



(Data as at 4 November 2022)

**Research Office** Legislative Council Secretariat



ISSF03/2022

### 1. Sources of government revenue

1.1 Government revenue is the aggregate of operating revenue<sup>1</sup> and capital revenue.<sup>2</sup> In 2022-2023, government revenue is forecast to increase by 3.2% to HK\$715.9 billion. In the first half of this fiscal year (April to September 2022), HK\$131.7 billion in revenue was collected (**Table 1**), representing 18.4% of the forecast revenue. For the past fiscal year 2021-2022, profits tax was the largest revenue item, accounting for 24.1% of total revenue, followed by land premium (20.6%), stamp duties (14.4%) and investment income (11.6%). Taken together, these four items took up 70.7% of total government revenue (**Table 2**).

	2020-2021	2021-2022	2022-2023	Apr-Sep 2022
	(Actual)	(Actual)	(Budget Estimates)	(Actual)
Operating revenue	459.3	528.4	556.9	110.9
	(81.4%)	(76.2%)	(77.8%)	(84.2%)
Capital	104.9	165.2	158.9	20.9
revenue	(18.6%)	(23.8%)	(22.2%)	(15.8%)
Government	564.2	693.6	715.9	131.7
revenue <sup>(2)</sup>	(100%)	(100%)	(100%)	(100%)

## Table 1 – Government revenue (HK\$ billion)<sup>(1)</sup>

Notes: (1) Figures in brackets shown in the table represent percentage shares in the total government revenue.(2) Individual figures may not add up to the total due to rounding.

Sources: Financial Services and the Treasury Bureau, and The Treasury.

<sup>&</sup>lt;sup>1</sup> Operating revenue comprises revenue credited to the General Revenue Account, which includes direct and indirect taxes and excludes those items which are treated as capital revenue such as loan repayments received. Major types of tax and their corresponding rates applicable in 2022-2023 are set out in **Table 3**.

<sup>&</sup>lt;sup>2</sup> Capital revenue consists of certain revenue items in the General Revenue Account and all receipts credited to the following seven Funds: Capital Investment Fund, Capital Works Reserve Fund, Civil Service Pension Reserve Fund, Disaster Relief Fund, Innovation and Technology Fund, Loan Fund and Lotteries Fund.

Table 2 – Government revenue	by item	(HK\$ billion) <sup>(1)</sup>	)
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	2020-2021	2021-2022	2022-2023	Apr-Sep 2022
	(Actual)	(Actual)	(Budget Estimates)	(Actual)
Profits tax	135.5	167.3	167.7	9.7
	(24.0%)	(24.1%)	(23.4%)	(7.4%)
Stamp duties	89.0	99.7	113.0	34.6
	(15.8%)	(14.4%)	(15.8%)	(26.3%)
Investment	41.8	62.9	78.5	0.1
income	(7.4%)	(9.1%)	(11.0%)	(0.1%)
Salaries tax	75.0	75.6	72.9	8.7
Salaries tax	(13.3%)	(10.9%)	(10.2%)	(6.6%)
General rates	19.0	19.3	19.0	8.5
General lates	(3.4%)	(2.8%)	(2.7%)	(6.4%)
Other	98.8	103.6	105.9	49.2
operating revenue <sup>(2)</sup>	(17.5%)	(14.9%)	(14.8%)	(37.4%)
Operating	459.3	528.4	556.9	110.9
revenue <sup>(3)</sup>	(81.4%)	(76.2%)	(77.8%)	(84.2%)
Land	88.7	143.0	120.0	19.4
premium <sup>(4)</sup>	(15.7%)	(20.6%)	(16.8%)	(14.7%)
Investment	10.6	17.6	29.9	0.0 <sup>(5)</sup>
income	(1.9%)	(2.5%)	(4.2%)	(0.0%)
Other capital revenue <sup>(2)</sup>	5.6	4.6	9.1	1.4
	(1.0%)	(0.7%)	(1.3%)	(1.1%)
Capital	104.9	165.2	158.9	20.9
revenue <sup>(3)</sup>	(18.6%)	(23.8%)	(22.2%)	(15.8%)
Government	564.2	693.6	715.9	131.7
revenue <sup>(3)</sup>	(100%)	(100%)	(100%)	(100%)

Notes: (1) Figures in brackets shown in the table represent percentage shares in the total government revenue.

(2) Other operating revenue includes fees and charges, betting duty, government rents and duties. Other capital revenue includes loan repayments received by the various funds, and recovery of the land costs for the flats sold under the Home Ownership Scheme from the Hong Kong Housing Authority.

(3) Individual figures may not add up to the total due to rounding.

(4) Breakdown of the land premium is shown in Table 4.

