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Property Taxation in the People's Republic of China

Abstract

- A property tax is a general tax imposed on all property owners based on the value of their properties. Property taxation is common throughout the world due to its numerous advantages. It is regarded as a steady source of local government revenue.
- The property taxation system in the People's Republic of China (PRC) is still developing and does not include important features that would make it efficient. For instance, residential property is excluded from the tax base. This has contributed to real estate speculation, income disparity, and revenue losses.
- A well-functioning local property tax system in the PRC would provide an efficient, equitable and sustainable way to finance local development and government spending. By helping to align expenditure responsibilities with revenue allocations at the local level, property taxation could reduce inequality in the provision of public goods and foster local government ability to provide them. Further, it will reduce the incentive for speculative behavior mitigating housing bubbles.
- To further develop property taxation in the PRC it is recommended to gradually strengthen and expand the existing pilots, supported by clear principles on the delegation of taxation responsibilities, the definition of a nationally standardized tax base, an affordable tax rate, and enhanced local government capacity.

Keywords

property tax, People's Republic of China, tax rate, real estate

Comments

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Property Taxation in the People's
Republic of China

中华人民共和国房地产税

Asian Development Bank

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Abstract

摘要

- A property tax is a general tax imposed on all property owners based on the value of their properties. Property taxation is common throughout the world due to its numerous advantages. It is regarded as a steady source of local government revenue.

房地产税是以房地产价值为依据，向所有房地产所有人征收的一种一般税。由于房地产税具有众多优势，世界各地普遍征收房地产税。它被视为地方政府收入的稳定来源。

- The property taxation system in the People's Republic of China (PRC) is still developing and does not include important features that would make it efficient. For instance, residential property is excluded from the tax base. This has contributed to real estate speculation, income disparity, and revenue losses.

中华人民共和国（中国）的房地产税制仍处于发展阶段，尚不具备一些使其高效运作的重要特征。例如，税基中不包括住宅房地产。这造成了房地产投机、贫富差距和税收流失等现象。

- A well-functioning local property tax system in the PRC would provide an efficient, equitable and sustainable way to finance local development and government spending. By helping to align expenditure responsibilities with revenue allocations at the local level, property taxation could reduce inequality in the provision of public goods and foster local government ability to provide them. Further, it will reduce the incentive for speculative behavior mitigating housing bubbles.

运作良好的地方房地产税制，将可以有效、公平、可持续地支持中国地方发展和维持地方政府开支。房地产税可以帮助地方政府按照收入分配来调整支出责任，从而减少公共物品分配的不均等，并提高地方政府提供公共物品的能力。此外，它能够遏制投机行为的诱因，减轻房地产泡沫风险。

- To further develop property taxation in the PRC it is recommended to gradually strengthen and expand the existing pilots, supported by clear principles on the delegation of taxation responsibilities, the definition of a nationally standardized tax base, an affordable tax rate, and enhanced local government capacity.

为了中国房地产税制的进一步发展，建议逐步巩固和扩大现有试点，明确地方政府的税收权责、全国统一的税基界定、合理的税率以及提高地方政府能力。

I. INTRODUCTION

1. A property tax is a general tax imposed on all property owners based on the value of their properties. It is regarded as a significant source of stable tax revenues for local governments. For example, property taxes account for more than 70% of local government revenue in Australia, the UK and the US, and 45% of city revenue in Kuala Lumpur (Malaysia).

2. Property taxation is common throughout the world due to its numerous advantages: (i) stability and predictability as a source of revenue, facilitating longer term budgeting and infrastructure development planning; (ii) fiscal revenue resiliency during downturns due to its limited cyclicality; (iii) economic efficiency resulting from low administration costs; (iv) transparency and high collection success rates due to difficult evasion; and (v) improved growth inclusiveness as a well-designed property tax could be progressive.

3. Currently, the property taxation system in the People's Republic of China (PRC) is still developing and does not include important features that would make it efficient. For instance, residential property, the largest source of property revenue in most countries, is excluded from the tax base. This has contributed to real estate speculation, income disparity, and significant revenue losses in light of the booming housing market in the last decade.

