



# A EUROPEAN AGENDA TO TAX THE SUPER-RICH

A solution to inequality in the European Union

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## Abstract

Europe faces a deep inequality crisis: the richest 1% in the EU own nearly a quarter of all wealth while half the population share just 3%. Decades of tax cuts for the wealthy and corporations resulted in the super-rich paying proportionally less taxes than ordinary citizens, eroding fairness, democracy, and social cohesion. The EU lacks harmonized policies to curb extreme wealth concentration and tax avoidance of the wealthiest. Oxfam calls for bold reforms, such as an EU-wide or national taxes on the super-rich and transparency mechanisms like an EU assets registry, to fund social needs, climate action, and development. Taxing the super-rich is widely supported, is feasible and is urgent.

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This paper was written to inform public debate on development and humanitarian policy issues.

For further information on the issues raised in this paper, please email [advocacy@oxfaminternational.org](mailto:advocacy@oxfaminternational.org)

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# Foreword

The money's there, it's just not in the right hands.



Photo credit: Clarissa  
Sopper

Only true democracies tax wealth. Taxing wealth binds the potential for economic and financial violence and puts resources back in the hands of democratic power and public systems of control. I want to be taxed because not only can I easily afford it, but I also understand the social responsibility of contributing and sharing our access to wealth in order to prosper together.

Power makes us blind to the fact that, in the end, we are just human beings, worth no more or no less than anyone else, and that our greatest strength lies in sharing and cooperation, not in selfish hoarding and control issues. In a democracy, there should be no place for oligarchy or aristocracy, but wealth inequality creates these systems of power. And that means we must enforce bold rules to share wealth, land and power.

Coming from one of the richest families in the world, I know from personal experience how our private wealth effectively shapes realities through our financial and economic power over jobs, rents, prices and taxes. We create the cost-of-living crises by making living expensive or even unaffordable; we withhold the public funds needed for public infrastructure; we pocket profit from soaring prices. We hide behind philanthropy to draw attention away from the fact that we have effectively created the problem we pretend to solve with a fraction of the return on investment. Meanwhile, our stocks and shares essentially set the planet on fire and discard human life, especially in the Global South.

Unfortunately, there is almost no system in place to prevent us from creating harm. Yet. And we know from report after report and study after study that the richest 1% – whether we like it or not, whether we want it or not – severely disadvantages women, Black people and people of colour, people with disabilities and essentially burns the planet. So, the same wealth that causes all this harm could be used publicly and democratically to create justice and freedom. Resources are there, they are just disproportionately in private hands with no mandate and no accountability.

Tax justice is a comparatively easy tool to solve this. All it takes is the political will to fulfil the task at the heart of democracy: to share.

**Marlene Engelhorn, co-founder of Taxmenow**

# Executive summary

**Europe is in the grip of a profound inequality crisis.** The EU's richest 1% hold nearly a quarter of all wealth, while the poorest half of the population owns just 3%.<sup>1</sup> Since 1995, in nearly 30 years, 90% of Europeans have seen their share of regional wealth shrinking, while the richest 10% have increased their share of the pie.<sup>2</sup> The combined wealth of the EU's billionaires soared by more than €400bn over the first 6 months of 2025 – and they added 39 more people to their club in the last year –<sup>3</sup> at a time when one in five Europeans are facing poverty and social exclusion.<sup>4</sup> The cost-of-living crisis has eroded wages, and governments are diverting funds for public services towards defence.

This extreme concentration of wealth alongside widespread hardship is not just unfair, it is a threat to democracy, social cohesion, the economy and our climate.

**Tax systems are exacerbating inequality instead of fighting it.** Over recent decades, EU countries have slashed taxes for the richest people and corporations, while leaving ordinary people to pay the price. Today, over 80% of tax revenue in the EU comes from taxes that fall primarily on ordinary citizens,<sup>5</sup> while the wealthiest can exploit loopholes, tax havens and special regimes to pay lower effective tax rates than nurses and teachers. In Belgium, for example, members of the richest 1% contribute just 23% tax of their incomes, which is half of what the average person contributes.<sup>6</sup>

**EU and member state policy lets the super-rich off the hook.** EU countries differ significantly on how they tax the income and wealth of their richest citizens, but none do so to an adequate level. A wealth tax existed in nine European countries in the 1990s; today, only Spain has one. The lack of harmonization across the EU fuels aggressive tax competition and allows the super-rich to choose the most favourable regime to minimize their tax contribution.

**This is a political choice and a problem that can be solved.** The EU and its member states must urgently rewrite tax rules to ensure the richest pay their fair share. The EU needs to enact policies to end harmful tax regimes for individuals, establish a European assets registry and put in place a common standard on the taxation of capital. The EU and its member states should introduce European or national taxes on the wealthiest individuals. Two-thirds of Europeans support the introduction of a tax for the wealthiest individuals to ensure they pay a minimum level of taxes.<sup>7</sup>

**Taxing the super-rich can raise the billions the world urgently needs.** For example, an EU-wide wealth tax up to 5% on millionaires and billionaires could raise €286.5bn annually,<sup>8</sup> enough to cover the annual needs of the new EU long-term budget proposal.<sup>9</sup> Ending

harmful and wasteful tax regimes for individuals would recover €3.9bn per year,<sup>10</sup> enough to cover a third of the current annual EU aid budget.<sup>11</sup> This money is urgently needed to tackle Europe's growing social needs, close the climate finance gap, and respond to rising development and humanitarian needs.

**We stand at a crossroads.** EU governments can either continue down the path of austerity and deepening inequality or build a more just and resilient Europe and rest of the world by taxing extreme wealth and the super-rich. In these times of unprecedented crisis, Oxfam calls on the European Union and its member states to act boldly: taxing the super-rich is not radical; it is common sense, backed by public opinion and economic evidence. People and planet can wait no longer.



# 1 Wealth concentration and inequality in the EU

Economic inequality is a pernicious and persistent problem across the world. The concentration of wealth and power in the hands of an elite few undermines poverty reduction, economic growth and social mobility, erodes democracy, and increases economic and social instability. It also has an impact on our climate, because the super-rich, with their lavish lifestyle and their polluting investments, are the most responsible for the carbon pollution.<sup>12</sup> The dangers of inequality have been raised by voices as diverse as the Pope<sup>13</sup> and the IMF,<sup>14</sup> and have sparked public protest and civil society campaigns<sup>15</sup> around the world.

The EU is no exception.

The past years' crises —first the Covid-19 pandemic, followed by the cost-of-living and energy crises, and then the war at the EU's borders— have hit ordinary citizens harder. Wages have failed to keep pace with inflation, years of austerity have weakened public services and safety nets, and now governments face massive pressure to divert scarce resources towards defence spending.

At the same time, wealth concentration across the European Union is extreme and has grown since 1995. In 2023, on average, a person in the EU's richest 1% had 740 times the wealth of someone in the poorest 50%, up from 522 in 1995.<sup>16</sup> The concentration of wealth into private hands has caused national governments to grow poorer in relative terms and has driven a wedge between workers and rich CEOs and shareholders, while exacerbating gender and racial labour inequalities.

The result is a dangerous cocktail of insecurity and scarcity that is fuelling new forms of politics rooted in anger, resentment, and division.

## 1.1 Rising fortunes for the wealthiest

2025 appears to be another bonanza year for the super-rich. The combined wealth of the EU's billionaires grew by €405bn over the first 6 months of the year, equal to half of the annual EU government's expenditure for education in 2023.<sup>17</sup> By the end of June, it stood at €2.3tn, shared among 487 billionaires, 39 more billionaires than in 2024.<sup>18</sup>

Europe's wealthiest are also taking a bigger slice of the pie: between 1995 and 2023, the richest 1% — comprising 3.2 and 3.6 million adults respectively — saw their share of regional wealth rise from 22.6% to 25%.<sup>19</sup>

This concentration in wealth at the top has been driven by a combination of rising asset values, such as land, houses and financial assets; tax systems that increasingly benefit the richest;<sup>20</sup> and inheritance.<sup>21</sup>

Oxfam estimates that 69% of EU billionaires' wealth comes from inheritance.<sup>22</sup> All but six of the 21 billionaires aged 30 or below on the Forbes World's Billionaires List are from Europe.<sup>23</sup> This does not reflect wealth earned through entrepreneurship or skill. It is the rise of a new aristocratic class, whereby inequality is perpetuated through generations of rich families.

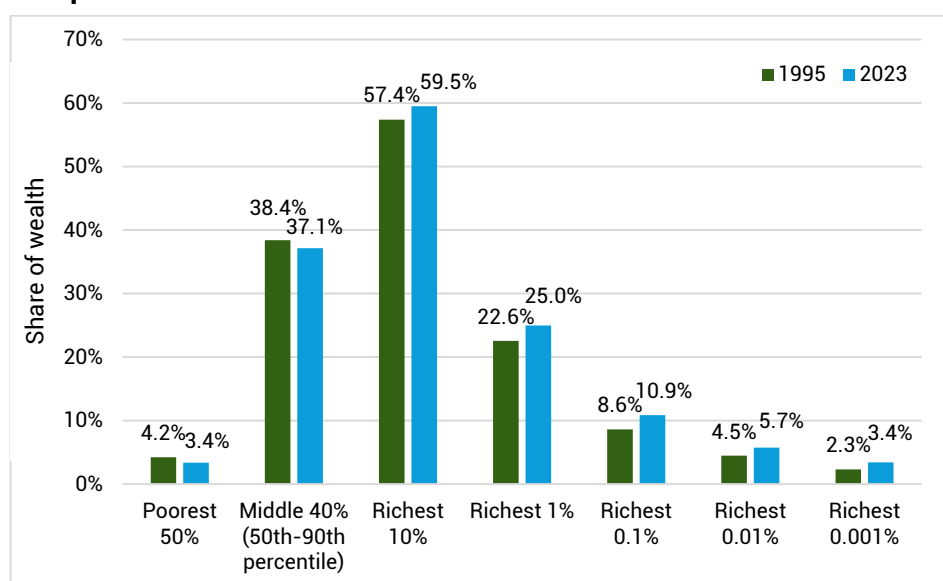
Oxfam has also found that part of the wealth of Europe's richest people has been taken from the Global South.<sup>24</sup> This continues today; for example, in 2023, the richest 1% in 12 EU countries could have extracted €84.4bn from the Global South solely through the way the international financial system operates.<sup>25</sup>

## 1.2 The gulf between the super-rich and the rest

The extreme concentration of wealth in the hands of the EU's super-rich is even starker when compared to the rest of the population.

In 2023, the poorest half of people in the EU (181 million adults) had the same share of Europe's wealth as the richest 0.001% (3,600 adults).<sup>26</sup> The richest 1% had seven times more wealth and nearly a quarter of all regional wealth (see Figure 1).<sup>27</sup> Since 1995, people in the richest 10% have increased their share of wealth, while the rest have received a dwindling portion.<sup>28</sup>

**Figure 1: Share of regional wealth per wealth group in 1995 and 2023, European Union**



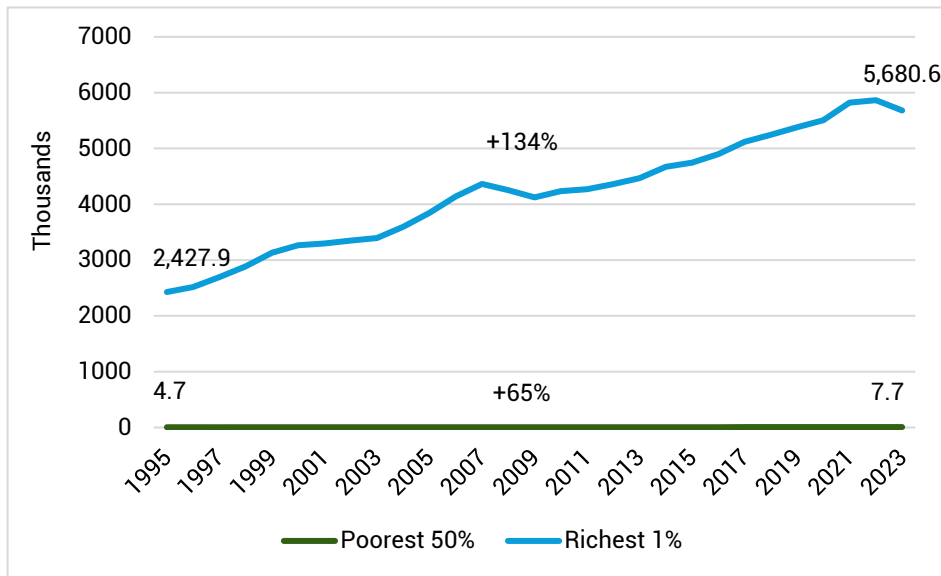
Source: World Inequality Database <https://wid.world/data/> (accessed 22 July 2025)



Notes: The figure shows that from 1995 to 2023, the share of wealth decreased for the poorest 50% and middle 40%, while it increased in the same period for the richest 10% and above.

In 2023, the average wealth for someone in the richest 1% was €5.6m, almost 740 times the €7,686 owned on average by someone in the poorest 50%.<sup>29</sup> As Figure 2 shows, this gap has grown significantly since 1995, when the ratio was 522. The average wealth for someone in the richest 1% has increased twice as fast as for someone in the poorest 50% – from an already high base.<sup>30</sup>

**Figure 2: Average wealth for the poorest 50% vs richest 1%, 1995–2023, European Union (€k, real)**



Source: World Inequality Database <https://wid.world/data/> (accessed 9 September 2025) and Oxfam's own calculations.

Notes: The average wealth of a person in the poorest 50% increased by 65% from 1995 to 2023, from €4,655 to €7,686. The average wealth of a person in the richest 1% increased by 134% in the same period, from €2.4m to €5.6m.

The middle class has also reduced in almost two-thirds of EU member states, as people have been moved into a lower income class<sup>31</sup> due to the rising cost of living, job insecurity and over-indebtedness. This brings risks for social cohesion, economic performance and democracy.<sup>32</sup>

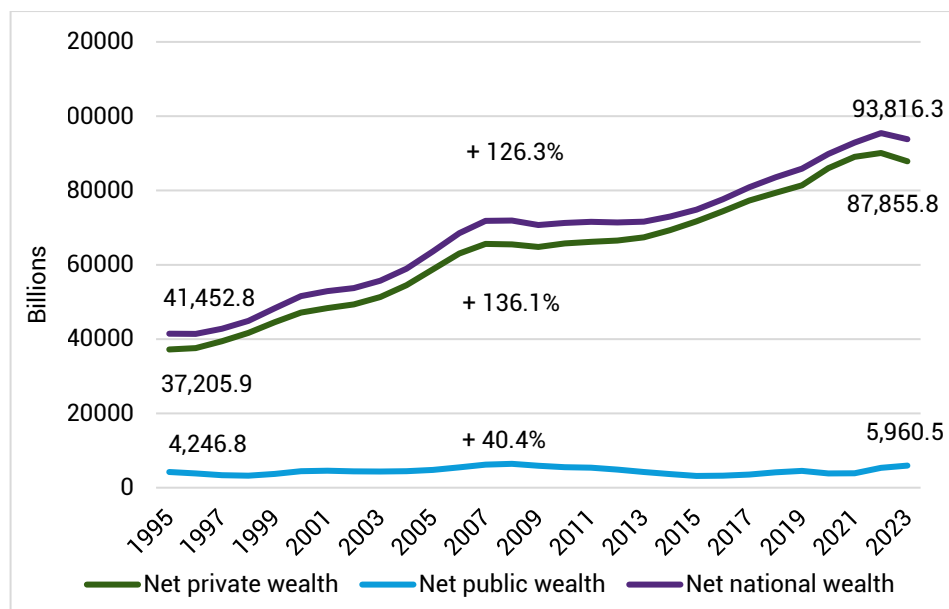
Worse, poverty is on the rise. In 2024, more than one-fifth (21%) of the EU population was at risk of poverty or social exclusion, with women more likely to suffer (21.9% compared to 20.0% of men).<sup>33</sup> This represents an increase of 2 million people at risk since 2019 – and a move away from meeting EU poverty reduction targets that aim to cut the number by at least 15 million between 2019 and 2030.<sup>34</sup>

The recent cost-of-living crisis has been particularly hard for lower-income households, which have been worst affected by inflation on basic goods and services like energy and food.<sup>35</sup> This 'inflation inequality'<sup>36</sup> is further deepening the gulf between the region's haves and have-nots.

