

Cross-Border Impact Assessment 2019

Dossier 1: The qualifying foreign taxpayer obligation (“90% rule”) – An ex-post impact assessment



Maastricht University

Cross-Border Impact Assessment 2019

**Dossier 1: The qualifying foreign taxpayer obligation (90% rule) – an ex-post impact
assessment**

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The *Institute for Transnational and Euregional cross-border cooperation and Mobility / ITEM* is the pivot of scientific research, counselling, knowledge exchange, and training activities with regards to cross-border cooperation and mobility.

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1. Introduction

The purpose of this dossier is to assess the potential cross-border impact of the qualifying foreign taxpayer obligation (*kwalificerende buitenlandse belastingplicht* – hereafter: KBB), which entered into force on 1 January 2015. The KBB provides that non-resident taxpayers in the Netherlands can benefit from the same deductions and tax credits as resident taxpayers if they earn at least 90% of their total income in the Netherlands. They are excluded from this scheme, however, if their income is below this threshold. The KBB may particularly affect the labour mobility and residential mobility of frontier workers who earn less than 90% of their world income in the Netherlands and who do not have sufficient taxable income in their respective countries of residence. In the ITEM Cross-Border Impact Assessment of 2018, a preliminary *ex-post* impact assessment was carried out. To this end, the trend in the number of non-resident workers in the Netherlands between 2013 and 2016 was analysed. The analysis showed no notable changes in the number of non-resident workers during that period. In this edition of the Cross-Border Impact Assessment, the analysis has been extended to allow for a better *ex-post* impact assessment.

This dossier is structured as follows: The first part explains the study plan. We discuss the potential consequences of the KBB and put this tax scheme in the context of European integration, European cohesion and socio-economic development. We also summarise the 2017 and 2018 Impact Assessments and explain how this dossier builds on both reports. The second part of the dossier contains an overview of the data and definitions used. The third part contains the empirical analysis and is followed by a conclusion.

2. Research objectives and methods

2.1 The research themes, principles, benchmarks and indicators of the dossier

The KBB, which entered into force on 1 January 2015, provides that non-resident taxpayers in the Netherlands qualify for the same deductions and tax benefits as resident taxpayers if they earn at least 90% of their total income in the Netherlands. The KBB replaces the optional scheme, which allowed non-resident taxpayers to opt for the same tax treatment as Dutch resident taxpayers even if they received less than 90% of their total income in the Netherlands. Under the new system, non-resident taxpayers will only be eligible for foreign taxpayer status if they receive 90% of their total income in the Netherlands. They will be denied this status if their income is below this threshold.

The KBB has clear legal implications for the principles of European integration. The compulsory income threshold of 90% is demonstrably at odds with the original position of the legislator outlined in the introduction of *the Dutch Income Tax Act 2001*, as well as with Court of Justice's case law in the Schumacker case, where the Court explicitly rejected any arbitrary threshold for the definition of the total income of foreign taxpayers.¹ The Court's preliminary ruling in the Schumacker case obliges EU Member States to allow foreign taxpayers who receive all or almost all of their income in a specific Member State (e.g. the Netherlands) to benefit from the same personal tax deductions as the domestic taxpayers of that specific Member State.² In February 2017, at the request of the Dutch Supreme Court (*Hoge Raad*), the Court of Justice of the European Union (CJEU) gave a preliminary

¹ CJEU 10 May 2012, Case C-39/10 (Commission v. Estonia), NTFR 2012/1371; CJEU 09 February 2017, Case C-283/15 (X).

² ECJ 14 February 1995, Case 279/93 (Schumacker), ECR 1995, p. I-225.

ruling in case X, also known as 'the Spanish football broker'.³ In this case, the Court ruled that this resident taxpayer in Spain, who received 60% of his total income in the Netherlands and 40% in Switzerland, was eligible for Dutch home mortgage interest deduction (*hypotheekrenteaftrek*). The CJEU ruling thus challenged the legislator's definition based in the Schumacker doctrine for self-employed persons, because this case did not make the enjoyment of personal tax benefits dependent on whether or not a certain income threshold was met, but rather on whether these benefits could be had in the country of residence. The CJEU decided that, if the country of residence is unable to grant these benefits – possibly because an insufficient part of the income is taxable there, the Member State in which the taxpayer does *not* reside must grant these benefits, proportionate to the income that the non-resident taxpayer has earned in that country. The Supreme Court of the Netherlands (*Hoge Raad*) accepted this decision in a judgment in May 2017 and referred the case back to a lower court.⁴ During the compilation of this report (1 July 2019), it remained unclear how the Dutch government would implement this decision, possibly through a revision of the KBB.