(5) The amount is HK\$4.058 million.

Sources: Financial Services and the Treasury Bureau, and The Treasury.

Types	Deteile
Types	Details
Profits tax <sup>(1)</sup>	<ul> <li><u>Corporations</u></li> <li>8.25% for the first HK\$2 million of assessable profits; and</li> <li>16.5% for the remaining assessable profits</li> </ul>
	<ul> <li>16.5% for the remaining assessable profits.</li> <li><u>Unincorporated businesses</u></li> <li>7.5% for the first HK\$2 million of assessable profits; and</li> </ul>
	15% for the remaining assessable profits.
Salaries tax	<ul> <li>Tax payable is calculated at the following rates, whichever is lower:         <ul> <li>(a) 2%-14% on the first four HK\$50,000 segments of net income (i.e. income less deductions and allowances) and 17% on the remaining net income;<sup>(2)</sup> or</li> <li>(b) 15% on income after deductions.</li> </ul> </li> </ul>
Stamp duties	<ul> <li><u>Sale or transfer of property</u></li> <li>Residential properties are subject to a flat rate of 15% of the transaction value or market value of the property (whichever is higher) as from 5 November 2016,<sup>(3)</sup> unless those specifically exempted under the Stamp Duty (Amendment) (No. 2) Ordinance 2014 which are subject to stamp duties of HK\$100-4.25% of the transaction value or market value of property.<sup>(4)</sup></li> <li>For non-residential properties, they are subject to stamp duties of</li> </ul>
	HK\$100-4.25% of the transaction value or market value. <sup>(5)</sup>

## Table 3 – Major tax/charging rates for 2022-2023

Notes: (1) An amendment bill was gazetted on 29 December 2017 to introduce the two-tiered profits tax rates.

(2) The marginal tax bands have been widened from HK\$45,000 to HK\$50,000 since assessment year 2018-2019.
(3) The Government has revised upward the stamp duty rates in an effort to cool down the residential property market on several occasions since 2010. With effect from 5 November 2016, a new flat rate of 15% has been chargeable on the transactions for residential properties acquired by buyers who already owned at least one residential property ("New Residential Stamp Duty"). Moreover, for Hong Kong permanent resident buyers who change residential property and wish to claim partial refund of the tax, the time limit for disposal of original property has been extended from within six months to within 12 months. With effect from 12 April 2017, the flat rate of 15% has also been applied to those buyers purchasing more than one residential property under a single instrument, even if they satisfy the exemption criteria.

- (4) The rate applies to Hong Kong permanent resident buyers acquiring residential properties, if they: (a) act on their own behalf; and (b) are not beneficial owners of any other residential property in Hong Kong at the time of acquisition, according to the Stamp Duty (Amendment) (No. 2) Ordinance 2014. Eligible incoming talents, upon becoming permanent residents, may also apply for a refund of the extra stamp duties (i.e. Buyer's Stamp Duty and New Residential Stamp Duty) paid for the first residential property bought on or after 19 October 2022, while the Ad Valorem Stamp Duty at Scale 2 rates (i.e. HK\$100-4.25%) is still applicable.
- (5) The Doubled Ad Valorem Stamp Duty (with rates from 1.5%-8.5%) on non-residential property transactions, introduced in 2013, was abolished with effect from 26 November 2020. Any transaction executed thereafter is subject to the above-stated original rates.

# Table 3 – Major tax/charging rates for 2022-2023 (cont'd)

Types	Details			
Stamp duties (cont'd)	<ul> <li><u>Lease of property</u></li> <li>0.25%-1% of the yearly rent depending on the term lease.</li> <li><u>Stock trade</u></li> </ul>			
	• 0.13% of the consideration or value of each transaction payable by both buyers and sellers. <sup>(6)</sup>			
Special Stamp Duty ("SSD")	SSD for resale of residential property acquired on or after <u>27 October 2012</u> <sup>(7)</sup>			
	<ul> <li>20% if the property has been held for six months or less;</li> <li>15% if the property has been held for more than 6 months but 12 months or less; and</li> <li>10% if the property has been held for more than 12 months</li> </ul>			
Buyer's Stamp Duty ("BSD")	<ul> <li>but 36 months or less.</li> <li>15% on residential property acquired by any person except a Hong Kong permanent resident.<sup>(7)</sup></li> </ul>			
Betting duty	<ul> <li><u>Horse races bets</u></li> <li>72.5%-75% on the net stake receipts, depending on the amount of receipts.</li> </ul>			
	<ul> <li><u>Football matches bets</u></li> <li>50% on the net stake receipts.</li> </ul>			
	<ul> <li>Mark Six Lottery</li> <li>25% on the amount of proceeds.</li> </ul>			
General rates	• 5% of the rateable annual rent of landed property. <sup>(8)</sup>			
Government rents	• 3% of the rateable value of landed property.			