## 1.3 The privatization of wealth

Over the past three decades, EU countries have got significantly richer, but their governments have grown poorer in relative terms as most new wealth<sup>37</sup> has gone into private pockets, as shown in Figure 3.

**Figure 3: Public and private wealth, 1995–2023, European Union (€bn, real)**



Source: World Inequality Database <https://wid.world/data/> (accessed 9 September 2025) and Oxfam own calculations.

Notes: From 1995 to 2023 the net national wealth has increased by 126.3 %, from €41.5tn to €93.8tn. This rise is almost entirely the result of an increase in the net private wealth, which grew by 136.1%, from €37.2tn to €88.9tn. Net public wealth increased instead only by 40.4%, from €4.3tn to €6tn.

In 2023 private wealth was 15 times the public wealth, owned by local and central governments. This gap has widened from nine times in 1995.<sup>38</sup>

The fall in the share of public wealth as a proportion of total wealth, from 10% to 6%, has essentially reduced the capacity of the state to act in the interests of the many by reducing public spending and undermining investment in public policies to promote redistribution, mitigate inequality and tackle climate change.

This is a very costly trend: if public wealth had stayed at 10% of total wealth as in 1995, EU governments would have had an additional €3.6tn in 2023, equivalent to their aggregate expenditure on social protection in 2023.<sup>39</sup>

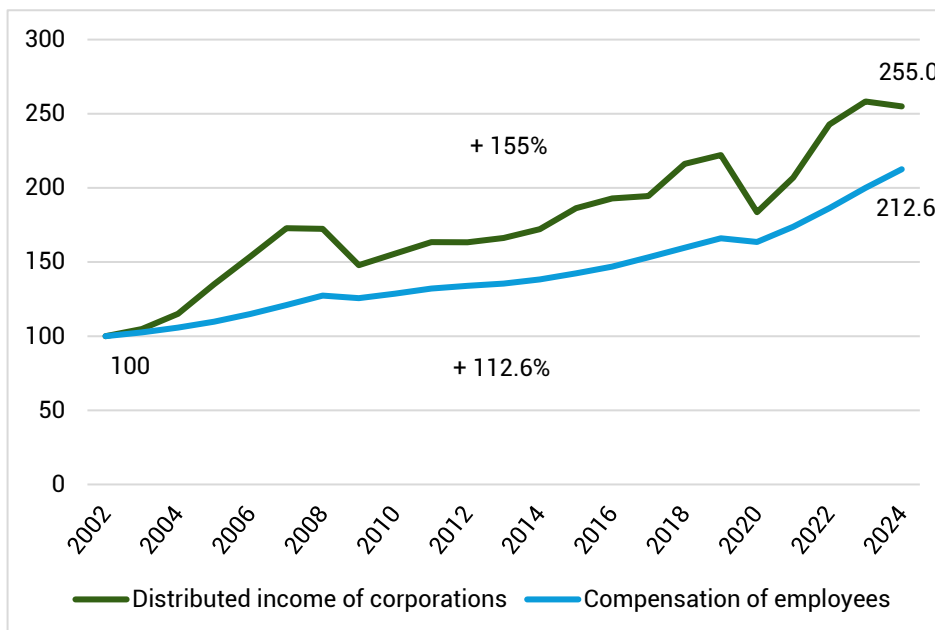
## 1.4 The gap between workers and company owners & shareholders

Inequality in the EU is also visible in the significant pay gap between workers' wages and the payouts received by CEOs and major shareholders.

New Oxfam analysis shows that the 1,000 largest companies in the EU increased their profit (in nominal terms) by 45% between 2019 and 2024. This translated into a significant pay rise for CEOs and wealthy shareholders: average CEO pay increased by 36%, and average dividends rose by 44%.<sup>40</sup>

This growth outstrips that of ordinary workers' pay. Inflation eroded salaries in recent years, with real wages in the EU decreasing from 2021 to 2023, and still below the pre-pandemic level in 2024.<sup>41</sup> Between 2002 and 2024, employee pay in the EU has doubled (in nominal terms), while the income distributed by companies mainly in the form of dividends is 2.5 times higher (Figure 4).<sup>42</sup>

**Figure 4: Compensation of employees and income distributed by companies (mainly dividends), European Union, 2002–24 (2002 = 100)**



Source: Eurostat. <https://ec.europa.eu/eurostat>

Notes: Starting from the same base value of 100 in 2002, the distributed income of corporations reached a value of 255 in 2024, with an increase of 155%, less than the compensation of employees, which was 212.6 in 2024 (increase of 112.6%).

The growing and substantial divide between capital and labour income further exacerbates income inequality by channelling more and more money into the hands of the wealthy. This gap is widened further by the beneficial tax treatment of capital compared to labour (see **Chapter 2**).

Among the EU's workers, gender and racial inequality still persists. Women still earn 13% less per hour than men on average, and the gap is

bigger at managerial level.<sup>43</sup> There are also still high numbers of women on casual, part-time, temporary and short-term contracts.<sup>44</sup> Surveys show that 35% of workers of African descent are overqualified compared to 21% of the EU population; almost 30% are on temporary contracts, which is three times higher than the EU average.<sup>45</sup>

The divides exposed in this chapter cannot be closed unless governments commit to both pre-distribution policies (e.g. competition, financial regulation and labour market policies), and redistribution policies such as social welfare and taxation.

## 2 Tax inequality in the EU

Taxation should reduce inequality through progressive taxes, where people with higher incomes or greater wealth pay a larger share of their income and wealth in taxes. This supports the social contract, tax morale, as well as the stability and sustainability of society.

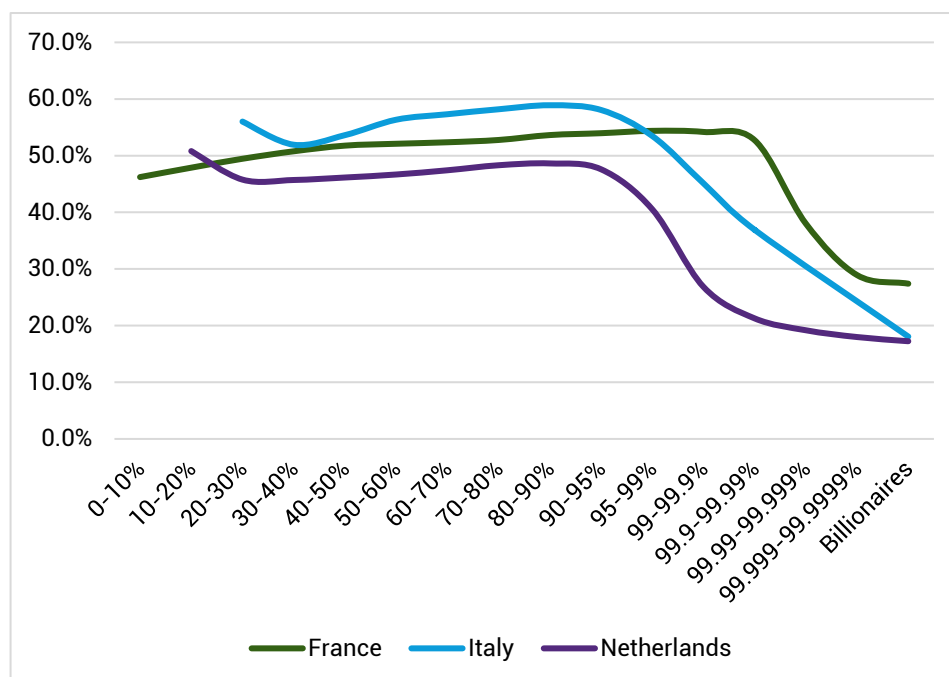
Yet, EU tax systems have become regressive at the top: the richest often pay a lower effective tax rate than ordinary people. Their taxes on wealth and corporations also make up a smaller share of total revenues.

This is a result of the neoliberal economy recipe, which has combined tax cuts for the wealthiest and their corporations, with loopholes in the taxation of income and wealth that allow part of the fortunes of the super-rich to remain completely untaxed.

### 2.1 How regressive are EU tax systems?

Generally, personal income tax increases with income, exempting those on very low incomes and featuring multiple tax brackets with increasing marginal tax rates. However, at the very top, the system is broken and becomes less progressive. This is because labour income – such as wages and salaries – makes up a smaller share of total income for the richest people, who often earn more from capital gains, dividends, holding companies and other sources that are taxed at much lower rates or even untaxed in some countries. This is evident from data collected in France, Italy, the Netherlands (Figure 5) as well as in Belgium and Spain.

**Figure 5: Total tax rates by pre-tax income groups, (% of pre-tax income)**



Source: EU Tax Observatory<sup>46</sup>

Notes: This figure reports estimates of effective tax rates by pre-tax income groups and for U.S. dollar billionaires in France, Italy and the Netherlands. These estimates include all taxes paid at all levels of government and are expressed as a percent of pre-tax income. Pre-tax income includes all national income (measured following standard national account definitions) before taxes and transfers and after the operation of the pension system. 0-10% denotes the 10% of adults at the bottom of the pre-tax income distribution, 10-20% the next decile, etc.

- In France, the tax system is slightly progressive up to the richest 0.1% of income, but strongly regressive beyond this. 99% of individuals in the income distribution face an average effective tax rate of between 46% and 54% on their economic income, considering all taxes combined. However, among the richest 0.1%, the overall tax rate becomes regressive, falling from 46% for the richest 0.1% to 26% for the richest 0.0002%. Studies have even shown that if the overall economic income of the 378 richest households is taken into account, the effective tax rate as a proportion of this income decreases significantly to 2%.<sup>47</sup>
- In Italy, the tax system is very mildly progressive for most of the income distribution, but it turns regressive for the richest 7%, with an effective tax rate falling from a peak of 50% to 32.5%.<sup>48</sup>
- The Netherlands is also a high-tax country for low-income groups and a low-tax country for the highest earners.<sup>49</sup> The effective tax rate for the richest 0.1% drops to around 20%, less than half that of the bottom 90%, at 45% of pre-tax income.

In Belgium, a recent study found that the richest 1% have an average effective tax rate of 23% on their income, compared to 43% for the average person.<sup>50</sup> The tax system is regressive from the richest 20% upwards, and the richest 1% contribute by far the least as a percentage of income.<sup>51</sup>



Another study for Spain shows that in 2022, the top 1% faced an average effective tax rate of 24.1% on their income, significantly lower than both the average effective tax rate on income (35.1%) and the rate paid by the poorest 20% (27.5%).<sup>52</sup>

These examples clearly expose the deep unfairness at the heart of EU tax systems, where the super-rich are allowed to pay far lower effective tax rates<sup>53</sup> than ordinary people<sup>54</sup>, thus exacerbating inequality.

## 2.2 The race to the bottom on taxing the richest

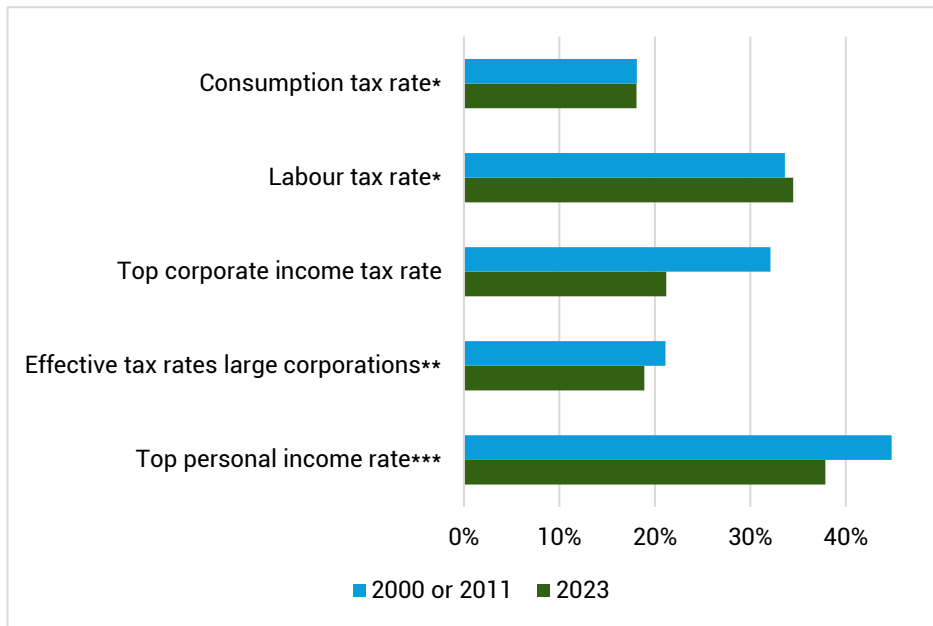
In recent decades, wealthy individuals and multinational companies have benefited from low-tax regimes and tailor-made tax loopholes.<sup>55</sup>

This was not always the case. In the decades following World War II, high taxation of wealthy individuals was commonplace across Europe. For example, France maintained a top marginal income tax rate from 60% to 70% between 1950 and 1980.<sup>56</sup> In 1980, Italy, Belgium, and the Netherlands had top marginal income tax rates of around 72%, Finland 69% and Spain and Denmark maintained a rate of 65%.<sup>57</sup> In addition, in 1990, nine EU countries had a wealth tax. These historically high tax rates coincided with some of the most prosperous economic periods in Europe. They contributed significantly to funding public goods such as education and healthcare, and effectively controlled inequality.<sup>58</sup>

Since the 1980s, the dominant neoliberal economic ideology has pushed the principle that higher taxation of capital income and wealth was deterring investment and disincentivizing savings. It also promoted the idea that tax cuts for the ultra-rich and large corporations would 'trickle down' to society as a whole. While these arguments have proven to be wrong,<sup>59</sup> they have nonetheless shaped tax policies and continue to do so, reinforced by relentless campaigning against taxation by super-rich individuals and corporations.

Aggressive tax planning, the exploitation of tax havens and holding companies, tailored tax schemes and various incentives have further reduced effective tax rates for the richest individuals.

**Figure 6: Shift in taxes from corporations and the rich to ordinary citizens, 2000 or 2011 and 2023, European Union**



Source: Oxfam calculation based on data from the European Commission.<sup>60</sup>

Notes: Figure 5 illustrates changes in selected tax rates in the European Union between 2000 or 2011 and 2023. Due to the availability of data, the year 2000 is considered for PIT and CIT tax rates, while the year 2011 is considered for implicit tax rate on labour, implicit tax rate on consumption and for effective average tax rates on large corporations. The chart shows that between the two periods, taxes on labour increased, taxes on consumption stayed stable and taxes on businesses and high incomes decreased.

\*Consumption and labour tax rates are implicit.

\*\*Large corporations are defined as companies that employ 250 or more people.<sup>61</sup>

\*\*\*Top personal income rate is marginal.

Thus, while the wealth share of the EU's richest people has increased (see **Chapter 1**), the average marginal tax rate on the highest incomes has dropped from 60.4% in the 1980s<sup>62</sup> to 44.8% in 2000 and 37.9% in 2023 (Figure 5).

Corporate taxes have also sharply declined in the EU and globally.<sup>63</sup> Between 2000 and 2023, the top statutory corporate income tax rate in the EU fell from an average of 32.1% to 21.2%, and between 2011 and 2023, the effective tax rate on large corporations dropped from an average of 21.1% to 18.9% (Figure 6). This has constituted a double dividend for the super-rich company owners and shareholders who also benefit most from corporate profits.

