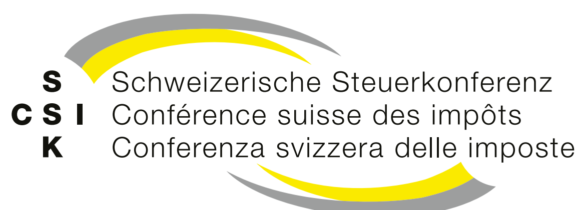
The Swiss Tax System

- **Main features of the Swiss tax system**
- **Federal taxes**
- **Cantonal and communal taxes**

2019 edition



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Author
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Preface

This brochure is suited primarily for foreign nationals interested in learning about the Swiss tax system. It gives an easy-to-understand overview of the taxes levied by the Confederation, cantons and communes.

This brochure is issued by the Information Committee of the Swiss Tax Conference, which all cantonal tax administrations and the Federal Tax Administration are part of. One of the Committee's aims is to foster relations between tax administrations and taxpayers by providing all interested parties with tax-related information in an objective manner. This should help the general public to have a better understanding of tax issues.

Swiss Tax Conference
Information Committee

The Chairman:

Lino Ramelli

Bellinzona, June 2019

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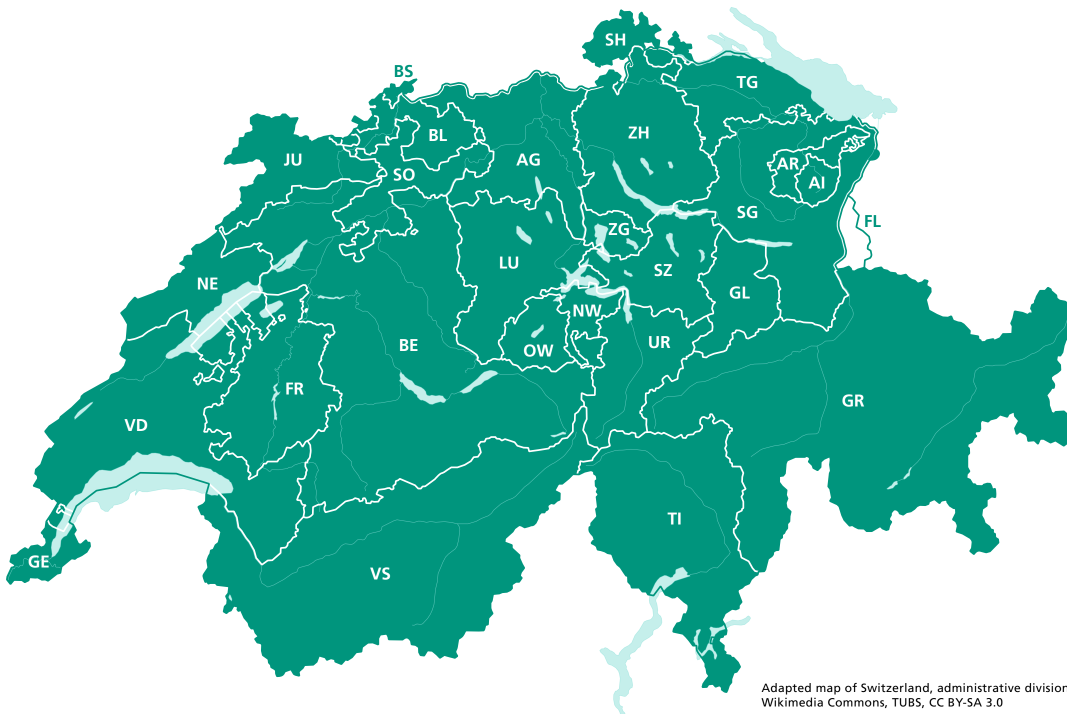
Abbreviations

ABV	Alcohol by volume
AHV	Old age and survivors' insurance
ALV	Unemployment insurance
Cst	Federal Constitution of the Swiss Confederation
DFTA	Federal Act on Direct Federal Taxation
dft	direct federal tax
DTHA	Federal Act on the Harmonisation of Direct Taxes of Cantons and Communes
EO	Compensation for loss of earnings
FCA	Federal Customs Administration
FDF	Federal Finance Department
FTA	Federal Tax Administration
IV	Disability insurance
VAT	Value added tax



Cantons

AG	Aargau	NW	Nidwalden
AI	Appenzell Innerrhoden	OW	Obwalden
AR	Appenzell Ausserrhoden	SG	St. Gallen
BE	Bern	SH	Schaffhausen
BL	Basel Landschaft	SO	Solothurn
BS	Basel Stadt	SZ	Schwyz
FR	Fribourg	TG	Thurgau
GE	Geneva	TI	Ticino
GL	Glarus	UR	Uri
GR	Graubünden	VD	Vaud
JU	Jura	VS	Valais
LU	Lucerne	ZG	Zug
NE	Neuchâtel	ZH	Zurich

Main features of the Swiss tax system

1 General

In the world of public finance, the term "tax system" refers to all taxes levied in a country, even if they are not consciously harmonised.

Theory distinguishes between a **traditional** or **historical** tax system and a **rational** or **theoretical** tax system depending on whether the system's development over time was more by accident than planned or whether it was intentionally structured on the basis of scientific findings.

Tax System	
Traditional or historical	Rational or theoretical

According to this doctrine, the Swiss tax system's development is **historical** in nature. It reflects the Confederation's **federal structure**.

Accordingly, all of the 26 **cantons** have their own tax laws and tax income, wealth, inheritances, capital and property gains, and other tax objects quite differently.

The some 2,220 **communes** may either levy communal taxes at their own discretion or decide on supplements relative to the cantonal basic tax scale or the cantonal tax payable.

Moreover, the **Confederation** also taxes income, although its tax receipts largely come from other sources, primarily from value added tax (VAT), stamp duties, customs duties and special consumption taxes.

1.1 Development of the tax system

During the **Helvetic period** (1798–1803), Switzerland obtained its only uniform tax system. However, this partly existed only on paper and it was never completely applied and implemented.

Following the collapse of the Helvetic Republic and the return to a federation of states, the cantons regained their tax autonomy and their tax systems developed fairly independently. This led to a large variety in the construction of the tax systems and the structure of the individual taxes.

Swiss federation of states pre-1848
Cantons' tax sources:
Customs duties, bridge tolls and other duties Taxes on wealth

While some cantons returned to the pre-French Revolution indirect taxes[1], i.e. primarily consumption taxes (customs duties, bridge tolls, etc.), others kept the taxes from the Helvetic system that best suited them, particularly the wealth tax.

Swiss federal state 1848
Federal tax sources:
customs duties
Cantonal tax sources:
wealth income

This tax system underwent thorough change with the **foundation of the federal state in 1848**. The supreme customs authority was transferred entirely to the Confederation and the cantons were forced to generate their tax receipts from taxes on wealth and income (to compensate for the loss of customs duties). Thus, direct taxes, particularly wealth taxes, gradually acquired a dominant position in cantonal tax systems during the 19th century, whereas indirect taxes became insignificant. They were nevertheless the backbone of federal finances in the form of customs duties.

This distribution of tax sources remained unchanged until **1915**.

It was already apparent, however, that the wealth tax was not flexible enough to satisfy the cantons' growing financial needs.

But also the Confederation's tax system had reached its performance limit and could not have withstood any additional (financial) strain.

Following World War I and its financial repercussions, the Confederation and cantons had to make sweeping changes to their tax legislation and tax systems. Before then, customs duties had been sufficient to cover the Confederation's expenditures, but stamp duties were added towards the end of the war. Moreover, it was necessary to abandon the political principle developed over time according to which the cantons were entitled to levy direct taxes whereas the fiscal authority to levy indirect taxes lay with the Confederation.

The high defence costs obliged the Confederation to levy direct taxes as well. It has done that ever since, with the exception of 1933, and will continue to do so provisionally until the end of 2035.

The Confederation's financial situation was always the reason for introducing further federal taxes. The following table gives an overview of the introduction of the individual federal taxes, customs duties and levies.

[1] See *page 10* for an explanation of the terms "direct" and "indirect" taxes.

1.2 Overview of the introduction and duration of the individual federal taxes, customs duties and contributions

Levied	Type of tax
since 1849	Customs duties
since 1878	Military service exemption tax (previously compensatory military tax)
since 1887	Taxation of distilled spirits
1915–1920	War gains tax
1916–1917	War tax
since 1918	Federal stamp duties
1921–1932	New extraordinary war tax
since 1933	Tobacco tax
since 1934	Beverage tax (beer tax)
1934–1940	Federal crisis contribution
1939–1946	War gains tax
1940–1942	One-off contribution for national defence
since 1941	Direct federal tax (before 1983: national defence tax)
since 1941	Value added tax (before 1995: turnover tax)
1941–1945	Emigrants national defence contribution
1941–1954	Equalization tax
1942–1959	Luxury tax
since 1944	Withholding tax
1945–1947	New contribution for national defence
since 1997	Mineral oil tax and automobile tax (previously customs duties of a fiscal nature)
since 2000	Casino tax

Thanks to these additional revenues, the **Confederation** managed to reduce the debt it had built up during the two world wars to a level that was bearable. However, new tasks have continually been assigned to the Confederation since the end of World War II. Its expenditures rose to such an extent in the post-war period that a return to the pre-war tax system is no longer conceivable. Consequently, the Confederation has largely continued to levy the federal taxes introduced during the war years.

From 1941 to 1958, **direct federal tax** (dft; previously called national defence tax) was comprised of an income tax and a supplementary wealth tax.

The wealth tax for individuals was abolished in 1959, and the capital tax for legal entities followed suit in 1998. Since then, the dft has been levied solely on personal income and on the profits of legal entities.

Unlike the Confederation, which introduced a series of new taxes, the **cantons** mostly made do with their existing taxes. Initially, wealth tax was the most important tax collected by the cantons. Earned income was taxed only as a complement. However, the cantons gradually switched from the traditional taxes on wealth and income to a general income tax with a supplementary wealth tax.

This transition, which involved a reduction in wealth tax and an increase in income tax, was first implemented by the canton of Basel Stadt back in the 19th century. By 1945, another ten cantons had followed. The last canton to change its tax system was Glarus in 1970.

It is also worth noting in this regard that the canton of Schwyz did not introduce a tax on earned income until 1936. Until then, it only taxed wealth.

Originally, these taxes were proportional. Progressive taxation began to prevail over time and social deductions were introduced in consideration of taxpayers with modest incomes and families.

2 Who levies taxes in Switzerland?

As already mentioned, the Confederation, the cantons and even the communes levy taxes in Switzerland.

However, the right of these public bodies to collect taxes is restricted by the Federal Constitution (Cst). The aim is to distribute fiscal sovereignty in such a way that the three public bodies do not impede one other and that an excessive burden for taxpayers is prevented. Consequently, the Constitution gives the Confederation the right to levy certain taxes and denies the cantons the right to do the same.

The main features of the federalist structure are set out in art. 3 Cst which regulates the relation between Confederation and cantons as follows:

> **"The Cantons are sovereign except to the extent that their sovereignty is limited by the Federal Constitution. They exercise all rights that are not vested in the Confederation."**

Applied to taxes, this implies the following distribution of powers:

- The **Confederation** may levy only those taxes that it is expressly empowered to levy by the Constitution.
- By contrast, the **cantons** are generally free to choose their taxes, except where the Constitution expressly prohibits the levying of certain taxes by the cantons or reserves the right for the Confederation.

The fact that the Constitution empowers the Confederation to levy a tax does not, however, automatically exclude the right of the cantons to levy a similar tax. That would require an explicit prohibition. Such a prohibition does not exist for direct taxes. That is why both the Confederation and the cantons levy direct taxes and thus compete with one another in this area.

While the Confederation and the cantons have original fiscal sovereignty, the **communes** may levy taxes only to the extent they are explicitly authorised to do so by their respective canton. In contrast to original sovereignty, this is referred to as derived or delegated fiscal sovereignty. However, this does not detract from the fact that the communes have genuine fiscal sovereignty that is integrated in the Swiss tax system as another important component in addition to the powers of the Confederation and of the cantons.

The communes are of major importance in Switzerland's federal structure. Aside from local tasks (e.g. waste disposal), they also carry out tasks that in other countries fall under the responsibility of a higher level of government, e.g. primary education or social welfare. The communes generally bear the costs of performing these tasks, which is why they have to share in the utilisation of the available sources of funding. Consequently, the communes' tax-related independence goes hand in hand with their functional autonomy.

The taxes levied in Switzerland can be subdivided into **direct taxes** (e.g. income and wealth taxes for individuals and profit and capital taxes for legal entities) and **indirect taxes** (consumption taxes and taxes on property or expenditures).

There are various ways of distinguishing between direct and indirect taxes. In the case of direct taxes, the calculation basis (e.g. income) is generally taxed directly. For direct taxes, the tax base is thus identical to the tax object. For example, the fact of having an income triggers income tax liability. By contrast, the tax object and calculation basis are different in the case of indirect taxes. The Confederation, cantons and communes levy taxes from both categories.

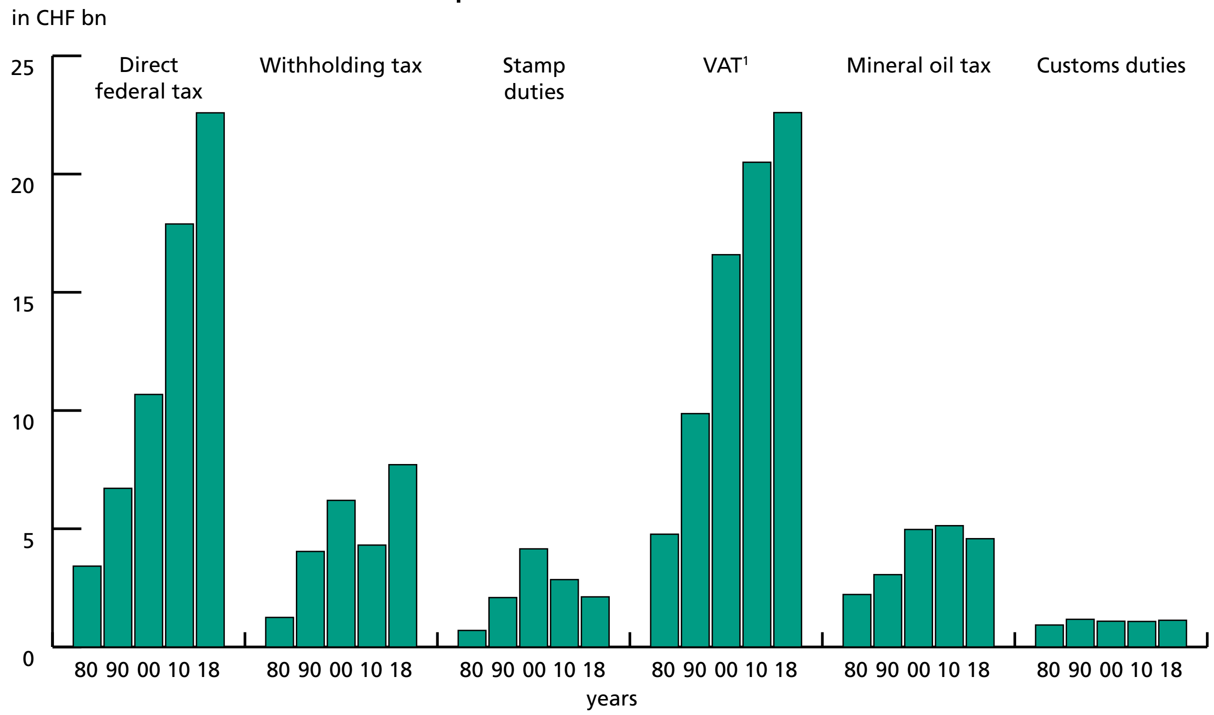
In 2016, the tax revenues for the different levels of government according to the FS Model[2] amounted to around CHF 138 billion, broken down as follows:

- Confederation: CHF 63.9 billion
- Cantons: CHF 45.6 billion
- Communes: CHF 28.4 billion

Consumption taxes (indirect taxes) are the main source of revenue for the Confederation, with VAT generating the most receipts.

Direct taxes account for slightly more than a third of the Confederation's tax receipts. In terms of revenue, dft accounts for the lion's share here.

[2] National consolidation and comparability are ensured with the so-called FS Model of financial statistics. This model is generally based on the Harmonised Accounting Model for the Cantons (HAM2).



The picture is somewhat different for the cantons and communes. Their most important tax sources are income and wealth taxes for individuals and profit and capital taxes for legal entities. In 2016, these accounted for 83.4 % of the cantons' and communes' total tax receipts.

3 Basic principles of fiscal sovereignty

Fiscal sovereignty refers to the legal and actual right of a public body to levy taxes.

