

# **Pricing in the Taxman: Corporate Tax Incidence and Commercial Real Estate**

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# Motivation

Who bears the burden of corporate taxes?

- ▶ **Capital owners** through lower profits (Harberger '62)
- ▶ **Workers** through lower wages (Fuest et al. '18, Kotlikoff & Summers '87)
- ▶ **Consumers** through higher retail prices (Baker, Sun, & Yannelis '20)
- ▶ **Residential land owners** through lower rents (Suárez Serrato and Zidar '16, '23)

▶ What about Commercial Land?

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- ▶ What about **Commercial Land**?

# Motivation

Why should we study tax incidence on commercial property?

- land is a necessary factor of production for almost all firms
- immobile factors of production are likely to bear a higher fraction of the corporate tax burden (see also [2])
- current research abstracts from firm mobility wrt. corporate taxes to affect real estate markets (see Serrano and Zidar '16, [3])
- neglecting this could lead to an overestimation of the burden born by other factors of production
- it may affect the progressivity of corporate taxes

# Motivation

Why should we study tax incidence on commercial property?

- ▶ land is a necessary **factor of production** for almost all firms
- ▶ **immobile factors** of production are likely to bear a higher fraction of the corporate tax burden (Auerbach '06)
- ▶ current research abstracts from firm mobility wrt. corporate taxes to affect real estate markets (Suárez Serrato and Zidar '16, '23)
- ▶ neglecting this could **lead to an overestimation** of the burden born by other factors of production
- ▶ it may affect the **progressivity of corporate taxes**

# This Paper

## 1. > 4,000 Tax Changes + Rich Microdata

- ▶ exploit variation from German local business tax
- ▶ unique real estate data + municipal panel

## 2. Empirics

- ▶ local open economy DiD comparing municipalities of similar size, and growth path
- ▶ estimate causal effect of corp. tax hikes on commercial property prices & rents + residential property + corporate profits

## 3. Stylized Model

- ▶ add a commercial real estate market to spatial equilibrium model
- ▶ calculate the distributional effects across capital owners + workers + residential and commercial property owners

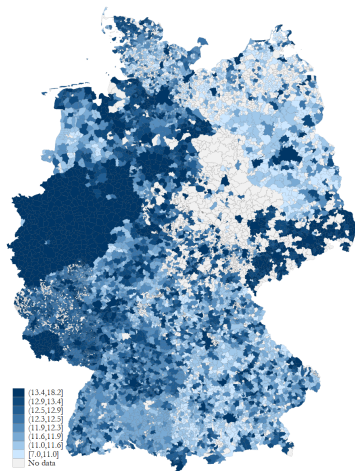
# Institutions and Data

- ▶ Use variation in local business tax (LBT) rates in Germany (Fuest et al. '18; Link et al. '24)
- ▶ Panel data on  $\sim 11,000$  German municipalities and their LBT rates between 2008-18
- ▶ Municipal governments set scaling factor independently every year:

$$\text{LBT Rate} = \text{Federal Basic Tax Rate} \times \text{Municipal Scaling Factor}$$

- ▶ Every year 10% of municipalities change their LBT  
 $\Rightarrow \sim 4,000$  hikes in sample

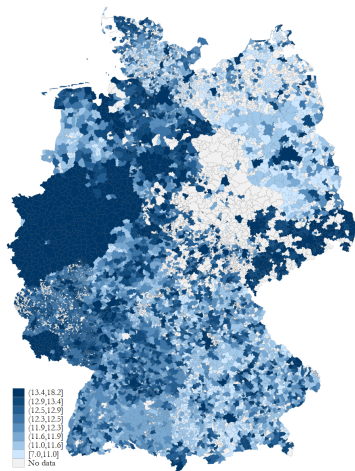
# Local Business Taxation in Germany



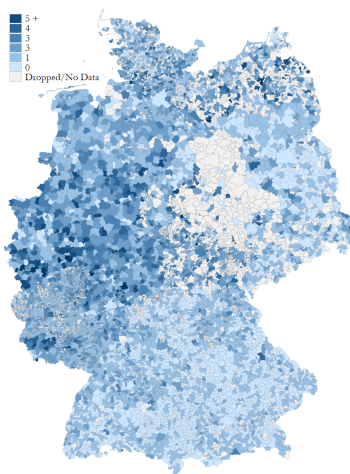
Average LBT rates are  $\sim 7 - 20\%$   
(2008-18)



