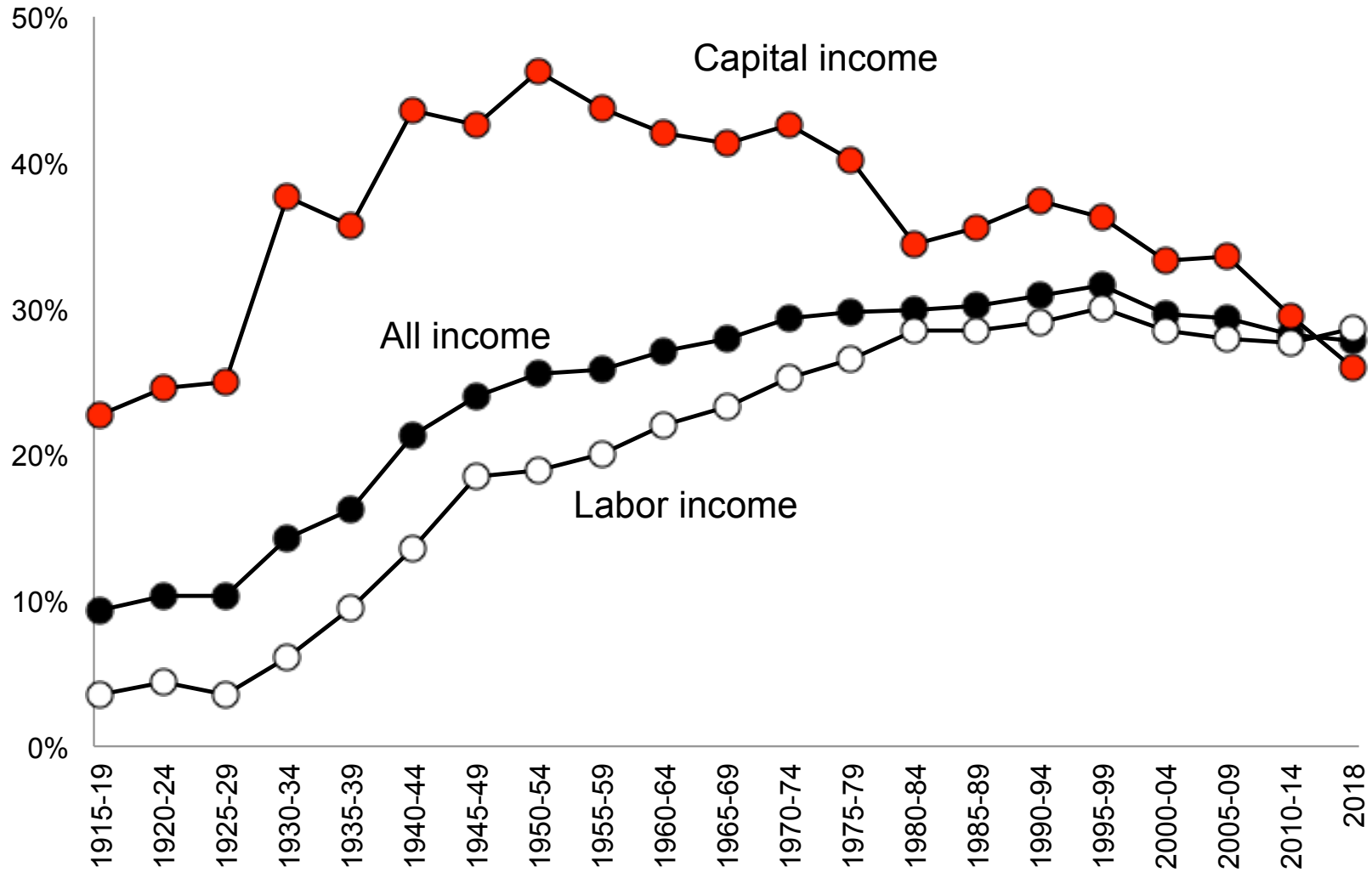
1 What are capital taxes?