4. A well-functioning local property tax system in the PRC would thus provide an efficient, equitable and sustainable way to finance local development and government spending. By helping to align expenditure responsibilities with revenue allocations at the local level, property taxation could reduce inequality in the provision of public goods and foster local governments' ability to provide them. It will also enhance the accountability of local governments to local residents on service delivery. Further, it will reduce the incentive for speculative behavior and increase the opportunity cost of holding property vacant, mitigating housing bubbles.

5. By reviewing best international practices and the specific challenges in the PRC, this policy note aims at drawing policy recommendations for future developments in property taxation.

II. LESSONS FROM INTERNATIONAL EXPERIENCE

6. **The choice of property tax varies across countries.** Property taxation could be one-off or recurring. One-off taxes typically take the form of property transfer taxes that occur during changes in ownership of property. As such, they reduce the turnover rate of properties distorting capital allocation, potentially creating grey markets for transactions. Hence, an increasing number of countries opt for recurrent property taxes, which consist of the imposition of an annual tax on land, commercial, and

residential properties. Recurrent property taxes could take the form of a flat tax per property, which is the most simple but also most blunt instrument, or a system of differentiated property tax where owners would pay different amounts based on established criteria. Due to the regressiveness of the flat tax, most countries choose various systems of differentiated property tax, which requires defining an appropriate base and valuation method.

7. **Valuation methods.** The three most common valuation methods are: (i) capital valuation method, in which property tax is based on the assessed property value (predominant in OECD and Latin American countries); (ii) rental values valuation, in which property tax is assessed on the potential rent that could be earned by the property in the open rental market (usual in former British colonies); and (iii) area-based valuation, where the tax base is the area and size of the property, either unadjusted or calibrated for location and use (common Central and Eastern European countries). Recent trends show a shift towards capital valuation as the preferred method. However, valuation has proven complex, particularly in a volatile market. In most European countries effective tax base for calculating property tax liabilities tend to be significantly below market prices to keep taxation levels stable, afford protection against price fluctuations, and avoid over-taxation.

8. **Tax rates should be low and applied over a broad base.** Ideally all properties should be covered. If the tax base is broad enough, even a modest tax rate could yield significant revenues, especially when combined with broad coverage and high compliance ratios. Property taxes in the US vary across counties, but averages below 1% of assessed values. In Japan, the Local Tax Law limits the maximum tax that local governments can levy at 2.1% of taxable value. However, less than 10% of local governments charge more than the standard 1.4% of taxable value. In most countries, rates on residential property, the largest source of property tax income, are lower than non-residential rates. On the nature of the rate, under capital valuation methods, either uniform or progressive rates are typically applied, often distinguishing between residential versus commercial properties, and urban versus rural properties. Under rental values and area-based methods, a uniform tax rate is more common.

9. **Exemptions should be minimized.** The development of a property tax system often begins in urban areas to capture the capital gains from improved urban properties, and is applied to rural areas at a later stage. Yet many countries exempt various properties from taxation, such as agricultural land, government property, religious properties, and use exemptions as incentives for commercial land development. However, evidence suggest that the longer the list of exemptions, the larger the revenue loss for the government, and the greater the loss of transparency over the authority to confer exemptions. However, it is common for governments to provide welfare support to property owners with affordability issues, typically those at the lowest income levels.

10. **Government capacity is instrumental to success.** Rapid urbanization often results in outdated data and obsolete administrative capacity. Developing good quality property data is indispensable to

ensure consistency and fairness in the distribution of tax liabilities among taxpayers, coupled with solid legal principles to guide the assessment. To address these issues countries are turning to computer assisted mass appraisal systems¹ with greater private sector involvement in the valuation process. To ensure the independence of the assessment, tax assessment and collection responsibilities are handled by different authorities in a growing number of countries, supported by conflict resolution mechanisms to resolve discrepancies with government tax assessments.