Specifically, holding companies are typically taxed at very low or even zero rates, which is an incentive for the wealthiest to retain their profits in such companies in order to defer or entirely avoid taxation on a significant portion of their income.<sup>64</sup>

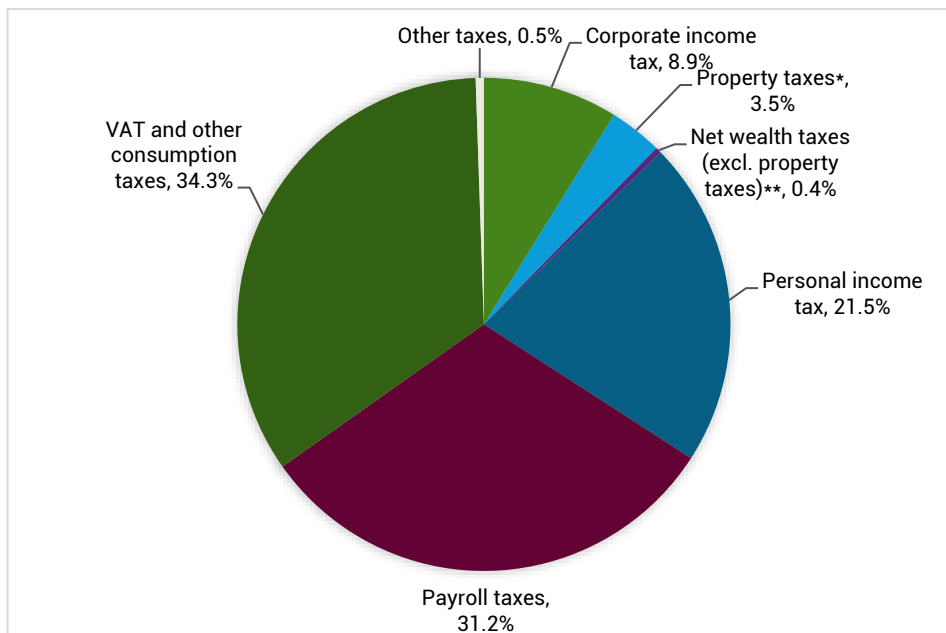
## 2.3 Higher taxes for ordinary citizens

As tax rates on rich people and corporations have been cut, governments have tried to rebalance their budgets by relying more on taxes that fall mainly on ordinary people, like those on labour, and goods and services (e.g. VAT). Consumption taxes tend to be regressive, because poorer people, and women in particular, spend a higher share of their income on consumption (see **Box 1**).

Between 2000 and 2023, the average income tax on labour in the EU rose from 33.6% to 34.5%, and consumption taxes stayed at 18.1% (Figure 6).

In 2022, more than 80% of total tax revenue in EU countries came from taxes that fall primarily on ordinary citizens (i.e. personal income, payroll<sup>65</sup> or consumption taxes), compared to around 9% from corporations and 0.4% from taxes on net wealth (Figure 7).<sup>66</sup>

**Figure 7: Composition of EU tax revenues by type of tax, 2022**



Source: Oxfam calculations based on OECD data<sup>67</sup>, taking into account 26 EU countries.

Note: In 2022, on average, EU tax revenues came mainly from consumption taxes (34.3%), payroll taxes (31.2%), and personal income tax (21.5%). Corporate taxes made up just 8.9%, while property and recurrent net wealth taxes contributed less than 4% combined. This shows a strong reliance on labour and consumption taxes over wealth-based taxation.

\*Property taxes, according to the OECD database, include taxes on immovable property or net wealth, taxes on the change of ownership of property through inheritance or gift and taxes on financial and capital transactions. Net wealth taxes are considered separately in this figure.

\*\*Net wealth tax covers taxes levied regularly (in most cases annually) on a wide range of movable and immovable property, net of debt. This is therefore not a category that covers taxes on all net wealth in the strict sense, since only Spain applies such a tax in the EU.

In 2023, the average tax wedge<sup>68</sup> (personal income tax and social security contributions) for a single worker without children earning the average wage was 38.6% in the EU and 39.3% in the Euro area. This is

around the same level as the average top personal income tax rate (38%),<sup>69</sup> and higher than taxes on capital income in many countries, which is the most important source of income for the richest 1% in many countries.<sup>70</sup>

The fact that the wealthiest people contribute such a small proportion of their income in tax (see **Section 2.1**), also undermines social solidarity. Social protection and public services make up 76% of EU government expenditure,<sup>71</sup> but ordinary citizens fund a disproportionate share of this, while the wealthiest contribute little and have the means to pay for private services.

#### **Box 1: The gender equality case for progressive taxation**

Regressive taxes like VAT disproportionately affect women, who are over-represented among low-income earners, carry out the bulk of unpaid care work, and spend a higher share of their income on consumption.<sup>72</sup> This is further exacerbated in times of austerity,<sup>73</sup> which itself is championed by neoliberal ideology and results in regressive taxation. Cuts to essential public services (such as healthcare, education, and childcare) on which women in particular depend further deepen the cycle of gender and economic inequality.

Tax systems are often presented as neutral, ignoring these structural inequalities. However, even the OECD recommends exploring gender bias in the taxation of capital income and capital gains, notably in wealth and inheritance taxes.<sup>74</sup> The IMF (long criticized for failing women through its tax advice to low-income countries)<sup>75</sup> has also acknowledged that gender dynamics provide an additional argument for raising capital income taxes, especially as lower capital income taxes disproportionately benefit men.<sup>76</sup>

The example of Denmark, one of the most gender-equal EU countries,<sup>77</sup> shows how tax policy shapes both economic and gender inequality. Oxfam found that men receive over 70% of income from stocks and shares, taxed less than wages (See **Section 3.1**), and are twice as likely as women to face the top marginal income tax rate, meaning that recent tax cuts for high earners largely benefited men.<sup>78</sup> Men also make up over three-quarters of the wealthiest 0.1%, so a wealth tax would affect them far more than VAT or other taxes that fall disproportionately on women.<sup>79</sup>

In the EU, where VAT is widely used and austerity policies have weakened public services, adopting a gender-responsive approach to taxation (which means making sure that tax policies do not put one gender at an unfair disadvantage compared to the other) would better address women's needs and help reduce economic and social inequalities.

# 3 The unfairness of tax systems in EU countries

The devil is in the details and the inequality in EU tax systems can be better understood when looking at how different types of income and wealth are taxed across EU countries. Although such taxes vary significantly from one country to another, no country taxes the super-rich adequately. Some even have particularly regressive policies that incentivize aggressive tax competition and facilitate tax avoidance.

Some EU countries have adopted low flat tax rates on personal income, and most tax capital income at lower rates than labour income. Taxation of capital gains, inheritance, wealth and property is woefully inadequate, and favourable tax regimes that benefit the richest people are on the rise. The result is that European tax systems reward capital income and wealth instead of work.

## 3.1 Taxation of income

### Personal income tax

**Worst EU performers:** Bulgaria, Estonia, Hungary and Romania

To be progressive, Personal income tax (PIT)<sup>80</sup> systems should increase rates gradually as income goes up, so that those with very high incomes contribute relatively more than the low earners. While the marginal rate plays an important role, overall progressivity also depends on elements such as brackets, thresholds and allowances.

Top PIT rates in the EU declined between 1995 and 2008 when the financial crisis occurred, with the average top statutory rate falling from 48% to less than 40%, where it remains today. This downward trend in top marginal rates has weakened the overall progressivity of PIT systems and their ability to reduce inequalities.<sup>81</sup>

Belgium (53.4%), Denmark (55.9%), France (55.4%) and Austria (55%) have the highest top rates.<sup>82</sup> At the other end, since the mid-1990s, some EU member states have adopted a low flat tax rate, applying the same tax rate to everyone regardless of income.<sup>83</sup> This is the case in Estonia (20%), Hungary (15%), Bulgaria (10%) and Romania (10%).<sup>84</sup> Additional loopholes – such as generous deductions, provisions that shrink the tax base, and rules that lower effective top tax rates – are also undermining the progressivity of PIT.

## Taxation of capital income

Capital income taxes<sup>85</sup> – on dividends and capital gains – should play a key role in modern tax systems, as they apply predominantly to the richest individuals.<sup>86</sup> In Europe, the richest 1% hold 47% of total financial wealth, which is the main source of capital income.<sup>87</sup> However, in most EU countries, capital income is taxed at rates that are generally lower than the top PIT rate. This makes tax systems more regressive, increasing vertical inequities by failing to tax adequately top earners, and horizontal inequalities by taxing individuals with similar income differently depending on the source of that income (i.e., labour or capital).

Because capital income is often taxed at lower rates than labour, high-income individuals are incentivized to reclassify wages as dividends or capital gains through companies and trusts. Preferential tax treatment of capital income also encourages tax arbitrage: wealthy company owners and shareholders can retain profits within companies, rather than distributing them as salaries, and defer asset sales, until their taxable income is lower or they can benefit from business reliefs. Those retained profits show up as unrealized capital gains, which become a major driver of personal wealth accumulation.<sup>88</sup>

Capital income taxes vary significantly across EU countries. For example, Denmark taxes dividends at a rate of up to 42% (from dividend income around €9,000 and above),<sup>89</sup> and Germany and France have introduced a flat tax of 25% and 30% on capital income, respectively.<sup>90</sup> However, other EU member states have adopted a flat tax across all income types, resulting in low contributions from the richest.

These disparities could exacerbate tax competition,<sup>91</sup> and the high mobility of capital in the EU could enable rich individuals to exploit cross-border tax differences to minimize their tax liability.

### Dividend tax

**Worst EU performers:** Estonia, Malta

Tax on income from dividends should be at least as high as tax on income from wages. When dividends are taxed less, owners of closely held businesses are incentivized to receive their income in dividends rather than wages. For example, Estonia<sup>92</sup> and Malta<sup>93</sup> do not generally tax dividends from listed or unlisted companies.<sup>94</sup>

A common way for wealthy families to pay zero or little dividend taxes is the use of holdings. These companies exist mainly to own shares and control subsidiaries, and do not produce goods or services. In many countries, dividends paid to holdings with substantial participations are tax exempt under the Parent-Subsidiary Directive<sup>95</sup> to prevent double taxation, leading to extremely low effective tax rates. In Belgium, main holdings controlled by wealthy families pay close to 0% in dividends, despite huge profits, and create a profound inequity with small shareholders, who face a 30% tax on their dividends.<sup>96</sup>



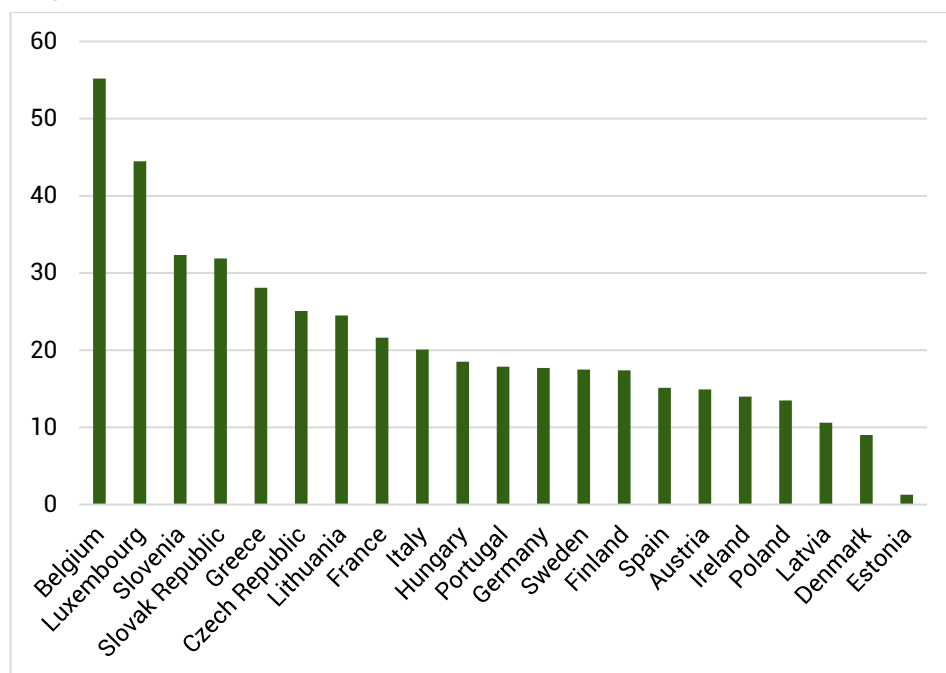
In addition, cross-border differences and lack of coordination on dividend taxes can be exploited for tax avoidance and fraud, like in the “Cum-Ex” scandal, which cost EU public coffers billions of euros.<sup>97</sup>

## Capital gains tax

**Worst EU performers:** Belgium (2025), Cyprus, Luxembourg, Malta and the Netherlands

In most EU countries, income from capital gains<sup>98</sup> is taxed at lower rates than income from work (Figure 8).<sup>99</sup>

**Figure 8: Difference between wages and long-term capital gains, 2023 effective tax rate on income, EU countries (percentage point higher for wages)**



Source: OECD (2023)<sup>100</sup>

Note: The chart calculates the difference in effective tax rates between two hypothetical individuals, both earning five times the national average salary, with one earning only wage income and the other earning only long-term capital gains from stocks.

In Luxembourg, a person pays 44 percentage point (p.p.) less tax on income from capital gains on shares than on income from labour. The country also exempts capital gains on small holdings of securities held for more than six months, making it an attractive destination for anyone looking to sell assets tax-free.<sup>101</sup>

In France, taxation on long-term capital gains for high earners is 21 p.p. lower than for labour. It is 20 p.p. lower in Italy, 15 p.p. in Spain and 9 p.p. in Denmark (Figure 8), where a tax reform in 2024 increased the gap further.<sup>102</sup>

Belgium long stood out as the most aggressive EU country in this area by not taxing capital gains at all. However, the government has proposed introducing a 10% tax on gains exceeding €10,000 from 2025.<sup>103</sup> That said, major shareholders (holding more than 20%

participation) would benefit from a full exemption on capital gains below €1m, with reduced rates applying to gains up to €10m.<sup>104</sup> Similarly, Cyprus exempts capital gains that are not related to the ownership of immovable property,<sup>105</sup> while Malta exempts many capital gains or taxes them at very low rates, especially for wealthy non-residents.<sup>106</sup>

In the Netherlands, there is no capital gains tax per se. Instead, taxpayers with high returns on assets are currently taxed on a notional return on their wealth (known as the 'Box 3' regime),<sup>107</sup> meaning that any actual capital gains above the notional return of the Box 3 regime are effectively untaxed.

Weak taxation regimes for capital gains bring cross-border tax optimization strategies within the EU itself, undermining neighbouring countries' taxing capacity. Tax competition over capital gains also pushes some states to lower rates or introduce loopholes out of fear of losing wealthy taxpayers.

## Taxation of unrealized capital gains

**Worst EU performers:** No EU country has a tax on unrealised capital gains

All EU countries effectively treat unrealized capital gains<sup>108</sup> as tax-free,<sup>109</sup> allowing the richest people to accrue value from assets without having to pay tax on their growth.<sup>110</sup>

Opponents of taxing unrealized gains argue that it is not 'real money'. But assets (e.g., financial assets, property, etc.) can be used as collateral to raise loans, so they can be used just like real money. By borrowing against their equity or real estate portfolios, wealthy asset owners can even obtain liquidity without having to sell. This essentially allows them to convert unrealized capital gains into tax-free cash while retaining ownership of the tax-free asset.