- Taxes on the stock of capital: one-off taxes (inheritance, estates, gifts) vs. annual taxes (property, wealth)
- Taxes on the flow of capital income: corporate level (corporate profits) vs. individual level (dividends, interest, rents, capital gains)
- Capital taxes T_k account for a sizable but falling share of government revenue T
- In the US: T_k about 25% of government revenue T

Macro capital tax rates in the US (2018)

- In the US, capital taxes $T_K = 25\%$ of total tax revenue T
- $T \approx 30\%$ of total national income $Y \rightarrow T_K = 7.5\%$ of Y
- Capital income $Y_K = 30\%$ of Y
(Capital/income ratio $\beta = K/Y \approx 500\%$; $r \approx 6\% \rightarrow \alpha = r \cdot \beta = 30\%$)
- Macro capital tax rate $\tau_K = T_K/Y_K \approx 25\%$

Macro tax rates on labor and capital income in the US



Source: Saez and Zucman (2019).

The structure of capital taxes in the US (2018)

- Corporate tax = 1.5% of Y (around 10% of a 15% tax base)
- Annual property taxes = 3% of Y (around 1% of a 300% tax base)
- Estates = 0.2% of Y (around 2% of a 10% tax base)

Taxing flows vs. taxing stocks

- If rate of return r is the same for all individuals and assets, then flow and stock capital taxes are equivalent
- Ex: If $r = 5\%$, it is equivalent to tax capital stock at $\tau_K = 1\%$ per year or to tax capital income flow at $t_K = 20\%$ per year
- In practice returns differ; individual i prefers stock taxes if $r_i > r$
- Argument in favor of taxes on stock rather than on flow: they put incentives to get a high return on capital (Allais, 1966, 1977)
- See Guvenen et al. (2017) for recent analysis

2 The history of capital taxes

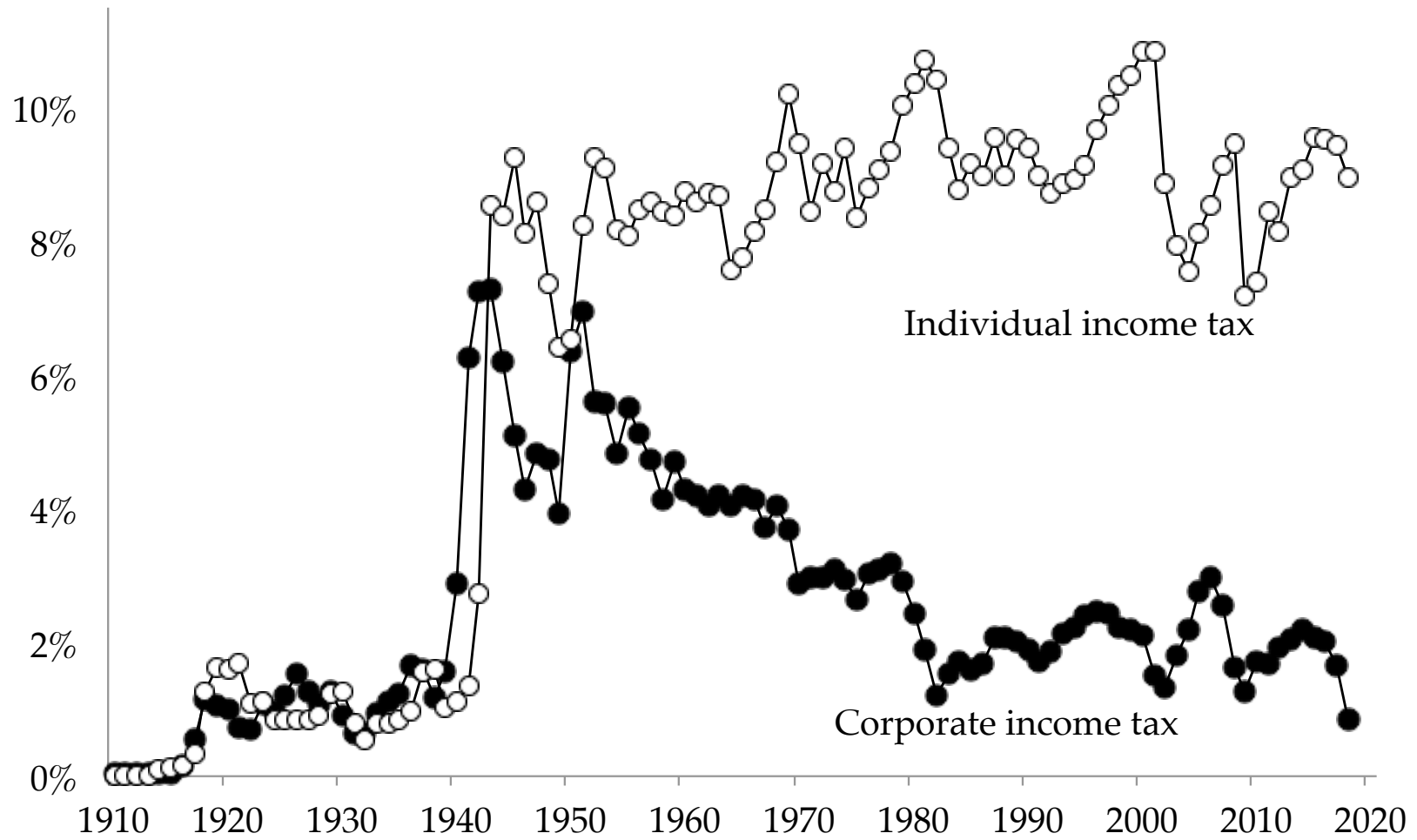
The property tax: the oldest capital tax