# Local Business Taxation in Germany

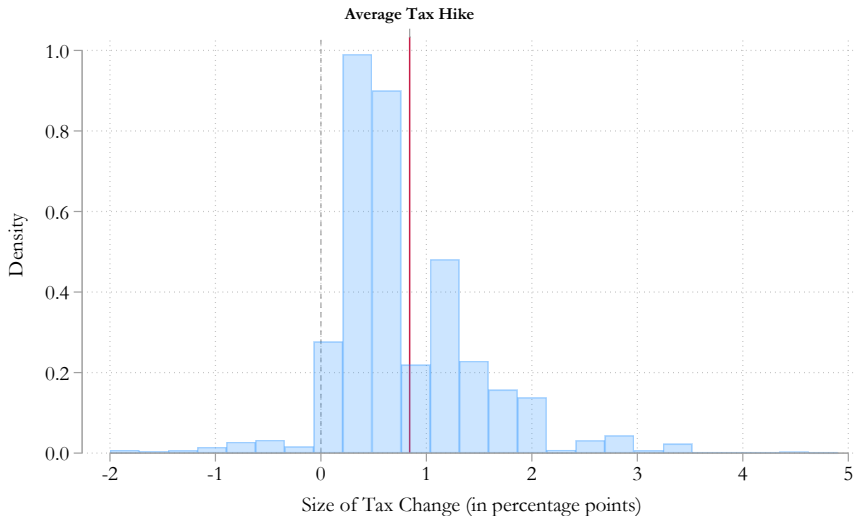


Average LBT rates are  $\sim 7 - 20\%$   
(2008-18)



Few Municipalities increase LBT more  
than 5 times between 2008-18

# Municipalities increase the LBT by 0.8%p on average



# Property Data

- ▶ Large and detailed micro-dataset on the German real estate market provided by F+B
- ▶ Information on prices, rents, constr. year, floor size, # rooms, and more
- ▶ Sample comprises information on residential and commercial properties offered for sale and rent between 2008-18:

Property Type	Rents	Sales
Residential	~ 13 Mio. obs.	~ 15 Mio. obs.
Commercial	~ 2.4 Mio. obs.	~ 1.1 Mio. obs.

# Property Data

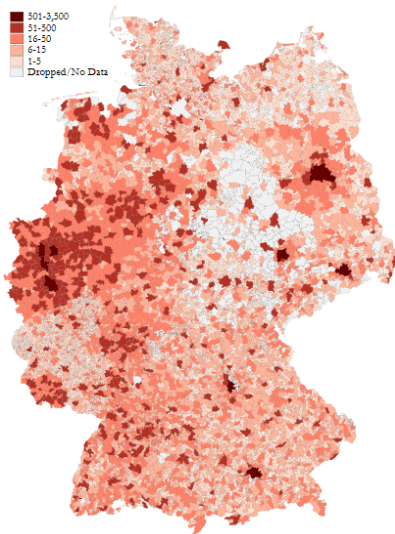
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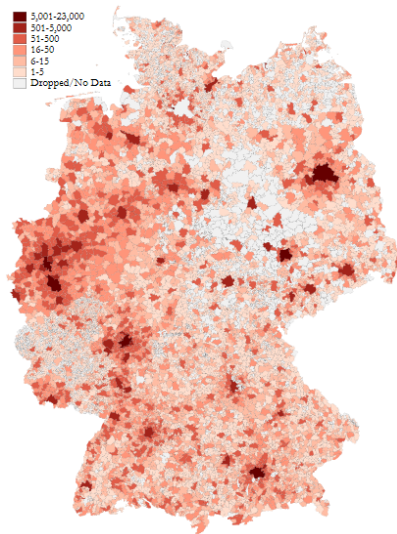
# Sample Restrictions

	# Municipalities	# Tax Hikes	# Properties
Municipality Data (2008–18)	11,085	13,859	-
Dropped mergers	10,638	12,640	-
No tax drops (results robust to drops)	10,113	11,924	-
Merge with Property Data	9,556	8,094	1,074,272
>5 Ads per year	6,561	4,627	1,002,914
Max. 1 Tax Hike	4,218	1,214	598,775

