R&D Tax Incentives: Iceland, 2021

Design of R&D tax relief provisions

Iceland provides R&D tax relief through a volume-based, payable (refundable) R&D tax credit with a headline rate of 35% for SMEs and 25% for large firms in 2020 (previously 20% for SMEs and large firms).

Table 1. Main design features of R&D tax incentives in Iceland, 2021

<table>
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<tr>
<th>Type of instrument</th>
<th>R&amp;D tax credit</th>
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<tbody>
<tr>
<td>Eligible expenditures†</td>
<td>Volume-based</td>
</tr>
<tr>
<td>Headline rates (%)</td>
<td>35 (SMEs), 25 (large firms)</td>
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<tr>
<td>Refund</td>
<td>Immediate</td>
</tr>
<tr>
<td>Carry-over (years)</td>
<td>No</td>
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<table>
<thead>
<tr>
<th>Thresholds &amp; ceilings</th>
<th>Floor (R&amp;D expenditure)</th>
<th>Ceiling (R&amp;D expenditure)</th>
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<tbody>
<tr>
<td>ISK 1 million per project</td>
<td>ISK* 1100 million (including ISK 200 million for subcontracted/collaborative R&amp;D)</td>
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*100 ISK = 0.6719 EUR, Q3 2021.

Note: For more details, see OECD R&D Tax Incentive Compendium and Eligibility of current and capital expenditure for R&D tax relief

Key features:

- In the case of insufficient tax liability, firms are entitled to an immediate refund of unused credits.
- As of 2020, an upper ceiling of ISK 1100 million (previously ISK 600 million) applies to qualifying R&D expenditures. This includes an allowance of ISK 200 million for purchased or collaborative R&D (previously ISK 300 million).
- Furthermore, a minimum level (floor) of ISK 1 million applies to R&D projects.

Generosity of R&D tax support in 2021

Differences in the design of R&D tax incentives drive significant variation in the expected generosity of tax relief per additional unit of R&D investment. In 2021, the marginal tax subsidy rate for profit-making (loss-making) SMEs in Iceland is estimated at 0.42 (0.42), well above the OECD median of 0.20 (0.18). The implied R&D tax subsidy rate for large enterprises is equal to 0.3 (0.3) in the profit (loss)-making scenario and likewise well above the OECD median of 0.17 (0.15).

Figure 1. Implied tax subsidy rates on R&D expenditures: Iceland, 2021

1-B-Index, by firm size and profit scenario

Note: Implied marginal tax subsidy rates, presented for different firm size and profitability scenarios, are calculated based on headline tax credit/allowance rates (see methodology and country-specific notes), providing an upper bound value of the generosity of R&D tax support, not reflecting the effect of thresholds and ceilings that may limit the amount of qualifying R&D expenditure or value of tax relief.
Recent developments in R&D tax relief provisions

Regular reforms of R&D tax incentives lead to continuous changes in the availability, scope and generosity of R&D tax incentives. Such reforms relate to the launch of new tax incentives, the R&D definition adopted for tax purposes, changes in tax credit and allowance rates, adjustments of thresholds or upper ceilings on qualifying R&D expenditure or tax relief amounts, or changes in the terms and availability of refunds.

In 2020, Iceland undertook two changes in its R&D tax relief provisions which continue to apply in 2021:

- The rate of the volume-based R&D tax credit has been increased from 20% to 35% for SMEs and from 20% to 25% for large companies.
- The total ceiling on payments to individual parties has been increased from ISK 900 to 1100 million. This includes an allowance for purchased external R&D-work up to ISK 200 million (previously ISK 300 million).

Both policy changes were taken in response to the COVID-19 crisis.

Trends in the generosity of R&D tax support

Since the introduction of a refundable R&D tax credit in 2011, the generosity of R&D tax incentives has practically remained unchanged in Iceland until the year 2019.

The sharp increase in the implied R&D tax subsidy rate for SMEs and large firms in 2020 can be attributed to the increase of headline tax credit rates. Iceland raised the R&D tax credit rate of SMEs from 20% to 35%, leading to an increase in the tax subsidy rate estimated for SMEs from 0.24 to 0.42 in both profit scenarios.