- US: property taxes in Northern states as far back as 17th century (Einhorn, 2004). France: created in 1790.
- On personal real estate and business properties (buildings, land, offices, warehouses, etc.)
- Usually proportional (no wealth declaration required) and low rates
- Still collects sizable revenue (US: about 3% of national income)

Taxes on capital income

- Individual income tax: initially mostly on capital income (interest, dividends, rents, etc.), because of high exemption threshold
- Corporate tax created at the same time as individual income tax
- Corporate tax is a backstop: without it the rich incorporate → progressive income tax fails

Federal tax revenue (% of national income)

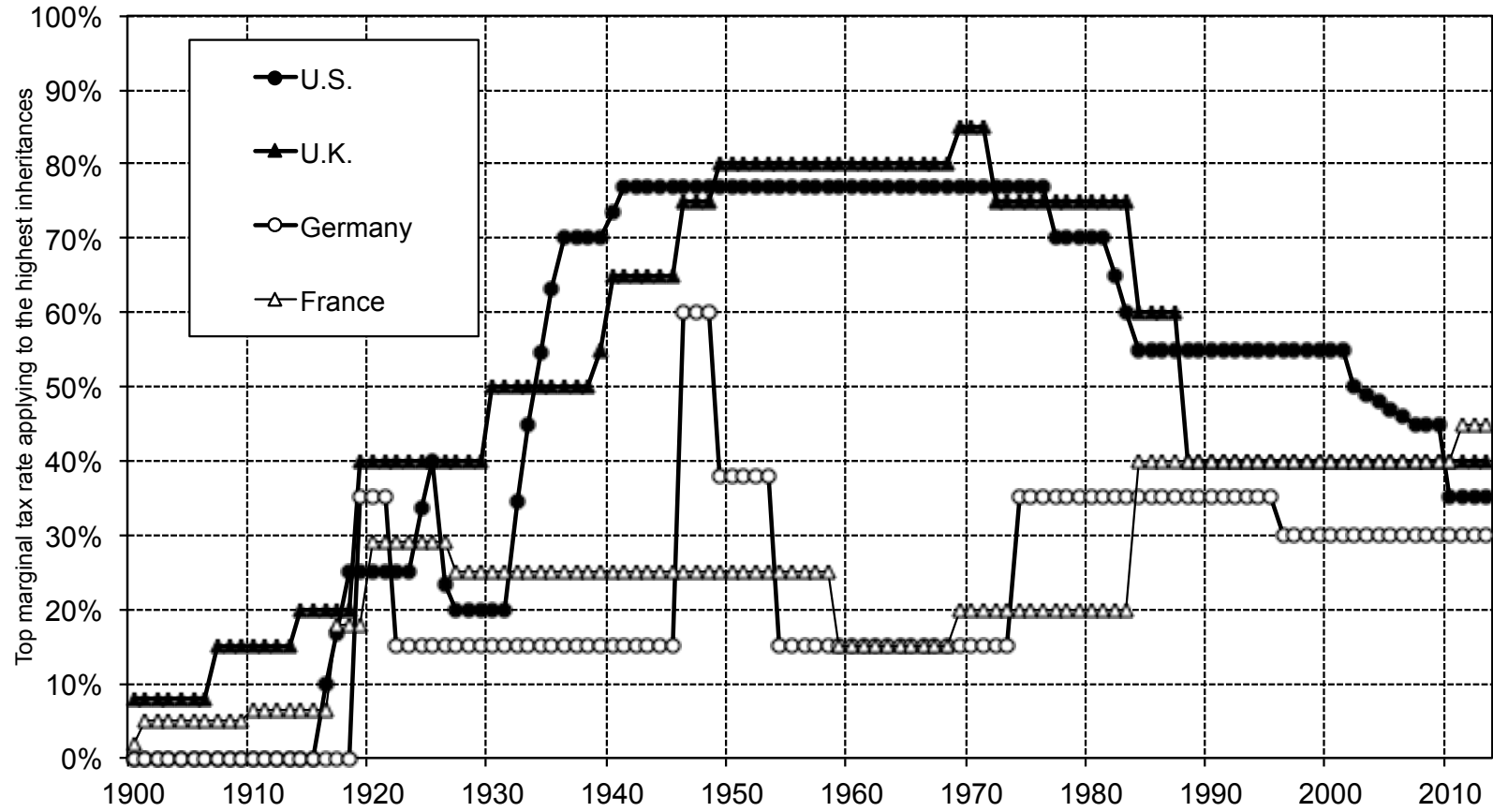


Source: Saez and Zucman (2019).

Inheritance and estate tax

- Estate tax: on wealth of the deceased (US, UK...)
- Inheritance tax: on wealth received by heirs (France, Germany, Japan...)
- Estate / inheritance taxes: smaller (in terms of revenue) than other capital taxes
- But more progressive than other K taxes → key role for inequality
- Big increase in inheritance taxation after mass-mobilization wars (Scheve and Stasavage, 2012, 2016)

Top inheritance tax rates, 1900-2013



The top marginal tax rate of the inheritance tax (applying to the highest inheritances) in the U.S. dropped from 70% in 1980 to 35% in 2013. Sources and series: see piketty.pse.ens.fr/capital21c.