Table 1: Research themes, principles, benchmarks and indicators for the evaluation of the impact of the KBB

Research theme	Principles	Benchmark	Indicators
European integration	Cross-border mobility as an incentive for European integration, cohesion and socio-economic development	The situation on/before 1 January 2015, when the KBB became effective	The number of non-resident employees in the Netherlands before (2012, 2013, 2014) and after (2015, 2016, 2017) the introduction of the KBB.
European cohesion	Freedom of movement of workers (Article 45 TFEU) Freedom of establishment (for the self-employed) (Article 49 TFEU)		
Socio-economic development	Dutch Income Tax Act 2001 Schumacker case (C 279/93)		Flows of individual labour and residential mobility

Paradoxically, whereas the Dutch legislator's interpretation of the Schumacker doctrine was intended to translate European law into Dutch law, its implementation is likely to constitute a violation of the principles of the European free movement of persons (Article 45 TFEU).

From a theoretical point of view, the KBB is expected to have a negative effect on labour and residential mobility in the Dutch border regions and on the number of non-resident workers, i.e. those living abroad and working in the Netherlands. Non-resident workers may lose tax benefits (such as mortgage interest relief for homeowners) if they earn less than 90% of their global income in the Netherlands while generating insufficient taxable income in their respective countries of residence.

³ CJEU 09 February 2017, Case C-283/15 (X). See also H. Arts and J. Korving, The Qualifying Foreign Tax Obligation of Article 7.8 Dutch Income Tax Act and EU Law. In: Cross-Border Impact Assessment 2016, Institute for Transnational and Euregional cross-border cooperation and mobility/ITEM, pp. 188-198.

⁴ Supreme Court of the Netherlands (*Hoge Raad*), 12 May 2017, Case 13/03468, ECLI:NL:HR:848.

This may cause some non-resident workers to opt for a different employer or a move to the Netherlands. For the same reason, it is also conceivable that presently resident employees will refrain from moving abroad or that non-residents who currently work abroad will forego a job offer in the Netherlands.

The potentially negative effect of the KBB on the number of people employed in the Netherlands may have adverse consequences for socio-economic development, especially in the border regions. Many employers take advantage of labour mobility within the EU to address labour or skills shortages. It is expected, however, that employers will need to provide more incentives to retain experienced and skilled non-resident workers for their businesses, given that a number of non-residents will be facing increasing indirect costs under the new scheme. It can therefore be concluded that any negative impact on labour and residential mobility would be problematic for all of the major research themes identified in Table 1 (see above): European integration, European cohesion and socio-economic development.

2.2 Results of previous analyses

Both the 2017 and the 2018 Cross-Border Impact Assessments have equally studied the KBB dossier⁵. The 2017 analysis was an *ex-ante* assessment, including an analysis of the population of non-resident workers in the Netherlands since 1 December 2014. The potential impact of the legislation was estimated by mapping those non-resident workers potentially affected by the KBB. The analysis showed that, at that time, more than 130,000 employees were working in the Netherlands without living there. The majority of these 'non-resident' workers were living in Belgium, Germany or Poland and held the Belgian, German, Dutch or Polish nationalities. In addition, the majority of non-resident workers worked in the 14 COROP areas along the Dutch-Belgian and Dutch-German borders.⁶ This led to the conclusion that these areas were the most vulnerable to any negative consequences of the KBB.