11. **Assignment of property tax.** Property taxation is typically assigned to local governments for several reasons: (i) the tax's transparency and visibility enhances local governments accountability; (ii) the tax burden is imposed on the residents of the jurisdiction where the services financed by the tax are provided; and (iii) the size or value of the tax is often related to the taxpayer's ability to pay, which requires information usually only available at the local level. However, there is often flexibility in the assignment depending on the administrative capacity of each jurisdiction and, occasionally, specific administrative tasks are divided between the central and local governments (i.e., assigning tax assessment responsibilities to the central government while collection remains at the local level).

III. PROPERTY TAXATION IN THE PRC

12. Property tax in the PRC generates modest revenue. Property taxation was introduced in the PRC in 1951 through the Provisional Regulations on Urban Real Estate Tax. After 1985, more regulations were introduced resulting in the coexistence of five taxes: Real Estate Tax, Urban Land Use Tax, Land Value Added Tax, Cultivated Land Occupation Tax, and Deed Tax. However, despite increasing yield, all five types of taxes combined contributed to 21.4% of total local tax revenue in 2012², compared to 73% in the US, and almost 100% in Australia, Ireland, and the UK. As a result, local governments in the PRC tend to rely on other sources of income, such as land leasing fees.

13. The low yield of property taxes in the PRC is explained by diverse factors. First, the tax structure focuses on taxing transactions rather than possession of property. For example, deed tax raises the most revenue out of the currently administered property taxes. However, it is a one-off tax, which prompts tax evasion through underreporting of transacted amounts. Second, owner-occupied residential properties are excluded from the tax base. Given that over 85% of households in the PRC own their homes, this omission represents the biggest loss of stable potential source of tax

1. Defined as the systematic appraisal of groups of properties using standardized procedures and statistical testing.

2. In 2006, these five taxes combined contributed to only 12.9% of local tax revenues. Nationally, the significance of property taxes has also increased during the same time period, rising from 3.5% to 10.1% of total government tax revenue.

base. Third, the tax base is narrow and has not been significantly widened over the years, basing tax rates on the original price instead of an updated property market value, a notable loss in light of the impressive appreciation of land and property prices in the last decade. Fourth, despite trials in property valuation conducted by State Administration of Taxation (SAT) since 2007 in several cities, there are no nation-wide established standards for assessment and assessors.

14. Ongoing experimental schemes since 2011 to tax home ownership in Chongqing and Shanghai target the introduction of taxation of residential properties, but had limited impact so far.³ Both cities opted for low rates with high exemptions⁴, focusing on luxury units in Chongqing and new purchases in Shanghai. In Chongqing, property tax was levied on approximately 8,800 housing units in 2011 and 11,000 units in 2012. Despite this slight increase, property tax continued to yield less than 1% of local government revenues, given the coverage ratio below 1% of all properties. Results are similar in Shanghai, where property tax revenue, albeit larger at CNY9.3 billion, amounts to less than 1% of local government revenue in 2012, and with similarly low coverage ratio.⁵ Nonetheless, the pilots were extremely important in introducing residential property taxation in the PRC, paving the way to the nationwide rollout of the pilot announced in the aftermath of the Third Plenary Session of the 18th Central Committee of the Chinese Communist Party.

15. Other issues deserving attention are: (i) poor-quality property and land registration data; (ii) separate land and building registrations authorities; (iii) difficulty assessing the market value of land, rural housing, and subsidized housing of government and state-owned enterprises' employees; (iv) lack of independence of property appraisal firms, which remain dominated by subsidiary companies of local governments; and (v) vested interest resistance to adopt property residential taxation.

IV. POLICY RECOMMENDATIONS

16. **Adopt a phased approach.** Along with revenue generation, redistribution aspects should be considered in property taxation. Thus, a phased approach is recommended with review of experience

3. Prices of new homes in both cities were still rising above national average in 2013, partly since property tax was not applicable to almost all home purchases.