In terms of the arrangement of fiscal sovereignty, Swiss tax law has to abide by the following principles enshrined in the Constitution:

- Principle of equality before the law;
- Principle of economic freedom;
- Principle of guarantee of ownership;
- Principle of freedom of religion and conscience;
- Prohibition of inter-cantonal double taxation;
- Prohibition of unjustified tax benefits.

3.1 Principle of equality before the law (art. 8 Cst)

The cantons have to respect the constitutional principle of equality before the law in their tax legislation as well as in their tax collection and tax-related jurisprudence. There is a violation of equality before the law if the ban on objectively unjustified unequal treatment in legislation or the application of the law is violated.

If this principle is violated by rulings of cantonal courts of the last instance, citizens can defend themselves by submitting an appeal in matters of public law to the **Federal Supreme Court** in Lausanne.

In tax law, the principle of equality before the law is implemented in the principle of taxation according to taxpayers' ability to pay, among other things.

3.2 Principle of economic freedom (art. 27 and art. 94–107 Cst)

The principle of economic freedom may not be impaired by tax law provisions and measures. Thus, the cantonal legislator may not impinge on the free play of economic competition by introducing special trade taxes which reduce the competitiveness of certain branches.

Taxpayers can likewise defend themselves against violations of the principle of economic freedom by submitting an appeal in matters of public law to the Federal Supreme Court.

3.3 Principle of guarantee of ownership (art. 26 Cst)

The principle of guarantee of ownership is violated if the tax burden becomes confiscatory in nature. The idea whereby the guarantee of ownership constitutes a limit to taxation is nowadays recognised not only in doctrine, but also in jurisprudence.

3.4 Principle of freedom of religion and conscience (art. 15 Cst)

The principle of freedom of religion and conscience constitutes another limit to taxation. It can be inferred from this constitutional standard that no church taxes can be levied on people who do not belong to the corresponding religious community.

According to the Federal Supreme Court's jurisprudence, only individuals, and not legal entities, can invoke this constitutional provision.

3.5 Prohibition of inter-cantonal double taxation (art. 127 para. 3 Cst)

This prohibition indicates that one and the same person may not be taxed by more than one canton for the same time period and for the same tax object (e.g. salary).

The Constitution empowers the Confederation to take the measures necessary to prevent this double taxation, but no federal law has been established yet. The Federal Supreme Court's extensive jurisprudence replaces the law.

The double taxation prohibition arises only in the case of competing demands by two or more cantons, but not in the relation between Confederation and canton.

Double taxation can also occur between sovereign states (international relationship). The avoidance of such international double taxation is governed by means of intergovernmental agreements (so-called double taxation agreements, or DTAs). Switzerland has signed a total of 61 DTAs in accordance with the international standard, and 55 of which are in force.

3.6 Prohibition of unjustified tax benefits (art. 129 para. 3 Cst)

Because of tax competition, there is a certain temptation for the cantons to attract wealthy taxpayers (primarily foreigners) by granting objectively unjustified tax breaks. The Constitution gives the Confederation the right to combat abuses of this type through legislation.

However, the Confederation has never yet had to use this power, as the cantons have effectively voluntarily remedied the situation with a mutual agreement (inter-cantonal concordat on the exclusion of tax agreements).

4 The people have the final say

Aside from the unique feature that the Confederation, the cantons and the communes all levy taxes, the Swiss tax system also sets itself apart by letting citizens decide for themselves which taxes may be levied on them. This is because the state can impose only those obligations on them – including taxes – that are provided for in the Constitution and laws, and constitutional amendments automatically have to be subject to a popular vote (**mandatory referendum**) at both the federal and cantonal level. Only a few cantons have a mandatory referendum also for the revision of laws. In the other cantons, the **optional referendum** generally applies, although in some cantons the mandatory or optional referendum applies depending on the type of legislative amendment in question.

In most cases, the people also have a say when setting **tax rates**, **tax scales** and **tax coefficients**.[3]

In the case of dft, the maximum rate of the tax scale is enshrined in the Constitution. It may be increased only if the majority of the people and of the cantons approve. In contrast, the scale can be changed by a federal law (subject to optional referendum).

In the cantons and communes, a tax law revision is required in order to change the tax scale. The situation is different for the tax coefficient: in most cases, it is determined by the cantonal/municipal parliament or communal assembly, subject to an optional or mandatory referendum.

[3] See *chapter 6.1* for an explanation of the terms "tax rate", "tax scale" and "tax coefficient".

5 Assessment and collection of taxes

This section deals with the assessment and collection of taxes using the example of income and wealth taxes for individuals.

5.1 Assessment

In Switzerland, the assessment of income and wealth taxes is based on a **tax return** that is submitted to all taxpayers and has to be completed truthfully and exhaustively by them (self-assessment). The tax return has to be submitted to the competent authority within the deadline determined by the canton. In general, an extension can be requested. If the deadline is missed, a reminder is sent to the taxpayer and a new deadline is set. If taxpayers do not submit their tax return despite a reminder, they are assessed ex officio (using dutiful judgement).

Once the assessment authority has received the duly completed and signed[4] tax return, together with the required enclosures, it generally determines the tax factors and the tax amount.

If the tax return contains data that is clearly erroneous, it is rectified ex officio. Finally, as soon as the tax factors are determined, the tax amount is calculated on the basis of the **tax scale**.

If the tax return and enclosures do not allow the tax factors to be determined, the assessment authority has to carry out the necessary investigations by requesting evidence, examining accounting books, making onsite visits, questioning the taxpayer, etc.

If these investigations do not lead to a result, or an insufficient one for assessment, income and wealth have to be estimated by the assessment authority within the bounds of its dutiful discretion.

The taxpayer receives notification of the assessment by means of a written ruling. This ruling contains the decisive tax factors as well as the tax amount for the tax year in question. It also indicates the legal remedies (generally an objection), the form and time frame to be observed and the authority to which the objection is to be addressed.

If there is no objection to the duly notified assessment decision within the set deadline, it takes legal effect. Legally binding assessments can however be changed to the detriment of the taxpayer by a supplementary tax procedure if it subsequently transpires that

4 In the cantons of Berne, Lucerne, Obwalden, Zug, Fribourg, Vaud, Neuchâtel and Geneva, there exists the possibility to submit the tax return electronically and without signature. The identification occurs by personal access code.

they are insufficient, e.g. because of tax evasion or tax fraud. They may also be changed in the tax-payer's favour if there are reasons to justify a revision, e.g. new significant facts or decisive evidence.

5.2 Tax collection

The collection of income and wealth taxes for **individuals** is generally carried out by the same office that performed the tax assessment.

While **dft** is generally collected by the cantonal tax administration, the organisation for **cantonal** and **communal taxes** differs. Here, tax collection is partly carried out by a central cantonal office, partly by the commune of residence, or cantonal taxes (also called state taxes) are collected by the canton and communal taxes are collected by the communes.

Collection of direct federal tax (income tax)	
by the canton	by the commune of residence
all cantons except LU, UR and SG	cantons of LU, UR and SG

Collection of cantonal and communal taxes			
Central	By communes	Cantonal tax by canton, communal tax by communes	Other systems
OW, NW, GL, ZG, AR, AI, NE, GE, JU	ZH, LU, UR, SZ, TG	FR[1], SO, BL[2], BS[3], GR, TI, VS	BE[4], SH[5], SG[6], AG[5], VD[7]

1. **FR:** The communes and parishes can also delegate tax collection to the canton.
2. **BL:** For around 45 communes, communal tax is collected by the canton.
3. **BS:** The city of Basel does not collect any communal tax, as only the canton has the right to collect tax. In contrast, communal taxes are collected in addition to the cantonal taxes on income, wealth and property gains in the communes of Bettingen and Riehen.
4. **BE:** Five decentralised cantonal collection offices collect cantonal and communal taxes (including church tax). In the cities of Bern, Biel and Thun, cantonal and communal taxes (including church tax) are collected by the communal au-

thorities. The central collection division is responsible for the functional coordination of the collection offices.

5. **SH and AG:** The cantonal tax administration collects the taxes from legal entities (including taxation at source). The taxes of individuals are collected by the communes. In the canton of SH, some communes have delegated collection to the canton.
6. **SG:** The collection of income and wealth taxes for individuals is carried out collectively for both the canton and the communes via the political communes' tax offices. The taxes for legal entities are collected centrally by the canton.
7. **VD:** To date, almost all of the communes (over 95 % of taxpayers) have delegated tax collection to the canton. This proportion is continually rising.

The taxes have to be paid by set **due dates**. For example, dft becomes payable on 1 March of the year following the tax year, with a grace period of 30 days.

The data in the table below and the associated notes refer solely to the number of **provisional instalments**.

In most cantons, cantonal and communal taxes are collected in several provisional instalments during the tax year. The balance, i.e. the difference between what has already been paid and the sum actually due, either still has to be paid or else is refunded to the taxpayer as soon as the tax assessment is definitive.

Tax collection				
once	twice	three instalments	three, four or five instalments	nine, ten or twelve instalments
dft, LU, UR, SZ[1], OW, ZG[2], BS, BL[3], AG	NW, GR[4]	ZH[5], BE, GL, SH, AR[5], AI[5], SG[5], TG[5], TI	SO[6], VS[7]	FR[8], NE[9], GE[9], VD[10], JU[11]

Several cantons also allow for the possibility of the advance payment of cantonal and communal taxes, in some cases also for dft. In some cantons, taxpayers have the option of paying the entire tax due in a one-off advance payment upon receipt of the provisional tax bill or before a certain date. In return, the taxpayer gets a discount.

1. **SZ:** Possibility of paying in three instalments.
2. **ZG:** Advance invoice mid-year with the possibility of paying in one or more instalments by the end of December.
3. **BL:** Advance invoice in January with the possibility of paying in instalments in the following months up to the end of September.
4. **GR:** The communes can make deviating arrangements.

5. **ZH, AR, AI, SG and TG:** In principle in three instalments, but – upon request – also possible in seven instalments (ZH), in one or 11 instalments between February and December (AI), in a maximum of 11 instalments (SG), in a maximum of 12 instalments (TG), as well as in one, nine or 11 instalments (AR).
6. **SO:** Canton: Advance collection invoice in February, payable in one or three instalments up to the end of July at the latest.
   Communes: Generally two to four instalments with set due dates.
7. **VS:** In principle in five instalments.
8. **FR:** In principle in nine instalments. However, payment possible also in one instalment or for dft in six instalments.
9. **NE and GE:** In principle in ten instalments (GE also gives the possibility of paying dft in ten instalments from May to February and to fuse the instalments of the cantonal and communal taxes with those of dft. This allows the taxpayers to settle all the bills in a single monthly payment).
10. **VD:** In principle in 12 monthly instalments (possibility of integrating dft).
11. **JU:** In 12 monthly instalments.

6 Tax burden in Switzerland [5]

Switzerland's taxes are not among the highest by international standards. However, there are significant differences in the tax burden within its borders, not only from canton to canton, but also from commune to commune within the same canton. The differences concern primarily income and wealth taxes, and to a lesser extent consumption taxes, which are collected mainly by the Confederation and are not subject to regional differences in terms of the tax burden.

6.1 Reasons for the different tax burdens in Switzerland

The main reason for the different tax burdens lies in the fact that each of the 26 cantons has its own tax law. Tax scales and the level of deductions vary from one canton to another and therefore so does the tax burden.

In most cantons, the tax scales contained in cantonal tax laws define simple rates (basic rates). These simple rates are then multiplied by cantonal and communal coefficients to obtain the actual tax rate. The tax coefficient is a multiple (expressed in units or percent) of the statutory simple rates. These tax coefficients are usually adjusted annually in line with the financial needs of the political bodies (canton, commune, parish).[6]

To illustrate, consider the following example. A single taxpayer living in the city of Zurich has a gross earned income of CHF 50,000. Based on the statutory tax scale, the basic income tax is CHF 1,406. The canton collects 100 % of this basic tax, the commune of Zurich 119 % (communal tax). The parish collects church tax of 10 % of the basic cantonal tax amount.

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[5] For more information see *appendix part I.*

[6] In the case of dft and some cantonal income taxes, the tax amount payable can be taken directly from the scale. Consequently, there is no need to set a tax coefficient.

Basic tax according to the scale		CHF	1,406.00
Tax coefficient (multiple)			
Canton of Zurich:	100 %	CHF	1,406.00
Commune of Zurich:	119 %	CHF	1,673.15
(Roman Catholic) parish:	10 %	CHF	140.60
Personal tax		CHF	24.00
Total income tax		**CHF**	**3,243.75**
Tax burden in percent			6,49

Dft is owed, in addition to the cantonal and communal taxes. It amounts to CHF 211 with a gross earned income of CHF 50,000.

The differences in the cantonal and communal tax burdens are the result of the considerable fiscal autonomy of each public body. It would be possible to eliminate these differences only if **fiscal sovereignty** were withdrawn from the cantons and communes and reserved solely for the Confederation. However, such unilateral fiscal sovereignty would also have adverse effects. The cantons' independence would undoubtedly take a major hit.

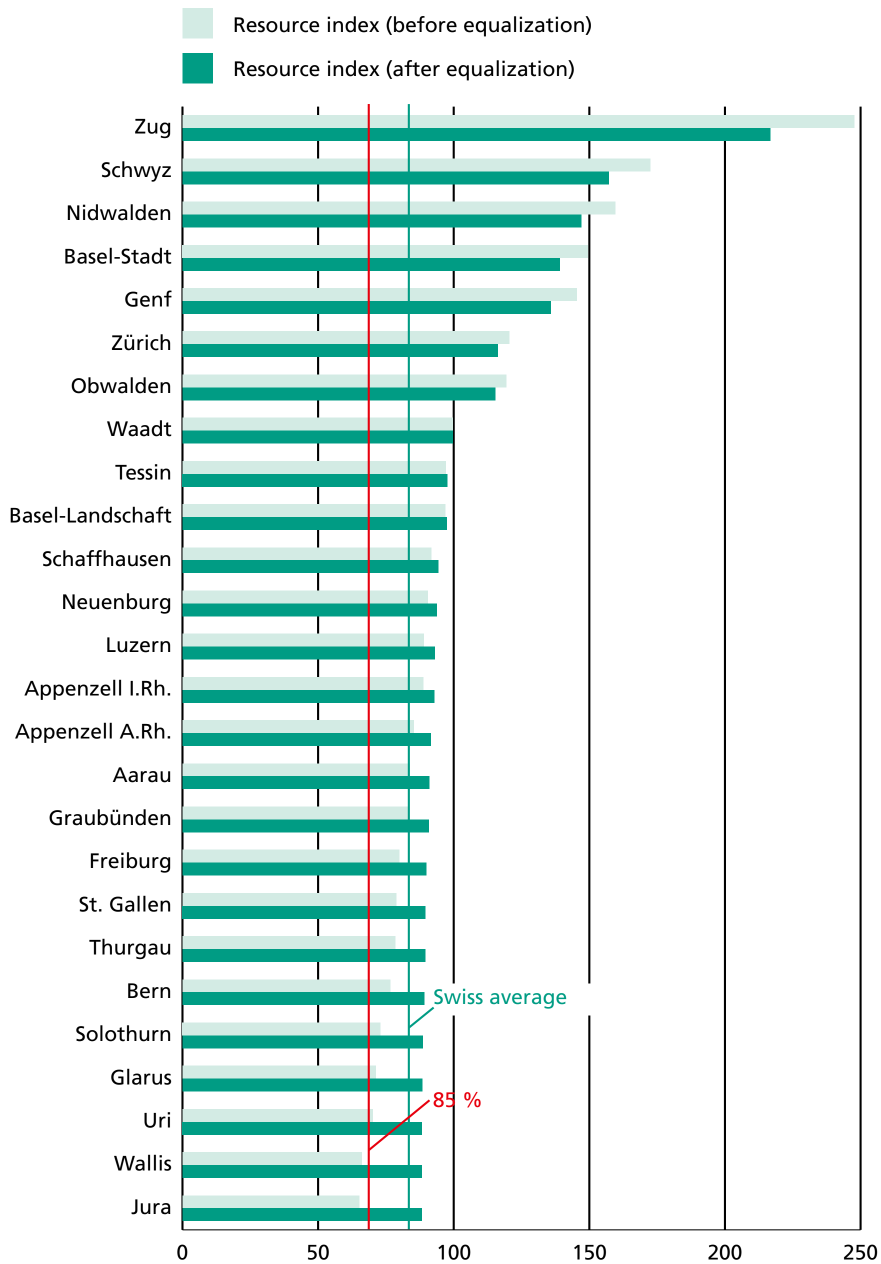
In order to prevent the tax burden differences between rich and poor regional bodies from becoming too big, Switzerland applies both national fiscal equalization between the Confederation and the cantons as well as 26 cantonal fiscal equalization systems. In this way, the financially weak cantons and communes receive equalization payments that enable them to keep their tax burden as low as possible or even reduce it.