Only a few EU countries – including France, Spain, Germany, and Denmark – apply an exit tax as part of their capital gains system.<sup>111</sup> Individual taxpayers who relocate remain liable for capital gains accumulated before departure. This is good practice to curb fiscal emigration by the wealthiest, even if the Court of Justice of the EU set some boundaries to make the exit tax compliant with the free movement of persons and capital.<sup>112</sup>

Another gap in the system is that countries do not typically apply capital gains tax at death or when assets are gifted. This incentivizes taxpayers to accumulate unrealized capital gains within holding companies and transfer ownership to heirs, thereby avoiding taxation.<sup>113</sup>

## 3.2 Taxation of wealth

### Net wealth tax<sup>114</sup>

**Worst EU performers:** all except Spain

Today's extreme levels of wealth inequality mean that taxing income alone is not enough. Taxes on wealth are not a new idea: in the 1990s, 9 EU countries applied an annual wealth tax on the richest households.<sup>115</sup>

Today, Spain is the only EU country with a net wealth tax (see **Box 2**); Germany and Denmark abolished their wealth tax as early as 1997; Sweden followed suit in 2007.<sup>116</sup> France narrowed the scope of its tax to cover only real estate wealth in 2018.<sup>117</sup>

#### Box 2: Spain's wealth tax

Spain's net wealth tax applies to all worldwide net assets held by Spanish tax residents, as well as assets located in Spain owned by non-residents. It is assessed annually based on holdings as of 31 December each year. Taxpayers must file a wealth tax declaration if their total assets exceed €2m, regardless of whether any tax is due. The tax has a progressive structure, with rates ranging from 0.2% to 3.5%, and considers a minimum exemption threshold of €700,000 per individual, as well as a primary residence exemption of up to €300,000.<sup>118</sup>

The net wealth tax was first introduced in 1978, abolished in 2008, and reintroduced in 2011 as a temporary measure. Since 2021, it has been made permanent and is collected annually. Although it is a state tax, its administration is transferred to the regional governments, which collect the revenues and have wide discretion to adjust rates and apply exemptions and discounts. For example, since 2009, the Madrid region has applied an exemption of up to 100%.

In response, the central government introduced in 2022 a temporary complementary 'Solidarity tax on large fortunes', applying to individuals with net wealth above €3m across the Spanish territory. To avoid double taxation, taxpayers are only required to pay solidarity tax on amounts not already taxed by their region, leading to regions like Madrid and others to cancel the 100% exemption. As a result, internal tax competition among Spain's 17 autonomous regions<sup>119</sup> has been significantly reduced, while combined revenue from the wealth tax and the solidarity tax has increased by nearly 39% in just two years.<sup>120</sup>

While on paper Spain's wealth tax has a progressive structure, in practice the design still includes two major limitations that undermine both revenue collection and progressivity at the very top. The first is the broad exemption for family-owned companies, including very large and public companies. The second is the "60% rule", which caps the sum of the wealth tax and the PIT to be paid at 60% of an individual's total income. These two limitations benefit the wealthiest the most, making the wealth tax not progressive in practice.

Nevertheless, the combined effect of the wealth tax and the Solidarity Tax has shown a very encouraging trend in revenue collection, especially if

remaining loopholes are eliminated in the future. Despite the alarmism around a possible exodus of the rich, both the number of taxpayers and revenues collected have increased. Between 2011 and 2022 (latest data available), the number of tax returns significantly increased by 77% (from 130.216 to 230.365), while revenues more than doubled (from 739,5 to 1.873 million euros).<sup>121</sup>

While the Netherlands does not levy a formal net wealth tax, some income from savings and investments (the 'Box 3' system introduced in **Section 3.1**) is taxed based on a deemed – not actual – return on net assets. Although taxpayers with lower returns than the deemed returns are taxed based on their actual returns, those with high returns face relatively low effective tax rates as they are not taxed based on their actual returns but on the deemed returns. In essence, the system contributes to wealth inequality.<sup>122</sup>

**Table 1: Net wealth tax revenues as % of total tax revenue and % of GDP, 1990 and latest year**

Country (latest year of data)	% of total tax revenues		% GDP	
	1990	Latest year	1990	Latest year
Austria (1993)	0.35	0.34	0.14	0.14
Denmark (1996)	0.24	0.13	0.11	0.06
Finland (2005)	0.06	0.18	0.03	0.08
France (2017)	0.22	0.48	0.09	0.22
Germany (1996)	0.31	0.30	0.11	0.11
The Netherlands (2000)	0.53	0.49	0.21	0.18
Spain (2023)	0.61	0.57	0.19	0.21
Sweden (2006)	0.42	0.42	0.20	0.19

Source: OECD Data Explorer

Notes: Data from the latest year refer to the last year when the wealth tax was in place, before repeal, except for Spain which still has a wealth tax.

Concerns over capital flight and valuation difficulties are often cited to justify the repeal of wealth taxes; historical wealth taxes did have other shortcomings like exemptions and poor progressivity.<sup>123</sup> Today, the case for wealth taxation is strong, supported by evidence of feasibility from Spain (see **Box 2**). In **Chapter 4**, we show that addressing weaknesses is possible and ultimately depends on political will.

## Inheritance tax

**Worst EU performers:** Austria, Cyprus, Czech Republic, Estonia, Latvia, Malta, Portugal, Romania, Slovakia and Sweden

Inheritance tax,<sup>124</sup> especially when designed progressively and applied primarily on large transfers of wealth, is one of the most progressive and legitimate forms of taxation, as it targets the transmission of unearned wealth and therefore is a very effective way to reduce intergenerational inequality.

The coming decades will see one of the largest transfers of wealth in history. It is projected that, by 2033, some 270,000 wealthy individuals in Europe will pass on a total of US\$7.4 trillion, which accounts for 22% of global wealth transfers during the period.<sup>125</sup> This risks widening already extreme inequality and creating a new European aristocracy. It is also estimated that at least 90% of those transferring great wealth over the next decade are men.<sup>126</sup>

However, 10 EU countries do not levy inheritance tax (Table 2), allowing great fortunes to be passed on without any tax contribution. Six of these countries abolished their inheritance and/or gift taxes since 2001. For example, Sweden ended its centuries-old inheritance tax in 2005.<sup>127</sup>

Rates vary significantly across EU countries (Table 2), and revenues remain very low; in 2019, they accounted for less than 1% of total tax revenue in all EU countries except Belgium and France.<sup>128</sup>

The revenue-raising potential of inheritance tax is undermined by preferential treatment for transfers to close relatives; relief on the transfer of specific assets (such as primary residences, business and agricultural assets, pension assets and life insurance policies); and estate planning (which allows certain assets to be transferred by donation, at preferential rates).

For example, a child inheriting from their parents in Germany<sup>129</sup> or Italy<sup>130</sup> can benefit from a tax-free allowance of around €400,000 or €1m, respectively. Above those levels, inheritance tax has only a progressive rate of 7%–30% in Germany and a flat rate of 4% in Italy.

In 2024, Denmark reduced the rate on inheriting family-owned businesses, following an intense lobbying campaign from some of the richest families in the country.<sup>131</sup> Analysis from the Danish Ministry of taxation shows that the tax cut will overwhelmingly go to the richest.<sup>132</sup>

In France, heirs should be subject to a 45% inheritance tax rate on amounts over €1.8m. In practice, however, the “super heirs” - the richest 0.1% of heirs who inherit around €13m each (about 180 times the median inheritance) - pay only around 10% due to tax loopholes and exemptions like allowances on donations, exemptions on life insurance, the ability to reduce the taxable value of an asset through property dismemberment, and exemptions on family businesses. If this situation is not corrected, it is estimated that France will lose out on up to €160bn in tax revenues over the next thirty years.<sup>133</sup>

Other countries face the same shortcomings. For example, Ireland's 33% inheritance tax rate has generous thresholds that allow many people to escape taxation through low or even zero tax rates.<sup>134</sup>

**Table 2: Inheritance taxes, including rates and revenues raised (as of 2024), in EU countries**

Country	Year of first introduction	Year of repeal	Statutory tax rates (%)	Revenues % total tax (avg. 2010–20)
Belgium	1936		3 to 85.75	1.56
Bulgaria	1998		0.4 to 6.6	n.a.
Croatia	2018		3 to 4	n.a.
Denmark	1995 <sup>135</sup>		0 to 36.25	0.51
Finland	1940		7 to 33	0.66
France	1791		5 to 60	1.18
Germany	1974 <sup>136</sup>		7 to 50	0.51
Greece	2001		1 to 40	0.2
Hungary	1918		18	0.06
Ireland	1976		33	0.62
Italy	2006 <sup>137</sup>		4 to 8	0.09
Lithuania	2003		5 to 10	0.01
Luxembourg	1817		0 to 48	0.4
The Netherlands	1956		10 to 40	0.65
Poland	1983		0 to 20	0.05
Slovenia	2006		5 to 39	0.07
Spain	1988		7.65 to 34 <sup>138</sup>	0.69
Austria	1955	2008	2 to 60	
Czech Republic	1993	2014	3.5 to 20	0.15
Portugal	1959	2004	5	
Cyprus	N/A	2001		
Slovakia	1993	2004	1 to 40	
Sweden	1884	2004	10 to 30 <sup>139</sup>	
Estonia	Never implemented			
Latvia	Never implemented			
Malta	Never implemented			
Romania	Never implemented			

Source: M. Schratzenstaller.(2024) <sup>140</sup> and others (Spain and Sweden)

Notes: Inheritance tax systems vary considerably from one EU country to another in terms of tax rates and contribution to tax revenues. While most countries maintain inheritance taxes ranging from less than 5% to more than 80% depending on the degree of kinship, their share of total tax revenues remains modest, generally less than 2%. Several EU countries have also repealed or never implemented these types of contributions.



# Property tax

**Worst EU performers:** Estonia, Malta

Property ownership is a significant component of the assets held by the wealthiest individuals, making property taxes<sup>141</sup> highly redistributive. Property taxes are effective tools in preventing the concentration of land and housing in a small number of hands and reducing disparities between wealthy property owners and lower-income renters.<sup>142</sup> They are also considered very efficient because property is highly immobile, and taxes on property incentivize productive use of land and buildings. Low property taxes benefit the richest (who have substantial real estate assets), deepening inequality.<sup>143</sup>

After stabilizing at around 2.25% of GDP between 2014 and 2020, property tax revenues in the EU fell to 1.85% of GDP in 2023 – their lowest level since 2009.<sup>144</sup>

Again, the EU picture is highly fragmented with significant variations. For example, recurrent property taxes account for more than 35% of local government revenues in France.<sup>145</sup> On the other hand, Malta does not levy any recurrent tax on immovable property, and Estonia only taxes the value of land, not buildings.<sup>146</sup>

The systems also differ in terms of tax base. Some are based on an outdated cadastral value – such as the municipal property tax in Spain<sup>147</sup> and Italy – while others use the more realistic current market value of the property as a reference, like Ireland<sup>148</sup> and the Netherlands.<sup>149</sup> Property tax systems that rely on outdated cadastral values can exacerbate inequality by allowing wealthier property owners to benefit from lower assessed values, while modest homeowners pay a proportionately higher share of their property's value. This is a particular problem in Italy, where there is a greater mismatch between cadastral values and market prices for higher-value properties and the richest homeowners.<sup>150</sup>

## 3.3 Harmful tax regimes

Discussions of 'harmful tax competition' have traditionally focused on corporate tax havens, but there are also harmful tax regimes<sup>151</sup> for individuals. These often target wealthy foreign retirees or pensioners, and sometimes specific professionals (like highly skilled workers or athletes) to attract them to relocate, either physically or with just their assets.

The use of special tax schemes for wealthy or mobile individuals has increased substantially in recent decades. In the mid-1990s, only five personal tax regimes of this kind existed in the EU; as of 2020, there were 28.<sup>152</sup>

At the elite end of the spectrum, provisions such as non-domiciled resident programmes or lump-sum tax agreements specifically target

ultra-rich individuals by allowing them to pay substantially reduced taxes relative to their actual income or wealth. Other regimes, including flat-tax deals and targeted expatriate incentives, cater to upper-middle-class professionals or moderately wealthy individuals, offering them attractive (but generally less extreme) benefits, like slightly reduced tax rates or temporary relief.<sup>153</sup>

Table 3 details some examples of harmful tax regimes in EU countries that target the wealthiest foreigners. Similar schemes also exist in other countries, including Portugal, Denmark, Luxembourg, the Netherlands, Spain,<sup>154</sup> Sweden, France, Belgium, Ireland, Greece, Finland and Austria.<sup>155</sup> They are primarily intended to attract retirees or highly skilled workers.

**Table 3: Examples of harmful tax regimes for the wealthiest**

Country and regime	Target group	Tax scheme
<b>Italy</b> – High-net-worth individual lump-sum regime	Wealthy new residents	<p>It grants new tax residents the option to pay a flat tax of €200,000 per year (and €25,000 for each of their family members moving to Italy) on their foreign-source income, while their Italian source income remains taxed under the domestic tax rules. The scheme was introduced with a lower lump sum of €100,000 (and early entrants remain at that rate).</p> <p>The regime represents a major tax break for high-net-worth individuals who derive their income from countries with high(er) levels of personal taxation. The Italian Court of Auditors has stressed the impossibility of conducting any serious cost-benefit assessment due to a lack of transparency and data.<sup>156</sup> Notably, the regime imposes no conditionality on beneficiaries (like requirements to invest or contribute economically to Italy), making it particularly attractive for rentier capital holders. The attractiveness of the regime is also represented by the opportunity to obtain the Italian tax residency status in view of intergenerational wealth transfer, given Italy's exceptionally lenient inheritance tax rules, that place the country among the worst tax havens for inheritance and inter vivos donations in the EU.<sup>157</sup></p>
<b>Malta</b> – Residence Programme Rule (RP) and Global Residence Programme (GRP)	High-net-worth individuals	<p>The RP Rule and the GRP allow a flat 15% tax rate on all income for foreigners not employed in Malta, with an annual minimum tax of €15,000. The programmes are restricted to high-net-worth individuals meeting specific criteria, such as holding immovable property in Malta worth at least €275,000.<sup>158</sup></p>
<b>Cyprus</b> – High-income expat exemption	High-earning expatriates	<p>New residents employed in Cyprus enjoy a 50% income tax exemption on employment earnings above €100k/year.<sup>159</sup></p>

The existence of wide-ranging preferential regimes among EU member states intensifies intra-EU tax competition and a race to the bottom on tax, as countries seek to undercut and outdo each other. This undermines cooperation to achieve and maintain fair tax standards.

It also significantly erodes tax progressivity and equity: it creates vertical inequity by reducing taxes disproportionately for those able to contribute most,<sup>160</sup> and horizontal inequity as a local high-earner might pay the standard top rate, while a similarly wealthy new resident pays far less. Over time, this can erode public trust in the tax system's fairness.

Finally, preferential regimes for the elite lead to significant revenue loss for both host countries and countries of origin. Based on a study published by the EU Tax Observatory, such regimes lead to lost revenue of over €3.9bn annually in EU host countries.<sup>161</sup>

# 4 A roadmap to tax the super-rich in the EU

While the EU has deployed a broad agenda to review corporate taxation in the last decade – particularly on corporate tax avoidance measures – it has never directly intervened on member states' taxation of individuals, except for the exchange of information. This is a missed opportunity. The EU could play a critical role in harmonizing EU countries' wider tax systems based on the same legislative principles that guide their interventions on corporate taxation. This would ensure the correct functioning of the internal market and limit tax avoidance and aggressive tax competition within the EU.

There are indications that appetite for such interventions is building. The European Commission and Parliament have shown interest in taxation of the wealthiest, and debate has increased in national institutions in the EU. For example, in his public hearing, Commissioner Hoekstra said it was 'imperative' to tackle wealth inequality through a fair tax system.<sup>162</sup> In 2024, Commissioner Dombrovskis announced that the Commission would launch a study examining existing wealth-related taxes in the EU.<sup>163</sup> In February 2025, the French National Assembly voted for a 2% minimum tax on centi-millionaires, but the measure was finally not adopted by the Senate.<sup>164</sup>

The case for urgent action is also growing.