4. The tax base in Chongqing includes newly purchased luxury apartments and existing villas, with owner-use exemption of 100 square meters for apartments and 180 square meters for villas, and a three-tiered rates ranging from 0.5-1.2% of unit transaction price on the non-exempt areas. In Shanghai, the tax base includes new homes purchased after January 2011, with the exemption of 60 square meters per capita and purchase of first and only homes for residents.

5. In Shanghai, the trial property tax was applied to approximately 20,000 units in 2011, increasing to 30,000 in 2012, and to 110,000 units in 2013.

at each stage, starting at the higher end, where ability to pay is good, and gradually moving down to lower income levels. As such, reform should target first the strengthening of the current pilots in Shanghai and Chongqing, aiming at introducing a genuine property tax based on home values and gradually imposed on all urban homes. Further, while a national level rollout is not yet feasible, these trials should be gradually expanded to include the cities that participated in the SAT pilots in property value assessment. In light of urban-rural income disparities, property tax reform should focus on urban areas first, sharing the municipal burden of providing local public services across urban property owners.

17. **Broaden the urban tax base.** It is recommended to include residential property in the tax base. A broad-based property tax would be more effective in moderating speculative investments in real estate. Cities could start with levying property taxes on new units, or on second units (including investment properties) and high-cost units. In the longer term, all units should be included in the tax base. In this process, standardization of definitions of tax base would increase transparency on the effective tax rates, as well as facilitate the development of a nation-wide appraisal system. While it is important to minimize exemptions, especially those that could be granted through ad-hoc special permissions, property taxation in the PRC should take into account equity considerations, exempting low-income owner-occupiers at the first stages of reform.

18. **Empower local governments.** Local governments need to have the clear authority to collect and enforce property tax payments throughout their respective jurisdictions, giving cities a new source of stable, sustainable funding for urban development, which would help absorb existing and new migrants under the announced gradual phase-out of the household registration system (hukou). They should also be granted autonomy to set the tax rate. International experience suggests that low rates would make property taxation more palatable and encourage higher compliance. To establish the optimal rate, it is first essential to address the affordability issue, and assess the extent to which residents—including retired people—can reasonably afford to pay taxes on their housing units. Social welfare support mechanisms should be established accordingly to deal with affordability shortcomings.

19. **Improve local government capacity.** Establishing a reliable property data registration requires the commitment of local government resources and adequate skills and technical capacity. Local government capacities should be strengthened. First, by creating a methodological valuation system and training of appraisers to prepare and maintain the property valuation cadaster. In this context, having a nationally standardized tax-base would be useful for a nation-wide standardized methods and qualifications for appraisers. Second, by upgrading local governments' capacity to assess the quality of the valuation, establish an integrated property registration and valuation database, analyze the data to determine potential revenue and appropriate tax rates, and effectively prepare property tax bills to notify tax liabilities. Ultimately, a stable property tax revenue base could form the collateral for municipal bonds, thus further strengthening local governments' fiscal capacity.

20. **Strengthen the institutional framework.** It is important to improve taxpayer understanding and support of property tax, given its potential unpopularity, especially if the system is seen as unfairly designed. Taxpayers should have the right to be treated professionally and equitably. Thus, it is crucial to establish a clear mechanism of information dissemination and oversight at the administrative and judicial levels. In case of discrepancies (either in perceived valuation or actual administrative errors in billing), taxpayers must avail of a clear conflict resolution mechanism to address queries and appeals in an impartial manner. The latter would involve clear information on the appeal process, timeline, responsibilities of courts or tribunal bodies, and the bearer of the costs of legal representation.