# Distribution of Postings



Sales Sample



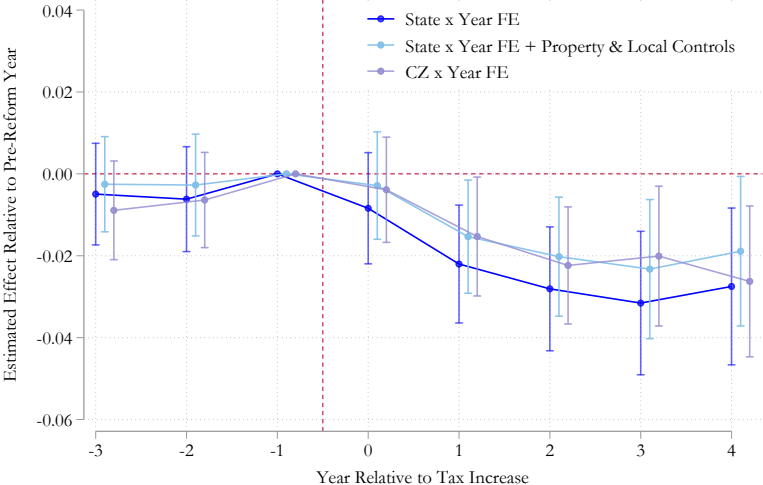
Rents Sample

# Empirical Strategy

$$\ln(p_{i,m,t}) = \sum_{j=-4}^5 \beta_j \Delta LBT_{m,t}^j + \delta X_{i,m,t} + \mu_m + \theta_{s,t} + \varepsilon_{i,m,t}.$$

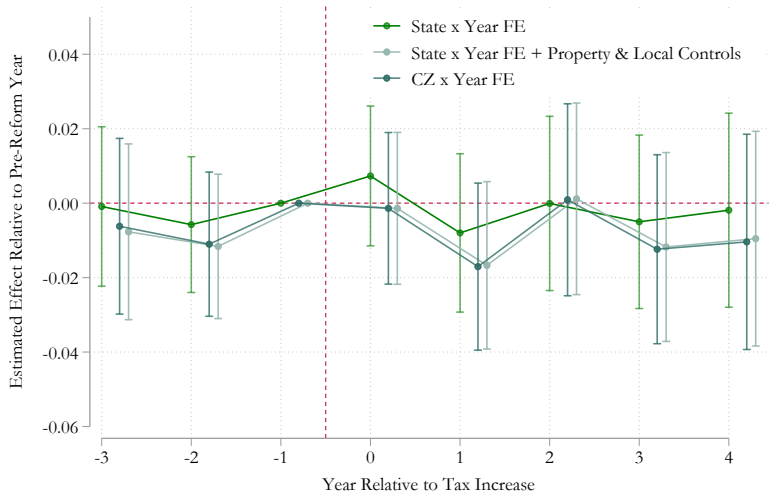
- ▶  $\ln(p_{i,m,t})$  : Log price/rent of property  $i$ , in year  $t$ , and municipality  $m$
- ▶  $\Delta LBT_{m,t}^j$  : Event study indicator scaled by tax change
- ▶  $X_{i,m,t}$  : Property & district/municipality controls
- ▶  $\mu_m$  : Municipality FE
- ▶  $\theta_{s,t}$  : State x Year FE