The agenda of the EU and its member states requires a stronger financial foundation, especially in view of the next EU long-term budget.<sup>165</sup> It is not possible to drive a just transition, enhance social inclusion, advance cohesion, and fulfil international cooperation with partners without significant additional resources. Budgets cannot be stretched and shuffled to achieve these goals, and paying for them with further austerity measures that hit the poorest and most vulnerable people is not politically feasible. The resources Europe needs are in the pockets of its wealthiest individuals, and the only practical and socially acceptable solution is to increase taxes on them and the companies they run.

**Table 4: Estimated revenue gains from taxing the super-rich**

Measure	Revenue gains (in €bn per year)	What could be financed (as an example) <sup>166</sup>
Stop harmful tax regimes for the wealthiest	3.9	One third of the current annual EU aid budget (around €11.3bn). <sup>167</sup>
European assets registry	37.7	Almost two years of the EU budgets for employment, social and education policies (€142.7bn over seven years).

Measure	Revenue gains (in €bn per year)	What could be financed (as an example) <sup>166</sup>
European wealth tax	286.5	One year of the new EU long-term budget proposal (€288bn)

Source: Oxfam's own calculation based on EU Tax Observatory, Tax Justice Network, Oxfam and European Commission.<sup>168</sup>

The very existence of extreme wealth is also fuelling climate breakdown. The excessive consumption and investment emissions of the world's richest people are burning through the world's remaining carbon budget.<sup>169</sup> Just 31 of the EU's wealthiest individuals emit 3,469 tons each per year through the use of their superyachts and jets.<sup>170</sup> This figure is 432 times more than the average European.<sup>171</sup> Taxing the wealthiest would target the highest polluters, disincentivizing their carbon-intensive habits and reducing extreme wealth. Simply put, taxing the super-rich is now a necessary step to averting climate catastrophe.

### Box 3: Momentum is growing for taxing the super-rich

Momentum on taxing the super-rich is growing, which is recognized in the European Commission's *Annual Report on Taxation 2025*.<sup>172</sup>

For example, in November 2024, G20 leaders meeting in Brazil agreed for the first time in history to launch international cooperation on taxing the super-rich.<sup>173</sup> The South African Presidency is building on this historic step in the lead-up to the Johannesburg G20 Summit in November 2025, as President Cyril Ramaphosa has announced the creation of an Extraordinary Committee of Independent Experts on Extreme Wealth Inequality, chaired by Joseph Stiglitz.<sup>174</sup>

At the Fourth International Conference on Financing for Development in Seville in July 2025, 192 countries committed to '*address tax evasion and avoidance by high-net-worth individuals and ensure their effective taxation*',<sup>175</sup> and Spain and Brazil (supported by South Africa and Chile) launched the 'Sevilla Platform for Action' on taxing the super-rich, a coalition to advance initiatives on taxing the high-net-worth Individuals.<sup>176</sup>

In addition, 192 countries are negotiating a UN Framework Convention on International Tax Cooperation.<sup>177</sup> The Convention, to be agreed by 2027, will include a commitment on taxation of high-net-worth individuals.

There is also strong public support. In May 2025, 9 out of 10 people across 13 countries around the world (including France, Germany, Italy and Spain) supported taxing the super-rich to pay for public services and climate action.<sup>178</sup> In another recent survey covering all EU countries, nearly two-thirds (65%) of Europeans support the introduction of a tax for the wealthiest individuals to ensure they pay a minimum level of taxes.<sup>179</sup> In 2024, more than 350,000 EU citizens signed a petition to ask for a European wealth tax.<sup>180</sup>

There are several steps the EU could take to make tax systems in the region more progressive and significantly decrease inequality. The time to act is now. We urge EU institutions and their member states to act on the following initiatives, and the Commission to show the way by including them in its forthcoming report on wealth-related taxes in the EU.

## 4.1 Screen harmful tax regimes for individuals

Preferential tax regimes for individuals, particularly the richest, are costing billions and undermining the progressivity of EU income tax systems. The EU Tax Observatory estimates that ending the most harmful tax regimes for individuals in EU countries could reclaim €3.9bn each year – enough to cover a third of the current annual EU's aid budget.<sup>181</sup>

The Council of the EU has a body, the Code of Conduct Group (Business Taxation), that, since 1997, reviews potentially harmful tax practices granted to corporations. Its mandate could be extended to assess harmful tax regimes for individuals – a direction that was suggested by several member states and the Commission when the Code was drafted.<sup>182</sup> There have been discussions since, but some countries, such as the Netherlands and Ireland, have blocked reform.<sup>183</sup>

In September 2024, the influential think tank Bruegel recommended 'a code of conduct on personal income taxation'<sup>184</sup> to the commissioner responsible for tax policy. Moreover, some of the blockers have changed their position. For example, at the 2025 Tax Symposium in Brussels, the Dutch minister for tax affairs stated that 'it is now time to expand that mandate of the Code of Conduct Group to individuals'.<sup>185</sup>

**There is no rational or practical reason to limit the screening of harmful tax regimes to corporations, and therefore the EU should extend it to cover personal taxation.**

## 4.2 Common standards on the taxation of capital

As described in **Section 3.1**, capital income is unequally distributed, taxed differently between EU countries, and at rates generally far lower than labour. To address this, the EU could take action on harmonization of different capital income taxes, as also recommended by the think tank Bruegel.<sup>186</sup> In addition to addressing income inequality, harmonizing capital taxation could help to strengthen the Capital Markets Union;<sup>187</sup> capital is mobile, and significant differences in tax rates are likely to cause distortions within the European single market.<sup>188</sup>

The EU could start by **establishing a common definition of what types of income should be taxed and/or by setting a standard to at least equalize the taxation of capital income (dividends and capital gains) to the taxation of labour**. There are precedents for harmonisation in the VAT Directive, for example.<sup>189</sup>

They could also promote best practices, like Denmark's progressive



taxation of capital gains, and the exit taxes for capital gains in France, Spain, Germany and Denmark, while discouraging harmful tax practices, like the very low tax rates on dividends in Malta and capital gains exemptions in Luxembourg and Belgium (see **Section 3.1**).

## 4.3 A European assets registry

To tax assets and limit tax avoidance, transparency of assets' value and beneficial owners is essential. However, a substantial share of high-net-worth individuals' assets is allowed to slip through the net.

According to the EU Tax Observatory offshore financial wealth held abroad represented 16.8% of EU countries' GDP on average in 2022 (US\$2.1 trillion).<sup>190</sup> According to Tax Justice Network, in 2021, EU countries lost €37.7bn to offshore tax evasion related to undeclared financial wealth,<sup>191</sup> enough to cover almost two years of the EU budget for social, education and employment policies.<sup>192</sup>

Improved automatic information exchange on offshore banking accounts has reduced untaxed offshore wealth, but loopholes remain, and the majority of assets are not covered. In particular, real estate is not included in the existing automatic exchange of information, which has made it the preferred store of wealth over financial assets and allows for greater tax evasion.<sup>193</sup> In Norway, for example, research finds that offshore ownership of real estate involved tax evasion in three-quarters of cases.<sup>194</sup> An investigation into the real estate of Italian owners in Dubai suggests that Italy might have lost between €2.7m and €5.4m in foreign property value taxes in 2022 because of undeclared real estate assets in the Arab Emirate.<sup>195</sup>

In EU countries, there are transparency registries of beneficial owners for companies and trusts, and bank account registries, but these have limitations and suffer from fragmentation.<sup>196</sup> The 6th Anti-Money Laundering Directive – adopted in May 2024 – obliges EU countries to have national real estate registers, but does not include an interconnection between them.<sup>197</sup> Assets like listed securities, crypto assets, artwork, jewellery, luxury cars, yachts and planes tend to be covered by national registries, but these are not connected to other registries, including those on beneficial ownership.<sup>198</sup>

It is clear that more coordination and full transparency facilitate the tracking and taxation of assets. Thus, **the EU and its member states should work together to establish a common centralized European Asset Registry that lists all types of assets and their respective owners, and brings together information from all EU countries in one common repository.**

Achieving this would involve:

- Assigning correct and up-to-date values to assets in national registers, for example, by applying standards to value private business and artwork,<sup>199</sup> and assigning a true market value for

immovable assets (rather than using outdated cadastral values).

- Connecting existing national registers domestically (for real estate, beneficial ownership and national bank accounts), as recommended by the EC Feasibility Study.<sup>200</sup>
- Creating additional national registers for assets not yet covered.
- Harmonizing information between EU countries.
- Linking national registers between EU countries for different types of assets so that ownership information is accessible by authorities across the EU.

## 4.4 A European wealth tax

The European Commission's 2024 *Annual Report on Taxation* recognized that wealth taxation is gaining '*traction globally*' as a tool to '*ensure a fairer sharing of the tax contribution across individuals*'.<sup>201</sup> In addition to that, in the first half of 2025, the Polish Presidency of the Council presented a "minimum tax on the ultra-high-net-worth of individuals in the EU" as one of the potential new own resources for the EU budget.<sup>202</sup>

Oxfam estimates that a European wealth tax of up to 5% on multi-millionaires and billionaires could raise €286.5bn per year.<sup>203</sup> This would be enough to cover one year of the new EU long-term budget proposal.<sup>204</sup> The EU Tax Observatory estimates that a 2% minimum tax on the wealth of centi-millionaires in the EU would '*neutralize the regressivity of European tax systems and raise €67bn. A 3% minimum tax would make European tax systems slightly progressive and raise €121bn*'.<sup>205</sup>

While only one EU country (Spain) currently has a wealth tax, there is no reason why other EU countries cannot implement one (see **Box 4**), or why the EU can't introduce a European wealth tax. Recent progress on tax cooperation, information exchange, and transparency on beneficial ownership would make the implementation of wealth taxes easier than in the past.

The EU could set common standards for national wealth taxes or introduce an EU-wide wealth tax. **Oxfam recommends a wealth tax with a high threshold (applying to the richest 1%) and progressive tax rates, in order to target the wealthiest and at rates high enough to meaningfully reduce economic inequality.** All types of assets of an individual should be included – domestic and offshore – and correctly valued, to avoid people shifting their wealth to low-tax or exempt assets. The creation of asset registries (as discussed in **Section 4.3**) would facilitate this. A European wealth tax should also be a substitute, not in addition to existing wealth taxes.

### Box 4: Debunking wealth tax myths

*Myth 1: The wealthiest individuals will just move country*

Evidence shows that few wealthy people leave when a wealth tax is introduced.<sup>206</sup> In Spain, between 2011 and 2022 (latest data available), the number of tax returns has increased by 77% while the revenue collected has more than doubled (see **Box 2**).

Only 0.23% of taxpayers subject to France's Wealth Solidarity Tax in 2014 left the country; a loss of just 780 taxpayers, and 300 returned in the same year.<sup>207</sup> A study in Sweden and Denmark found that a one percentage point increase in the top wealth tax rate reduces the stock of wealthy taxpayers by about 2%, with very modest effects on the economy.<sup>208</sup>

Countries can introduce a tax on wealth when people leave the fiscal residence country (an 'exit tax', see **Section 3.2**), or tax individuals for a number of years after they leave. Both act as powerful disincentives to shopping and changing jurisdictions. Moreover, studies show that the vast majority of the world's millionaires live in their home country. Only around 5% move after accruing their wealth.<sup>209</sup>

Of course, an EU-coordinated wealth tax would significantly reduce the opportunity for individuals to benefit from changing residence within the EU, as all countries would have to implement the tax.

#### *Myth 2: The wealthiest individuals will hide their assets*

It is much harder to hide wealth in secret offshore accounts than it used to be. All EU countries are now part of a global system that exchanges financial information and automatically notifies all tax administrations in the region if an EU citizen opens a bank account in another country, including tax havens. According to an IMF study, this system has led to an average 25% decrease in bank deposits by foreign taxpayers in tax havens.<sup>210</sup> While loopholes still exist, this is a significant step in preventing the super-rich from hiding wealth offshore. Action on beneficial ownership transparency and assets registries would further reduce it.<sup>211</sup>

#### *Myth 3: Rich people will stop investing in the economy and job creation*

Between 1950 and 1980, high taxes on corporations and rich people existed side by side with impressive levels of job creation and improved living standards across the Global North.

The study on Sweden and Denmark mentioned above found that wealth taxes modestly impacted employment and investment,<sup>212</sup> because even when wealthy individuals expatriate, it does not necessarily mean they relocate their economic activity.

Low-tax regimes for the wealthiest individuals reduce government budgets and the latter's ability to invest in the economy and create jobs, such as teachers, nurses and firefighters. Even the IMF has recognized that tax cuts for the rich can increase inequality<sup>213</sup> and that taxing the richest can help reduce inequality without harming growth.<sup>214</sup>

## 4.5 Progressive domestic tax systems

While more coordination on tax policies would create a better level playing field and be more efficient, EU member states should not wait for regional or global initiatives to be fully implemented. They can and should act now to restore the progressivity of their tax systems and start taxing the wealthiest fairly.

**Tax policies should be appropriate to national contexts, but there are common recommendations that each EU government could follow:**

- Increase taxes on the richest 1% by introducing higher top rates of tax on personal income for the highest earners, and by taxing income from dividends and capital gains at rates that are at least as high as those on income from work.
- Tax the wealth of the richest 1% at rates high enough to bring down inequality, by:
  - Introducing robust domestic net wealth taxes on the wealthiest.
  - Effectively implementing steeply progressive inheritance and property taxes.
  - Updating housing and land values to current market levels as a first step towards reforming property taxation.
- Ensure more transparency of information on national tax systems in order to have a clear picture of how much the wealthiest pay in taxes by, for example, publishing full and periodical distributional accounts of income and wealth, especially at the very top, and by introducing reporting requirements on assets and their geographic location for the super-rich.<sup>215</sup>

National action would bring direct benefits at home – raising revenue and tackling inequality – but also have a positive spillover effect, incentivizing progress elsewhere. For example, the EU solidarity contribution (a windfall profit tax on energy companies) was agreed in 2022 after some European countries like Italy, Spain, Romania and Greece had already introduced or announced one.<sup>216</sup> Similarly, some EU countries have been at the forefront of the taxation of the digital economy, triggering the 'Two-Pillar Solution' at the OECD.<sup>217</sup>

## 4.6 Global champions of fair taxation

More than ever, we need leaders to implement progressive tax reforms that will build a more sustainable future for all. We also need exemplars to champion fair taxation at the global level. The EU and its member states could take this role.

The UN is the most representative body negotiating tax issues, and the forthcoming Tax Convention could establish truly global and inclusive standards on taxation. Yet EU countries have thus far always abstained in votes on the Convention, failing to use their voices to champion progressive reform.

At the G20 Summit in Johannesburg in November 2025, the world's largest economies will have the opportunity to consolidate their commitment to a global deal to tax the super-rich (see **Box 3**).

The moment has come for the EU to proactively champion progressive reform and increased taxation of the super-rich at the international level, and help get a global deal over the line. **We therefore urge the EU and its**

**member states to:**

- **Push for an ambitious G20 declaration** that commits G20 members to implement a global standard to tax the super-rich. This is a necessary step to transform last year's historic agreement into action.
- **Actively cooperate in negotiations towards the UN Framework Convention on International Tax Cooperation.** This also means championing an ambitious commitment to progressive taxation and the taxation of high-net-worth individuals in the Convention.
- **Join the coalition of the willing to tax the richest established at the Financing for Development Summit in Sevilla** ('Sevilla Platform for Action' on taxing the super-rich).

# 5 Conclusion

In this time of reshuffling of the geopolitical equilibrium and growing trade wars, the EU and its member states have an opportunity to show leadership and become champions in taxation of the super-rich.

First, the EU can lead internally, by adopting a roadmap to tax the super-rich, with feasible and practical steps to end favourable tax treatments for the wealthiest, increase data collection and transparency on their assets, and ensure adequate taxation of capital and wealth across the EU. The upcoming European Commission report on wealth-related taxation can serve as a starting point.

Second, EU countries should not wait. They can act domestically by increasing taxes on the income and wealth of the richest 1% to significantly reduce inequality, introducing, for example, domestic net wealth taxes and other taxes on the super-rich individuals.

