

# The Taxation of Personal Wealth in International Perspective

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L'importance des revenus d'impôt sur la richesse nette et sur les transferts de capital diminue presque partout. En général, cependant, les pays développés qui utilisent ces impôts ne semblent pas avoir l'intention de les abandonner. Les seules exceptions sont l'Australie et le Canada, qui n'ont jamais eu d'impôts sur la richesse nette et qui, comme un certain nombre de pays en voie de développement, ont aboli les impôts au décès. Quoique le Canada ait influencé certains pays en voie de développement en introduisant un impôt sur la richesse des compagnies, seul un changement politique majeur (comme l'élection d'un gouvernement socialiste en France et en Espagne) pourrait amener la réintroduction d'impôts sur la richesse personnelle dans ce pays.

The revenue importance of taxes on net wealth and capital transfers is diminishing almost everywhere. In general, however, those developed countries with such taxes show no sign of abandoning them. The main exceptions are Australia and Canada, which have never had net wealth taxes and which have, like a number of developing countries, abolished death taxes. Although Canada has further emulated some developing countries by introducing a new wealth tax on corporations, only a major political change (like the election of socialist governments in France and Spain) seems likely to result in the reintroduction of direct taxes on personal wealth in this country.

The origins of wealth taxes lie hidden in antiquity. Periodic taxes on land, livestock, and other forms of visible wealth are among the oldest sources of government revenues. Their modern descendant, the property tax, remains an important source of revenue in a number of countries, particularly English-influenced countries in which local governments are significant.<sup>1</sup> Even the most modern forms of wealth taxation, the net wealth and capital transfer taxes, have histories that may be traced back centuries. While the succession duties first levied in Ontario and three other provinces in 1892 were modelled directly on inheritance taxes in New York and Pennsylvania and indirectly on earlier 19th cen-

tury predecessors in the United States and the United Kingdom (Perry, 1961), the history of death taxes goes back at least to the Romans. The association of death and taxes has long seemed as acceptable to the tax administrator as to the aphorist, if not always greeted with acclaim by the public at large.<sup>2</sup>

This paper focusses on two forms of wealth taxation: net wealth taxes and capital transfer taxes.<sup>3</sup> These two levies share two important features in common. First, they constitute the only direct taxes imposed on personal wealth in most countries – and when neither exists, as in Canada, there is in effect no purposive taxation of such wealth.<sup>4</sup> Secondly, both taxes were

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