# Effects on Commercial Sales Prices

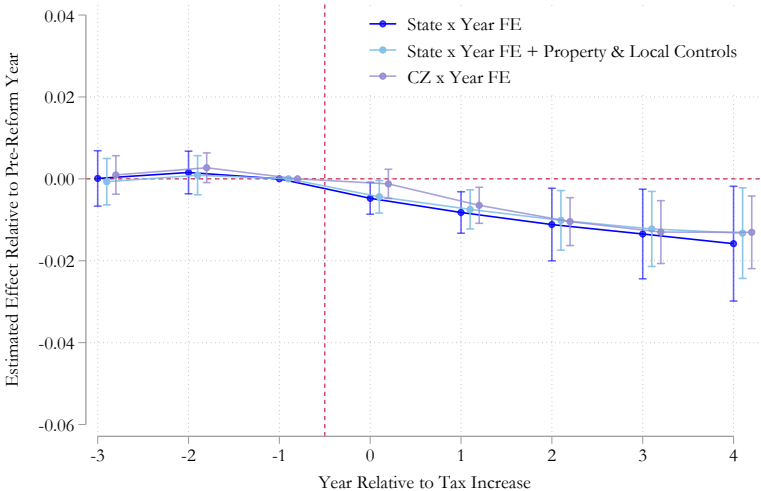




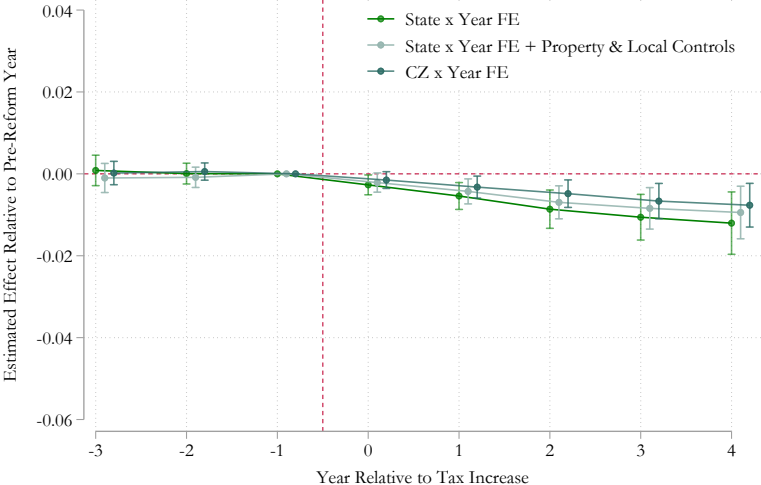
# Effects on Commercial Rental Prices



# Effects on Residential Sales Prices



# Effects on Residential Rental Prices



# Potential Mechanisms and Robustness

We conduct several robustness checks and heterogeneity analyses

- ▶ Heterogeneity-robust estimation à la De Chaisemartin and d'Haultfoeuille '20, '22, '24
- ▶ Separate effects for different property types (offices, retail, storage, production, restaurants)
- ▶ Separate effects for urban vs rural municipalities and different municipality sizes
- ▶ Focus on municipalities with only one tax hike during sample period

# Incidence Analysis

- ▶ What do our results imply for the distribution of the corporate tax burden?
- ▶ We extend the spatial equilibrium model by Suárez Serrato and Zidar (2016) to compute the distribution of the tax burden across four groups/inputs:
  - ▶ Firm owners
  - ▶ Workers
  - ▶ Residential property
  - ▶ Commercial property

# Incidence – Theory

**Table:** Parameters to identify Incidence

Stakeholder	Required Parameters
Workers (disposable income)	$\gamma^W - \alpha\gamma^{RH}$
Residential Landowners (housing costs)	$\gamma^{RH}$
Commercial Landowners (rent of comm. property)	$\gamma^{RG}$
Firm owners (after-tax profit)	$\gamma^\Pi$

- ▶  $\gamma^W$ : Tax-elasticity of wages (taken from Fuest, Peichl, and Siegloch (2018))
- ▶  $\gamma^{RH}$ : Tax-elasticity of residential property prices (own estimations)
- ▶  $\gamma^{RG}$ : Tax-elasticity of commercial property prices (own estimations)
- ▶  $\gamma^\Pi$ : Tax-elasticity of corporate profit (own estimations)

# Results – Incidence Analysis

**Table:** Incidence Estimates

<b>A. Incidence</b>			
Landowners (Residential)	1.708*** (0.504)	0.877** (0.316)	0.716*** (0.204)
Landowners (Commercial)	1.646*** (0.475)	1.215** (0.467)	1.095* (0.446)
Workers	0.490*** (0.099)	0.737*** (0.155)	0.785*** (0.189)
Firm owners	3.001*** (0.776)	2.329*** (0.803)	3.017*** (0.708)
<b>B. Share of Incidence</b>			
Landowners (Residential)	24.9%	17%	12.8%
Landowners (Commercial)	24%	23.6%	19.5%
Workers	7.2%	14.3%	14%
Firm owners	43.8%	45.2%	53.8%
Property Controls		✓	✓
Municipality Controls		✓	✓
State x Year FE	✓	✓	
CZ x Year FE			✓