More recent data were available for the 2018 analysis, allowing for a preliminary *ex-post* impact assessment based on an analysis of the period from 2013 to 2016. The trends in the number of non-resident employees in the period before the KBB came into force (2013, 2014) and after its introduction (2015, 2016) were compared in view of the hypothesis of expecting a change in trend since the introduction of the legislation. The researchers found that the number of non-resident workers had increased significantly between 2013 and 2016, an increase mainly driven by the large influx of Polish non-resident workers. The number of non-resident workers with Belgian, German and Dutch nationalities remained more or less constant between 2013 and 2016. This trend did not show any significant differences between the period prior to the introduction of KBB and the period immediately after. It led to the conclusion that, based on the analysed data, there were no perceivable negative effects of the KBB on the number of non-resident workers in the Netherlands.

⁵ Vink, M., van der Valk, J., Schaper, M., & Schmidt, L. (2017). Cross-Border Impact Assessment 2017, Dossier 6. ITEM
Finch, M., van der Valk, J., Duijndam, S. (2018). Cross-Border Impact Assessment 2018, Dossier 2. ITEM

⁶ The 40 'COROP' areas were designated in 1970 by the *Coördinatiecommissie Regionaal Onderzoeksprogramma* (the Coordinating Committee for Regional Research Programmes - COROP). For more information, visit https://www.regioatlas.nl/indelingen/indelingen_indeling/t/corop_regio_s.

2.3 This year's analysis

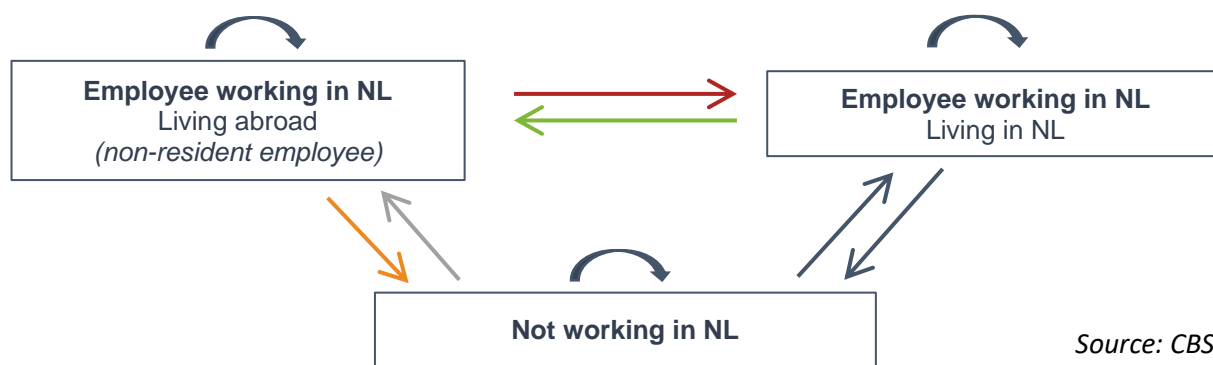
This year's analysis constitutes a more comprehensive *ex-post* impact assessment of the KBB. Compared to last year, the analysis includes two new elements: Firstly, we have a longer time series at our disposal: we can now use a time series from 2012 to 2017, the most recent year for which Statistics Netherlands (*Centraal Bureau voor de Statistiek* – hereafter: CBS) has data available. This means that we may be able to map any possibly delayed effects of the KBB. Also, a longer time series makes it possible to determine any changes in trends regarding cross-border mobility more accurately. The second new element is a longitudinal analysis that monitors changes in the living or employment situations of individual employees between 2012 and 2017. This analysis allows us to identify cross-border flows and to investigate which share of non-residents remains stable over time and to what extent changes in the number of non-residents are caused by labour mobility or residential mobility across the border. Has the number of relocations between the Netherlands and the other countries changed (residential mobility) and/or has the number of people leaving to go work in another country changed (labour mobility)?

For every year and for each person, we can determine whether they were working in the Netherlands as employees and in which country they lived. This produces three categories as a basis for the analysis:

- People working in the Netherlands as employees and living abroad, i.e. non-resident employees,
- People working as employees and living in the Netherlands, and
- People not working in the Netherlands.