一、简介

1. 房地产税是以房地产价值为依据,向所有房地产所有人征收的一种一般税。它被视为地方政府稳定税收收入的重要来源。例如,在澳大利亚、英国和美国,房地产税均占地方财政收入的70%以上,而在吉隆坡(马来西亚),房地产税也占市政收入的45%。

2. 房地产税在世界各地都很普遍,因为它具有众多优势,其中包括:(1)它具有稳定性和可预测性的收入来源,有利于长期的预算和基础设施发展规划;(2)低顺周期性,在经济下行时仍能保持财政收入相对稳定;(3)行政成本低,经济效益高;(4)由于不易逃税,它具有较高的透明度和征收成功率;及(5)设计合理的房地产税可以是累进式的,因而具有较高的增长包容性。

3. 目前,中国的房地产税制仍处于发展阶段,尚不具备一些使其高效运作的重要特征。例如,税基中不包括住宅房地产,而这是大多数国家最大的房地产税收来源。鉴于房地产市场在过去十年里的蓬勃发展,这加剧了房地产投机、贫富差距和巨大的税收流失等现象。

4. 因此,在中国,如果具备运作良好的地方房地产税制,将能有效、公平、可持续地支持地方发展和维持政府开支。房地产税可以帮助地方政府按照收入分配来调整支出责任,从而减少公共物品分配不均,并提高地方政府提供公共物品的能力。它还将提高地方政府向当地居民提供服务的责任感。此外,房地产税将有助于遏制投机行为的诱因,增加持有空置房地产的机会成本,减轻房地产泡沫风险。

5. 通过回顾国际上的最佳实践和中国面临的具体挑战,本文旨在为房地产税的未来发展提供政策建议。

二、国际经验

6. **各国选择的房地产税不尽相同。**房地产税可以一次性或者定期缴纳。一次性缴纳的房地产税通常采取房地产转让税的形式,在房地产所有权变更时缴纳。这会降低房地产的周转率,扰乱资本分配,甚至可能造成灰色交易市场。因此,越来越多的国家倾向于选择定期缴纳的房地产税,包括每年对土地、商业房地产和住宅房地产征税。定期缴纳的房地产税可以对单位房地产采取单一税制,这种征管措施非常简便;也可以采用差异化的房地产税制,房地产所有人将依据既定标准缴纳不同数额的税费。由于单一税制的累退性,大多数国家选择了各种差异化的房地产税制,这种税制需要确立合适的税基和评估方法。

7. **评估方法。**三种最为常见的评估方法是:(1)资本评估法,以估定的房地产价值为依据来确立房地产税(主要盛行于经济合作与发展组织国家和拉美国家);(2)租金评估法,以房地产能够在

公开租赁市场上赚取的潜在租金为依据，来估定房地产税（英国前殖民地通常采用此法）；（3）面积评估法，计税基础为房地产的面积和规模——可以不作任何调整，也可以根据地理位置和用途进行校正（常见于中东欧国家）。最近趋势表明，资本评估法已日渐成为首选方法。然而，事实证明，这一评估过程错综复杂，在不稳定的市场下更是如此。在大多数欧洲国家，用于计算房地产税税额的实际税基往往明显低于市场价格，从而保持税收水平的稳定，抵御价格波动以及避免过度征税。

8. **税率要低，税基要宽。**理论上，所有房地产都应该纳税。如果税基足够宽，即使税率低，也能创造可观的税收，尤其是覆盖率和征缴率高时。在美国，各州县的房地产税各不相同，但平均都低于估定价值的1%。在日本，地方税法限定了最高税率，地方政府最高能征收应课税价值的2.1%。然而，只有不到10%的地方政府收取超过应课税价值的1.4%这一标准税率。在绝大多数国家，住宅房地产作为房地产税收的最大来源，所征收的税率要低于非住宅类。至于税率的种类，在采用资本评估法的情况下，通常实行统一税率或累进税率，且往往会区分住宅房地产和商业房地产，城市房地产和农村房地产。采用租金评估法和以面积为依据的评估法时，统一税率更为常见。

9. **尽量少免税。**房地产税制的发展往往始于城市地区从增值的城市房地产中获取资本收益，而后再应用于农村地区。然而，许多国家对多种房地产都免除税收，如农业用地、政府房地产和宗教房地产，并将免税作为鼓励商业用地开发的激励机制。但是，有证据表明，免税清单越长，政府的税收损失就越大，裁量减免税的授权机构的透明度也越低。不过，政府普遍会向有支付困难的房地产所有人——通常是最低收入水平的人——提供保障措施。