# Summary

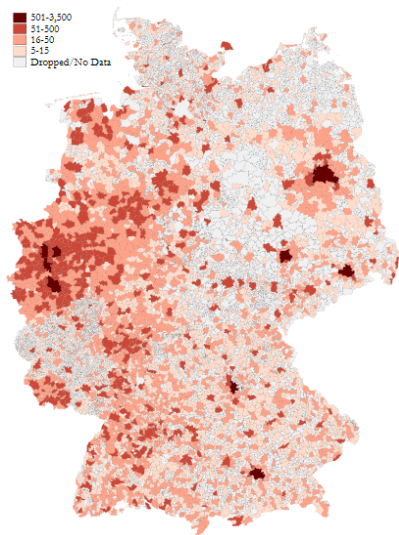
- ▶ We investigate the **causal effect of corporate tax increases on commercial property prices** by exploiting the local character of business taxation in Germany
- ▶ **Event study design finds significant and negative effect on sales prices**
- ▶ **Incidence analysis** reveals commercial land owners bear roughly **one quarter** of corporate tax incidence



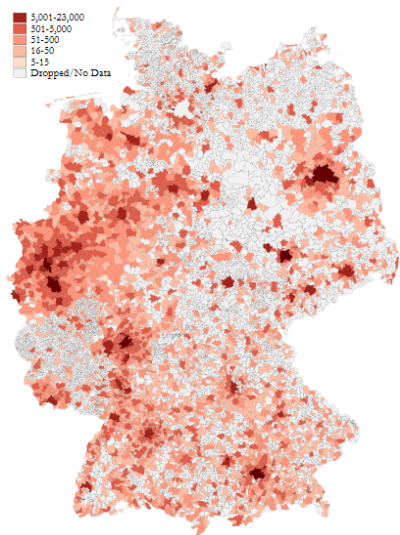
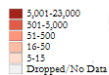
Thanks for your attention!  
[Zamorski@ifo.de](mailto:Zamorski@ifo.de)

# APPENDIX

# Average Number of Postings per Year

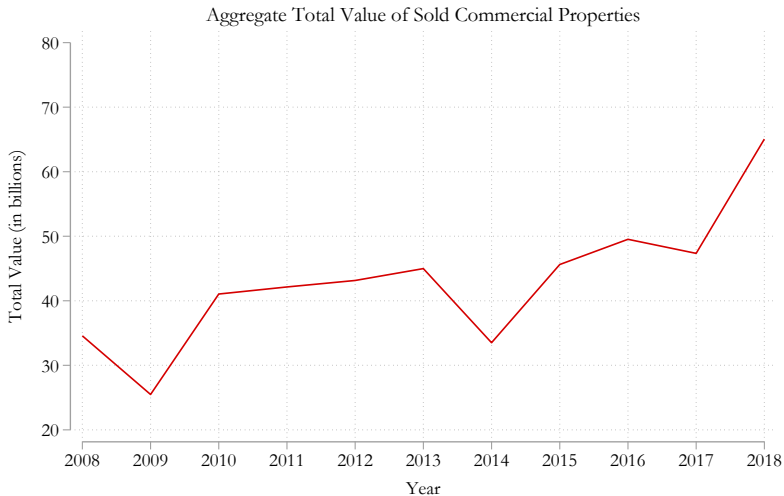


Sales Sample

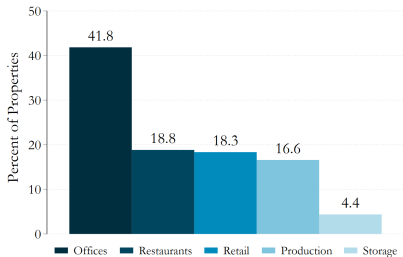


Rents Sample

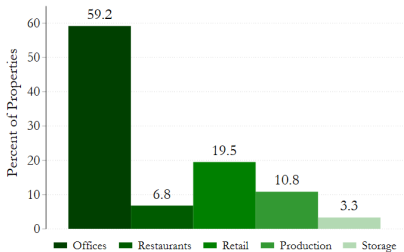
# Aggregate Value of Commercial Properties



# Distribution of Commercial Property Types

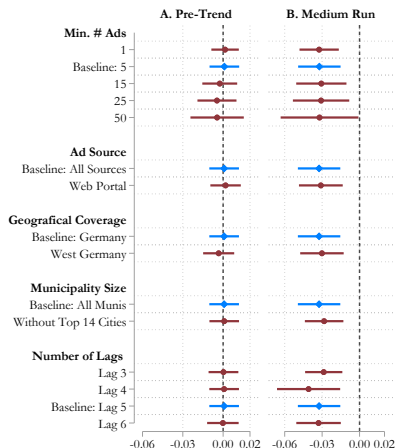
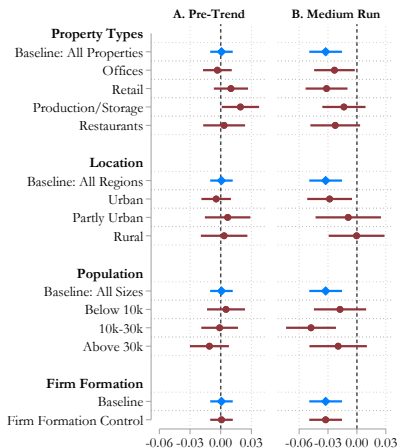