Figure 1 shows the year-on-year flows of people that are relevant for the analysis. These flows allow us to analyse to what extent a change in the number of non-resident employees may be caused by relocation between the Netherlands and the other countries (residential mobility) or by starting to or stopping work in the Netherlands (labour mobility).

Figure 1: Labour mobility and residential mobility expressed by cross-border flows



Source: CBS

3. Data and definitions

This dossier uses the same datasets and definitions as the assessments of 2017 and 2018⁷. We combine data from the UWV customer policy records (*polisadministratie*) and the Key Register of Persons (*Basisregistratie Personen*, BRP) to identify non-resident employees. The policy records managed by the Dutch employee benefits agency (*Uitvoeringsinstituut Werknemersverzekeringen*, UWV) contains data about workers with an employment contract, i.e. employees whose employers withhold payroll tax on their monthly salaries – hereafter referred to as the “*employee policy records*”. The BRP contains personal information, such as the home address, age and gender of anyone registered and resident in a Dutch municipality. In addition, the BRP contains data on people who used to live in the Netherlands but have moved abroad. This is called the Register of Non-Residents (*Registratie Niet-Ingezetenen*, RNI). The *employee policy records* and the BRP are both part of the social statistics database (*Sociaal-statistische Bestanden*, SSB).

By linking these datasets, it is possible to identify the population of non-resident employees who must pay income tax in the Netherlands. **“Non-resident workers” are thus defined, from the perspective of the Netherlands, as people who are included in the policy records and who are not registered in any Dutch municipality.** The characteristics that we use in this dossier to further specify the concerned persons’ background are ‘nationality’ and ‘country of residence’. Nationality refers to the country of citizenship of the non-resident worker, whereas country of residence is defined as the country where the ‘non-resident’ worker lives.⁸ Most non-resident workers are Belgians, Germans, Dutch or Poles, who usually live in Belgium, Germany or Poland, respectively. For this reason, we have included these countries in the analysis as categories.

4. Empirical analysis

This chapter contains an *ex-post* analysis of the potential effects of the KBB for non-resident employees in the Netherlands. The first section shows the numbers of non-resident employees in the Netherlands over the years 2012-2017, broken down by country of residence. The second section of this chapter analyses what will happen if the numbers of non-resident workers in the Netherlands change. Special emphasis is placed on non-resident workers living in Belgium and Germany.

4.1 Time series of non-resident workers in the Netherlands, 2012-2017

Table 2 (below) shows the number of non-resident employees in the Netherlands by country of residence and nationality over the period 2012-2017. A distinction is made between non-resident workers living in the following countries: Belgium, Germany, Poland and “other countries” as residual category. In 2017, the highest number of non-resident employees in the Netherlands (82,200) were domiciled in Poland. However, these employees are expected to work in the Netherlands only

⁷ Vink, M., van der Valk, J., Schaper, M., & Schmidt, L. (2017). Cross-Border Impact Assessment 2017, Dossier 6. ITEM
Finch, M., van der Valk, J., & Duijndam, S. (2018). Cross-Border Impact Assessment 2018, Dossier 2. ITEM

⁸ [Note from the editors: Please note that, for the purpose of this study and as clarified in the definition above, the term “non-resident worker” will always refer to the perspective of the Netherlands, as the country of employment but not of residence – meaning the concerned workers live *outside* the Netherlands. Whilst this technical term may at times lead to rhetorically confusing constructions like ‘non-resident workers living in Germany/Belgium’, it describes the correct legal term coined in the Dutch public administrative system and is accordingly applied in the following presentation of the results from the data analysis to visualise the population of cross-border workers who work in the Netherlands but do not live there (on a permanent basis).]

temporarily.⁹ Since Germany and Belgium border directly on the Netherlands, we believe that non-resident workers from these countries are more likely to commute to the Netherlands on a daily basis. In 2017, the Netherlands employed almost 40,000 non-resident workers from each neighbouring country, i.e. Germany and Belgium. The number of non-resident employees living in other countries was slightly lower, totalling around 36,000.