Third, the EU and its member states should play a more constructive role globally by actively promoting an ambitious UN Framework Convention on International Tax Cooperation, including the taxation of the super-rich, and by supporting and contributing to the 'Sevilla Platform for Action' on taxing the super-rich.

The solution to constrain public revenues and increase inequality is there. What we need is the political will to act. We demand that the EU and EU governments put the needs of people and planet before the greed of their wealthiest citizens by taxing the super-rich.

# Note

<sup>1</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 4.

<sup>2</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 5.

<sup>3</sup> See methodology note, stats 1 and 2.

<sup>4</sup> 'At risk of poverty or social exclusion [...] corresponds to the sum of persons who are either at risk of poverty, or severely materially and socially deprived or living in a household with a very low work intensity.' Eurostat. (n.d.). *Statistics Explained, Glossary: At risk of poverty or social exclusion (AROPE)*. [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:At\\_risk\\_of\\_poverty\\_or\\_social\\_exclusion\\_\(AROPE\)](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:At_risk_of_poverty_or_social_exclusion_(AROPE))

<sup>5</sup> Based on data from: OECD. <https://data-explorer.oecd.org/>

See methodology note, stat 18.

<sup>6</sup> A. Decoster & al. (16 January 2025). *Inégalités en Belgique: un paradoxe?* Bruxelles: Éditions Racine/LannooCampus, 2ed. [French]. <https://www.racine.be/fr/in%C3%A9galit%C3%A9s-en-belgique-un-paradoxe>

<sup>7</sup> European Commission. (August 2025). *Citizens' attitudes towards taxation*. Eurobarometer Report. <https://europa.eu/eurobarometer/surveys/detail/3375>

<sup>8</sup> Oxfam. (15 January 2024). *Wealth of EU's five richest men soars almost 6 million euros every hour since 2020*. <https://www.oxfam.org/en/press-releases/wealth-eus-five-richest-men-soars-almost-6-million-euros-every-hour-2020>

<sup>9</sup> The new EU long-term budget refers to the European Commission's proposal for the 2021-2027 budget, including the Multiannual Financial Framework (1.2 trillion) and Next Generation EU (806.9 billion), for a total of 2.018 trillion.

See methodology note, stat 23.

<sup>10</sup> Based on: A. Alstadsæter, S. Godar, P. Nicolaides and G. Zucman. (2024). *Global Tax Evasion Report 2024*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/global-tax-evasion-report-2024/>

See methodology note, stat 21.

<sup>11</sup> Aid budget refers to the financial programming of the Neighbourhood, Development and International Cooperation Instrument – Global Europe. See: European Commission (2025). *Neighbourhood, Development and International Cooperation Instrument – Global Europe – Performance*. [https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/neighbourhood-development-and-international-cooperation-instrument-global-europe-performance\\_en](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/neighbourhood-development-and-international-cooperation-instrument-global-europe-performance_en)

See methodology note, stat 21.

<sup>12</sup> M. Alestig, N. Dabi, A. Jeurkar, A. Laitland, M. Lawson, D. Horen Greenford, C. Lesk and A. Khalfan. (2024). *Carbon Inequality Kills: Why curbing the excessive emissions of an elite few can create a sustainable planet for all*. Oxfam. <https://policy-practice.oxfam.org/resources/carbon-inequality-kills-why-curbing-the-excessive-emissions-of-an-elite-few-can-621656/>

<sup>13</sup> *Address of Pope Leo XIV to Members of the International Inter-Parliamentary Union*. (21 June 2025). <https://www.vatican.va/content/leo-xiv/en/speeches/2025/june/documents/20250621-giubileo-governanti.html>

<sup>14</sup> R. Partington. (14 March 2024). *Tackling inequality vital for next century of growth, IMF head says*. The Guardian. <https://www.theguardian.com/business/2024/mar/14/imf-kristalina-georgieva-inequality-growth-living-standards-john-maynard-keynes#:~:text=The%20head%20of%20the%20International,ninefold%20increase%20in%20living%20standards.>

<sup>15</sup> For example, see the Tax the Super Rich campaign, which has more than 60 supporting organizations. <https://taxthesuperrich.world/about/>

<sup>16</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 6.

<sup>17</sup> See methodology note, stat 1.

<sup>18</sup> See methodology note, stat 2.

<sup>19</sup> See methodology note, stat 3.

<sup>20</sup> European Commission (2024). *Annual Report on Taxation 2024*. <https://op.europa.eu/en/publication-detail/-/publication/154705e0-38ef-11ef-b441-01aa75ed71a1/language-en>

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<sup>21</sup> P. Salas Rojo and J. Gabriel Rodríguez (2020). *The Role of Inheritance on Wealth Inequality: A Machine Learning Approach*. Cross-National Data Center in Luxembourg. <https://www.lisdatacenter.org/newsletter/nl-2020-14-im-2/>

<sup>22</sup> Oxfam International. (2024). *Billionaire wealth in the EU surges by nearly €400 million per day in 2024, with a new billionaire nearly every week*. Press release. <https://www.oxfam.org/en/press-releases/billionaire-wealth-eu-surges-nearly-eu400-million-day-2024-new-billionaire-nearly>

<sup>23</sup> M. Hunter-Hart. (1 April 2025). *The World's Youngest Billionaires 2025*. Forbes. <https://www.forbes.com/sites/monicahunter-hart/2025/04/01/the-worlds-youngest-billionaires-2025/>

<sup>24</sup> A. Taneja, A. Kamande, C. G. Gomez, D. Abed, M. Lawson and N. Mukhia. (2024). *Takers not makers. The unjust poverty and unearned wealth of colonialism*. Oxfam. <https://www.oxfam.org/en/research/takers-not-makers-unjust-poverty-and-uneared-wealth-colonialism>

<sup>25</sup> Oxfam International. (2024). *Billionaire wealth in the EU surges by nearly €400 million per day in 2024, with a new billionaire nearly every week*. Press release. <https://www.oxfam.org/en/press-releases/billionaire-wealth-eu-surges-nearly-eu400-million-day-2024-new-billionaire-nearly>

<sup>26</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 4.

<sup>27</sup> Ibid.

<sup>28</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 5.

<sup>29</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 6.

<sup>30</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 7.

<sup>31</sup> The definition of middle class is based on median income and includes those households that have more than 75% but less than 200% of the median national income. See C. Vacas-Soriano. (2024). *Developments in income inequality and the middle class in the EU*. Eurofound. <https://www.eurofound.europa.eu/en/publications/2024/developments-income-inequality-and-middle-class-eu>

<sup>32</sup> OECD. (2019). *Under Pressure: The Squeezed Middle Class*. <https://doi.org/10.1787/689afed1-en>

<sup>33</sup> 'At risk of poverty or social exclusion [...] corresponds to the sum of persons who are either at risk of poverty, or severely materially and socially deprived or living in a household with a very low work intensity.' Eurostat. (n.d.). *Statistics Explained, Glossary: At risk of poverty or social exclusion (AROPE)*. [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:At\\_risk\\_of\\_poverty\\_or\\_social\\_exclusion\\_\(AROPE\)](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:At_risk_of_poverty_or_social_exclusion_(AROPE))

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<sup>34</sup> Eurostat. (2025). *Living conditions in Europe - poverty and social exclusion*. [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Living\\_conditions\\_in\\_Europe\\_-](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Living_conditions_in_Europe_-)



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<sup>35</sup> FEPS et al. (2025). *The profit-price spiral in food and energy: analysis and toolbox to fight inflation*. <https://feeps-europe.eu/wp-content/uploads/2025/04/The-profit-price-spiral-in-food-and-energy-1.pdf>

<sup>36</sup> C. Vacas-Soriano. (2024). *Developments in income inequality and the middle class in the EU*. Eurofound. <https://www.eurofound.europa.eu/en/publications/2024/developments-income-inequality-and-middle-class-eu>

<sup>37</sup> Total wealth in a country is equal to the sum of private and public wealth, where the private wealth is those owned by private actors and institutions in the forms of firms, bonds and housing, while public wealth is that owned by local and central governments, e.g., public hospitals and roads, as well as bonds and publicly owned firms.

<sup>38</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 8.

<sup>39</sup> Based on data from: World Inequality Database. <https://wid.world/data/>

See methodology note, stat 9.

<sup>40</sup> See methodology note, stats 10 and 11.

<sup>41</sup> European Trade Union Institute. (2025). *Benchmarking Working Europe 2025*. <https://www.etui.org/publications/benchmarking-working-europe-2025>

<sup>42</sup> Based on data from: Eurostat. <https://ec.europa.eu/eurostat>

See methodology note, stat 12.

<sup>43</sup> M. McCaughey. (1 October 2024). *Inequalities unmasked: disparities across the EU*. Social Europe. <https://www.socialeurope.eu/inequalities-unmasked-disparities-across-the-eu>

<sup>44</sup> D. Abed and F. Kelleher. (2022). *The Assault of Austerity: How prevailing economic policy choices are a form of gender-based violence*. Oxfam. <https://policy-practice.oxfam.org/resources/the-assault-of-austerity-how-prevailing-economic-policy-choices-are-a-form-of-g-621448/>

<sup>45</sup> European Union Agency for Fundamental Rights. (2023). *Being Black in the EU – Experiences of people of African descent*. <https://fra.europa.eu/en/publication/2023/being-black-eu>

<sup>46</sup> G. Zucman (25 June 2024). *A blueprint for a coordinated minimum effective taxation standard for ultra-high-net-worth individuals*. EU Tax Observatory. <https://gabriel-zucman.eu/files/report-g20.pdf>

<sup>47</sup> L. Bach, A. Bozio, A. Guillouzouic and C. Malgouyres. (2023). *Quels impôts les milliardaires paient-ils?* Institut des Politiques Publiques. [French] [https://www.ipp.eu/wp-content/uploads/2023/06/Note\\_IPP\\_Billionaires-version-actualisee.pdf](https://www.ipp.eu/wp-content/uploads/2023/06/Note_IPP_Billionaires-version-actualisee.pdf)

<sup>48</sup> M. Dalle Luche, D. Guzzardi, E. Palagi, A. Roventini and A. Santoro. (2024). *Tackling the regressivity of the Italian tax system: an optimal taxation framework with heterogeneous returns to capital*. WIL Working Paper n. 2024. [https://prod.wid.world/www-site/uploads/2024/10/WorldInequalityLab\\_WP2024\\_23\\_Tackling-the-regressivity-of-the-Italian-tax-system\\_Final.pdf](https://prod.wid.world/www-site/uploads/2024/10/WorldInequalityLab_WP2024_23_Tackling-the-regressivity-of-the-Italian-tax-system_Final.pdf)

<sup>49</sup> A. Bruil, C. van Essen, W. Leenders, A. Lejour, J. Möhlmann and S. Rabaté. (2025). *Inequality and Redistribution in the Netherlands*. <https://wouterleenders.eu/Bruiletal2025WP.pdf>

<sup>50</sup> Data for Belgium have not been included in Figure 5 because they are not directly comparable to Zucman's "average tax rate by income group as a percentage of pre-tax income" due to differences in the definition of pre-tax income. In the data from Belgium, income includes factor incomes and replacement benefits, without subtracting social security contributions.

<sup>51</sup> A. Decoster & al. (16 January 2025). *Inégalités en Belgique: un paradoxe?* Bruxelles: Éditions Racine/LannooCampus, 2ed. [French]. <https://www.racine.be/fr/in%C3%A9galit%C3%A9s-en-belgique-un-paradoxe>

<sup>52</sup> J. López Laborda, C. Marín González and J. Onrubia (2025). *Observatorio sobre el reparto de los impuestos y las prestaciones entre los hogares españoles*. Fedea. [Spanish]. <https://fedea.net/noveno-informe-2022-del-observatorio-sobre-el-reparto-de-los-impuestos-y-las-prestaciones-entre-los-hogares-espanoles/>

<sup>53</sup> The effective tax rate refers to the actual percent of income (such as wages, dividends, ...) that an individual pays in taxes, after accounting for deductions, credits, exemptions, and other tax benefit.

<sup>54</sup> Moderate taxation on wealth and capital income contributes to this trend, particularly for very wealthy individuals. Other factors also play a role, such as the regressive nature of the VAT system and the capping of social security contributions.

<sup>55</sup> W. Zwysen. (2024). *Wage inequality in Europe*. European Trade Union Institute. [https://www.etui.org/sites/default/files/2024-02/Wage%20inequality%20in%20Europe-The%20institutional%20and%20economic%20factors%20supporting%20workers\\_2024.pdf](https://www.etui.org/sites/default/files/2024-02/Wage%20inequality%20in%20Europe-The%20institutional%20and%20economic%20factors%20supporting%20workers_2024.pdf)

<sup>56</sup> T. Piketty (2021). *Une brève histoire de l'égalité*. Ed. du Seuil. [French]. <http://piketty.pse.ens.fr/files/egalite/pdf/G20.pdf>

<sup>57</sup> B. Brys, S. Matthews and J. Owens. (2011). *Tax Reform Trends in OECD Countries*. OECD. [https://www.oecd.org/en/publications/tax-reform-trends-in-oecd-countries\\_5kg3h0xxmz8t-en.html](https://www.oecd.org/en/publications/tax-reform-trends-in-oecd-countries_5kg3h0xxmz8t-en.html)

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<sup>58</sup> E. Saez and G. Zucman (2019). *The Triumph of Injustice: How the Rich Dodge Taxes and How to Make Them Pay*. New York: W. W. Norton & Company.

<sup>59</sup> D. Hope and J. Limberg. (2022). *The economic consequences of major tax cuts for the rich*. Socio-Economic Review 20(2): 539–59. <https://doi.org/10.1093/ser/mwab061>

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<sup>60</sup> Based on data from: European Commission. [https://taxation-customs.ec.europa.eu/taxation/economic-analysis/data-taxation-trends\\_en](https://taxation-customs.ec.europa.eu/taxation/economic-analysis/data-taxation-trends_en)

See methodology note, stat 13.

<sup>61</sup> Eurostat. Glossary: entreprise size. [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Enterprise\\_size](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Enterprise_size)

<sup>62</sup> Based on data from: OECD.

See methodology note, stat 14.

1980s data include Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Spain and Sweden.

<sup>63</sup> Eurodad. (2017). *Tax games : the race to the bottom. Europe's role in supporting an unjust tax system*. [https://d3n8a8pro7vbm.cloudfront.net/eurodad/pages/253/attachments/original/1637656459/Tax\\_Games-\\_the\\_Race\\_to\\_the\\_Bottom\\_-\\_Full.pdf?1637656459](https://d3n8a8pro7vbm.cloudfront.net/eurodad/pages/253/attachments/original/1637656459/Tax_Games-_the_Race_to_the_Bottom_-_Full.pdf?1637656459)

<sup>64</sup> L. Bach, A. Bozio, A. Guillouzouic and C. Maltouyres. (2023). *Quels impôts les milliardaires paient-ils?* Institut des Politiques Publiques. [French]. [https://www.ipp.eu/wp-content/uploads/2023/06/Note\\_IPP\\_Billionaires-version-actualisee.pdf](https://www.ipp.eu/wp-content/uploads/2023/06/Note_IPP_Billionaires-version-actualisee.pdf)

<sup>65</sup> In the EU, payroll taxes primarily fund social security systems (including pensions, healthcare, unemployment benefits, and support for sickness, disability and families). They are paid by both employers and employees.

<sup>66</sup> Based on data from: OECD. <https://data-explorer.oecd.org/>

See methodology note, stat 18.

<sup>67</sup> Based on data from: OECD. <https://data-explorer.oecd.org/>

See methodology note, stat 17.

<sup>68</sup> The 'tax wedge' refers to the proportion of an employee's total labour cost that is taken in taxes and social security contributions, rather than received as net income. It illustrates how much of the income generated by employment is absorbed by the tax system.