10. **政府能力是成功的要素。**快速的城镇化常常导致数据过时、行政能力滞后。要确保纳税人之间税务责任分配的一致性和公平性，开发高质量的房地产数据必不可少，还要有相应的法律来指导评估工作。为了解决相关问题，有些国家开始使用计算机辅助的批量评估系统¹，让私营部门更多地参与到评估过程中。为确保评估的独立性，越来越多的国家由不同部门履行评税和征税职责，同时辅以冲突解决机制，来解决政府评税工作的差异性。

11. **房地产税的划分。**房地产税通常划归地方政府，有以下几个原因：（1）税收的透明度和能见度可增强地方政府的问责制；（2）税负由享受相关税费支持的服务的居民承担；（3）税收规模或税值往往与纳税人的支付能力相关，而所需信息通常只有地方政府才能提供。不过，税收划分通常具有灵活性，这主要取决于各管辖区的行政能力，而有时候，会将特定的行政任务分配给中央政府和地方政府（即将评税职责分配给中央政府，而地方政府保留征税职责）。

1. 定义为利用标准化程序和统计检验来进行房地产组群的系统评估。

三、中国的房地产税制

12. 中国的房地产税创造的税收偏低。1951年, 房地产税以《城市房地产税暂行条例》的形式在中国推行。1985年后, 多项法规相继出台, 形成五税并存的状况: 房产税、城镇土地使用税、土地增值税、耕地占用税和契税。然而, 尽管税收额不断增加, 但五个税种的总税收额在2012年仅占地方税收总额的21.4%², 而美国为73%, 澳大利亚、爱尔兰和英国几近100%。结果, 中国的地方政府往往需要依靠其他收入来源, 如土地租赁费。

13. 中国的房地产税收入低有多种原因。第一, 税收结构侧重于交易税, 而不是对房地产的持有征税。例如, 契税是现行的房地产税税种中收入最高的。然而, 它属于一次性税费, 助长了通过少报交易额来逃税的行为。第二, 业主自住房地产不包含在税基内, 鉴于中国85%以上的家庭拥有自己的居所, 这无疑是稳定的潜在税基来源的最大损失。第三, 税基窄, 且多年来未得到明显拓宽, 并且是依据房地产的原价来计算税率, 而不是依据最新市场价格, 鉴于过去十年土地和房地产价格飙升, 这也是一项巨大的损失。第四, 尽管2007年以来, 国家税务总局在多个城市试行了房地产评估, 但尚未针对评估和评估员建立全国统一的标准。

14. 2011年起, 重庆和上海两地开始实行对房屋产权征税的试验方案, 目标在于对住宅房地产征税, 但迄今为止, 影响有限³。两个城市都选择了低税率和高免税额⁴, 重庆侧重于高档房, 而上海侧重于新购房。在重庆, 2011年征收房地产税的住房为8,800套, 2012年为11,000套。虽然略有增长, 但房地产税仍不到地方财政收入的1%——因为覆盖率还不到所有房地产的1%。上海的结果大致相似, 2012年的房地产税收虽然高达93亿元人民币, 却不到地方财政收入的1%, 覆盖率也同样偏低⁵。然而, 试点对于中国推行住宅房地产税是极其重要的, 它为十八届三中全会后宣布在全国推开试点铺平了道路。

15. 其他值得关注的问题包括: (1) 低质量的房地产和土地登记资料; (2) 土地和建筑物分属不同的登记机关; (3) 难以评估土地、农村住房和政府及国企员工补贴住房的市场价值; (4) 房地产评

2. 2006年, 这五个税种的总税收额仅占地方税收总额的12.9%。从全国来看, 房地产税的重要性在这一时期有所增加, 占政府税收总额的比例由3.5%上升至10.1%。