6.2 National fiscal equalization

Federalism is one of the fundamental principles of the Swiss Constitution. The cantons and communes thus have extensive powers, e.g. in the form of financial and tax autonomy. This autonomy brings with it sometimes significant differences between the cantons and communes in terms of their financial capacity. As part of the new system of fiscal equalization and the division of tasks between the Confederation and the cantons (NFE), a totally revised fiscal equalization and cost compensation system came into force in the beginning of 2008. This aims to boost the cantons' financial autonomy and reduce the disparities. It provides the necessary compensation mechanisms and thereby creates the financial prerequisites needed to maintain the federal structure of Switzerland (revised art. 135 Cst).

National fiscal equalization consists solely of non-earmarked resources, with a distinction being made between resource equalization (redistribution of financial resources) and cost compensation (compensation for excessive exceptional burdens). In addition, a cohesion fund exists to compensate for temporary hardships.

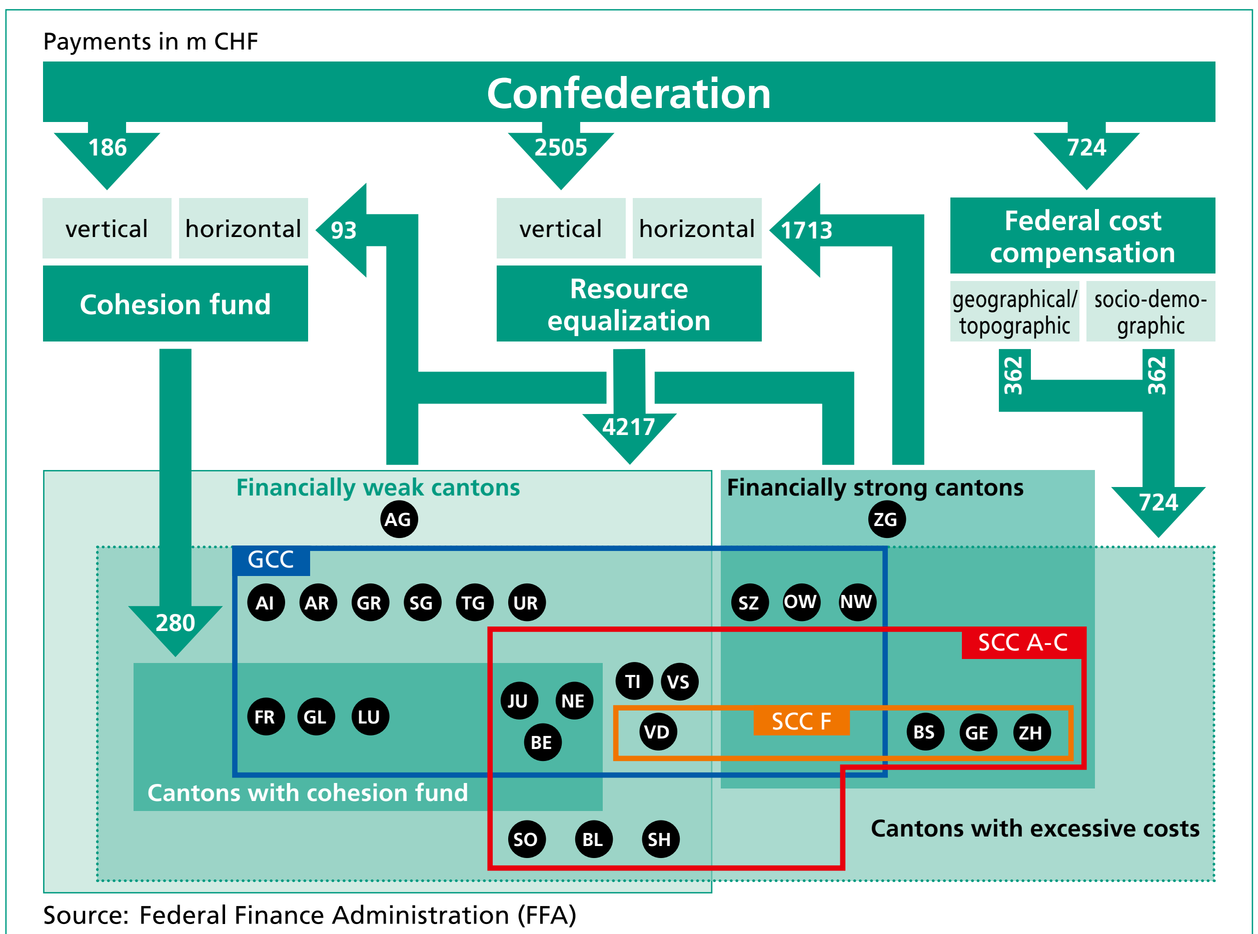
Resource equalization is based on the resource index. It reflects the cantons' resource potential, i.e. the fiscally utilisable added value. Resource equalization is financed jointly by the Confederation (vertical resource equalization) and by the financially strong cantons (horizontal resource equalization). The resource equalization payments to the financially weaker cantons are calculated in such a way that the weakest cantons benefit disproportionately. The aim is for all cantons to have minimum financial resources per capita of 85 % of the Swiss average. The following chart shows the compensation effect of resource equalization in 2019.



Source: Federal Finance Administration (FFA)

Cost compensation consists of geographical/topographic and socio-demographic cost compensation, and is financed entirely by the Confederation. While geographical/topographic cost compensation offsets the excessive costs due to low population density and topographic conditions in peripheral cantons, socio-demographic cost compensation benefits primarily urban cantons. It compensates them for excessive costs that arise as a result of the population structure or the role of core cities as centres.

The fiscal equalization system is shown in the following diagram. The amounts indicated for the individual equalization components are payments for 2019. Taking into consideration a periodic efficacy report, parliament decides every four years on the allocation of funds to the different parts of the equalization mechanism.



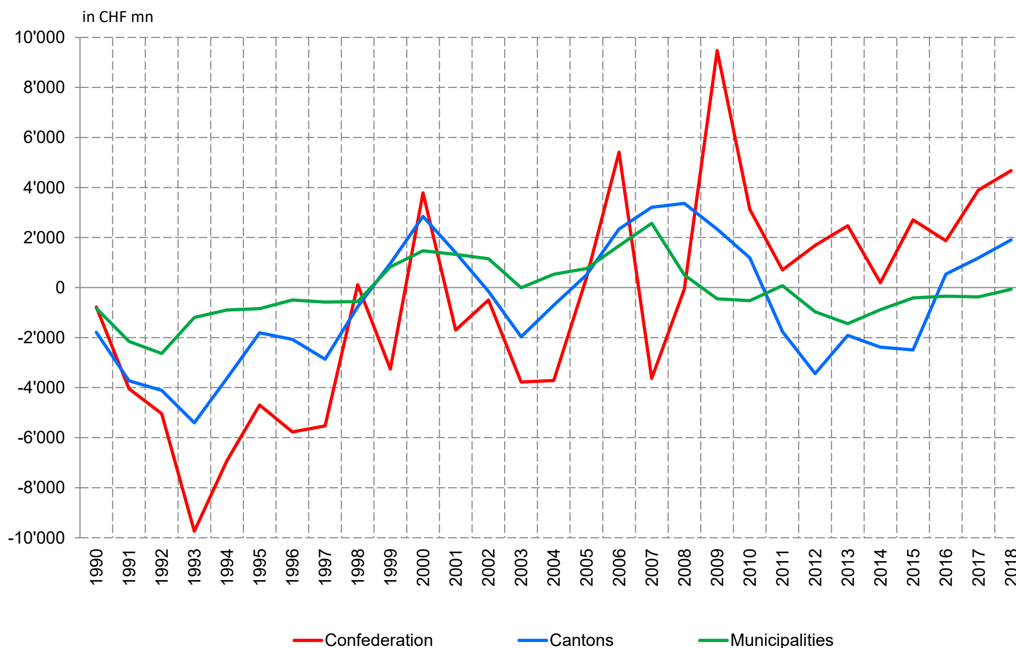
Source: Federal Finance Administration (FFA)

7 Development of the Swiss tax system

7.1 Development of public finances

It can be seen from the following chart that the recession that commenced in 1991 primarily saw an extraordinarily sharp increase in the Confederation's deficit. However, only part of these deficits was cyclical; a significant share was structural in nature. Following an interim high in 2000, the situation significantly deteriorated again. This was due mainly to the slump in receipts that followed the bursting of the dotcom bubble in 2000. The introduction of the debt brake in 2003 made it possible to eliminate the Confederation's structural deficit with two relief programs in 2003 and 2004. Surpluses were posted by all three levels of government in 2008, despite the financial crisis. Excluding extraordinary expenditure (purchase of UBS mandatory convertible notes, expenditure associated with the transition to national fiscal equalization), the Confederation's financial statement ended the year with a surplus of over CHF 6.8 billion. Extraordinary expenditure reduced the surplus to CHF 11 million, though. The surplus of CHF 9.5 billion in the 2009 recession was the result of the extraordinary receipts generated by the sale of the UBS mandatory convertible notes.

Overall financial statements of the Confederation, cantons and communes



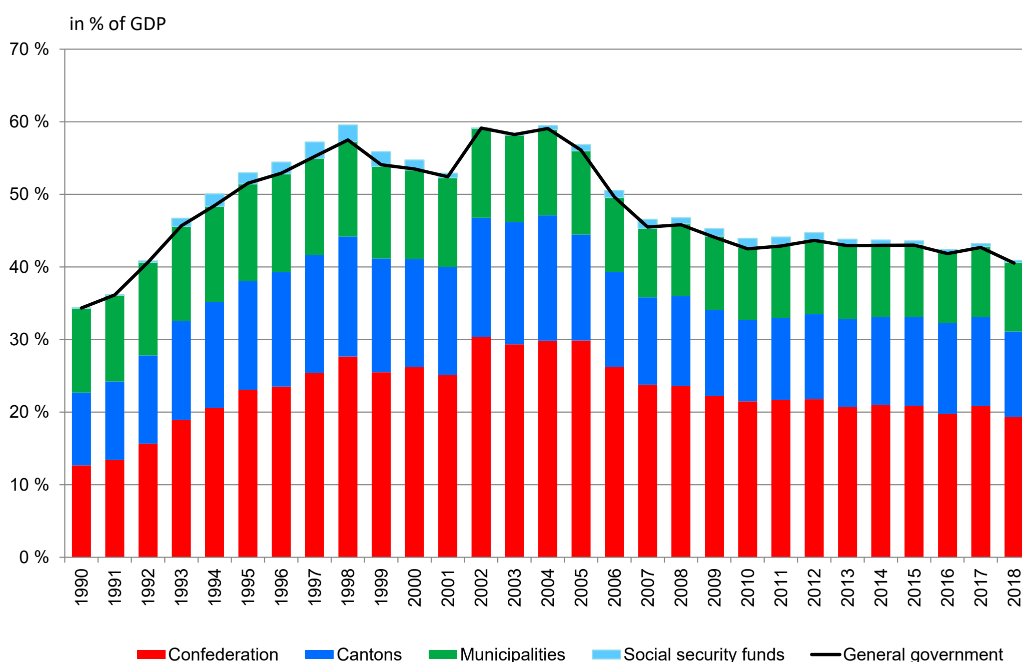
Quelle: Eidgenössische Finanzverwaltung (EFV), Finanzstatistik

Even excluding those extraordinary factors, the federal financial statement posted a sound surplus of CHF 2.7 billion. The cantons also recorded a solid surplus of CHF 2.3 billion during the crisis in 2009, whereas the communes had a deficit of CHF 478 million.

In the years 2017 and 2018 the financial statement of the Confederation came to a close with a surplus of CHF 3.7 and 4.6 billion. These results can be attributed primarily to the very positive development of the withholding tax. The cantons and social insurance closed their statements with a surplus of CHF 1.2 and 2 billion resp. CHF 888 and 713 million. The recovery of the public finances seems to be more problematic on the municipal level, for these latter ones closed their statements with a deficit of CHF 404 million in 2017 and of CHF 80 million in 2018.

Debt is the result of accumulated deficits. Public debt sustainability depends among other things on domestic value creation. Therefore, the following chart shows gross debt of Switzerland's public authorities with reference to the definition of the International Monetary Fund as a percentage of gross domestic product (GDP). Here too, a strong increase of indebtedness in regards to the federal budget can be seen in the 1990s. While the level of debt of the communes and cantons relative to GDP was kept in check to some extent during that period, the Confederation's debt rose from 12.7% of GDP in 1990 to 27.7 % in 1998. After the dotcom bubble burst, the debt ratio even rose to 29.9 % of GDP between 2002 and 2005. After the introduction of the debt brake in 2003 and due to the solid economic situation as of 2004, the total government debt in relation to GDP stabilized in 2005 and has been declining since 2006. The following chart illustrates in contrast a much more stable development of the indebtedness on the cantonal and municipal levels, which suggests a better control over the public finances on the levels closer to their citizens.

Gross dept of public authorities
(Definition of the International Monetary Fund)



Quelle: Eidgenössische Finanzverwaltung (EFV), Finanzstatistik

7.2 Taxation principles in the Confederation's financial regime

The taxation principles are part of the Confederation's so-called financial regime, which is governed by art. 126 to 135 Cst. The financial regime sets out the principles for the federal finances in three pillars: budget management (debt brake), taxation principles and fiscal equalization and cost compensation.

Aside from the general taxation principles, the financial regime also contains a list of taxes that the Confederation is authorised to collect. These include: dft, VAT, various excise taxes (including on tobacco, spirits, automobiles and mineral oil), stamp duties, withholding tax and customs duties. The revenue from these taxes accounts for approximately 95 % of the Confederation's total tax receipts. Regarding the other tax receipts, the Confederation's power to impose duties is governed either by the respective political area in the Constitution (e.g. motorway tax, heavy vehicle charge) or at the statutory level (e.g. CO_2 tax, casino tax).

Maximum rates are set out in the Constitution for the most important sources of receipts, i.e. dft and VAT. Consequently, the approval of the people and the cantons (mandatory referendum) is always required to increase those rates. This clearly limits the possibility of raising taxes to offset imbalances in the federal budget.

The debt brake, which defines the relationship between the Confederation's expenditure and receipts in a binding manner, transposes this limitation to the expenditure side as well.

Moreover, the power of the Confederation to collect dft and VAT has always been temporary. It was last extended to the end of 2035 with the revision of the Confederation's financial regime entering into force on 1 January 2021 (art. 196 no. 13 and 14 Cst). The time limitation obliges the Confederation to fundamentally rethink the receipts side of its budget at regular intervals and to let the people and the cantons decide on the fundamentals of the federal financial regime.

7.3 Aims and principles of the Confederation's financial policy model

The financial policy model adopted by the Federal Council in 1999 specifies aims, principles and instruments for the Confederation's fiscal policy. It is a management tool of the Federal Council. It points the way for fiscal policy decisions by the executive authority and the administration, but it does not supersede the Confederation's policy objectives.

The primary aim of fiscal policy is to ensure stability and support economic growth, and thereby promote employment, welfare and social cohesion. This primary aim includes the following subordinate aims which are relevant for tax policy:

- Revenue and expenditure policy has to favour growth.
- The tax-to-GDP ratio, tax-and-social-security-contributions-to-GDP ratio and general government expenditure ratio have to be among the lowest in the Organisation for Economic Cooperation and Development (OECD). The level of development of the economies in question has to be taken into account when making comparisons.

The above-mentioned aims are supplemented by some principles in the Confederation's financial model. The following apply in particular in terms of taxation principles:

- The tax burden is to be distributed equitably among taxpayers, in compliance with the constitutional principles of universality and uniformity of taxation, as well as the principle of proportionality (taxation according to ability to pay).
- Taxes are to be structured in such a way that the burden for the taxpayer is as low as possible and the adverse effect on economic activity is minimised. If state services produce an individual, allocable benefit, full or partial financing via originator-oriented fees and amounts has to be examined.

- The tax system is to be structured in such a way that Switzerland's appeal as a location can be maintained and enhanced. High taxes and high marginal tax rates[7] are to be avoided insofar as possible.
- The tax system contributes to the long-term preservation of natural resources.
- Taxes are to be structured in such a way that they have a stabilising effect on the economic situation and employment (principle of economic policy effectiveness).

7.4 Tax harmonisation

Tax harmonisation is another key component of the Swiss tax system.

The people and the cantons decided in June 1977 to slightly restrict the cantons' freedom regarding the design of their tax laws by adopting a constitutional article on the harmonisation of the direct taxes on income and wealth, and on profits and capital (art. 129 Cst).

In implementation of this constitutional mandate, Parliament adopted the Federal Act on the Harmonisation of Direct Taxation at Cantonal and Communal Levels (DTHA) on 14 December 1990. This is a framework law. It addresses the cantonal and communal legislators and stipulates the principles according to which they have to design the tax regime in terms of **tax liability, the object of the tax and the tax period, procedural law and the law relating to tax offences** (art. 129 para. 2 Cst).