Notes: (6) The Government has raised the rate of stamp duty for transaction of Hong Kong stock, with effect from 1 August 2021.

(7) With effect from 20 November 2010, SSD rates have been raised for different holding periods of residential properties, while a new Buyer's Stamp Duty ("BSD") has also been introduced since 27 October 2012. The Government allows eligible incoming talents to, upon becoming permanent residents, apply for a refund of BSD and New Residential Stamp Duty paid for the first residential property purchased, from 19 October 2022.

(8) It was proposed in the 2022-2023 Budget that a progressive rating system for domestic properties would be introduced from 2024-2025. For properties with rateable value ("RV") over HK\$550,000, rates will be charged at 5%-12% of RV on a progressive basis. For properties with RV of HK\$550,000 or below, rates will be charged at the current level of 5% of RV.

Sources: Inland Revenue Department, and Rating and Valuation Department.

	2020-2021	2021-2022	2022-2023	Apr-Sep 2022
	(Actual)	(Actual)	(Budget Estimates)	(Actual)
Sales by public auction and tender	53.6 (60.4%)	91.6 (64.1%)		11.5 (59.3%)
Modification of existing leases, exchanges and extensions	32.5 (36.7%)	44.2 (30.9%)	Breakdown not available	6.2 (31.9%)
Fees received in respect of short term waivers <sup>(2)</sup>	0.3 (0.3%)	0.3 (0.2%)		0.1 (0.8%)
Private treaty	2.3	6.9		1.6
grants	(2.6%)	(4.8%)		(8.0%)
Total <sup>(3)</sup>	88.7	143.0	120.0 <sup>(4)</sup>	19.4
	(100%)	(100%)	(100%)	(100%)

### Table 4 – Breakdown of the land premium (HK\$ billion)<sup>(1)</sup>

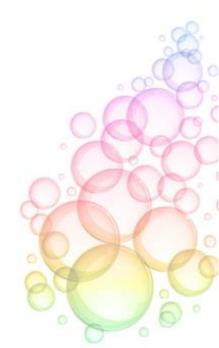
Notes: (1) Figures in brackets shown in the table represent percentage shares in the total land premium.

(2) Government leases, under which all private properties in Hong Kong are held, usually contain restrictions to the use of land and buildings. Nevertheless, a leaseholder may apply for a short term waiver from the Lands Department to temporarily relax the restriction(s) under the lease. If the waiver application is approved, the Government will require the leaseholder to pay a fee reflecting the enhanced value of the property for the waiver period.

- (3) Individual figures may not add up to the total due to rounding.
- (4) The Government only provides the estimate for the total land premium receivable in 2022-2023 without breakdown in view of the market-driven nature of the land sales. The total land premium for 2022-2023 is estimated having regard to both the overall performance of the property market and the prevailing market conditions.

Sources: Financial Services and the Treasury Bureau, and The Treasury.

Research Office Research and Information Division Legislative Council Secretariat 10 November 2022 Tel: 3919 3181



# **References^**

- 1. Financial Secretary. (2022) *The 2022-23 Budget*. Available from: https://www.budget.gov.hk/2022/eng/index.html
- 2. Financial Services and the Treasury Bureau. (2022) *Estimates for the year ending 31 March 2023*. Available from: https://www.budget.gov.hk/2022/eng/estimates.html
- 3. *Hong Kong Monetary Authority*. (2022) Available from: https://www.hkma.gov.hk/eng/
- 4. Inland Revenue Department. (2022) Available from: https://www.ird.gov.hk/eng/welcome.htm
- 5. *Rating and Valuation Department*. (2022) Available from: https://www.rvd.gov.hk/en/
- 6. The Treasury. (2021) Accounts Published in the Gazette: Accounts for the year ended 31 March 2021. Available from: https://www.gld.gov.hk/egazette/pd f/20212520/egn202125203060.pdf
- 7. The Treasury. (2022a) Accounts Published in the Gazette: Accounts for the year ended 31 March 2022. Available from: https://www.gld.gov.hk/egazette/pd f/20222620/egn202226202487.pdf
- 8. The Treasury. (2022b) Accounts Published in the Gazette: Accounts for the year ended 30 September 2022. Available from: https://www.gld.gov.hk/egazette /pdf/20222644/egn202226446383.pdf
- 9. *The Legislative Council.* (2022) Available from: https://www.legco.gov.hk/en/index.html

Note: ^ Internet resources listed in this section were accessed in November 2022.

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