3. 2013年, 这两个城市的新建住宅价格仍不断上涨, 涨幅高于全国平均水平, 部分原因在于房地产税对于几乎所有住宅购置都不适用。

4. 在重庆, 税基包括新购的高档公寓和现有的别墅, 公寓的自住免税面积为100平方米, 别墅的自住免税面积为180平方米; 非免税面积实行三档税率, 税率为交易价格的0.5%~1.2%。在上海, 税基包括2011年1月后购买的新房, 人均免税住房面积为60平方米, 首套住房和家庭唯一住房也免税。

5. 在上海, 2011年实行房地产税试点的住房约为20,000套, 2012年增至30,000套, 2013年增至110,000套。

估公司缺乏独立性，仍被隶属于地方政府的公司所主导；(5) 实行住宅房地产税收所面临的既得利益群体的阻力。

四、政策建议

16. **采取分阶段方法。**除了创收，房地产税的再分配问题也应予以考虑。因此，建议采取分阶段的方法，且每个阶段都要进行经验总结，从支付能力较好的高端群体开始，然后逐步覆盖较低收入群体。因此，改革应先加强当前上海和重庆两地的试点，推行以房屋价值为依据的真正的房地产税，并逐步覆盖所有城市住房。此外，尽管全国范围的推行尚不可行，但试点应逐步扩展，涵盖所有参加国家税务总局房地产价值评估试点城市。鉴于城乡收入差距，房地产税改革应先侧重于城市地区，共同向城市房地产业主提供地方公共服务。

17. **拓宽城市税基。**建议将住宅房地产纳入税基。宽税基的房地产税能够更有效地控制投机性的房地产投资。各地可以从新建住房或者第二套房（包括投资性房地产）和高档住房开始征收房地产税。从长远来说，所有住房都应纳入税基。在这一过程中，税基的定义标准化能够提高实际税率的透明度，同时促进全国性评估系统的发展。虽然尽量少免税很重要，尤其是要减少那些能够通过临时特殊权限授权的免税，但中国的房地产税制应将公平因素纳入考虑，在改革的初始阶段免除低收入自住业主的房地产税。

18. **向地方政府授权。**地方政府需要有明确的权力，才能在各自管辖区内征收和执行房地产税，为城市带来一个稳定、可持续的新资金来源。鉴于中国已经宣布要逐步取消户籍制度（户口），这将有助于各城市吸收现有的和新的外来人口。地方政府还应获得设定税率的自主权。国际经验表明，低税率能够使房地产税更得民心，征缴率也会更高。为了确立最佳税率，需要解决支付能力问题，并评估居民——包括退休人士——能够为其住所合理负担的税负程度。同时应建立相应的社会保障支持机制，以解决支付能力不足的问题。

19. **提高地方政府的能力。**建立可靠的房地产资料登记系统，需要地方政府资源的积极参与以及充分的技能。地方政府的能力应加以提高。首先，创建评估方法体系，并培训评估员，以构建和维护房地产评估基本信息数据库。在此背景下，全国统一的税基将有助于确定全国性的标准化方法和评估员资质鉴定。第二，提升地方政府对评估质量的评定能力，建立一个综合性的房地产登记和评估数据库，分析数据以确定潜在的税收来源和适当的税率，并适时有效地告知纳税义务。最后，稳定的房地产税税基可以构成市政债券的抵押品，从而进一步提高地方政府的财政能力。

20. **强化制度框架。**提高纳税人对房地产税的理解和支持很重要，因为房地产税极有可能不受民众欢迎，尤其是当相关体制被认为不公平时。纳税人应有权得到专业而公平的对待。因此，关键是

Observations and Suggestions

观察与建议

要建立明确的信息传播机制,从行政和司法层面进行监督。在出现矛盾的情况下(不管是感觉上的评估错误还是实际的行政过失),纳税人可以利用明确的冲突解决机制,使疑问和申诉得到公平解决。后者将涉及申诉程序、时间表、法院或仲裁机构的责任和律师代理费由谁承担等详细信息。

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