In compliance with the constitutional mandate, the DTHA specifies that the **cantons** remain **responsible** for the setting of **tax scales, tax rates and tax exemption amounts** (art. 129 para. 2 Cst, as well as art. 1 para. 3 DTHA).

In contrast, the law does not contain provisions on the organisation of authorities. This remains reserved for the cantons, as the state and administrative structure of each one has its own specific features.

The DTHA entered into force on 1 January 1993. The cantons had a period of eight years to adjust their legislation in line with the framework law. Ever since that period expired, federal law applies directly in the event of cantonal tax law contradicting federal law (art. 72 paras. 1 and 2 DTHA).

The DTHA has already been revised several times since coming into effect.

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[7] The marginal tax rate refers to the tax rate applied to the next bracket of the tax base. It indicates the part of an additional taxable franc that has to be paid as tax.

The individual taxes

8 Federal taxes

Taxes on income and other direct taxes	Consumption taxes and other indirect taxes
Direct federal tax – on the income of individuals – on the profit of legal entities Federal casino tax Military service exemption tax	Value added tax Federal withholding tax Federal stamp duties Tobacco tax Beer tax Mineral oil tax Automobile tax Tax on spirits Customs duties

8.1 Taxes on income and profit as well as other direct taxes

8.1.1 Direct federal tax

The competence of the Confederation to levy direct taxes, initially in part based on emergency law, was only anchored on the constitutional level in 1958. In 1982 the «national defense tax» was renamed «direct federal tax» (dft). The duration of validity of the dft is however still limited and is prolonged periodically. It was most recently prolonged until the end of 2035, within the scope of the significant adoption of the New financial regime 2021 by the people and the cantons on 4 march 2018.

Legal basis

Art. 128 Cst

Federal Act on Direct Federal Tax of 14 December 1990 (DFTA)

The dft is levied on the income of individuals and the net profit of companies. The wealth of individuals and the capital of companies are in contrast not targeted by the dft.

The cantons assess and collect this federal tax annually for the Confederation, under its supervision.

With the entry into force of the NFE on 1 January 2008, the distribution key was modified. Up to the end of 2007, the Confederation received 70 % of the dft receipts and the cantons' share of 30 % was subdivided as follows: 17 % of the gross tax amount remained with the canton, and 13 % was used for intercantonal fiscal equalization. These equalization payments now flow into the federal coffers as well.

The revenue from dft goes into the Confederation's general fund coffers and, together with virtually all other federal receipts, is used to perform the Confederation's various tasks. Each canton delivers generally **83 %** of the tax amount, fines and interest it collects to the Confederation. In general, the **cantonal share** thus amounts to **17 %**.

The income tax is determined and collected for each tax period based on the income actually earned during this period. The tax period corresponds to the calendar year for individuals. The tax on the net profit of legal entities is also determined and collected for each tax period, whereby it corresponds to the business year.

8.1.1.1 Income tax for individuals

Individuals who are **permanent or temporary residents** in Switzerland are subject to **unlimited tax liability**. Tax residence is deemed to exist in the case of a stay in Switzerland (irrespective of a temporary interruption) if a person

- spends at least 30 days in Switzerland and is gainfully employed or
- spends at least 90 days in Switzerland and is not gainfully employed.

Moreover, individuals without tax domicile or residence in Switzerland are subject to **limited tax liability** if there is an **economic relationship** between the individual and certain tax objects (e.g. landed property, permanent establishment) located in Switzerland.

According to the principle of **family taxation**, the family forms a community and therefore also an economic unit from a tax point of view. Consequently, the incomes of spouses living in a legally and effectively intact marriage are aggregated for tax purposes irrespective of the marital property regime (art. 9 para. 1 DFTA). The same system has been applied by analogy to registered partnerships since 1 January 2007 (art. 9 para. 1bis DFTA).

The joint assessment is triggered by marriage whereupon the spouses are subject to a joint assessment for the whole tax period concerned. In case of death of one of the spouses, marriage ends and therefore also the joint assessment. In case of a divorce, a separation decreed by a court or even an actual separation, the spouses are assessed separately for the whole tax period.

The income of minors is added to that of the holder of parental responsibility, with the exception of earned income, for which the child is taxed independently.

Dft is levied on the **total income**, for example:

- Income from salaried employment and secondary activities (including supplementary income like long-service awards, tips, financial benefits from employee shares etc.);
- Income earned on a self-employed basis (including capital gains from the sale of business assets);

- Revenue from movable and immovable property;
- Income from pension schemes (annuities and lump sum benefits from 1st and 2nd pillar as well as from recognized forms of tied private pension schemes);
- Other income (e.g. winnings of over CHF 1 million from online-gambling or bulk gaming as well as winnings of over CHF 1,000 from lotteries and skill games for sales promotion.

Expenses incurred in order to earn the income, e.g. professional expenses, are generally deductible from gross income.

Furthermore, **general deductions** (e.g. private debt interest up to a certain amount, maintenance contributions, premiums and contributions to AHV/IV/EO/ALV, to occupational funds and tied private pension schemes as well as for life, health and accident insurance, interest from savings capital, costs of professionally oriented education and further training) and **social deductions** (e.g. for children, married couples and persons in need of support) are permitted.

The dft scales for the income of individuals are progressive. The term "progressive" means that the tax rates increase as the taxpayer's income increases, i.e. they are not proportional.

Dft is levied on the income of individuals based on three scales: a basic scale for single persons, a scale for married persons and a parental scale. The scale for married persons takes into account the limited financial capacity of a household with several individuals relative to a single-person household. Taxpayers who live together with children or persons in need of support in the same household and who take care of most of their upkeep are taxed according to the parental scale. This is comprised of the scale for married persons (basis) and a **deduction** of CHF 251 **from the tax amount** for each child or person in need of support.

Because tax amounts of less than CHF 25 are not collected (**collection minimum**), tax collection for the 2018 tax period commences with a taxable income of CHF 30,800 for married persons and single parent families, and respectively CHF 17,800 for all other taxpayers.

The **statutory maximum dft rate** is defined in the Cst and is 11.5 % (art. 128 para. 1 lit. a Cst). According to the tax rate applicable for the fiscal year 2018, this is reached in case of a taxable income of CHF 895,900 for married persons and single parent families or respectively or CHF 755,300 for all other taxpayers.

The scales are applied directly for calculating the tax amount. Therefore, there is no tax coefficient.

To compensate for the consequences of **bracket creep,** the scales and deductions for individuals are adjusted annually in line with the National Consumer Price Index. The level of the index on 30 June before the start of the tax period is decisive. An adjustment is excluded in the event of negative inflation.

The Constitution also specifies that the Confederation, in fixing the tax rates, shall take into account the burden of direct taxation imposed by the cantons and communes (art. 128 para. 2 Cst).

The gross revenue from dft on individuals amounted to approximately CHF 11.2 billion (including cantons' share) in 2018.

8.1.1.2 Profit tax for legal entities

Legal entities **headquartered or effectively managed in Switzerland** are generally liable to tax based on personal affiliation.

A distinction is made between two categories of legal entities:

- **Corporations**, i.e. stock corporations, partnerships limited by shares, limited liability companies, as well as **cooperatives;**
- **Associations, foundations and other legal entities** (public and ecclesiastical entities and institutions, as well as collective investment schemes with direct real estate ownership).

The gross revenue from dft on the profits of legal entities amounted to approximately CHF 11.4 billion (including cantons' share) in 2018.

Corporations and cooperatives

These companies pay a **tax on net profit**. There is no federal capital tax.

The tax rate of the dft is **proportional** and amounts to **8.5 %** of net profit. No tax coefficient is applied. The tax paid is deductible, reducing the effective tax rate.

Associated companies, i.e. corporations or cooperatives that have a stake of at least 10 % in the share capital or at least 10 % in profits and reserves of other companies or which have an interest in such capital with a market value of at least CHF 1 million, benefit from a tax reduction based on the relationship between the net revenue from these financial interests and total net profit. This **participation deduction** is granted in order to prevent multiple taxation via profit tax.

Associations, foundations and other legal entities

Associations, foundations, public and ecclesiastical entities and institutions are generally subject to profit or income tax at the federal level with a **proportional tax rate** of **4.25 %** of net profit, provided they are not tax exempt due to their charitable, social or similar purpose.

The same applies for collective investment schemes with direct real estate ownership.

The profit is not taxed unless it amounts to CHF 5,000 or more.

8.1.2 Federal casino tax

Following the removal of the casino ban from the Constitution in 1993, the Confederation received the power to collect a special tax on the receipts of casinos. However, this may not exceed 80 % of the gross gaming revenue, and it is assigned to the AHV/IV fund. Since 1 January 2019, the receipts of casinos holding an extended concession can also derive from operating online-gambling. If the canton where the casino is located also collects a similar tax, the Federal Council can reduce the tax levied by the Confederation on the gross gaming revenue of the terrestrial casinos holding a type B concession. The reduction corresponds to the amount of the cantonal tax, but it may not exceed 40 % of the total casino tax due to the Confederation.

Legal basis

Art. 106 Cst

Federal Act on Gambling of 29 September 2017 (Gambling Act, GamblA)

Casino tax has been collected by the Federal Gaming Board since April 2000. Gross gaming revenue is calculated as the difference between all game stakes and all winnings paid out in a regular fashion. The commissions collected by casinos for table games (as poker for instance) are also part of gross gaming revenue.

In 2017, the tax revenue from casino tax generated around CHF 272 million for the AHV/IV fund and CHF 45 million for the cantons where the casinos holding a type B concession are located.

8.1.2.1 Tax scales

- **Gross gaming revenue from terrestrial casinos:**
  The basic tax rate is 40 % for the first CHF 10 million of gross gaming revenue. For each additional million, the tax rate is increased by 0.5 % until it reaches the maximum rate of 80 %.
- **Gross gaming revenue from online-casinos:**
  The basic tax rate is 20 % for the first CHF 3 million of gross gaming revenue.
  The marginal tax rate increases thereafter according to the following levels to up to 80 %:

  a 2 % for each million gross gaming revenue between 3 and 10 million;

  b 1 % for each million gross gaming revenue between 10 and 20 million;

  c 0.5 % for each million gross gaming revenue between 20 and 40 million;

  d 0.5 % for each tranche of 4 million gross gaming revenue between 40 and 80 million;

  e 0.5 % for each tranche of 10 million gross gaming revenue of more than 80 million.

The Federal Council can reduce the tax rate by half during the first four years of a casino’s operation.

8.1.2.2 Tax reductions for casinos

The Federal Council can reduce the tax rate for casinos by up to a quarter, provided that the casino's revenue is largely used for public interests in the region, particularly for promoting cultural activities or for charitable purposes (e.g. promotion of sport, social measures, promotion of tourism). The tax reduction does not apply for online-gambling.

The Federal Council can lower the tax rate by up to a third if the casino is in a region that is economically dependent on highly seasonal tourism. If both reasons for a reduction apply, it can cut the tax rate in half at most. The tax reduction does not apply for online-gambling.

8.1.3 Military service exemption tax

Legal basis

Art. 40 para. 2 and art. 59 para. 1 and 3 Cst

Federal Act on the Military Service Exemption Tax of 12 June 1959 (MSETA)

Every Swiss male is required to perform military service (art. 59 para. 1 Cst). Anyone who, for whatever reason, fails (in whole or in part) to fulfil this duty personally by doing military or civilian service has to pay military service exemption tax in accordance with the MSETA. Despite the name, this is not a tax in the pure sense, but rather a **compensation charge**. The MSETA makes provision for various reasons for exoneration.

The cantons collect the military service exemption tax under the supervision of the Confederation. They receive a collection commission of 20 % for this.

In accordance with dft legislation, this exemption tax is levied on the total net income that the person liable to the tax earns in Switzerland and abroad. Dft forms the assessment basis. If the exemption tax cannot be determined on the basis of dft, it is assessed on the basis of a special exemption tax declaration.

The **exemption tax amounts to CHF 3 per CHF 100** of income liable to tax, but no less than CHF 400. However, it is reduced according to the total number of service days performed by the end of the relevant year. The reduction is one tenth for 50 to 99 military service days (75 to 149 civilian service days), plus another tenth for each set of 50 additional military service days (75 civilian service days) or fractions thereof.

The exemption tax assessment is carried out annually, generally in the year following the exemption year.

Only those who have performed the total number of mandatory service days are entitled to a refund of the exemption tax(es) paid.

The revenue from military service exemption tax amounted to approximately CHF 167 million (including the cantons' collection commission of 20 %) in 2018.

8.2 Consumption-based taxation

8.2.1 Value added tax

VAT was introduced on 1 January 1995. The change in system from turnover tax to value added tax was due largely to the establishment of VAT in all EU member states.

The completely revised VATA came into force on 1 January 2010. It contains numerous simplifications relative to the previous law and is generally more user-friendly. As of 1 January 2018 the VATA was partially revised, especially to eliminate VAT related disadvantages for domestic companies towards their foreign competitors.

Legal basis

Art. 130 Cst; Art. 196 no. 14 Cst transitional provisions

Federal Act on Value Added Tax of 12 June 2009 (VATA)

8.2.1.1 Taxation principle

VAT is a **general consumption tax**. It targets non-business-related domestic consumption of goods and services. It is levied at all stages of production, trade and the service sector (domestic tax), on the acquisition of services from companies domiciled abroad (acquisition tax), as well as on the importation of goods (import tax).

Anyone who carries on a business and is not exempt from tax liability is liable to the tax (domestic tax). A distinction has to be made between domestic and foreign companies. Decisive for the tax liability is the turnover earned worldwide from services that would be taxable if rendered domestically.

Exemption from tax liability is granted to any person domiciled or with a permanent establishment on Swiss territory, who:

- generates turnover of less than CHF 100,000 from taxable services on Swiss and/or foreign territory in a given year or
- generates turnover of less than CHF 150,000 from taxable services on Swiss and/or foreign territory as a non-profit, voluntarily-run sporting or cultural association or as a charitable institution.

Companies without domicile or permanent establishment on Swiss territory are only liable to tax if they:

- render services on Swiss territory and
- generate a turnover from taxable services of at least CHF 100,000 on Swiss and foreign territory (CHF 150,000 for charitable institutions and non-profit sporting or cultural associations).

In addition, companies which generate solely tax exempt turnover on Swiss territory can abstain from registration as a taxable person with the FTA.

The following are also liable to tax:

- anyone who in a given calendar year acquires services worth more than CHF 10,000 from businesses domiciled abroad, provided these businesses are not liable to tax in Switzerland (acquisition tax), as well as
- customs debtors regarding the tax on the importation of goods (import tax).

There are currently around 382,000 VAT payers in Switzerland.

The assessment basis is the revenue agreed or earned on domestic deliveries and services. In their VAT returns, taxpayers may deduct the tax paid on the goods and services they themselves acquire, as well as on the goods they import. This **input tax deduction** prevents a cumulative tax effect (taxed purchases and turnover taxation), i.e. net all-phase principle.

This principle is overridden in the case of services that are excluded from tax because the suppliers of such services are not entitled to any input tax deduction *(see special features below)*.

As VAT is intended to be borne by consumers, it is generally passed on to them by inclusion in the retail price or is added separately on the invoice.

8.2.1.2 Special features

The law makes a distinction between **zero-rated** and **exempted services**. No tax has to be paid for either category. However, there is a difference in terms of the entitlement to the input tax deduction. This entitlement exists only for the acquisition of goods and services that are used to provide services that are zero-rated.

If in contrast the goods and services acquired are used to provide services that are exempted from tax, no input tax deduction may be applied on the goods and services in question.

The following in particular are **zero-rated** (right to input tax deduction):

- Deliveries of goods that are directly transported or dispatched abroad;
- Cross-border transport services;
- Services for recipients whose place of business or residence is abroad.

Tax exempt (no right to input tax deduction) are for example services in the area of healthcare, education, culture, sports, banking and insurance as well as for letting or selling properties.

8.2.1.3 Tax rates

Normal rate
The tax is **7.7 %**.

Special rate
Accommodation services (overnight stays with breakfast) in the hotel and accommodation business (e.g. letting of holiday apartments) are subject to a rate of 3.7 % until the end of 2027.

Reduced rate
A reduced rate of **2.5 %** applies for certain categories of goods and services, particularly:

- Foodstuffs (except alcoholic beverages) according to the Foodstuffs Act of 20 June 2014 (exception: the normal rate applies for foodstuffs that form part of restaurant services);
- Cattle, poultry, fish;
- Seeds, living plants, cut flowers;
- Grains;
- Animal feed and fertilizer;
- Medications;
- Newspapers, magazines, books and other printed products without advertising character of the kinds to be stipulated by the Federal Council;
- Electronic newspapers, magazines and books without advertising character of the kinds to be stipulated by the Federal Council;
- Services of radio and television companies (exception: the normal rate applies for services of a commercial nature).