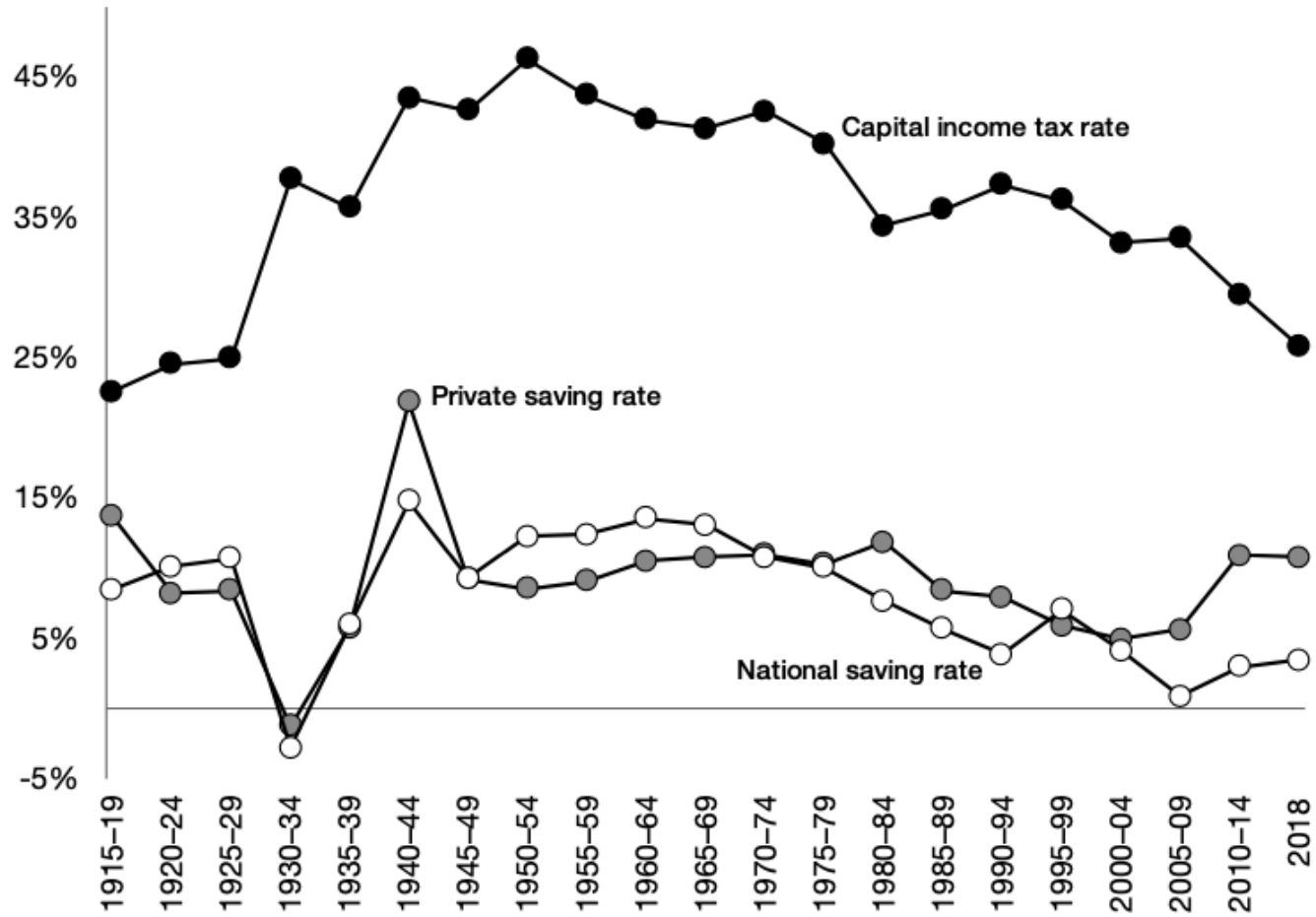
Source: Piketty (2014).

3 Who pays capital taxes?

- Are capital taxes really paid by capital owners or shifted to labor?
- Depends on supply elasticities of labor vs. capital
- Do saving and investment collapse when capital taxes rise?

5.4 CAPITAL TAXATION AND CAPITAL ACCUMULATION

(Macroeconomic capital tax rate versus saving rates
in the United States)



The incidence of the corporate tax

Key distinction: residence vs. source-based capital taxes

- Source: Tax based on location of capital → elasticity can be high if unregulated tax competition
- Residence: tax based on residence of the owner
- A policy choice

The incidence of the property tax

View 1: the property tax is mostly a capital tax like the corporate tax

- Property tax in community i is $\tau_i = \bar{\tau} + \epsilon_i$ with $\bar{\tau}$ national average property tax rate and ϵ_i local deviation (Mieszkowski, 1972)
- Harberger model $\rightarrow \bar{\tau}$ tax on all forms of capital
- ϵ_i residual either shifted to prices or immobile factors (labor, land)
- Raising property taxes nationally is progressive, but locally can be regressive

View 2: the property tax is not really a tax (“benefit view”)