The increase in the tax credit rate for large firms from 20% to 25% led to a correspondingly smaller increase in the implied R&D tax subsidy rate for large firms from 0.24 in 2019 to 0.30 in both profit scenarios. With the maintenance of the enhanced tax credit rates for SMEs and large firms in 2021, the implied R&D tax subsidy rates estimated for SMEs and large firms in 2021 remain unchanged in the profit (loss-making) case.

Throughout the 2011-21 period, marginal tax subsidy rates for SMEs and large firms do not vary by profit scenario due to the refundable nature of the R&D tax credit.

Figure 2. Implied tax subsidy rates on R&D expenditures: Iceland, 2000-21

1-B-Index, by firm size and profit scenario

Note: Implied marginal tax subsidy rates, presented for different firm size and profitability scenarios, are calculated based on headline tax credit/allowance rates (see methodology and country-specific notes), providing an upper bound value of the generosity of R&D tax support, not reflecting the effect of thresholds and ceilings that may limit the amount of qualifying R&D expenditure or value of tax relief.

Policy support for business R&D: the policy mix

In 2019, Iceland is placed above the OECD average in terms of total government support to business R&D as a percentage of GDP, at a rate equivalent to 0.24% of GDP.

Figure 3. Direct government funding of business R&D and tax incentives for R&D, 2019 (nearest year)

As a percentage of GDP

Note: Data on subnational tax support are only available for a group of countries.

Key points:
- From 2006 to 2019, total government support for BERD as a percentage of GDP increased in Iceland by 0.18 percentage point (pp), while the OECD average increased by 0.05 pp.
- During this period, business R&D intensity in Iceland increased from 1.52% to 1.6%.
- In 2019, R&D tax incentives accounted for 48% of total government support for BERD in Iceland.

Distribution of R&D tax relief recipients and government tax relief for R&D

The distribution of R&D tax relief recipients and government tax relief for R&D expenditures (GTARD) provide insights into what types of firms claim and benefit from tax relief.

Figure 4. Number of R&D tax relief recipients and value of government tax relief for R&D, 2019

By firm size*, share in percent

By industry**, share in percent

Note: Figures refer to the R&D tax credit. *SMEs are defined as firms with 1-249 employees and follow the EU criteria in terms of number of employees, turnover and balance sheet total. **Economic activity is defined based on the Icelandic industry classification (ISAT 2008).

Key points:
- In Iceland, SMEs accounted for 88% of R&D tax relief recipients in 2019, while the share of R&D tax support accounted for by SMEs amounted to around 80% in this year. 20% of R&D tax benefits were allocated to large firms, comprising 12% of the population of R&D tax relief recipients in 2019.
- In 2019, firms in services represented around 63% of R&D tax relief recipients in Iceland, followed by firms in manufacturing with a share of 23%. The share of R&D tax benefits accounted for by the latter amounted to 29% in that year, while this share amounted to 61% in the case of firms in services.
Trends in the uptake of R&D tax incentives
Over the period 2011-2019, the number of R&D tax relief recipients increased in Iceland, reaching 160 in 2019. Most of this increase is attributable to SMEs. Throughout these years, the number of SMEs receiving R&D tax support more than doubled from around 60 to 140, while the number of large firms receiving tax support increased by a factor of more than 6 but remained comparatively smaller, with close to 20 recipients in 2019. Over the 2011-19 period, SMEs accounted for more than 90% of R&D tax relief recipients in Iceland.

Figure 5. Number of R&D tax relief recipients, Iceland, 2011-2019

Note: Figures refer to the R&D tax credit.

Trends in government support for business R&D
Since the introduction of R&D tax support in 2011, the importance of R&D tax incentives has increased in Iceland, both in absolute and relative terms.

Figure 6. Direct funding of business R&D and tax incentives for R&D, Iceland, 2000-2019
As a percentage of GDP, 2015 prices (right-hand scale)


- The cost of tax government tax relief for R&D rose (in 2015 prices) from ISK 735 million in 2011 to ISK 3 229 million in 2019 following the 2016 increase in the upper ceilings on qualifying R&D from ISK 100 million to ISK 300 million, and purchased or collaborative R&D from ISK 150 million to ISK 450 million.
- As percentage of GDP, R&D tax support increased from 0.04% to 0.12% over this period.
- Direct funding of BERD increased from 0.10% to 0.13% of GDP between 2011 and 2019.
- The share of tax incentives in total government support increased from 27% in 2011 to 48% in 2019.