Taxpayers whose annual turnover does not exceed CHF 5.005 million and whose tax bill does not exceed CHF 103,000 per year can opt for a simplified tax return. The tax due is calculated by multiplying the total taxable gross turnover by the **net tax rate** for the sector in question.

With the application of such net tax rates, which are always lower than 7.7 %, there is no need to determine the eligible input tax deductible from the tax on turnover, as it is already taken into account when determining the net tax rate (examples: net tax rate for architects = 5.9 %, for bakeries = 0,6 %).

The net tax rates are used solely to calculate the tax due in VAT returns of the Federal Tax Administration (FTA). In contrast, the statutory tax rates of 7.7 %, 3.7 % or 2.5 % have to be applied in transactions with the recipients of services.

The percentage VAT rates in our neighbouring countries are as follows (as of 1.1.2019):

Germany	19 / 7
France	20 / 10 / 5.5 / 2.1
Austria	20 / 13 / 10
Italy	22 / 10 / 5 / 4

8.2.1.4 Tax collection

The FTA is responsible for levying and collecting the domestic and acquisition taxes.

In contrast, the Federal Customs Administration (FCA) is responsible for levying tax on imported items.

8.2.1.5 Earmarking of some receipts

According to the currently applicable constitutional provisions (art. 130 Cst, as well as art. 196 no. 14 Cst transitional provisions), about 20 % of VAT revenue is earmarked for social insurance, major railway projects and health insurance premium reductions, and therefore does not go to the general federal coffers:

- The revenue from one tax percentage point (1 % of the normal rate, 0.5 % of the special rate for accommodation services and 0.3 % of the reduced rate) is earmarked for social insurance.
- The revenue from 0.2 percentage points is used for financing major railway projects.
- 5 % of the remaining amount is used for health insurance premium reductions for lower income groups.

In 2018, the gross tax revenue generated by VAT amounted to approximately CHF 22.6 billion.

8.2.2 Federal withholding tax

Withholding tax is a **tax withheld at source** by the Confederation on the revenue from moveable capital assets (particularly interest and dividends), on winnings from gambling as well as from lotteries and skill games for sales promotion and on certain insurance benefits. It aims to prompt the recipients of the taxable benefits to declare to the authorities responsible their earnings and investment income subject to withholding tax, as well as the assets on which taxable profits were generated (so-called security purpose of the withholding tax). It is thus also a means of combating tax evasion.

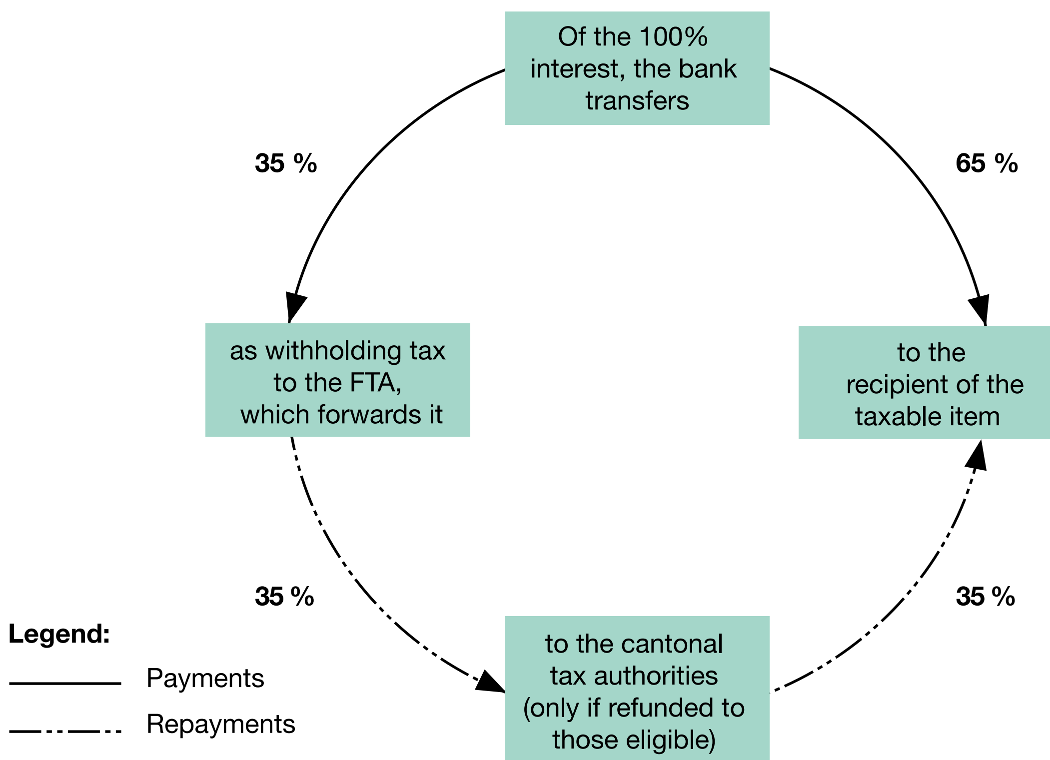
Legal basis

Art. 132 para. 2 Cst

Federal Act on Withholding Tax of 13 October 1965 (WTA)

Under certain conditions, withholding tax is **offset** against due cantonal and communal taxes or **refunded**. Consequently, the tax is not definitively charged to the recipients of the taxable benefits domiciled in Switzerland who fulfil their duty to declare concerning taxes on income and wealth.

By the example of an interest payment, the withholding tax mechanism can be shown as follows:



Withholding tax is an **impersonal tax,** i.e. it is levied without taking into account the economic capacity of the recipient of the taxable benefits.

The **tax rate** is

- **35 %** for moveable capital revenue and winnings from gambling as well as from lotteries and skill games for sales promotion;
- **15 %** for life annuities and pensions;
- **8 %** for other insurance benefits.

Domestic debtors (e.g. banks) of taxable items are liable to the tax. They have to pay the tax on the taxable item and transfer it coercively to its recipient (e.g. accountholder) by subtracting the tax from the benefits. In certain cases, the tax claim can be satisfied by notification instead of payment.

The tax debtor has to spontaneously register with the FTA, submit the prescribed statements and supporting documents, and at the same time pay the tax (principle of self-assessment).

If tax amounts are not paid on time, statutory default interest which is determined by the Federal Department of Finance (FDF) is payable without a reminder being issued.

A **refund of withholding tax** is granted as follows to recipients domiciled in Switzerland:

- To **individuals resident in Switzerland,** provided they duly declared the assets and the revenue earned on them in the relevant tax return for cantonal and communal taxes. The refund of withholding tax to individuals is carried out by the cantons, with the sum to be refunded generally being offset against the cantonal tax debt.
- To **legal entities domiciled in Switzerland,** provided that they duly booked particularly the earnings subject to withholding tax as revenue. Withholding tax is refunded directly to legal entities by the FTA.

The recipient of the taxable item has to apply for a withholding tax refund within three years from the end of the calendar year in which the taxable item became due.

If the aforementioned conditions are not met, no refund entitlement arises or else an existing entitlement is forfeited. Moreover, a refund is inadmissible in all cases where it would lead to tax avoidance.

Taxable item recipients who do not exercise their right to a refund or who forfeit it by breaching their tax duties are not released from the duty to pay the direct taxes due on the income and assets concerned.

Withholding tax constitutes a final tax in principle to **recipients domiciled abroad.** However, persons whose country of domicile has entered into a **DTA** with Switzerland are entitled to a full or partial withholding tax refund, depending on the regulations in the agreement, provided they meet the conditions set out therein.

In certain situations, exhaustively listed by the WTA and the Ordinance on Withholding Tax of 19 December 1966, taxpayers can also fulfil their tax duty by declaring the taxable item instead of paying the tax. In this case, there is no corresponding refund procedure. Under certain conditions, the same is valid for recipients domiciled abroad (certain companies) whose state of domicile has signed a DTA with Switzerland.

Gross withholding tax revenue totalled approximately CHF 7.7 billion (including cantons' share of 10 %) in 2018.

8.2.3 Federal stamp duties

Stamp duties are taxes levied by the Confederation on certain legal transactions, particularly the issuance of and trading in securities, i.e. the procurement and movement of capital, as well as insurance premium payments.

Legal basis

Art. 132 para. 1 Cst

Federal Act on Stamp Duties of 27 June 1973 (StA)

The Confederation levies three types of stamp duties: issuance duty, transfer duty and the duty on insurance premiums.

8.2.3.1 Issuance duty

Issuance duty is levied primarily on the **emission of domestic participation rights**. It is levied on the gratuitous and non-gratuitous issuance of and increase in the nominal value of participation rights in the form of shares of Swiss joint stock companies, initial capital contributions of Swiss limited liability companies, shares of Swiss cooperatives, profit sharing certificates and participation certificates of Swiss companies, cooperatives or commercial enterprises under public law.

The issuance duty is **1 %** of the amount that accrues to the company as consideration for the participation rights, but at least of the nominal value. Upon the foundation or capital increase of a joint stock company or a limited liability company, an exemption limit of CHF 1 million generally applies for the non-gratuitous issuance of participation rights. In the case of participation rights, Swiss companies are liable for payment of the tax.

Participation rights created or increased in association with mergers, conversions or splits of corporations or cooperatives and the transfer of a foreign company's headquarters to Switzerland are exempt from the issuance duty. To strengthen the stability in the finance sector, certain stock and conversion capital has been exempt from issuance duty.

The gross issuance duty revenue was approximately CHF 248 million in 2018.

8.2.3.2 Transfer duty

Transfer duty is levied on **purchases and sales** or similar paid property transfers of Swiss and foreign **securities** by domestic securities dealers.

The duty amounts to

- 1,5‰ for domestic securities and
- 3‰ for foreign securities.

The tax is calculated based on the consideration, i.e. on the price paid for the purchase or sale of a security.

The gross transfer duty revenue was approximately CHF 1.2 billion in 2018.

In order to keep the Swiss financial centre attractive despite the internationalisation of securities trading and the growing competition from foreign stock exchanges, the provisions concerning the object and the exceptions of the duty have been revised as required.

In particular, the following transactions or investors and contracting parties are **exempt from the duty:**

- The issuing business (with the exception of foreign fund units);
- Foreign banks, stock brokers or so-called central counterparties in terms of the Federal Act on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading of 19 June 2015 (FMIA) acting as a counterparty;
- Foreign stock exchanges (e.g. Eurex) acting as a counterparty for exercising standardised derivatives;
- Trading in subscription rights and options;
- Trading in money market papers;
- The foreign contracting party for transactions in foreign bonds (Eurobonds);
- Transactions for the trading portfolio of a professional securities dealer;
- Trading on behalf of Swiss and foreign investment funds;
- Certain foreign investors, often identified as institutional investors (states, central banks, social security and occupational pension institutions, life insurers);
- Foreign companies whose shares are listed on a recognised stock exchange (so-called corporates), including their consolidated group companies.

The **Swiss securities dealer** involved in the taxable transaction as an intermediary or contracting party is **liable for the tax**.

Aside from banks, bank-like finance companies in terms of the Federal Act on Banks and savings banks of 8 November 1934, the Swiss National Bank as well as the central counterparties in terms of the FMIA, also investment advisors, asset managers and holding companies are considered as securities dealers obliged to pay transfer duty.

Swiss occupational institutions (e.g. pension funds) and restricted financial security institutions, Swiss public bodies (Confederation, cantons and political communes and their entities) which show more than CHF 10 million of taxable certificates in their balance sheet respectively in their statement of account as well as Swiss social security institutions (e.g. AHV compensation fund) are deemed to be securities dealers.

In the event of intermediation, the securities dealer has to pay half of the tax for each contracting party that does not provide the dealer with proof of being a registered securities dealer or an exempt investor.

If a Swiss securities dealer acts on his or her own behalf within the framework of his or her own investment portfolio, he or she has to pay half of the tax for him- or herself as contracting party and another half for the counterparty, unless the latter provides proof of being a registered securities dealer or an exempt investor.

8.2.3.3 Duty on insurance premiums

This duty is due mainly on payments for single-premium redeemable life insurance with a single premium taken out by residents, civil liability, fire, collision and household contents insurance.

- The duty is calculated on the basis of the insurance premium and generally amounts to **5 %**.
- This does not apply for single-premium redeemable life insurance policies, which are subject to a rate of **2.5 %**.

Swiss insurers are generally liable for payment of the duty. If an insurance policy is taken out with a foreign insurer, the domestic policyholder is responsible for paying the duty.

Particularly personal insurance policies such as life insurance with periodic premium payments and health, accident, disability and unemployment insurance are exempt from the duty.

The gross revenue from the duty on insurance premiums was approximately CHF 703 million in 2018.

8.2.3.4 Tax collection

For all federal stamp duties, the person liable for paying the duty has to spontaneously register with the FTA, submit the prescribed statements and supporting documents, and at the same time pay the duty due (principle of self-assessment).

If duty amounts are not paid on time, statutory default interest is payable without a reminder being issued. The interest rate is determined by the FDF and is currently 5 %.

The law neither prescribes nor prohibits the passing on of stamp duties. Those liable are thus free to choose whether they bear the duties themselves or pass them on to others (e.g. insurance policyholder).

8.2.4 Special consumption taxes

The Confederation's special consumption taxes include tobacco tax, beer tax, mineral oil tax, automobile tax and the tax on spirits.

8.2.4.1 Tobacco tax

Legal basis

Art. 131 para. 1 lit. a Cst

Federal Act on Tobacco Taxation of 21 March 1969 (TTA)

Ordinance on Tobacco Taxation of 14 October 2009 (TTO)

This tax is levied on ready-to-use tobacco and substitute products manufactured in Switzerland for commercial purposes, as well as imported tobacco and substitute products.

Liable to tax are the producers of ready-to-use products manufactured in Switzerland or the customs debtors in the case of imported products.

The **rates** are as follows (since 1 April 2013):

- For **cigarettes**, the tax is calculated per unit (specific tax component) and as a percentage of the retail price. It is 11.832 centimes per unit and 25 % of the retail price, but no less than 21.210 centimes per unit.
- For **cigars**, the duty is 0.56 centimes per unit and 1 % of the retail price.
- For **fine-cut and water pipe tobacco**, the duty is CHF 38 per kg plus 25 % of the retail price, but at least CHF 80 per kg net weight.
- For **smoking tobacco other than fine-cut tobacco**, the duty is 12 % of the retail price.
- For **chewing tobacco and snuff**, the duty is 6 % of the retail price.

For a packet of cigarettes sold at CHF 8.60, the total tax amount is CHF 5.207, comprised of CHF 4.54 in tobacco tax, CHF 0.615 in VAT (7.7 % of the selling price) and various other taxes (CHF 0.052).

The duty is levied by the FCA, according to the principle of self-assessment for goods produced in Switzerland and according to the applicable regulations for customs duties in the case of imported products.

The total tobacco tax receipts (approximately CHF 2.1 billion in 2018) are mandatorily earmarked for **co-financing AHV/IV**.

8.2.4.2 Beer tax

Liable to tax are the producers (breweries) for beer produced in the customs territory and the customs debtors in the case of imported beer.

Beer tax is calculated per hectolitre and on the basis of the gravity of the wort, expressed in degrees Plato.

The tax amounts to:

- **Light beer** (up to 10.0 degrees Plato)
  CHF 16.88 per hectolitre;
- **Normal** and **special beer** (from 10.1 to 14.0 degrees Plato)
  CHF 25.32 per hectolitre;
- **Strong beer** (14.1 degrees Plato or more)
  CHF 33.76 per hectolitre.

No tax is levied on beer with an alcohol content of 0.5 % alcohol by volume (ABV) or less (non-alcoholic beer).

The tax rate is **reduced** as follows for beer brewed by independent producers whose annual production is less than 55,000 hectolitres:

- to 90 % in the case of annual production of 45,000 hectolitres;
- to 80 % in the case of annual production of 35,000 hectolitres;
- to 70 % in the case of annual production of 25,000 hectolitres;
- to 60 % in the case of annual production of 15,000 hectolitres or less.

The tax is levied by the FCA, according to the principle of self-assessment for beer produced in Switzerland and according to the applicable regulations for customs duties in the case of imported beer. The tax revenue amounted to approximately CHF 114 million in 2018.

Legal basis

Art. 131 para. 1 lit. c Cst

Federal Act on Beer Tax of 6 October 2006 (BTA)

Ordinance on Beer Tax of 15 June 2007 (BTO)

8.2.4.3 Mineral oil tax

This special consumption tax includes:

- a mineral oil tax on crude oil, other mineral oils, natural gas, the products obtained from the processing thereof and motor fuel;
- a mineral oil surtax on motor fuel.