<sup>69</sup> European Commission Directorate-General for Taxation and Customs Unions. (2022). *Taxation trends in the European Union: Data for the EU Member States, Iceland, Norway – 2022 edition*. <https://op.europa.eu/en/publication-detail/-/publication/f85da28f-f5be-11ec-b976-01aa75ed71a1/language-en>

<sup>70</sup> M. Förster, A. Llana-Nozal and V. Nafilyan. (2014). *Trends in Top Incomes and their Taxation in OECD Countries*. OECD. [https://www.oecd.org/en/publications/trends-in-top-incomes-and-their-taxation-in-oecd-countries\\_5jz43jhlz87f-en.html](https://www.oecd.org/en/publications/trends-in-top-incomes-and-their-taxation-in-oecd-countries_5jz43jhlz87f-en.html)

<sup>71</sup> Based on data from: Eurostat. <https://ec.europa.eu/eurostat>

See methodology note, stat 19.

<sup>72</sup> T. Snyckers (2024) *Tax policy and gender disparity: A call to action on International Women's Day 2024*, Tax Justice Network. <https://taxjustice.net/2024/03/08/tax-policy-and-gender-disparity-a-call-to-action-on-international-womens-day-2024/>

<sup>73</sup> D. Abed and F. Kelleher. (2022). *The Assault of Austerity: How prevailing economic policy choices are a form of gender-based violence*. Oxfam. <https://policy-practice.oxfam.org/resources/the-assault-of-austerity-how-prevailing-economic-policy-choices-are-a-form-of-g-621448/>

<sup>74</sup> OECD. (2022). *Tax Policy and Gender Equality: A Stocktake of Country Approaches*. [https://www.oecd.org/en/publications/tax-policy-and-gender-equality\\_b8177aea-en/full-report.html](https://www.oecd.org/en/publications/tax-policy-and-gender-equality_b8177aea-en/full-report.html)

<sup>75</sup> R. Sharpe. (2018). *Short-changed: How the IMF's tax policies are failing women*. ActionAid. <https://actionaid.org/publications/2018/short-changed-how-imfs-tax-policies-are-failing-women>

<sup>76</sup> M. Delgado Coelho, A. Davis, A.D. Klemm, C. Osorio Buitron. (2022). *Gendered Taxes: The Interaction of Tax Policy with Gender Equality*. IMF. <https://www.imf.org/en/Publications/WP/Issues/2022/02/04/Gendered-Taxes-The-Interaction-of-Tax-Policy-with-Gender-Equality-512231>

<sup>77</sup> European Institute for Gender Equality. (2025). *Gender Equality Index*. <https://eige.europa.eu/gender-equality-index/2023/country/DK>

<sup>78</sup> Oxfam Ibis (2023). *Skattelettelser i toppen tilgodeser mest mænd*. [Danish]. [https://oxfam.dk/documents/analyser/2023\\_03-skattelettelser-i-toppen-tilgodeser-mest-maend\\_oxfam-ibis-analyse.pdf](https://oxfam.dk/documents/analyser/2023_03-skattelettelser-i-toppen-tilgodeser-mest-maend_oxfam-ibis-analyse.pdf)

<sup>79</sup> Ibid.

<sup>80</sup> A personal income tax (PIT) is a tax collected on the basis of individuals' wages, salaries and/or rental income. Financial incomes from dividends can also be considered part of personal income.

<sup>81</sup> S. Godar, E. Flamant and G. Richard. (2021). *New Forms of Tax Competition in the European Union: An Empirical Investigation*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/new-forms-of-tax-competition-an-empirical-investigation/>

European Commission Directorate-General for Taxation and Customs Union. (2025). *Annual Report on Taxation 2025: Review of taxation policies in the EU Member States*. <https://op.europa.eu/en/publication-detail/-/publication/998524d7-4fe5-11f0-a9d0-01aa75ed71a1/language-en>

<sup>82</sup> European Commission Directorate-General for Taxation and Customs Union. (2025). *Annual Report on Taxation 2025: Review of taxation policies in the EU Member States*. <https://op.europa.eu/en/publication-detail/-/publication/998524d7-4fe5-11f0-a9d0-01aa75ed71a1/language-en>

<sup>83</sup> K. Abdel-Kader and R.A. de Mooij. (2020). *Tax Policy and Inclusive Growth*. IMF. <https://www.imf.org/en/Publications/WP/Issues/2020/12/04/Tax-Policy-and-Inclusive-Growth-49902>

<sup>84</sup> European Commission Directorate-General for Taxation and Customs Union. (2025). *Annual Report on Taxation 2025: Review of taxation policies in the EU Member States*. <https://op.europa.eu/en/publication-detail/-/publication/998524d7-4fe5-11f0-a9d0-01aa75ed71a1/language-en>

<sup>85</sup> 'Capital income' refers to any income generated from the ownership of capital assets, such as investments, other financial assets, or property. Unlike labour income, which is earned through work or active participation in economic activities, capital income is mostly derived from the passive ownership of assets that generate returns over time.

<sup>86</sup> M. Förster, A. Llana-Nozal and V. Nafilyan. (2014). *Trends in Top Incomes and their Taxation in OECD Countries*. OECD. [https://www.oecd.org/en/publications/trends-in-top-incomes-and-their-taxation-in-oecd-countries\\_5jz43jhlz87f-en.html](https://www.oecd.org/en/publications/trends-in-top-incomes-and-their-taxation-in-oecd-countries_5jz43jhlz87f-en.html)

<sup>87</sup> The figure refers to Europe, as per the UN definition, which also includes countries like Russia, Norway and the UK.

Oxfam. (2024). *Wealth of EU's five richest men soars almost 6 million euros every hour since 2020*. Press release. <https://www.oxfam.org/en/press-releases/wealth-eus-five-richest-men-soars-almost-6-million-euros-every-hour-2020>

<sup>88</sup> European Commission Directorate-General for Taxation and Customs Union. (2025). *Annual Report on Taxation 2025: Review of taxation policies in the EU Member States*. <https://op.europa.eu/en/publication-detail/-/publication/998524d7-4fe5-11f0-a9d0-01aa75ed71a1/language-en>

<sup>89</sup> PWC. (2025). *Denmark: Individual – Taxes on personal income*. <https://taxsummaries.pwc.com/denmark/individual/taxes-on-personal-income>

<sup>90</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

In Germany, in addition to a flat rate of 25% on capital income, there is a solidarity surcharge of 5.5% and, where applicable and depending on the federal state, 8% or 9% church tax. See: PwC (2025). *Worldwide Tax Summaries – Individual – Income determination*. <https://taxsummaries.pwc.com/germany/individual/income-determination> (last accessed 28th August 2025)

<sup>91</sup> S. Godar, E. Flamant, G. Richard. (2021). *New forms of tax competition in the European Union. An empirical investigation*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/new-forms-of-tax-competition-an-empirical-investigation/>

<sup>92</sup> Dividends are generally tax exempt if the distributing company has paid corporate income tax.

<sup>93</sup> Malta has a full imputation system, which means the 35% corporate income tax is credited from the dividend tax, which is 35% at most. This means there is no effective dividend tax, and sometimes even a tax refund when dividends are paid out.

<sup>94</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

<sup>95</sup> European Commission (2025). *Parent-Subsidiary Directive*. [https://taxation-customs.ec.europa.eu/taxation/business-taxation/parent-subsubsidiary-directive\\_en](https://taxation-customs.ec.europa.eu/taxation/business-taxation/parent-subsubsidiary-directive_en)

<sup>96</sup> J. Desiderio (2024). *Le dividende des inégalités*. Oxfam Belgium. Pp. 25-30. [French]. <https://oxfambelgique.be/publications/le-dividende-des-inegalites>

<sup>97</sup> Correctiv. (2021). *CUMEX FILES. A cross-border investigation*. <https://correctiv.org/en/latest-stories/2018/10/18/the-cumex-files/>

<sup>98</sup> Capital gains tax is a tax levied on the increased value of an asset when it is sold. The most common capital gains are on stocks or bonds.

<sup>99</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

<sup>100</sup> OECD (2025). *The taxation of labour vs. capital income*. [https://www.oecd.org/en/publications/the-taxation-of-labour-vs-capital-income\\_04f8d936-en.html](https://www.oecd.org/en/publications/the-taxation-of-labour-vs-capital-income_04f8d936-en.html)

<sup>101</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

See methodology note, stat 20.

<sup>102</sup> In Denmark the top marginal PIT was raised in 2024 without a corresponding increase in the top tax rate on capital gains and dividends. Calculations from the Ministry of taxation estimates that most of the richest are expected to avoid the tax by reclassifying income to avoid the new top PIT rate. See: M.-B. Sabah (2025, 21 May). *Top-topskatten indeholder et gabende smuthul for de rigeste*. [Danish]. <https://www.zetland.dk/historie/s0YIVTpF-aeAEaNN5-c541a>

For figures on Denmark, France, Italy and Spain, see methodology note, stat 20.

<sup>103</sup> W. Eynatten, S. Van Breedam (2 July 2025). *Agreement on the new capital gains tax on financial*

assets. Deloitte. <https://www.deloitte.com/be/en/services/tax/blogs/agreement-on-the-new-capital-gains-tax-on-financial-assets.html>

<sup>104</sup> K. Lievens. (3 July 2025). *Political agreement reached on introduction of capital gains tax*. KPMG. <https://kpmg.com/be/en/home/insights/2025/07/ctx-political-agreement-reached-on-introduction-of-capital-gains-tax.html>

<sup>105</sup> PWC (2025). *Cyprus. Individual – other taxes*. <https://taxsummaries.pwc.com/cyprus/individual/other-taxes>

<sup>106</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feeps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

<sup>107</sup> The first Dutch 'Box 3' regime foresaw that all taxpayers were taxed based on the deemed returns. The regime has been ruled unlawful under the European Convention on Human Rights. On December 24, 2021, the Supreme Court of the Netherlands concluded that the design of the Box 3 levy violates both the prohibition of discrimination and the right to peaceful enjoyment of possessions. Since the ruling, those with lower returns than the deemed returns are taxed based on their actual returns, while people with higher returns than the deemed return are still being taxed based on the deemed return. A law to change the 'Box 3' system whereby only actual returns are taxed has been submitted to Dutch Parliament, and if approved, should enter into force in 2028. See: Dutch National Government. (19 May 2025). *Wetsvoorstel werkelijk rendement box 3 aangeboden aan Tweede Kamer*. [Dutch]. <https://www.rijksoverheid.nl/onderwerpen/inkomstenbelasting/nieuws/2025/05/19/wetsvoorstel-werkelijk-rendement-box-3-aangeboden-aan-tweede-kamer>

<sup>108</sup> A tax on unrealized capital gains is a tax levied on the increased value of an asset that has not been sold yet.

<sup>109</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feeps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

<sup>110</sup> Taxation of unrealized capital gains can occur in specific cases, notably upon a change of tax residence (exit tax). Several European countries tax accrued gains before emigration, although EU rules generally defer taxation until actual realization. Nonetheless, exemptions and legislative gaps still allow for avoidance strategies. Conversely, unrealized gains are typically exempt at death or upon donation, enabling indefinite deferral or complete avoidance. These loopholes facilitate tax avoidance, particularly through holding companies that convert realized income into untaxed unrealized gains.

<sup>111</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feeps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

For France: Assemblée nationale (2025). *Projet de loi de finances pour 2025 (no 324). Amendement n°I-CF31*. [https://www.assemblee-nationale.fr/dyn/17/amendements/0324A/CION\\_FIN/CF31](https://www.assemblee-nationale.fr/dyn/17/amendements/0324A/CION_FIN/CF31)

<sup>112</sup> C. Hiltrud Hartlaub. (2025) *Exit Taxation of Individuals vs. the Free Movement of Persons*. Lund University. <https://lup.lub.lu.se/luur/download?func=downloadFile&recordId=9192651&fileId=9192652>

<sup>113</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://feeps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

For France: Assemblée nationale (2025). *Projet de loi de finances pour 2025 (no 324). Amendement n°I-CF31*. [https://www.assemblee-nationale.fr/dyn/17/amendements/0324A/CION\\_FIN/CF31](https://www.assemblee-nationale.fr/dyn/17/amendements/0324A/CION_FIN/CF31)

<sup>114</sup> A net wealth tax is a tax levied on total wealth accumulated by an individual (above a certain threshold) based on the net value of all assets minus debts, within the country or offshore: housing, bank deposits, corporate stocks, financial assets or tangible assets (e.g., jewellery, paintings, yachts).

<sup>115</sup> The 9 EU countries that had a wealth tax in 1990 were Austria, Denmark, France, Germany, the Netherlands, Finland, Luxembourg, Spain and Sweden. See: OECD. (2018). *The Role and Design of Net Wealth Taxes in the OECD*. [https://www.oecd.org/en/publications/the-role-and-design-of-net-wealth-taxes-in-the-oecd\\_9789264290303-en.html](https://www.oecd.org/en/publications/the-role-and-design-of-net-wealth-taxes-in-the-oecd_9789264290303-en.html)

<sup>116</sup> Ibid

<sup>117</sup> T. Bastin, B. Bayenet, I. Tojerow and M. Verdonck. (2023). *Étude relative à la taxation des grands patrimoines*. [French] Département d'économie appliquée de l'ULB. <https://dulbea.ulb.be/wp->

[content/uploads/2023/11/DULBEA-POLICY-REPORT-No23.02-FR.pdf](#)

<sup>118</sup> PWC. (2025). *Spain: Individual – Other taxes*.  
<https://taxsummaries.pwc.com/spain/individual/other-taxes>

<sup>119</sup> Garrigues (2024). *Esta es la situación actual del Impuesto de las Grandes Fortunas*. [Spanish].  
[https://www.garrigues.com/es\\_ES/noticia/esta-es-situacion-actual-impuesto-grandes-fortunas](https://www.garrigues.com/es_ES/noticia/esta-es-situacion-actual-impuesto-grandes-fortunas)

<sup>120</sup> This refers to the increase in revenues between 2021 and 2022, according to the official numbers, due to the introduction of the solidarity tax. See: Ministerio de Hacienda y Función Pública. (2023). *El Impuesto de Solidaridad de las Grandes Fortunas recauda 623 millones de euros*. [Spanish].  
<https://www.hacienda.gob.es/GabineteMinistro/notas%20prensa/2023/s.e.hacienda/20-09-23-np-impuesto-grandes-fortunas.pdf>

<sup>121</sup> Spanish Tax Agency (2025). *Statistics of Wealth Tax Payers* (various years).  
[https://sede.agenciatributaria.gob.es/Sede/en\\_gb/datosabiertos/catalogo/hacienda/Estadistica\\_de\\_los\\_declarantes\\_del\\_impuesto\\_sobre\\_el\\_Patrimonio.shtml?faqlid=5aae71f7eadc0710VgnVCM100000dc381e0aRCRD](https://sede.agenciatributaria.gob.es/Sede/en_gb/datosabiertos/catalogo/hacienda/Estadistica_de_los_declarantes_del_impuesto_sobre_el_Patrimonio.shtml?faqlid=5aae71f7eadc0710VgnVCM100000dc381e0aRCRD)

<sup>122</sup> L. Finér and N. Pankka. (2025). *Tackling Tax Avoidance: Reforming capital income taxation in the EU*. Foundation for European Progressive Studies. <https://fepps-europe.eu/publication/reforming-capital-income-taxation-in-the-eu/>

OECD. (2018). *The Role and Design of Net Wealth Taxes in the OECD*.  
[https://www.oecd.org/en/publications/the-role-and-design-of-net-wealth-taxes-in-the-oecd\\_9789264290303-en.html](https://www.oecd.org/en/publications/the-role-and-design-of-net-wealth-taxes-in-the-oecd_9789264290303-en.html)

<sup>123</sup> E. Saez, I. and G. Zucman. (2022). *Wealth Taxation: Lessons from History and Recent Developments*. AEA Papers and Proceedings 112: 58–62. <https://gabriel-zucman.eu/files/SZ2022AEA.pdf>

<sup>124</sup> Inheritance tax (or 'estate tax') is a tax levied on the net value of all possessions (property, financial assets, bank accounts and tangible assets) transferred to someone else upon an individual's death. It is paid most of the time by those who inherit the wealth.