Table 2: Number of non-resident workers in NL, by country of residence and nationality, 2012-2017 (x 1 000)

Country of residence			2012	2013	2014	2015	2016	2017
Belgium	Nationality	NL	21,0	20,8	21,1	20,8	20,9	21,3
		BE	15,0	14,7	14,7	14,5	14,9	15,3
		Other	1,7	1,7	1,7	1,8	1,9	2,3
	Total		37,7	37,2	37,5	37,0	37,7	39,0
Germany	Nationality	NL	16,1	15,9	16,3	16,2	16,4	16,6
		DE	19,9	17,4	15,3	14,5	14,0	14,0
		PL	3,6	3,5	3,7	4,2	4,6	5,6
	Other	1,7	1,7	1,7	2,0	2,7	3,5	
Total		41,3	38,5	37,0	36,9	37,7	39,7	
Poland	Nationality	NL	1,1	1,0	1,1	1,3	1,5	1,7
		PL	70,1	66,6	68,8	72,5	78,0	79,5
		Other	2,0	2,4	1,5	1,2	1,3	1,0
Total		73,2	70,0	71,4	75,0	80,8	82,2	
Other	Nationality	NL	3,5	3,6	4,5	4,3	4,5	5,1
		Other	15,6	14,8	17,2	20,2	24,6	31,2
	Total		19,1	18,4	21,7	24,5	29,2	36,3
Total		171,2	164,1	167,5	173,4	185,3	197,3	

Source: CBS

Table 2 also shows a breakdown by nationality for each country of residence. First of all, it includes the number of non-resident workers with the Dutch nationality in each country of residence. A large proportion of the non-resident workers living in Belgium and Germany carried the Dutch nationality: in 2017, they constituted 55% of the non-resident workers living in Belgium and 42% of the non-resident workers living in Germany. Since it is likely that employees who are Dutch nationals, in particular, will be paying tax in the Netherlands, we expect the KBB to primarily affect these people. In addition to the Dutch nationality, Table 2 shows other nationalities with relatively high shares of non-resident employees per country of residence. The nationalities with relatively low shares have been combined in the 'other' category. A significant proportion of non-resident workers carried the nationality of their country of residence: in 2017, these numbers were 39% for Belgium, 35% for Germany and even 97% for Poland.

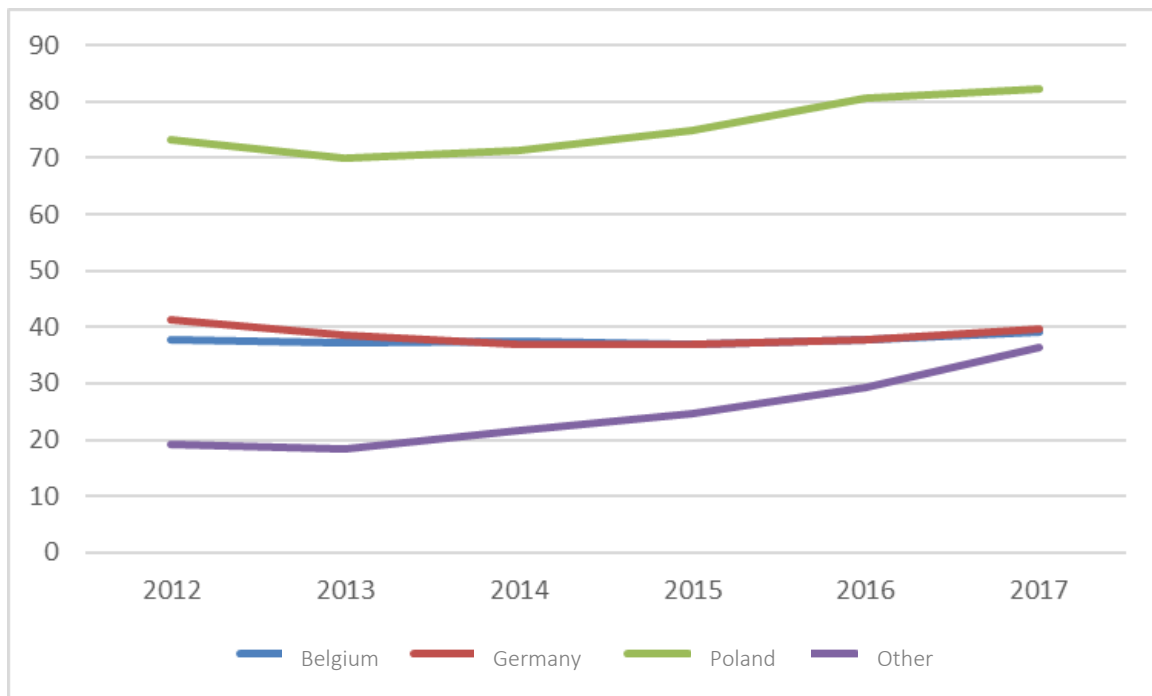
⁹ CBS (May 2018): 'Third of Polish workers still here after 5 years.'