Legal basis

Art. 131 para. 1 lit. e and para. 2 Cst

Mineral Oil Tax Act of 21 June 1996 (MinOTA)

The tax liability is at the trade level, with the tax being passed on to consumers via the product price. The mineral oil tax varies according to the product and its the use (motor fuel, combustible, technical purposes). For example, the **tax burden** per litre is:

- Petrol: **73.12 centimes**
  (including mineral oil surtax of 30 centimes per litre);
- Diesel: **75.87 centimes**
  (including mineral oil surtax of 30 centimes per litre);
- Extra-light heating oil: **0.3 centimes**[8].

Tax reductions are provided for in the case of motor fuel used in agriculture, forestry and professional fishing, as well as by licensed transport companies, for example.

Since July 2008, tax reductions have also been granted for biogenic fuel, provided the minimum ecological and social requirements set by the Federal Council are met.

The principles concerning the levying of mineral oil tax are as follows:

- Imported goods and goods produced and extracted domestically receive the same tax treatment. "Domestic" means within the Swiss territory and the customs union areas. "Domestic" does not include the Swiss customs enclaves (valleys of Samnaun and Sampuoir).
- The tax claim arises when the goods are released into free circulation under tax law. For imported goods, this is the time when the goods are released into free circulation under customs law. For goods in approved warehouses, the tax claim arises when the goods exit the warehouse or are used in the warehouse.
- The assessment basis is 1,000 litres at 15°C; for heavy distillates and a few other products, it is per 1,000 kg net mass. Volume-based taxation ensures a uniform tax burden without taking account of the density of the product.
- Approved warehouse owners and owners of compulsory stocks transmit tax returns electronically on a monthly basis. Importers can also request this procedure.
- Approved warehouses serve the purpose of storing, refining, producing and extracting untaxed goods. The production (including refinement), extraction and storage of untaxed goods must always take place in an approved warehouse.
- Gasoil intended for use as extra-light heating oil is coloured and marked to distinguish it physically from diesel.

[8] Extra-light heating oil is additionally subject to a CO_2 tax of 25.44 centimes per litre.

In 2018, consumers had to bear a burden of approximately CHF 4.58 billion, i.e. CHF 2.76 billion in mineral oil tax and CHF 1.82 billion in mineral oil surtax. With part of the net revenue from mineral oil tax on fuel, the Confederation finances part of its expenditures associated with road transport and aviation (approximately CHF 3.33 billion). The remainder of the net revenue (approximately CHF 1.25 billion) is intended for general federal budget expenses.

8.2.4.4 Automobile tax

The FCA levies a tax of 4 % on the value of imported or domestically manufactured automobiles.

Legal basis

Art. 131 para. 1 lit. d Cst

Vehicle Duty Act of 21 June 1996 (VDA)

For the purposes of the law, automobiles are light commercial vehicles (including minibuses) with a unit weight of no more than 1,600 kg, as well as passenger vehicles. Because of the insignificance of domestic production, 99.9 % of the receipts (approximately CHF 398 million in 2018) are generated upon importation. Electric vehicles are tax exempt.

The automobile tax replaced the former customs duties of a tax nature on automobiles and their parts.

A special feature of automobile tax is that, unlike customs duties and other special consumption taxes, it is levied also in the customs enclave of Samnaun.

8.2.4.5 Taxation of spirits

On spirits produced domestically as well as on imported spirits, the so called “spirit tax” is levied.

Legal basis

Art. 131 para. 1 lit. b Cst

Federal Act on Alcohol of 21 June 1932 (AlcA)

Ordonnance on Alcohol of 15 September 2017 (AlcO)

Personal use by agricultural producers is exempt from taxation. Moreover, persons aged 17 or more are allowed to import five litres of alcohol of up to 18 % ABV and one litre of more than 18 % ABV in tourist traffic without incurring any customs duties or spirit taxes.

Domestic and imported spirits are taxed at the same rate and using a uniform assessment basis. The **standard tax rate is CHF 29 per litre** of pure alcohol.

The tax is reduced by 50 % for:

- Wines made from fruits, berries or other raw materials with an alcohol content of between 15 % and 22 % ABV, as well as natural wines made from fresh grapes with an alcohol content of between 18 % and 22 % ABV;
- Wine specialities, sweet wines and mistelles with an alcohol content of no more than 22 % ABV;
- Vermouth and other wines made from fresh grapes flavoured with plants or aromatic substances with a maximum alcohol content of 22 % ABV.

Since 2004, a special tax of CHF 116 per litre of pure alcohol has been levied on alcopops (increase of 300 % of the tax rate).

Effective since 1 July 2009, a tax reduction of 30 % is granted to small producers for the first 30 litres of pure alcohol per year, provided the raw materials are exclusively cultivated from their own soil or wild growth they harvested themselves.

Domestic and imported spirits can be stored in a tax warehouse under tax suspension. Spirit tax has to be paid when the spirits are outsourced instead of at their removal from the tax warehouse.

The tax is levied by the FCA. For goods produced domestically, the tax has to be paid according to the principle of self-assessment, for imported goods according to the regulations applicable to customs duties.

The net revenue was approximately CHF 247 million in 2018. 90 % is attributed to social security (AHV and IV). The remaining 10 % is attributed to the cantons and has to be used to combat the causes and effects of addiction problems (“alcohol tenth”).

8.3 Customs duties

Legal basis

Art. 133 Cst

Customs Act of 18 March 2005 (CustA)

Customs Tariff Act of 9 October 1986 (CTA)

8.3.1 General

In the case of customs duties, the taxable event consists of crossing the customs border with goods. A customs debt also arises when goods are not used and are instead re-exported, for example. In terms of tax law, customs duties are thus an **economic transaction tax**.

According to art. 133 Cst, the Confederation can levy **customs duties** and other duties on the cross-border movement of goods. The specifics are set out in the customs tariff (appendix to the CTA).

The rates are almost exclusively **based on weight** (e.g. CHF X per 100 kg gross).

The revenue from customs duties goes into the federal coffers and amounted to approximately CHF 1.13 billion in 2018.

8.3.2 Import duties

8.3.2.1 Working tariff

The **tariff schedule** is based on the appendix to the International Convention on the Harmonised Commodity Description and Coding System.

The customs tariff with its some 8,850 tariff numbers contains the general tariff rates, which, with a few exceptions, are specified in the GATT Agreement. With the entry into force of the GATT/WTO

Agreement on 1 July 1995, the customs duty rates constitute the most important form of border protection for agricultural products, as most of the border duties were converted into customs duties.

The working tariff rates used in practice stem from deviations from the general tariff set independently or in state treaties.

8.3.2.2 Tariff preferences

Switzerland has entered into **free trade agreements** with various states and groups of states, for example the EFTA convention or the free trade agreement between Switzerland and the EU. For an exhaustive list see the Website www.seco.admin.ch → Foreign trade & Economic Cooperation → Economic Relations → Free Trade Agreements → List of Free Trade Agreements of Switzerland.

A product can enjoy a preferential rate (customs duty exemption or reduction) only if it fulfils the contractual origin provisions of the corresponding agreement and a valid certificate of origin is supplied. Preferential tariffs are also granted unilaterally to developing countries.

8.3.2.3 Variable components

To offset the Swiss food industry's price disadvantage on the domestic market, variable components are levied on certain processed agricultural products. The price disadvantage lies in the fact that the Swiss industry has to produce with more expensive primary materials than foreign competitors. By levying variable components, the prices of imported goods are raised to the Swiss level.

9 Cantonal and communal taxes

Legal basis

26 cantonal tax laws, various communal regulations

Federal Act on the Harmonisation of Direct Taxation at Cantonal and Communal Levels of 14 December 1990 (DTHA; see also the section on tax harmonisation in *chapter 7.4*)

As already mentioned earlier, the **cantons** are empowered to levy any type of tax that the Confederation does not claim solely for itself.

26 cantons	
Taxes on income and assets, as well as other direct taxes	Property and expenditure taxes
Income and wealth tax	Motor vehicle tax
Poll or household tax	Dog tax
Profit and capital tax	Entertainment tax
Inheritance and gift tax	Cantonal stamp duty
Lottery winnings tax	Lottery tax
Property gains tax	Water tax
Real estate tax	Miscellaneous
Real estate transfer tax	
Cantonal casino tax	

By contrast, the **communes** may levy taxes only to the extent authorised by the cantons (delegated fiscal sovereignty). Frequently, the communes levy their taxes in the form of supplements to the cantonal tax (communal tax coefficient), or else they simply get a share of the cantonal tax revenue.

The city of Basel does not levy any communal tax, as solely the canton has the right to levy taxes. However, the communes of Bettingen and Riehen levy communal taxes as a supplement to the cantonal taxes on income, wealth and property gains, for which they apply their own annual multiples expressed as a percentage of the cantonal tax due. The canton thus levies only 50 % of the cantonal income, wealth and property gains tax on the inhabitants of the two communes.

The taxes levied by the communes are stated in communal regulations in some cantons, whereas they are set out in cantonal laws in other cantons.

In the canton of Uri, separate tax rates are set out in the law on direct taxes for the canton, communes and parishes. Moreover, these three tax jurisdictions set the tax coefficient annually.

In the canton of Schwyz, the districts have their own annual tax coefficient.

2,220 communes	
Taxes on income and assets, as well as other direct taxes	Property and expenditure taxes
Income and wealth tax	Dog tax
Poll or household tax	Entertainment tax
Profit and capital tax	Miscellaneous
Inheritance and gift tax	
Lottery winnings tax	
Property gains tax	
Real estate tax	
Real estate transfer tax	
Trade tax	

In almost all cantons, the **parishes** of the three national churches (Protestant, Roman Catholic and, if represented, the Christian Catholic Church) levy a church tax on their members and usually also on the legal entities subject to tax in the canton.

The high number of taxes levied in Switzerland can appear surprising at first glance. In an international comparison, however, Switzerland does not stand out at all for the numerous taxes levied. What distinguishes it is the absence of a uniform legislative regime that applies to the entire territory for the individual taxes, particularly direct taxes.

The canton of Vaud does not have a separate church tax, as religious expenditure is financed with the revenue from ordinary taxes.

In the canton of Valais, where these costs are included in the communal budget, church tax is levied only in some communes.

The payment of church tax is optional for individuals in the cantons of Ticino, Neuchâtel and Geneva.

The payment of church tax is optional for legal entities in the cantons of Ticino and Neuchâtel. The cantons of Solothurn, Basel Stadt, Schaffhausen, Appenzell Ausserrhoden, St. Gallen, Aargau and Geneva do not impose any such tax on them.

9.1 Taxes on income and assets as well as other direct taxes

9.1.1 Preliminary remarks

Income and wealth taxes are **periodic (recurrent) taxes**. Consequently, the levying of them necessarily requires a temporal restriction. The time period for which the tax is due is governed by the tax period. The assessment period (period in which the income underlying the tax return is earned) is decisive for calculating and assessing the taxes. The value on a specific “**reference date**” (31.12.) is decisive for assessing wealth.

All cantons assess taxes according to the **postnumerando system** with one-year current assessment, whereby the **income actually earned** is taken into account. Therefore, the assessment period is identical to the tax period (tax year).

In general, these taxes are assessed **annually** based on a **tax return** that taxpayers have to complete and submit to the tax administration.

The applicable tax rate consists of two components in most cantons, i.e. the simple tax rate set by law and the tax coefficient set periodically.

These cantons' tax laws contain only the **basic tax scale**, i.e. the simple rates. The tax resulting from the basic scale is called **simple tax**. The cantonal or communal tax actually due results from multiplying this simple tax by the tax **coefficient**. The latter is a ratio and is generally reset annually by the legislative body.

In the case of income and wealth taxes for individuals, the communes generally apply the same assessment basis and the same scales as the canton.

The communes levy these taxes as a multiple (expressed in absolute figures or percent) of the cantonal basic tax scale, i.e. the simple cantonal tax, or as a multiple of the cantonal tax actually due.

With a few exceptions, this system applies also for communal profit and capital taxes for legal entities.

9.1.2 Income tax for individuals

All cantons and communes currently apply a system consisting of a general income tax and a supplementary wealth tax. Income tax is similar in structure to dft for individuals.

Total income is generally taxed in all cantons, i.e. no distinction is made between the individual components or their source.[9] Individuals have to pay tax in particular on the total income they earn from self-employment or gainful employment, replacement or secondary income, and as well as investment income from movable and non-movable assets, etc.

The Swiss system for the taxation of married couples is based on the principle of **household taxation** (see *chapter 8.1.1.1*). This means that the **income** of married couples living together is **aggregated**, and the income of minors is generally added to the income of the person holding parental custody as well. However, an exception is made for the employment income of minors, which is subject to an independent tax liability.

In all cantons, **expenses incurred in order to earn the income** (e.g. professional expenses or extraction costs) are **deductible** from the total gross income determined in this way.

[9] The partial taxation of dividends is an exception to this rule.

Furthermore, **general deductions** (deductions for insurance contributions, AHV/IV/EO/ALV premiums and contributions, contributions to occupational and individual pension funds, deduction in the event of both spouses earning an income, as well as private debt interest up to a certain amount, etc.) and **social deductions** (for married couples, for single parent families, for children and persons in need of support, etc.) are permitted. The amount of these deductions varies considerably from canton to canton.

The income tax scales are **progressive**[10] in almost all cantons, i.e. the tax rate increases as income increases, up to a certain limit. The progressiveness of the scales varies from one canton to the next.

All cantons take account of the **family situation** by making provision for special relief measures instead of or in addition to the deduction for married couples for spouses and equivalent taxpayers, e.g. single parent families, registered partnerships (see *Appendix II*).

9.1.2.1 Taxation at source

All cantons tax the earned income of foreign citizens without a residence permit (C permit) at source (withholding tax).[11]

The employer is obliged to deduct the tax due from the salary and to deliver this to the tax authority. The sum deducted covers the income taxes of the Confederation (dft), cantons and communes (including any church tax).

9.1.2.2 Expenditure-based taxation

In most cantons, foreigners who take up domicile or residence in Switzerland for tax purposes for the first time or following an absence of at least ten years and who do not exercise any gainful activity here can pay expenditure-based tax calculated with a simplified procedure instead of income tax based on an ordinary tax assessment (with the submission of a tax return). In some cantons, taxes on income as well as on wealth can be calculated according to expenditure-based taxation. This tax is generally calculated on the basis of the annual expenditure of taxpayers and their families. However, it may not be lower than the taxes calculated according to the ordinary scale on the income and wealth components of Swiss origin, as well as the income of foreign origin for which the taxpayer requests a partial or full remission of the foreign taxes by applying one of the DTAs concluded by Switzerland.

In the cantons of Basel Landschaft and Schaffhausen, expenditure-based taxation is now possible only in the year of arrival in the canton and only until the end of the tax period under way. In the cantons of Zurich, Basel-Stadt and Appenzell Ausserrhoden the expenditure-based taxation was abolished on the cantonal and communal level.

[10] Cantons of Uri and Obwalden: the income tax scale is proportional (flat-rate tax).

[11] Canton of Geneva: the income of minors is also taxed at source irrespective of their nationality.

9.1.3 Poll or household tax

In some cantons (Zurich, Lucerne, Uri[12], Nidwalden, Solothurn, Schaffhausen, Ticino, Vaud, Valais and Geneva), this generally fixed cantonal and/or communal tax has to be paid by (all) adults or the working population. It is levied in addition to income tax. The rates are low.

In the canton of Vaud, only the communes are authorised, but not obliged, to levy this tax (optional communal tax).

9.1.4 Wealth tax for individuals

All cantons and communes levy a tax on the assets of individuals. This is assessed annually at the same time as income tax (only one tax return for both taxes). A specific reference date is set for wealth tax.

In general, the taxpayer's **total assets** are subject to wealth tax. Total assets include all of the property and rights of which the taxpayer is the owner or holder of a usufruct. They are usually assessed at market value.

Taxable assets include in particular movable assets (e.g. securities, bank deposits, car) and immovable assets (e.g. land), redeemable life and annuity insurance, and assets invested in a business or farm.

Household goods and personal effects are not taxed.

The assessment basis for wealth tax is **net assets**, i.e. gross assets minus the taxpayer's documented debt.

Furthermore, **social deductions** that vary from canton to canton are also granted on net assets. Certain cantons do not provide for any social deductions and instead have a **tax-free minimum** that can be fairly high and can vary widely from canton to canton.

Most of the scales for wealth tax are **progressive**. The cantons of Lucerne, Uri, Schwyz, Obwalden, Nidwalden, Glarus, Appenzell Innerrhoden, St. Gallen and Thurgau have fixed tax rates (proportional tax).

Taking account of the deductions granted and the tax-free minimums, wealth tax liability starts at very different levels depending on the canton (in 2017, the amounts went from net assets of CHF 51,000 to CHF 261,000 for a married taxpayer without children).

In the case of foreign nationals with expenditure-based taxation, the cantons determine the extent to which that covers wealth tax.

[12] The tax is levied by the communes and parishes.