Sales Sample



Rents Sample

# Sales Results – Heterogeneity & Robustness



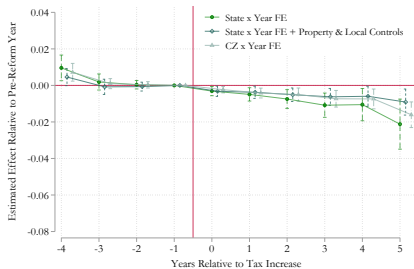
# Property Data – Summary Statistics

	Mean	Std.Dev.	Min	Max	N
<b>Panel A – Sales Sample</b>					
Price (in €/m <sup>2</sup> )	1,540	1,114	59.50	6,000	842,150
First price (in €/m <sup>2</sup> )	1,551	1,126	0.01	48,750	842,150
Construction year	1962	52	1500	2020	689,788
Floor size (in m <sup>2</sup> )	583.2	1,648	1	99,329	842,150
# Rooms	7.000	6.453	1	99	401,538
Basement dummy	0.254	0.435	0	1	842,150
Parking spots dummy	0.485	0.500	0	1	842,150
Web portal dummy	0.766	0.424	0	1	842,150
<b>Panel B – Rents Sample</b>					
Price (in €/m <sup>2</sup> )	9.69	6.80	1	66.67	2,446,382
First price(in €/m <sup>2</sup> )	9.48	5.83	1.43	40	2,446,382
Construction year	1973	44	1500	2018	1,340,624
Floor size (in m <sup>2</sup> )	511.3	1.10	13	10,000	2,446,382
# Rooms	3.23	2.02	1	15	893,259
Basement dummy	0.16	0.37	0	1	2,446,382
Parking spots dummy	0.37	0.48	0	1	2,446,382
Web portal dummy	0.81	0.39	0	1	2,446,382

# Event Study Results – Private Properties



Sales Sample



Rents Sample



# DiD Results – Commercial Properties

**Table:** DiD Estimation

	Commercial Properties					
	Ln Sales Price sqm			Ln Rent Price sqm		
$\Delta$ Ln Net-of-Tax Rate	1.646*** (0.475)	1.215** (0.467)	1.095* (0.446)	1.108* (0.434)	0.647 (0.394)	1.130** (0.391)
Property Controls		✓	✓		✓	✓
Municipality Controls		✓	✓		✓	✓
State x Year FE	✓	✓		✓	✓	
CZ x Year FE			✓			✓
Observations	897,804	890,163	890,160	2,125,364	2,099,526	2,099,522

# DiD Results – Residential Properties

**Table:** DiD Estimation

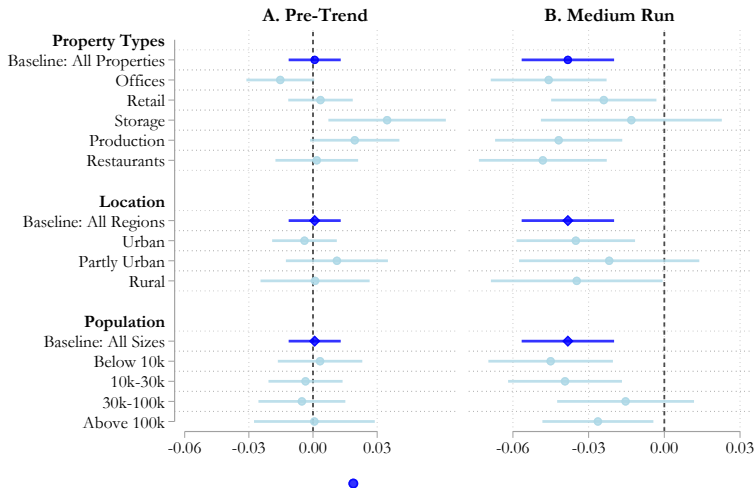
	Residential Properties					
	Ln Sales Price sqm			Ln Rent Price sqm		
$\Delta$ Ln Net-of-Tax Rate	1.708*** (0.504)	0.877** (0.316)	0.716*** (0.204)	0.923*** (0.270)	0.451* (0.188)	0.195 (0.110)
Property Controls		✓	✓		✓	✓
Municipality Controls		✓	✓		✓	✓
State x Year FE	✓	✓		✓	✓	
CZ x Year FE			✓			✓
Observations	12,988,552	12,905,538	12,905,538	10,762,438	10,638,794	10,638,790