<sup>125</sup> M. Imberg and M. Shaban. (2024). *Family Wealth Transfer 2024*. Altrata. [info.altrata.com/family-wealth-transfer-2024-pdf](https://info.altrata.com/family-wealth-transfer-2024-pdf)

<sup>126</sup> Ibid.

<sup>127</sup> M. Schratzenstaller. (2025). *Behavioral responses to inheritance taxation – A review of the empirical literature*. *Economic Analysis and Policy*, 85(C), 238–260.  
<https://doi.org/10.1016/j.eap.2024.11.026>

<sup>128</sup> OECD. (2021). *Inheritance Taxation in OECD Countries*. OECD.  
[https://www.oecd.org/en/publications/inheritance-taxation-in-oecd-countries\\_e2879a7d-en.html](https://www.oecd.org/en/publications/inheritance-taxation-in-oecd-countries_e2879a7d-en.html)

<sup>129</sup> Euodia. (n.d.). *Succession Allemagne : comment la préparer?*. [French].  
<https://www.euodia.fr/succession/allemaigne/>

<sup>130</sup> N26. (14 January 2022). *What is inheritance tax and how does it work?* Blog.  
<https://n26.com/en-it/blog/inheritance-tax>

<sup>131</sup> C. E. Arnfred. (11 April 2017). *Danmarks største familieejede virksomheder gik sammen om en massiv lobbyindsats. Nu sænkes arveafgiften for milliarder*. Politiken. [Danish].  
<https://politiken.dk/danmark/art5909177/Danmarks-st%C3%B8rste-familieejede-virksomheder-gik-sammen-om-en-massiv-lobbyindsats.-Nu-s%C3%A6nkes-arveafgiften-for-milliarder>

<sup>132</sup> Skatteministeriet. (2 June 2025). *Endeligt svar på spørgsmål 355*. [Danish].  
<https://www.ft.dk/samling/20241/almdel/sau/spm/355/svar/2145044/3032323.pdf>

<sup>133</sup> L. Abdelké Yakoub, A. Guillaume, S. Hannoun, L. Trely and N. Vercken. (2024). *Super-Héritages: Le jackpot fiscal des ultra-riches*. [French]. Oxfam France.  
[https://www.oxfamfrance.org/app/uploads/2024/09/Oxfam\\_rapport-sous-embargo-17-sept-2024\\_Super-heritages-le-jackpot-des-super-riches\\_sous-embargo.pdf](https://www.oxfamfrance.org/app/uploads/2024/09/Oxfam_rapport-sous-embargo-17-sept-2024_Super-heritages-le-jackpot-des-super-riches_sous-embargo.pdf)

<sup>134</sup> F. Reddan. (10 September 2024). *Inheritance tax: How many people actually pay it? The Irish Times*. [Paywall]. <https://www.irishtimes.com/your-money/2024/09/10/inheritance-tax-how-many-people-actually-pay-it/>

<sup>135</sup> The date refers to the current inheritance tax. Denmark had inheritance taxes before. See: Skatteministeriet. (15 november 2017). *Boafgift og gaveafgift – faktaside*. [Danish].  
<https://web.archive.org/web/20190723152814/https://www.skm.dk/skattetal/beregning/afgiftsberregning/boafgift-og-gaveafgift-faktaside>

<sup>136</sup> The date refers to a major reform of inheritance and gift taxation in Germany. However, German inheritance tax dates back to 1906. Since then, it has undergone many reforms. See: SOEP (2012). *Inheritance in Germany 1911 to 2009: A Mortality Multiplier Approach*. [https://www.diw.de/documents/publikationen/73/diw\\_01.c.407138.de/diw\\_sp0462.pdf](https://www.diw.de/documents/publikationen/73/diw_01.c.407138.de/diw_sp0462.pdf)

<sup>137</sup> The date refers to the latest and current form of inheritance tax in Italy. However, Italy has a long-standing tradition of taxing inheritances, dating back to pre-Unitary times. The Italian inheritance tax system has undergone many reforms throughout the 20th and 21st centuries, including its abolition in 2001 and reintroduction in a revised form in 2006. See: Ministero dell'Economia e delle Finanze (2025). *1862 Imposta sulle successioni e donazioni*. [Italian]. <https://www.finanze.gov.it/it/il-dipartimento/fisco-e-storia/i-tributi-nella-storia-ditalia/1862-imposta-sulle-successioni-e-donazioni/> [s://www.finanze.gov.it/it/il-dipartimento/fisco-e-storia/i-tributi-nella-storia-ditalia/1862-imposta-sulle-successioni-e-donazioni/](https://www.finanze.gov.it/it/il-dipartimento/fisco-e-storia/i-tributi-nella-storia-ditalia/1862-imposta-sulle-successioni-e-donazioni/) (last accessed 28 August 2025).

<sup>138</sup> BBVA (2023). *Qué es el impuesto de sucesiones y cuándo hay que pagarlo (en España)*. [Spanish] <https://www.bbva.com/es/es/salud-financiera/que-es-el-impuesto-de-sucesiones-y-cuando-hay-que-pagarlo-en-espana/>

<sup>139</sup> Skatteverket. (June 2024). *Bouppteckning*. [Swedish]. <https://www.skatteverket.se/download/18.6e795b103e5e0454180001785/1708607413367/46103.pdf>

<sup>140</sup> M. Schratzenstaller. (2024). 'Behavioral responses to inheritance taxation – A review of the empirical literature'. *Economic Analysis and Policy* 85: 238–60. <https://www.sciencedirect.com/science/article/pii/S0313592624003382> (last accessed 23 July 2025).

<sup>141</sup> A property tax is a tax calculated on the basis of the value of property, land and buildings.

<sup>142</sup> For instance, property tax in Ireland is higher for property with a market value over €1.75m. Irish Revenue Authority. (n.d.). *Valuing your property*. <https://www.revenue.ie/en/property/local-property-tax/valuing-your-property/determining-lpt-charge.aspx>

<sup>143</sup> R.R. Almy. (2013). *Property Tax Regimes in Europe*. UN Habitat. <https://unhabitat.org/property-tax-regimes-in-europe>

<sup>144</sup> European Commission Directorate-General for Taxation and Customs Union. (2025). *Annual Report on Taxation 2025: Review of taxation policies in the EU Member States*. page 47. <https://op.europa.eu/en/publication-detail/-/publication/998524d7-4fe5-11f0-a9d0-01aa75ed71a1/language-en>

<sup>145</sup> According to the most recent data from 2023, total local direct taxation reached €112 bn, with the *taxe foncière sur les propriétés bâties* (TFPB) alone generating €39.8 bn, representing approximately 35% of the total. See: M. Vayne. (2024). *La fiscalité directe locale en 2023*. BIS. N°184 – juillet 2024. [https://www.collectivites-locales.gouv.fr/files/Accueil/DESL/2024/BIS\\_184\\_FiscaliteC3%A9%20locale%202023\\_VF.pdf](https://www.collectivites-locales.gouv.fr/files/Accueil/DESL/2024/BIS_184_FiscaliteC3%A9%20locale%202023_VF.pdf)

<sup>146</sup> R.R. Almy. (2013). *Property Tax Regimes in Europe*. UN Habitat. (Malta, see page 6. Estonia, see page 27) <https://unhabitat.org/property-tax-regimes-in-europe>

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<sup>150</sup> P. Acciari, F. Alvaredo and S. Morelli. (2024). *The Concentration of Personal Wealth in Italy 1995–2016*. *Journal of the European Economic Association* 22(3): 1228–74. <https://doi.org/10.1093/jeea/jvae002>

<sup>151</sup> 'Harmful tax regimes for individuals' are preferential personal income tax schemes that grant certain taxpayers (usually new residents) special tax benefits not available to ordinary residents.

<sup>152</sup> S. Godar, E. Flamant and G. Richard. (2021). *New Forms of Tax Competition in the European Union: An Empirical Investigation*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/new-forms-of-tax-competition-an-empirical-investigation/>

<sup>153</sup> Ibid

<sup>154</sup> The 'Régimen de impatriados' or 'Expatriates' regime in Spain established a single rate of 24% on revenues generated in Spain below 600,000€ and a rate of 49% above this sum. All other

incomes originating in other countries are excluded from the tax base for up to five years. According to the latest numbers provided by the Spanish tax authorities, 16,733 taxpayers filed their personal income tax return using this method. See: P.Sempere (2025, 27 June). *¿Quiénes se benefician de la 'ley Beckham'? Desplazados a España con sueldos medios de 160.000 euros*. El País. [Spanish]. <https://elpais.com/economia/2025-06-27/quienes-se-benefician-de-la-ley-beckham-desplazados-a-espana-con-sueldos-medios-de-160000-euros.html>

<sup>155</sup> S. Godar, E. Flamant and G. Richard. (2021). *New Forms of Tax Competition in the European Union: An Empirical Investigation*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/new-forms-of-tax-competition-an-empirical-investigation/>

<sup>156</sup> Italian Court of Auditors (27 June 2024). *Audit of the administration of the State budget - FY 2023*. Vol. I Part I. pp. 188-189. <https://www.corteconti.it/Download?id=48274f67-375f-419b-9220-215ccc96b6c7>

<sup>157</sup> Baker McKenzie. (11 October 2024). *Italy: The Parliament confirms the increase of the flat tax on foreign-sourced income for new residents introduced in August by the Government*. <https://insightplus.bakermckenzie.com/bm/tax/italy-the-parliament-confirms-the-increase-of-the-flat-tax-on-foreign-sourced-income-for-new-residents-introduced-in-august-by-the-government>

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<sup>159</sup> S. Godar, E. Flamant and G. Richard. (2021). *New Forms of Tax Competition in the European Union: An Empirical Investigation*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/new-forms-of-tax-competition-an-empirical-investigation/>

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<sup>161</sup> Based on: A. Alstadsæter, S. Godar, P. Nicolaides and G. Zucman. (2024). *Global Tax Evasion Report 2024*. EU Tax Observatory. <https://www.taxobservatory.eu/publication/global-tax-evasion-report-2024/>

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<sup>162</sup> Committee on the Environment, Public Health and Food Safety Committee on Industry, Research and Energy Committee on Economic and Monetary Affairs. (2024). *Hearing of Wopke Hoekstra, Commissioner-Designate (Climate, Net-Zero and Clean Growth)*. Brussels. [https://hearings.elections.europa.eu/documents/hoekstra/hoekstra\\_verbatimreporthearing-original.pdf](https://hearings.elections.europa.eu/documents/hoekstra/hoekstra_verbatimreporthearing-original.pdf)

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<sup>164</sup> D. Cosnard. (21 February 2025). *Les députés votent la « taxe Zucman » sur le patrimoine des ultrariches portée par la gauche*. Le Monde. [French]. [https://www.lemonde.fr/politique/article/2025/02/21/les-deputes-votent-la-taxe-sur-le-patrimoine-des-ultrariches-portee-par-la-gauche\\_6556670\\_823448.html](https://www.lemonde.fr/politique/article/2025/02/21/les-deputes-votent-la-taxe-sur-le-patrimoine-des-ultrariches-portee-par-la-gauche_6556670_823448.html)

<sup>165</sup> European Commission (2025). *The 2028-2034 EU budget for a stronger Europe*. [https://commission.europa.eu/strategy-and-policy/eu-budget/long-term-eu-budget/eu-budget-2028-2034\\_en](https://commission.europa.eu/strategy-and-policy/eu-budget/long-term-eu-budget/eu-budget-2028-2034_en)

<sup>166</sup> The EU programmes and policies which could be financed by taxing the super-rich are mentioned for illustrative purposes. They could be financed by revenue gains from the fight against tax avoidance and if a European wealth tax is included in the EU own resources.

<sup>167</sup> Aid budget refers to the financial programming of the Neighbourhood, Development and International Cooperation Instrument – Global Europe. See: European Commission (2025). *Neighbourhood, Development and International Cooperation Instrument – Global Europe – Performance*. [https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/neighbourhood-development-and-international-cooperation-instrument-global-europe-performance\\_en](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/neighbourhood-development-and-international-cooperation-instrument-global-europe-performance_en)

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<sup>168</sup> See methodology note, stats 21, 22 and 23.

<sup>169</sup> M. Alestig, N. Dabi, A. Jeurkar, A. Laitland, M. Lawson, D. Horen Greenford, C. Lesk and A. Khalfan. (2024). *Carbon Inequality Kills: Why curbing the excessive emissions of an elite few can create a sustainable planet for all*. Oxfam. <https://policy-practice.oxfam.org/resources/carbon->



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<sup>175</sup> UN. (18 June 2025). *Sevilla Commitment*. <https://docs.un.org/en/A/CONF.227/2025/L.1>

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<sup>179</sup> European Commission. (August 2025). *Citizens' attitudes towards taxation*. Eurobarometer Report. <https://europa.eu/eurobarometer/surveys/detail/3375>

<sup>180</sup> EU. (2024). *Taxing great wealth to finance the ecological and social transition*. European Citizens' Initiative. [https://citizens-initiative.europa.eu/initiatives/details/2023/000006\\_en](https://citizens-initiative.europa.eu/initiatives/details/2023/000006_en)

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<sup>182</sup> M.F. Nouwen. (2020). *Inside The EU Code Of Conduct Group: 20 Years of Tackling Harmful Tax Competition*. <https://www.europarl.europa.eu/cmsdata/215810/Nouwen%20Code%20of%20Conduct.pdf>

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<sup>184</sup> P. Saint-Amans. (4 September 2024). *Memo to the commissioner responsible for tax policy*. Bruegel. <https://www.bruegel.org/memo/memo-commissioner-responsible-tax-policy>

<sup>185</sup> EU tax and customs. (2025). *EU Tax Symposium 2025 – Panel 2 [EU sustainable competitiveness: What taxation can or cannot do?]*. [Video content] <https://www.youtube.com/watch?v=0stQUiaZ0sw> See timecode 1:49:14

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<sup>191</sup> Tax Justice Network. (2024). *State of Tax Justice 2024*. <https://taxjustice.net/reports/the-state-of-tax-justice-2024/>

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<sup>192</sup> Based on data from: European Commission <https://european-social-fund-plus.ec.europa.eu/en>

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The OECD's 'Two-Pillar Solution' is a global tax reform: Pillar One, not yet in force, requires big companies to redistribute a proportion of their profits to sale jurisdictions; Pillar Two sets a global minimum corporate tax rate of 15%.

# About Oxfam

Oxfam is a global movement of people who are fighting inequality to end poverty and injustice. We are working across regions in more than 70 countries, with thousands of partners, and allies, supporting communities to build better lives for themselves, grow resilience and protect lives and livelihoods also in times of crisis. Please write to any of the agencies for further information or visit [www.oxfam.org](http://www.oxfam.org).

Oxfam America ([www.oxfamamerica.org](http://www.oxfamamerica.org))

Oxfam Aotearoa ([www.oxfam.org.nz](http://www.oxfam.org.nz))

Oxfam Australia ([www.oxfam.org.au](http://www.oxfam.org.au))

Oxfam-in-Belgium ([www.oxfamsol.be](http://www.oxfamsol.be))

Oxfam Brasil ([www.oxfam.org.br](http://www.oxfam.org.br))

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Oxfam Colombia ([www.oxfamcolombia.org](http://www.oxfamcolombia.org))

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Oxfam Hong Kong ([www.oxfam.org.hk](http://www.oxfam.org.hk))

Oxfam Denmark ([www.oxfam.dk](http://www.oxfam.dk))

Oxfam India ([www.oxfamindia.org](http://www.oxfamindia.org))

Oxfam Intermón (Spain) ([www.oxfamintermon.org](http://www.oxfamintermon.org))

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