9.1.5 Profit and capital taxes for legal entities

Like for dft, the principle applicable for cantonal and communal taxes is that legal entities have to pay taxes where they are headquartered or effectively managed or are deemed to have economic affiliation based on certain facts.

Nearly all cantons and communes provide for a net profit tax as well as a tax on paid-up share capital and reserves for corporations and cooperatives.

In the canton of Uri in contrast, legal entities subject to ordinary taxation are not subject to a cantonal tax on capital. Only holding and management companies pay the canton a preferential capital tax.

Legal entities are not subject to any communal tax in the canton of Basel Stadt.

The tax is assessed for each tax period, which corresponds to the business year.

The tax on net profit is most commonly proportional (fixed tax rate). The rates are expressed in percent and are sometimes based on the earnings intensity or return (ratio of profits to capital and reserves):

- **Proportional tax** (fixed tax rate): Zurich, Lucerne, Uri, Schwyz, Obwalden, Nidwalden, Glarus, Schaffhausen, Appenzell Ausserrhoden, Appenzell Innerrhoden, St. Gallen, Graubünden, Thurgau, Ticino, Vaud, Neuchâtel, Geneva and Jura; plus Fribourg, where the scale for profits is progressive up to a certain level (CHF 50,000).
- **Mixed system** with a combination of several rates depending on earnings intensity or the amount of pro-fits: Bern, Zug, Solothurn, Basel Stadt, Basel Landschaft, Aargau and Valais.

Expressed in parts per thousand, the **tax on capital** is **proportional** in almost all cantons. However, the scale is slightly progressive (double tax rate) in the cantons of Graubünden and Valais.

Since the adoption of the second corporate tax reform, the cantons have the option of **offsetting profit tax against capital tax** (art. 30 para. 2 DTHA). Therefore, the taxpayers pay only the amount of the higher of the two taxes.

Corporations that generate some or all of their revenue from Swiss and foreign **financial interests (holding and investment companies)**[13] benefit from tax reductions in all cantons.

For example, companies that do not have any business operations in Switzerland and whose primary purpose consists in the long-term administration of financial interests **do not pay any tax on their net profit** if the financial interests or the revenue therefrom account for **at least two thirds** of the total assets or revenue (holding companies). These tax reductions are granted in order to avoid multiple corporate taxation. Moreover, the cantons levy only a **reduced capital tax** for holding companies.

Like the Confederation, all cantons also impose ordinary taxation on the revenue from real estate ownership in Switzerland (in the canton).

Management companies (domiciliary and mixed companies)[13] are companies that only have their headquarters in the canton and have no business operations there, or only subordinate business operations; instead, their operations are carried out almost exclusively abroad. These companies benefit from special tax treatment, as their **revenue from financial interests is exempt from tax** while the other income from Switzerland (in the case of secondary commercial or industrial activities) is entirely taxed according to the ordinary scale. Receipts from foreign sources are taxed in relation to the total receipts depending on the significance of the management or business activity carried out in Switzerland.

Regarding capital tax, most cantons use reduced scales that are similar or even identical to those for holding companies.

Moreover, the cantons can make provision in their legislation for the granting of tax relief in the form of temporary total or partial tax exemption for a maximum of ten years to **newly created companies** that serve the economic interests of the canton.

In the case of the other legal entities (associations, foundations, etc.), the profit tax procedure is generally the same as for corporations, but other scales may be applicable (frequently a specific scale, sometimes the scale for corporations, and only in a few cases the income tax scale for individuals).

All cantons tax the capital of these entities. They usually use a different scale or different tax rates for legal entities than for individuals.

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[13] With the popular vote of 19 May 2019, the Federal Act on Tax Reform and AHV-Financing (STAF) was adopted. This statute stipulates, among other things, to abolish the cantonal tax status for holding, investment, domiciliary and mixed companies. This measure will presumably enter into force on 1 January 2020.

9.1.5.1 Minimum tax

Most cantons have a minimum capital tax burden for corporations and cooperatives. The minimum for cantonal tax ranges between CHF 100 and CHF 900 per year depending on the canton in question. A communal tax may be added.

In order to tax so-called non-profit companies of economic significance as well, the cantons of Lucerne, Schwyz, Obwalden, Nidwalden, Fribourg, Basel Stadt, Schaffhausen, Appenzell Ausserrhoden, Thurgau, Ticino, Vaud and Valais subject certain legal entities to a minimum tax on turnover, real estate or invested capital. This is levied instead of the ordinary profit and capital taxes if it is higher.

9.1.6 Inheritance and gift taxes

Inheritance and gift taxes are levied only by the cantons and not by the Confederation. In a few cantons, the communes are also authorised to levy inheritance and gift taxes, but most of them do not levy the taxes themselves and instead merely take a share of the cantonal tax revenue.

In the canton of Zug, the tax is levied by the canton but the revenue goes to the communes. The communes have their own fiscal sovereignty in the canton of Graubünden.

Although almost all cantons levy both inheritance and gift taxes, the canton of Lucerne does not tax gifts. However, gifts made during the five years preceding the death of a decedent are included in the calculation of inheritance tax.

The cantons of Schwyz and Obwalden levy neither inheritance nor gift taxes.

Subject to inheritance tax is the **transfer of assets** to the statutory and designated heirs and to legatees.

Inter vivos gifts are subject to gift tax, with the definition of "gift" under civil law generally being applied.

In general, the **canton of the decedent's last place of residence** is entitled to levy inheritance tax on movable assets.

Inherited **real estate** is to be taxed in the **canton where it is located.**

The tax on gifts of movable assets is levied by the **canton where the donor is resident** at the time of the gift being given. The gift tax on immovable property is levied by the canton where the property is located.

Inheritance tax is almost entirely structured as a **hereditary succession tax**. As such, it is levied individually on the inheritance share of each heir or legatee.

The canton of Solothurn levies an **estate tax** on the entire undivided estate left behind by the deceased in addition to hereditary succession tax. The canton of Graubünden levies only an estate tax, but the communes can additionally levy a hereditary succession tax.

In general, the recipients of an inheritance or gift are **liable to tax** in all cantons. These are **heirs and legatees** in the case of inheritance tax, and **donees** in the case of gift tax.

Inheritance and gift tax is a **one-off tax**. In the case of inheritance, it is generally calculated on the basis of the value of the assets at the time of the decedent's death. The value of the gift at the time of asset transfer is decisive for gift tax.

In principle, the market value is decisive for calculating both taxes. Deviations from this principle apply in certain cantons in particular for securities, real estate and insurance benefits.

Tax exemptions, personal deductions and tax-free amounts are regulated differently in the individual cantons.

- The **surviving spouse** and surviving registered partner are exempt from tax in all cantons.
- **Direct descendants** are exempt from tax in most cantons, with the exception of Appenzell Innerrhoden (deduction of CHF 300,000), Vaud (tax-free amount of CHF 250,000, followed by a degressive deduction up to CHF 500,000) and Neuchâtel (deduction of CHF 50,000). Only the communes can levy tax on the inheritance of direct descendants in the canton of Lucerne (tax-free amount of CHF 100,000).
- **Direct ascendants** (depending on the canton only the parents, stepparents or adoptive parents) are exempt from tax in the cantons of Uri, Nidwalden, Zug, Fribourg, Solothurn, Basel Landschaft, Appenzell Ausserrhoden, Aargau, Ticino, Valais and Geneva. They are taxed in all other cantons, although most of them make provision for personal deductions (tax-free amounts) that vary from CHF 500 to CHF 200,000.

In the canton of Geneva, exemption from inheritance and gift tax is not permitted if the decedent was subject to expenditure-based taxation according to one of the last three definitive assessment decisions before the time of death.

The **tax scales** for inheritance and gift taxes are structured very differently in the various cantons. However, they are identical for both taxes in most cantons and are progressive in almost all cases. The tax burden generally depends on the degree of kinship and/or the amount of the assets. The cantons of Uri, Nidwalden, Appenzell Ausserrhoden, Appenzell Innerrhoden and St. Gallen apply linear tax rates depending on the degree of kinship.

The assessment of inheritance tax is mostly based on an **inventory of the estate** that has to be prepared upon the death of the decedent.

Gift tax is assessed on the basis of a **tax return**, which has to be submitted by the donee in most cantons.

9.1.7 Tax on winnings from gambling as well as from lotteries and skill games for sales promotion

Winnings from gambling as well as from lotteries and skill games for sales promotion are taxed in all cantons. Winnings from gambling in Swiss casinos (*see chapter 8.1.2*) as well as winnings from small games of chance are exempt from tax in all cantons.

In the cantons of Schwyz, Ticino, Valais and Jura, these winnings have been taxed separately from all other income with a **special rate** or **special scale** until now. In the cantons of Bern and Neuchâtel, lottery winnings have been assessed together with all other income, but taxed separately with a separate scale. It remains to be seen, whether these methods of taxation will be maintained after the revision of the cantonal statutes according to the Gambling Act.

In all other cantons, in contrast, such winnings are subject to **ordinary income tax** together with other income.

However, the cantons tax these winnings only if they exceed a certain amount.

9.1.8 Capital gains on movable private assets

Gains on the sale of movable private assets such as securities, works of art, etc. are **tax-free** with regard to dft, as well as in all cantons.

9.1.9 Property gains tax

At **federal level**, gains on the sale of land under **private assets** are explicitly **tax-free.** Only capital gains realised on the sale of real estate under business assets (part of the assets of a self-employed person or a legal entity) or derived from commercial trading in immovable property are subject to dft.

In contrast, all cantons tax property gains realized on the sale of the taxpayer's land. In almost half of the cantons, all of these property gains are subject to a special tax called "property gains tax" that is levied on the gains of individuals as well as those of legal entities. This is an exclusive tax, i.e. the gains are covered exclusively by this tax and are not burdened in any other way (unitary system).

In the other cantons, only property gains on the sale of individuals' **private assets** are subject to this **special tax**. In contrast, capital gains realized on the sale of real estate under **business assets** (self-employed persons or legal entities) or derived from commercial trading in immovable property (gains generated by real estate traders in the course of their business) are generally covered by **ordinary income or profit tax** and are added to the other income/profits (dual system like for dft).

In most cantons, the tax is levied exclusively by the canton. In the cantons of Obwalden, Fribourg, Basel Stadt, Schaffhausen, Graubünden and Jura, it is levied by both the canton and the communes. In the cantons of Zurich and Zug, only the communes levy such a tax in accordance with the regulations in the cantonal tax act.

Where property gains tax is levied exclusively by the canton, the communes generally get a share of the cantonal tax revenue in one form or another.

9.1.10 Real estate tax

Aside from wealth and capital taxes, more than half of the cantons also levy a tax on real estate.

This periodic real estate tax (also called property tax) is assessed and levied annually. It is generally assessed and calculated on the basis of the decisive tax value at the end of the tax period. It is primarily a communal tax. Where it is a cantonal tax, the communes generally get a considerable share of its revenue.

All of the communes in the cantons of St. Gallen, Ticino, Valais and Jura levy a communal tax on the real estate of individuals and legal entities located in the canton, whereas the communes in the cantons of Bern, Fribourg, Appenzell Innerrhoden, Graubünden and Vaud are authorised but not obliged to levy such a tax (optional communal tax).

Real estate tax is levied solely by the canton in the cantons of Thurgau and Geneva (no communal tax).

The cantons of Ticino and Valais levy a cantonal tax on the real estate of legal entities in addition to the communal tax on all real estate.

The canton of Vaud additionally has an optional cantonal and communal surtax, but only on legal entities' real estate used for investment purposes. However, the real estate – or parts thereof – of legal entities that the entity uses for its own commercial or industrial purposes is exempt.

The canton of Neuchâtel levies a tax only on the real estate of legal entities used for investment purposes and on the real estate of occupational pension institutions which are normally exempt from tax.

The **property is to be taxed where it is located**, without taking the taxpayer's place of residence into account.

When calculating the tax, non-agricultural real estate is generally calculated at its **market value**, whereas agricultural and forestry real estate is assessed at its **capitalised income value**. Real estate tax is calculated on the full value of the immovable property, i.e. without taking account of any debts on it, which cannot be deducted.

In the canton of Neuchâtel, real estate tax is calculated on the cadastral value of real estate used for investment purposes. It is not possible to deduct debt.

The tax is always **proportional**. Expressed in parts per thousand, the tax rate varies from **0.2‰** to **3.0‰** of the market, capitalised income or cadastral value.

In addition, the cantons of Lucerne, Obwalden, Nidwalden, Basel Stadt, Schaffhausen, Appenzell Ausserrhoden, Thurgau and Ticino levy a so-called **minimum tax** on the real estate of legal entities if this is higher than the sum of profit and capital taxes or higher than the minimum tax on gross receipts. The cantons of Obwalden and Nidwalden also levy such a tax on the real estate of individuals.

The canton of Uri has a similar minimum tax, but only on the immovable property of individuals who pay less than CHF 300 in cantonal, communal and church taxes in the canton per tax year.

The cantons of Zurich, Schwyz, Glarus, Zug, Solothurn, Basel Landschaft and Aargau **do not levy any real estate tax**.

9.1.11 Real estate transfer tax

Real estate transfer tax is a **legal transaction tax** on all **transfers of ownership of immovable property** (and the associated rights) located in the canton or commune. It is thus a tax on the change of ownership as such.

Real estate transfer taxes or fees are levied in all cantons and generally by the canton. Only in the cantons of Appenzell Ausserrhoden, St. Gallen and Graubünden[14] is real estate transfer tax a communal tax, whereas in the cantons of Fribourg, Vaud and Valais, the communes can levy this tax as well as the canton. When only the canton levies the tax, the communes sometimes get a share of the revenue.

The cantons of Zurich, Uri, Schwyz, Glarus, Zug, Schaffhausen, Aargau and Ticino do not levy any real estate transfer tax as such, only ownership transfer fees or land register fees.

In principle, the tax is calculated on the basis of the purchase price. The buyer of the immovable property (individual or legal entity) is generally liable for payment of the tax. In the cantons of Obwalden, Basel Landschaft and Appenzell Ausserrhoden, the buyer and seller each pay half of the tax, unless agreed otherwise.

[14] The canton's communal and church tax act forms the statutory basis; the commune sets the tax rate (max. 2 %).

The **tax scales** are generally **proportional** (fixed tax rates) and amount to **between 1 %** and **3.3 %** of the purchase price in most cantons and communes.

9.1.12 Cantonal casino tax

The cantons cannot levy any tax on grand casinos holding a type A concession.

All cantons with casinos holding a type **B concession** amended their tax legislation and introduced a tax on casinos' gross gaming revenue, although this may not be more than 40 % of the total casino tax due to the Confederation.

The cantons that received a type B concession are Bern, Schwyz, Fribourg, Schaffhausen, St. Gallen, Graubünden, Ticino, Valais, Neuchâtel, Geneva and Jura.

9.1.13 Trade tax

In the **Canton of Geneva, communes** can levy a trade tax (taxe professionnelle communale) on individuals and legal entities operating in a self-employed capacity, running a trading, commercial or industrial business or owning a permanent establishment or subsidiary in their territory.

The tax does not apply to the parts of agricultural operations that are not industrial or commercial in nature.

The tax is calculated on the basis of coefficients that are linked to the annual turnover, annual rental expenses for operating premises and the number of people working in the business.

9.2 Property and expenditure taxes

9.2.1 Motor vehicle tax

In order to be allowed on the roads, all motor vehicles and trailers located in Switzerland must be duly registered in the country. The cantons, generally the vehicle licensing office in the owner's canton of residence, are responsible for registering vehicles and issuing the **registration papers** (vehicle registration document) and **number plates** in the name of the vehicle owner.

For the cantons of Obwalden and Nidwalden, motor vehicle tax is levied by the Traffic safety centre OW/NW (Verkehrssicherheitszentrum).

Registered motor vehicles and trailers are subject to a motor vehicle tax, which is levied annually in all cantons. The tax does not apply to vehicles registered in the name of the Confederation, cantons, communes and their subdivisions, as well as foreign states' representations.

The holder of the vehicle in whose name the vehicle registration document and number plates were issued is liable to payment of the tax. Unlike in some neighbouring countries, Swiss number plates are tied to the vehicle owner (provided the owner stays in the same canton). Consequently, they do not follow the vehicle in the event of a change of ownership.

The tax amount varies according to the vehicle type. The assessment criteria are always technical features (depending on the canton: tax-related horsepower, kilowatts, engine displacement, load capacity, overall or unladen weight, environmental impact rating, etc.). The tax burden for the same vehicles varies considerably from canton to canton.

Certain vehicle categories or types of propulsion are frequently exempt from the tax (e.g. electric or hybrid vehicles) or benefit from tax reductions (e.g. vehicles in category A or B according to the federal energy label or CO_2 emissions).

For the sake of completeness, it should be mentioned here that the cantons also have a watercraft tax, particularly for motorboats, sailboats and barges, which have to be registered with a cantonal shipping authority.

