R&D Tax Incentives: Sweden, 2021

Design of R&D tax relief provisions

Sweden provides R&D tax relief through a 19.59% exemption of employer's social security contributions.

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

<table>
<thead>
<tr>
<th>SSC exemption</th>
<th>Partial exemption of employer social security contributions</th>
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</thead>
<tbody>
<tr>
<td>Tax incentive</td>
<td>Volume-based</td>
</tr>
<tr>
<td>Type of instrument</td>
<td>Labour costs</td>
</tr>
<tr>
<td>Eligible expenditures†</td>
<td>Labour costs</td>
</tr>
<tr>
<td>Headline rates (%)</td>
<td>19.59</td>
</tr>
<tr>
<td>Refund</td>
<td>Redeemable against employer social security contributions</td>
</tr>
<tr>
<td>Carry-over (years)</td>
<td>n.a.</td>
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</tbody>
</table>

#### Ceilings

R&D tax relief

SSC deductions* are capped at SEK 1 225 652 per month (or SEK 14.7 million per year) for own standing firms and firms in an enterprise group.

* In Sweden, social security contributions consist of two parts, employer contributions (19.8%) and the general payroll tax (11.62%). Employer contributions can be deducted up to SEK 600 000 per calendar month and the general payroll tax is reduced by 10 percentage points up to SEK 625 652 per calendar month. The resulting social security contribution after the deduction of employer contributions must be at least equal to the old age pension contribution of 0.1021 of the salary. 1 SEK = 0.098 EUR, Q3 2021

#### Key features:

- Tax benefits are administered entirely through the social security contributions system, and are thus disconnected from the corporate tax liability of the firm.
- The value of SSC deductions per year is limited to SEK 14.7 million.

#### Generosity of R&D tax support in 2021

Differences in the design of R&D tax incentives drive a significant variation in the expected generosity of tax relief per additional unit of R&D investment. In 2021, the R&D tax subsidy rate for SMEs and large firms in Sweden is estimated at 0.11 (0.10) in the profit (loss) scenarios. These subsidy rates are well below the OECD median for profitable SMEs (0.20) and large firms (0.18) and smaller than the OECD median for loss-making SMEs (0.17) and large firms (0.15).

#### Figure 1. Implied tax subsidy rates on R&D expenditures: Sweden, 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 2021, Sweden undertook two changes in its R&D tax relief provisions:
- From July 1, 2021, the ceiling for the partial exemption of employer social security contributions has been increased from 450 000 SEK to 600 000 SEK per month. For enterprise groups the ceiling has been increased from 919 239 SEK to 1 225 652 SEK per month for all enterprises in the group.

This policy change was not undertaken in response to the COVID-19 crisis.

Trends in the generosity of R&D tax support

Sweden introduced R&D tax incentives for the first time in 2014 in the form of a partial exemption of employer social security contributions. With no full expensing of R&D capital expenditure or any other enhanced tax relief provisions in place until 2014, a negative marginal tax subsidy rate is estimated for both profit scenarios throughout the 2000-13 period. During this period, the step-wise reduction of the corporate income tax rate (from 28% to 26.3% in 2009 and to 22% in 2013) produced some minor increases in the R&D tax subsidy rate, due to the smaller weight placed on the non-availability of enhanced tax deductions. The value of allowances is directly linked to the magnitude of the corporate income tax rate. In the case of loss-making firms, the subsidy rate is slightly higher in net present value terms due to the ability to carry over losses.

With no change in the rate of SSC exemption between 2014 and 2019, the implied R&D tax subsidy rates estimated for profitable SMEs and large firms remain constant at 0.05 throughout this period. Due to the refundable nature of the SSC exemption for R&D labour costs, the tax subsidy rates for profitable and loss-making firms coincide or are at least very close, given the comparatively large share of R&D labour costs in total business R&D expenditure (on average around 60% across OECD countries). Following the increase of the rate of SSC exemption from 10% to 19.59% in 2020, R&D tax subsidy rate estimated for SMEs and large firms increased from 0.05 (0.05) to 0.11 (0.10) in the profit (loss) case, and stayed at this level in 2021.

Figure 2. Implied tax subsidy rates on R&D expenditures: Sweden, 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

Switzerland is placed below the OECD average in terms of total government support to business R&D as a percentage of GDP, at a rate equivalent to 0.12% of GDP in 2018 (latest figure available).

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 2018, government support for BERD as a percentage of GDP increased in Switzerland by 0.01 percentage point (pp), while the OECD average (2006-19) increased by 0.05 pp.
- From 2006 to 2018, business R&D intensity in Switzerland decreased from 2.60% to 2.36%.
- In 2018, R&D tax incentives accounted for 10% of total government support for BERD in Switzerland.

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 Partial exemption of social security contributions. *SMEs are defined as firms with 10-249 employees. **Economic activity is classified based on NACE rev.2.


Key points:
- In Switzerland, SMEs accounted for 90% of R&D tax relief recipients in 2019, while the share of R&D tax support accounted for by SMEs amounted to around 76% in this year. 23% of R&D tax benefits were allocated to large firms, comprising 5% of the population of R&D tax relief recipients in 2019.
- In 2019, firms in services represented around 80% of R&D tax relief recipients in Switzerland, followed by firms in manufacturing with a share of 18%. The share of R&D tax benefits accounted for by the latter amounted to 31% in that year, while this share amounted to 68% in the case of firms in services.
Trends in the uptake of R&D tax incentives

Over the period 2015-2019, the number of R&D tax relief recipients steadily increased in Sweden, reaching 2,570 in 2019. This increase is in large parts attributable to SMEs which accounted for nearly 90% of R&D tax relief recipients in Sweden throughout these years. The number of self-employed receiving tax support stayed fairly constant over this period, oscillating around 10 recipients. The number of large firms was also fairly constant at around 100 until 2017, increasing thereafter to reach 121 in 2019.

Figure 5. Number of R&D tax relief recipients, Sweden, 2015-2019

Note: Figures refer to the Partial exemption of social security contributions.

Trends in government support for business R&D

Sweden introduced R&D tax incentives in 2014. While the importance of R&D tax incentives increased in absolute terms ever since, their relative importance has remained fairly stable over the 2014-18 period.

Figure 6. Direct funding of business R&D and tax incentives for R&D, Sweden, 2000-18

As a percentage of GDP, 2015 prices (right-hand scale)


- As percentage of GDP, R&D tax incentives accounted for 0.013% in 2018, similar to 2014 (0.011%).
- Direct funding of BERD, equivalent to 0.18% of GDP in 2000, experienced an irregular decline over the 2000-18 period and amounted to 0.11% in 2018.
- The share of R&D tax incentives in total government support for BERD increased slightly from 8% in 2014 to 10% in 2018.


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