Table A.1 in the Appendix, which shows a breakdown by gender, shows that 68% of non-residents was male by 2017. In each country of residence and for each nationality, the proportion of male non-resident exceeds that of female non-resident workers. The exact figures can be found in the Appendix.

For clearer illustration, Figure 2 (below) plots the numbers of non-resident employees in the Netherlands from Table 2 by country of residence, covering the years 2012-2017. The number of non-resident employees living in Poland and in other countries increased over the period 2012-2017. The number of non-resident employees living in Belgium and Germany remained more or less constant during this period. Figure A.1 in the Appendix shows no striking trend differences between male and female non-resident workers; the numbers of male and female non-resident workers residing in Poland or other countries increased between 2012 and 2017, whereas the numbers of male and female non-resident workers living in Belgium or Germany remained almost constant over time during this period.

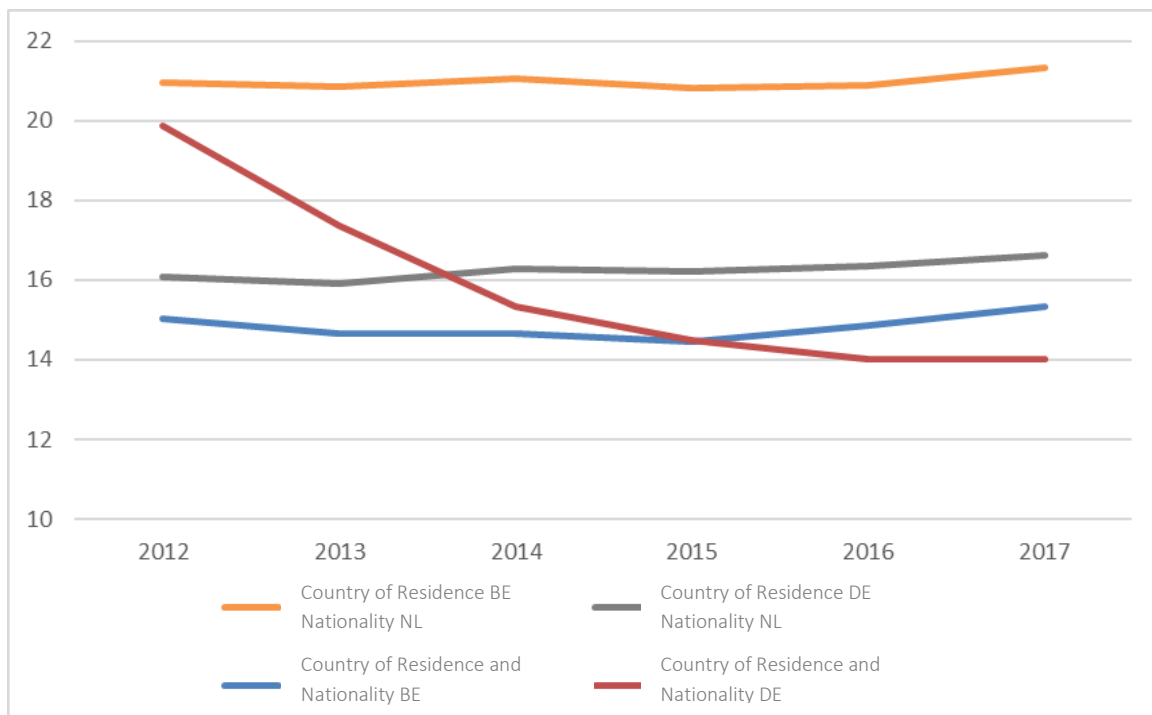
Figure 3 shows the number of Dutch or Belgian non-resident workers [i.e. cross-border workers in the Netherlands] living in Belgium between 2012 and 2017. It equally displays the trends for non-resident employees of Dutch or German nationality living in Germany. For Dutch people living in Belgium or Germany [while working in the Netherlands], there is no visible change in the trend. Their numbers remained virtually unchanged over the entire period. A similar trend can be observed for non-resident workers of Belgian nationality living in Belgium. However, the number of non-resident workers of German nationality living in Germany clearly decreased between 2012 and 2017. Figure A.2 in the appendix shows that this decrease was mainly driven by men. Given that the number of German non-resident workers living in Germany was already decreasing before 2015, this group showed no change in trend [in relation to the entry into force of the KBB] either.