9.2.2 Dog tax

The cantons and/or communes levy an annual dog tax. The tax can vary depending on the size or weight of the dog.

The amount of the tax can sometimes vary even from one commune to another within the same canton.

In certain cases there are tax reductions or tax exemptions (guide dogs, rescue dogs, etc.).

9.2.3 Entertainment tax

Entertainment tax is a tax on public events with payment of a fee and is levied in the form of either a **ticket tax** (usually 10 % of the admission fee or gross receipts) or a **flat-rate charge**.

It is levied in the cantons of Fribourg, Appenzell Ausserrhoden, Ticino (only cinemas), Neuchâtel and Jura. Entertainment tax is an optional communal tax in the cantons of Lucerne, Solothurn and Vaud.

9.2.4 Cantonal stamp duties and register duties

Aside from the federal stamp duties, cantonal stamp duties are also levied in the cantons of Ticino, Vaud, Valais and Geneva on documents issued by court or administrative authorities to individuals (judgments, identity documents, register extracts, etc.), documents and petitions submitted by individuals to the aforementioned authorities (pleadings, requests, appeals, etc.), as well as documents regarding legal transactions of all types (contracts, wills, receipts, etc.).

In the canton of Vaud, only **contracts creating a charge on immovable property** are subject to stamp duty.

The canton of Valais additionally levies stamp duty on **playing cards**.

Furthermore, the canton of Geneva has **register duties**, which are closely related to stamp duties and are levied on the mandatory and optional entry of public and private documents in a special official register. These duties are tax-like in nature.

According to art. 134 Cst, no cantonal or communal stamp or register duties may be levied on documents that are subject to federal stamp duty according to art. 132 para. 1 Cst or that have been declared as exempt by it.

9.2.5 Lottery tax

A tax is levied on public, non-professionally organised lotteries, raffles, etc. in most cantons. This is usually levied by the canton and more rarely by the communes. The communes sometimes get a share of the revenue from the tax levied by the canton.

However, this tax is usually in the form of an **authorisation fee**. It is tax-like in nature in only a few cantons.

The events subject to fees or taxes are regulated very differently in the individual cantons. This is also the case for the amount of the tax. The tax is usually based on the amount of the lottery or stake total (either with a fixed rate or a degressive or progressive percentage), but it can sometimes be according to other criteria (e.g. size of the event premises).

The cantons of Zurich, Basel Stadt, Schaffhausen, Thurgau and Neuchâtel have no tax or duty of this type.

9.3 Other duties

9.3.1 City tax/visitor's tax

A city tax is levied in most cantons. Only the cantons of Zurich and Thurgau have no such tax. In the cantons of Solothurn, Graubünden, Aargau and Vaud, the law allows the communes (AG: only communes with spa facilities) to levy such a tax, but it does not oblige them to do so.

It is usually collected by the local tourist office, and sometimes by the commune.

9.3.2 Tourism promotion tax

The cantons of Appenzell Innerrhoden and Geneva levy a so-called tourism promotion tax on companies that carry out a business or commercial activity and benefit from the direct or indirect effects of tourism.

It is based on the benefits and added value that the taxpayers derive from tourism. The revenue from this tax is intended for developing and promoting tourism.

Communes in the cantons of Bern, Lucerne, Glarus, Fribourg, Graubünden, Ticino, Vaud and Valais also have the option of levying such a tax or a similar one.

9.3.3 Fire brigade exemption tax

Most cantons have a fire brigade exemption tax that is levied by either the canton or the commune. In principle, it is levied on individuals subject to fire brigade service who do not do any such service.

There is no such tax in the cantons of Zurich, Basel Stadt, Ticino, Vaud and Geneva.

9.3.4 Water tax

This tax must be paid by hydroelectric power stations for using the hydropower beyond a certain gross output.

There is no such tax in the cantons of Zurich, Fribourg, Basel Stadt, Basel Landschaft, Schaffhausen, Thurgau and Ticino.

It has to be distinguished from the water charge levied for disposing of water (water sovereignty), which represents a payment for water used.

Appendix

I Tax burden

Because of the differences in cantonal tax laws the tax burden may vary not only from canton to canton, but also from commune to commune within the same canton.

Concerning the level of the effective tax burden in the cantons we refer to the document "Tax burden in the cantonal capitals 2017" on the Website of the FTA:
www.estv.admin.ch/estv/en/home.html → General → Tax Statistics → Specialist information → Tax burden

Customised calculations of income tax can be carried out with the Tax Calculator on the Website of the FTA:
www.estv.admin.ch/estv/en/home.html → General → Tax Information → Services → Tax Calculator

II Tax relief measures for married couples

Due to the progressive nature of the income tax scales, the family taxation principle can lead to unjustified increases in the tax burden. In order to prevent a tax disadvantage for married couples via-à-vis cohabiting couples, the Confederation and cantons introduced – in addition to possible deductions – certain relief measures in favour of married couples:

Special scales for single persons, married couples and families: dft.

Within the scope of dft, families with children receive further relief by means of a parent scale (deduction of CHF 251 on the tax amount as a complement to the deduction for children) and a deduction of a maximum of CHF 10,100 for third-party childcare.

Double scale: aside from a singles' scale, there is a married persons' scale that provides relief for married couples in Zurich, Bern, Lucerne, Zug[15], Basel Stadt[15], Appenzell Ausserrhoden, Ticino and Jura.

Splitting procedure: Schwyz, Nidwalden, Glarus, Fribourg, Solothurn, Basel Landschaft, Schaffhausen, Appenzell Innerrhoden, St. Gallen, Graubünden, Aargau, Thurgau, Neuchâtel and Geneva apply full or partial splitting. The total income of married couples is taxed at the rate that would be applicable to

- 50 % of total income: Fribourg, Basel Landschaft, Appenzell Innerrhoden, St. Gallen, Aargau, Thurgau and Geneva (full splitting);
- 52.63 % of total income: Schwyz, Solothurn, Schaffhausen and Graubünden (divisor 1.9);
- 54.05 % of total income: Nidwalden (divisor 1.85);
- 55 % of total income: Neuchâtel (divisor $1.\overline{81}$);
- 62.5 % of total income: GL (divisor 1.6).

What is splitting?

With a splitting procedure, the income of married couples is added together, but a specific divisor (2 for full splitting, 1.1 to 1.9 for partial splitting) is applied to this total income to determine the relevant tax rate. Therefore, the couple's total income is then taxed at this tax rate, which is usually significantly lower.

A total income of CHF 100,000, for instance, is thus taxed at the rate for CHF 50,000 in Fribourg, Basel Landschaft, Appenzell Innerrhoden, St. Gallen, Aargau, Thurgau and Geneva, at the rate for CHF 52,630 in Schwyz, Solothurn, Schaffhausen and Graubünden, at the rate for CHF 54,000 in Nidwalden, at the rate for CHF 55,000 in Neuchâtel and at the rate for CHF 62,500 in Glarus.

Taxation by consumption unit: a variable divisor that depends on the composition and size of the family is applied to a family's total income in order to determine the tax rate. Only the canton of Vaud has this system which is a kind of splitting that is extended to children and single parent families.

[15] Cantons of Zug and Basel Stadt: the married persons' scale corresponds practically to full splitting.

The quotients are as follows:

- 1.0 for single, widowed, separated or divorced individuals;
- 1.8 for married couples living together;
- 1.3 for single, widowed, separated or divorced individuals living in a household with children who are minors, apprentices or students for whom they are financially entirely responsible; cohabiting couples are not entitled to a quotient of 1.3;
- 0.5 for each child who is a minor, apprentice or student who is fully financially dependent on the taxpayer.

Example: For a married couple with two children, the divisor is 2.8 (1 × 1.8 for the couple + 2 × 0.5 for the children).

A total taxable income of CHF 100,000 is thus divided by 2.8. The result (CHF 35,700) forms the basis for determining the tax rate, although the rate is applied to the income of CHF 100,000.

However, there is a cap on the reduction of the decisive income for the tax rate (weakening of the effects of taxation by consumption unit).

Some cantons have **another system**:

- Uri: with flat-rate tax, the social deductions are scale-like in nature;
- Obwalden: percentage deduction on net income;
- Valais: tax rebate.

The aim of all of these procedures is to “break” the progressivity of tax scales and thereby bring the tax burden of married couples into line with that of cohabiting couples.

III Teaching materials on taxes

Aside from this brochure, the Team Documentation and Tax information of the FTA has elaborated other teaching materials (in French and German and sometimes Italian). They are as follows:

- Young people can familiarise themselves independently with the topic of taxes on www.steuern-easy.ch, where they will discover what they need to know about tax matters. They can test what they have learned with quizzes and fill out a tax return for one of five characters in a fun way.
- The **brochure "Guide for future taxpayers":** with its numerous illustrations and caricatures, this brochure gives readers an overview of the assessment of individuals' income and wealth taxes in a language everyone can understand. It also goes into more detail on special tax circumstances often faced by young and new taxpayers. This publication is designed primarily for teaching at school, but it can be of great help to all taxpayers. It is not available in English, but in French, German and Italian.
- The **"Tax information" dossier:** this documentation supplies detailed information regarding different subjects of taxation. It is not available in English, but in French and German.

The "Guide for future taxpayers", "The Swiss Tax System" and the "Tax information" dossier can be viewed on the Website of the FTA in the available languages.

In addition, there is a link leading to the Website www.steuern-easy.ch.

"The Swiss Tax System" in English can be found at: www.estv.admin.ch/estv/en/home.html → General → Tax Information → Specialist information → Swiss Tax System.

It can also be ordered in hardcopy form at:

- Eidgenössische Steuerverwaltung
  Direktionsstab
  Dokumentation und Steuerinformation
  Eigerstrasse 65
  3003 Bern
  E-Mail: ist@estv.admin.ch
- or at
  www.estv.admin.ch/estv/en/home.html → General → Tax Information → Specialist information → Swiss Tax System → order publication.

IV Tax administration addresses

FTA	Address:	Federal Tax Administration, Eigerstrasse 65, 3003 Bern
	Telephone:	058 462 70 68
	Email:	ist@estv.admin.ch
	Website:	www.estv.admin.ch
Aargau	Address:	Kantonales Steueramt, Tellistrasse 67, Postfach 2531, 5001 Aarau
	Telephone:	062 835 25 30
	Fax:	062 835 25 39
	Email:	steueramt@ag.ch
	Website:	www.ag.ch
Appenzell Ausserrhoden	Address:	Kantonale Steuerverwaltung, Gutenberg-Zentrum, 9102 Herisau 2
	Telephone:	071 353 62 90
	Fax:	071 353 63 11
	Email:	steuerverwaltung@ar.ch
	Website:	www.ar.ch
Appenzell Innerrhoden	Address:	Kantonale Steuerverwaltung, Marktgasse 2, 9050 Appenzell
	Telephone:	071 788 94 01
	Fax:	071 788 94 19
	Email:	steuern@ai.ch
	Website:	www.ai.ch
Basel Landschaft	Address:	Kantonale Steuerverwaltung, Rheinstr. 33, 4410 Liestal
	Telephone:	061 552 51 20
	Email:	steuerverwaltung@bl.ch
	Website:	www.steuern.bl.ch
Basel Stadt	Address:	Steuerverwaltung, Fischmarkt 10, Postfach, 4001 Basel
	Telephone:	061 267 46 46
	Fax:	061 267 42 82
	Email:	steuerverwaltung@bs.ch / steuerbezug@bs.ch
	Website:	www.steuerverwaltung.bs.ch
Bern	Address:	Steuerverwaltung des Kantons Bern, Brünnenstrasse 66, 3018 Bern
	Post Address:	Postfach 8334, 3001 Bern
	Telephone:	031 633 60 01
	Fax:	031 633 60 60
	Email:	info.sv@fin.be.ch
	Website:	www.be.ch
Fribourg	Address:	Kantonale Steuerverwaltung, Rue Joseph-Piller 13, 1701 Freiburg
	Telephone:	026 305 32 75
	Fax:	026 305 32 77
	Email:	SCC@fr.ch
	Website:	www.fr.ch

Geneva	Address:	Administration fiscale cantonale, Rue du Stand 26, Case postale 3937, 1211 Genève 3
	Telephone:	022 327 70 00
	Fax:	022 546 97 35
	Email:	(contact via website)
	Website:	www.ge.ch
Glarus	Address:	Kantonale Steuerverwaltung, Hauptstrasse 11/17, 8750 Glarus
	Telephone:	055 646 61 50
	Email:	steuerverwaltung@gl.ch
	Website:	www.gl.ch
Graubünden	Address:	Kantonale Steuerverwaltung, Steinbruchstrasse 18/20, 7001 Chur
	Telephone:	081 257 21 21
	Fax:	081 257 21 55
	Email:	info@stv.gr.ch
	Website:	www.stv.gr.ch
Jura	Address:	Service cantonal des contributions, Rue de la Justice 2, 2800 Delémont
	Telephone:	032 420 55 30
	Fax:	032 420 55 31
	Email:	secr.ctr@jura.ch
	Website:	www.jura.ch
Lucerne	Address:	Dienststelle Steuern des Kantons Luzern, Buobenmatt 1, 6002 Luzern
	Telephone:	041 228 56 56
	Email:	dst.pd@lu.ch
	Website:	www.steuern.lu.ch
Neuchâtel	Address:	Service cantonal des contributions, Rue du Docteur-Coullery 5, 2301 La Chaux-de-Fonds
	Telephone:	032 889 77 77
	Fax:	032 889 60 85
	Email:	service.contributions@ne.ch
	Website:	www.ne.ch
Nidwalden	Address:	Kantonales Steueramt, Bahnhofplatz 3, Postfach 1241, 6371 Stans
	Telephone:	041 618 71 27
	Fax:	041 618 71 39
	Email:	steueramt@nw.ch
	Website:	www.steuern-nw.ch
Obwalden	Address:	Kantonale Steuerverwaltung, St. Antonistrasse 4, 6061 Sarnen
	Telephone:	041 666 62 94
	Email:	steuerverwaltung@ow.ch
	Website:	www.obwalden.ch
Schaffhausen	Address:	Kantonale Steuerverwaltung, J. J. Wepfer-Strasse 6, 8200 Schaffhausen
	Telephone:	052 632 79 50
	Fax:	052 632 72 98
	Email:	sekretariat.stv@ktsh.ch
	Website:	www.sh.ch

Schwyz	Address:	Kantonale Steuerverwaltung, Bahnhofstrasse 15, Postfach 1232, 6431 Schwyz
	Telephone:	041 819 23 45
	Fax:	041 819 23 49
	Email:	stv@sz.ch
	Website:	www.sz.ch
Solothurn	Address:	Steueramt des Kantons Solothurn, Werkhofstrasse 29 c, 4509 Solothurn
	Telephone:	032 627 87 87
	Fax:	032 627 87 00
	Email:	steueramt.so@fd.so.ch
	Website:	www.steueramt.so.ch
St. Gallen	Address:	Kantonales Steueramt, Davidstr. 41, 9001 St. Gallen
	Telephone:	058 229 41 21
	Fax:	058 229 41 02
	Email:	ksta.dienste@sg.ch
	Website:	www.steuern.sg.ch
Ticino	Address:	Divisione delle contribuzioni, Vicolo Sottocorte, 6501 Bellinzona
	Telephone:	091 814 39 58
	Fax:	091 814 44 88
	Email:	dfe-dc@ti.ch
	Website:	www.ti.ch
Thurgau	Address:	Kantonale Steuerverwaltung, Schlossmühlestrasse 15, 8510 Frauenfeld
	Telephone:	058 345 30 30
	Fax:	058 345 30 31
	Email:	info.sv@tg.ch
	Website:	www.steuerverwaltung.tg.ch
Uri	Address:	Amt für Steuern, Tellsgasse 1, Postfach 950, 6460 Altdorf
	Telephone:	041 875 21 17
	Fax:	041 875 21 40
	Email:	steueramt@ur.ch
	Website:	www.ur.ch
Vaud	Address:	Administration cantonale des impôts, Route de Berne 46, 1014 Lausanne
	Telephone:	021 316 21 21
	Email:	info.aci@vd.ch
	Website:	www.vd.ch/impots
Valais	Address:	Service cantonal des contributions, Avenue de la Gare 35, 1951 Sion
	Telephone:	027 606 24 50 (French) 027 606 24 51 (German)
	Fax:	027 606 25 76
	Email:	scc@admin.vs.ch
	Website:	www.vs.ch

Zug	Address:	Kantonale Steuerverwaltung, Postfach 160, 6301 Zug
	Telephone:	041 728 26 11
	Fax:	041 728 26 99
	Email:	(contact via website)
	Website:	www.zg.ch
Zurich	Address:	Kantonales Steueramt, Bändliweg 21, Postfach, 8090 Zürich
	Telephone:	043 259 40 50
	Fax:	043 259 61 94
	Email:	(contact via website)
	Website:	www.steueramt.zh.ch