# DiD Results – Corporate Profit

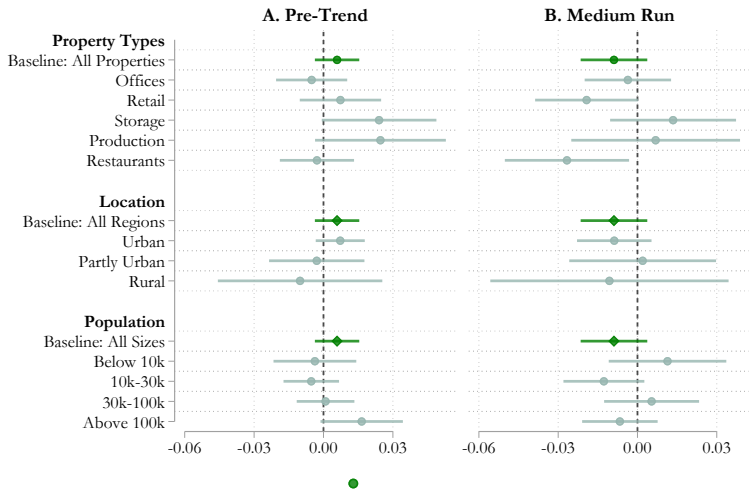
**Table:** DiD Estimation

	Ln Net Profit		
$\Delta$ Ln Net-of-Tax Rate	3.001*** (0.776)	2.329*** (0.803)	3.017*** (0.708)
Property Controls		✓	✓
Municipality Controls		✓	✓
State x Year FE	✓	✓	
CZ x Year FE			✓
Observations	117,967	90,537	90,477