Figure 2: Number of non-resident workers, by country of residence, 2012-2017 (x 1 000)



Source: CBS

Figure 3: Number of non-resident workers, by country of residence and nationality, 2012-2017 (x 1 000)



Source: CBS

In line with the findings of the 2018 report, there are thus no significant changes in the numbers of non-resident workers in the Netherlands between the period before the introduction of the KBB (2012, 2013, 2014) and the period after its introduction (2015, 2016, 2017). As there have hardly been

any changes since 2015, there is also no evidence of a delayed effect of the KBB on the *numbers* of non-resident employees. It would be preferable, however, to compile an even longer time series, so as to exclude any delayed effects with more certainty.

4.2 Employee flows to and from the Netherlands, 2012-2017

Since the focus of this dossier is on assessing the potential effects of the KBB on the border regions, we will use the second part of the analysis to focus on the employees working in the Netherlands and living in the neighbouring countries of Belgium and Germany. For this part of the analysis, we followed these non-resident workers over time to monitor any changes at individual level.

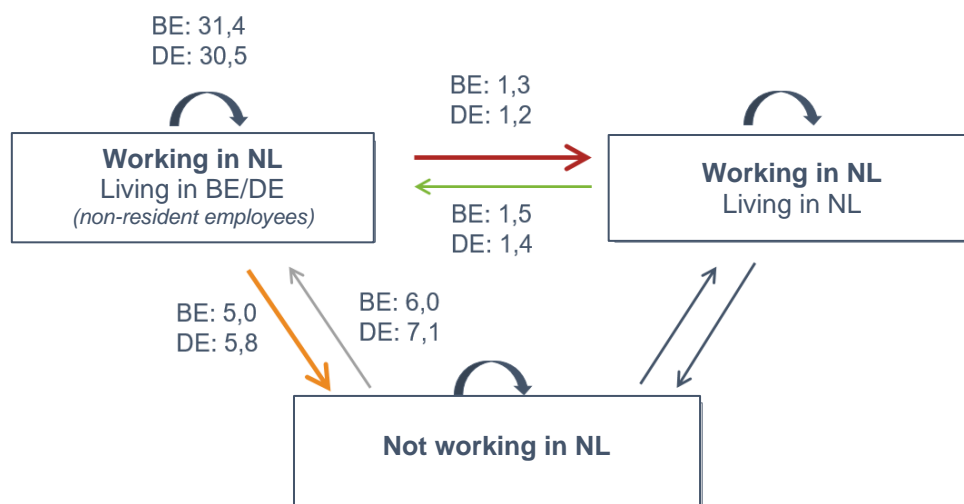
Figure 4 (below) is derived from Figure 2 and shows the size of the flows to and from the groups of non-resident employees living in Belgium or Germany between 2016 and 2017:¹⁰ 31,400 people who lived in Belgium as non-resident employees in 2016 remained there in 2017. Between 2016 and 2017, 6,300 people left the group of non-residents living in Belgium; 1,300 of the non-residents living in Belgium moved from Belgium to the Netherlands and continued to work in the Netherlands, while 5,000 of them stopped working in the Netherlands in 2017. Another 1,500 people who were both employed and resident in the Netherlands in 2016 moved to Belgium in 2017, thus becoming non-residents workers living in Belgium in that year. The group of non-residents living in Belgium was further supplemented by 6,000 people who were not working in the Netherlands in 2016.¹¹ This shows that, between 2016 and 2017, there was relatively more dynamism due to people starting or stopping work in the Netherlands (labour mobility) rather than due to people moving between the Netherlands and Belgium (residential mobility).