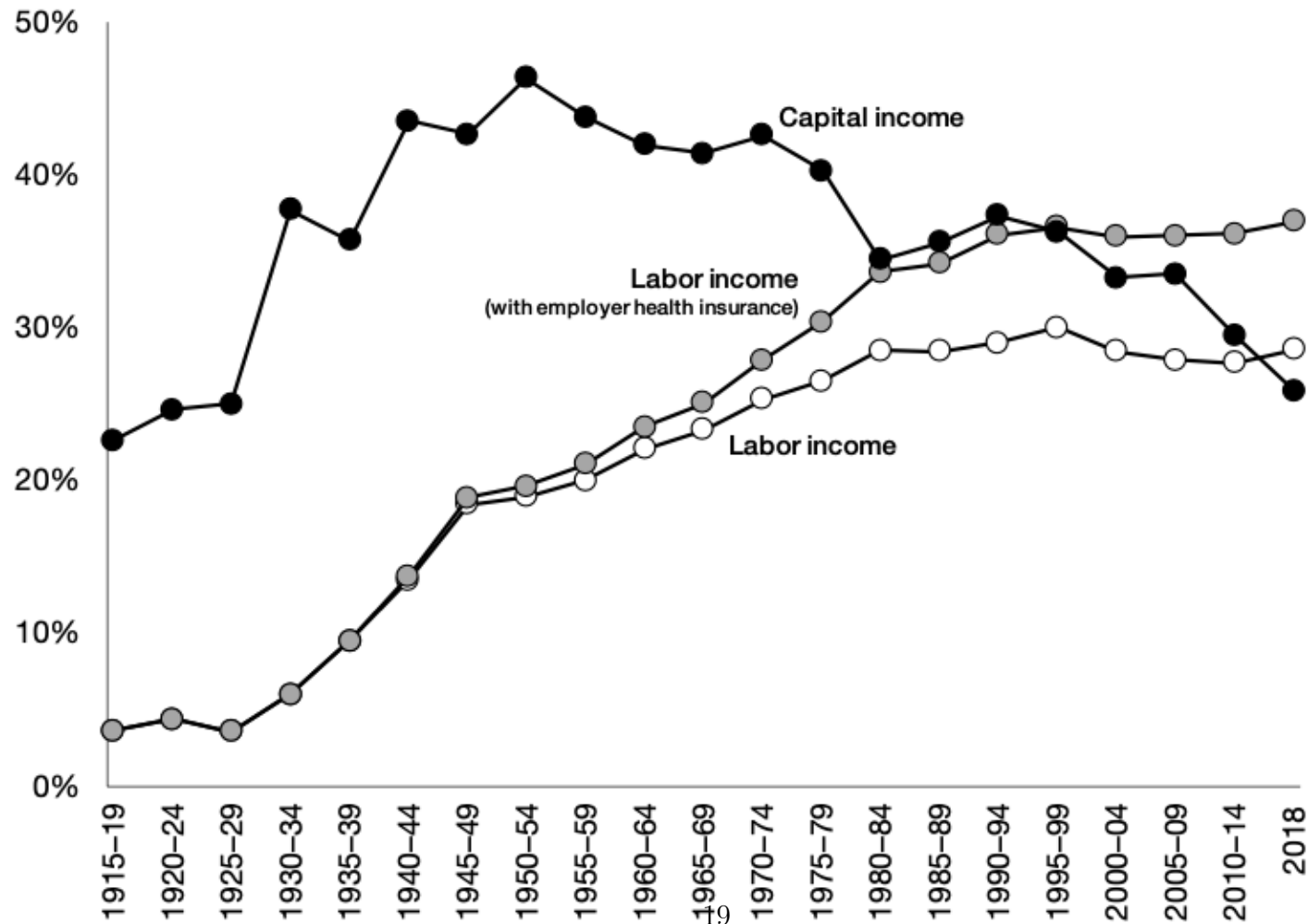
- Property taxes finance local public goods
- Mobile taxpayers would not live in a jurisdiction that charges a tax higher than value of its local public goods: Tiebout (1956)
- Local property tax is a price paid for those local goods (it’s like a fee paid to a gated community for the community’s pool)
- Problem: taxpayers probably not as mobile as Tiebout assumes; part of property taxes do not fund local public goods (e.g., part goes to State)

4 Labor taxes

- Large rise in all countries over the course of the 20th century
- Payroll taxes, plus quasi-private taxes (health)

5.2 THE RISE OF LABOR TAXATION

(Macroeconomic tax rates on labor and capital in the United States)



References

Allais, Maurice, “L’impôt sur le capital”, *Droit Social* (29), 465–544, 1966.