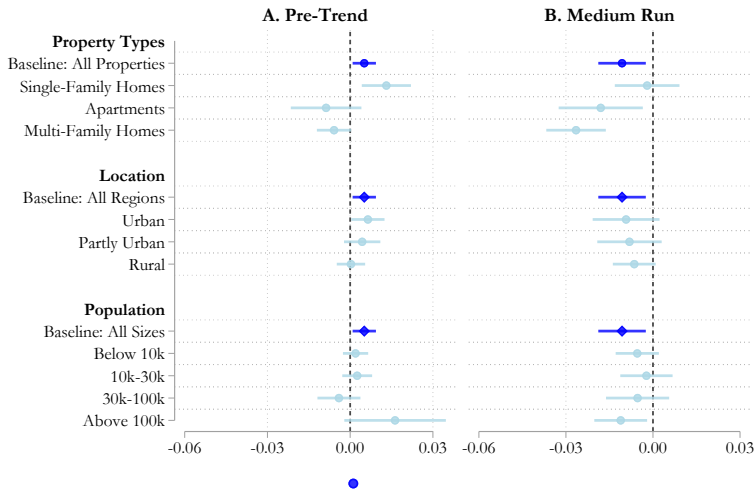
# Heterogeneity Commercial Sales



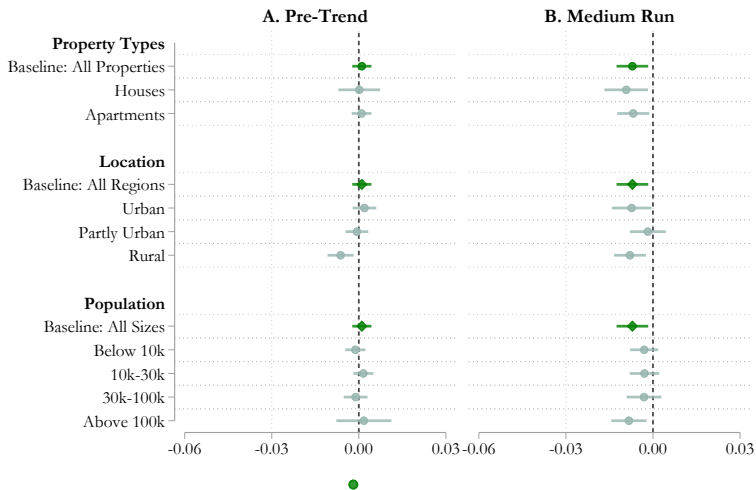
# Heterogeneity Commercial Rents



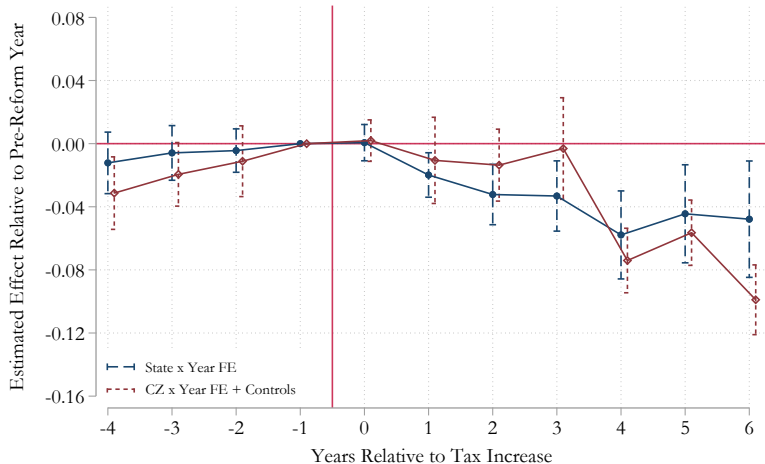
# Heterogeneity Residential Sales



# Heterogeneity Residential Rents

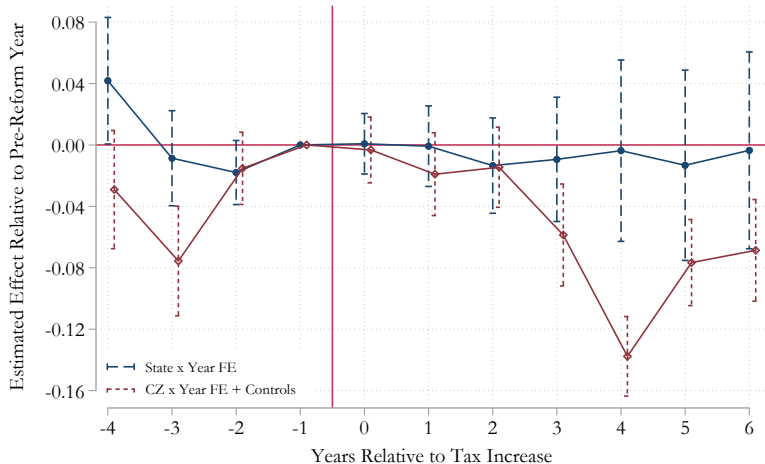


# Heterogeneity Robust Effects on Commercial Sales Prices

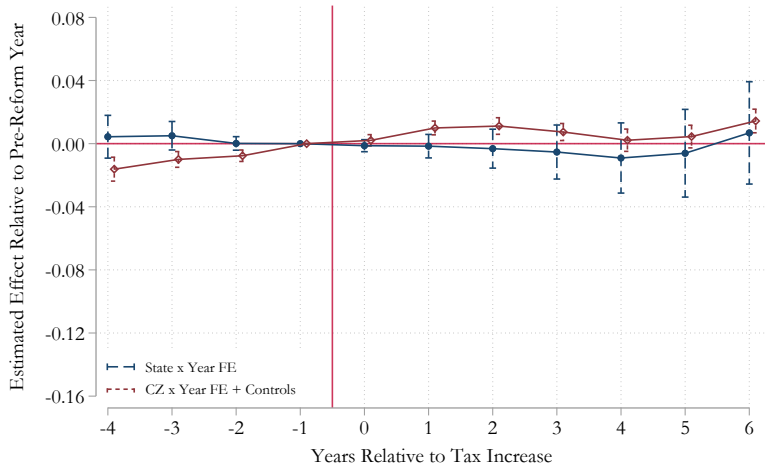




# Heterogeneity Robust Effects on Commercial Rental Prices



# Heterogeneity Robust Effects on Residential Sales Prices



# Heterogeneity Robust Effects on Residential Rental Prices