Allais, Maurice, *L’impôt sur le capital et la réforme monétaire*, Hermann, 1977.

Alvaredo, Facundo, Bertrand Garbinti, and Thomas Piketty, “On the share of inheritance in aggregate wealth Europe and the United States, 1900-2010”, *Economica*, 2017, (web)

Atkinson A.B. “Wealth and Inheritance in Britain from 1896 to the Present”, working paper 2013 (web)

Fuest, Clemens, Andreas Peichl, and Sebastian Siegloch “Do Higher Corporate Taxes Reduce Wages? Micro Evidence from Germany”, working paper 2016 (web)

Fullerton, Don and Gilbert E. Metcalf, “Tax incidence,” *Handbook of public economics*, 4, 2002 (web)

Guvenen, Fatih, Gueorgui Kambourov, Burhan Kuruscu, Sergio Ocampo, and Daphne Chen, “Use it or Lose It: Efficiency Gains from Wealth Taxation”, working paper, 2017 (web)

Harberger, Arnold C., “The incidence of the corporation income tax,” *Journal of Political Economy*, 1962 (web)

Kotlikoff, Laurence J. and Lawrence H. Summers, “The Role of Intergenerational Transfers in Aggregate Capital Accumulation”, *Journal of Political Economy* 1981 (web)

Kotlikoff, Laurence, “Intergenerational Transfers and Savings”, *Journal of Economic Perspectives* 1988 (web)

Mieszkowski, Peter, “The Property Tax: An Excise Tax or a Profit Tax?”, *Journal of Public Economics*, 1972, (web)

Modigliani, Franco, “Life Cycle, Individual Thrift, and the Wealth of Nations”, *American Economic Review* 1986 (web)

Modigliani, Franco, “The Role of Intergenerational Transfers and Life Cycle Saving in the Accumulation of Wealth”, *Journal of Economic Perspectives* 1988 (web)

Ohlsson H., J. Roine and D. Waldenström, “Inherited Wealth over the Path of Development: Sweden, 1810-2010”, working paper 2016 (web)

Piketty, Thomas, “On the Long-Run Evolution of Inheritance: France 1820-2050”, *Quarterly Journal*

of Economics, 2011 (web)

Piketty, Thomas, *Capital in the 21st Century*, Cambridge: Harvard University Press, 2014 (web)

Piketty, Thomas, and Emmanuel Saez “A Theory of Optimal Inheritance Taxation”, *Econometrica*, 2013 (web)

Piketty, Thomas, Gilles Postel-Vinay and Jean-Laurent Rosenthal, “Inherited vs Self-Made Wealth: Theory and Evidence from a Rentier Society” *Explorations in Economic History* 2013 (web)

Sachs, Dominik, Aleh Tsyvinski, and Nicolas Werquin, “Nonlinear Tax Incidence and Optimal Taxation in General Equilibrium”, working paper 2016, (web)

Saez Emmanuel, and Gabriel Zucman. *The Triumph of Injustice: How the Rich Dodge Taxes and How to Make Them Pay*. W.W. Norton, 2019.

Scheve Kenneth & D. Stasavage, “Democracy, War, and Wealth: Lessons from Two Centuries of Inheritance Taxation”, *American Political Science Review*, 2012 (web)

Scheve Kenneth, and David Stasavage, “Taxing the Rich : A History of Fiscal Fairness in the United States and Europe”, Princeton University Press, 2016

Suarez Serrato, Juan Carlos, and Owen Zidar, “Who Benefits from State Corporate Tax Cuts? A Local Labor Markets Approach with Heterogeneous Firms”, *American Economic Review*, 2016, (web)

Tiebout C. M., “A Pure Theory of Local Expenditure”, *Journal of Political Economy*, 1956, (web)

Zucman, Gabriel, “Taxing Across Borders: Tracking Personal Wealth and Corporate Profits”, *Journal of Economic Perspectives*, 2014 (web)