The same applies to the relative volume of labour and residential mobility among the group of non-resident workers in the Netherlands living in Germany: 30,500 people lived in Germany and worked in the Netherlands in 2016 and 2017; 1,200 people moved from Germany to the Netherlands, while continuing to work in the Netherlands. The flow of people who moved between the Netherlands and Germany was slightly higher: 1,400 people who lived and worked in the Netherlands in 2016 moved to Germany in 2017 while continuing to work in the Netherlands. Another 5,800 non-residents living in Germany in 2016 no longer worked in the Netherlands in 2017, while 7,100 people started working in the Netherlands in 2017 while living in Germany.

¹⁰ In order to obtain the complete picture, an analysis of the group of non-residents working in Belgium should include the flows between this group and non-residents living in a country other than Belgium or the Netherlands. The same applies to Germany. Since both of these flows are very small, however, we have decided to leave them out of the equation.

¹¹ [Think of, e.g. pensioners or unemployed, people who used to be employed in the Netherlands and are therefore part of the official records (e.g. BRP/RNI).]

Figure 4: Labour mobility and residential mobility of non-resident workers for countries of residence Belgium and Germany, 2016-2017 (x 1 000)

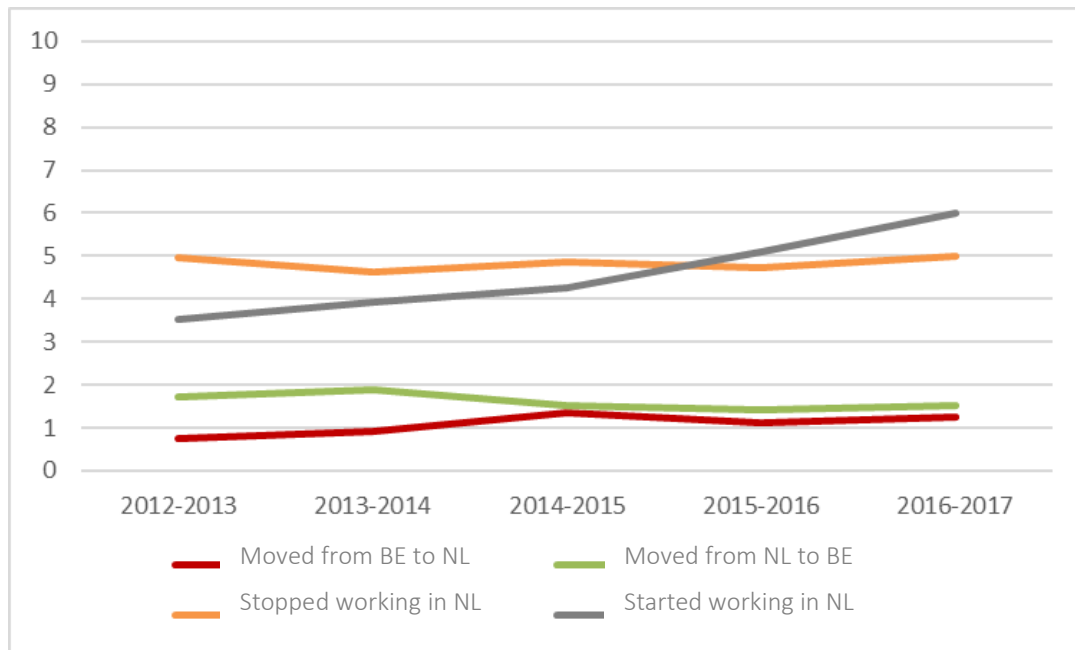


Source: CBS

Figures 5 and 6 (below) further clarify the size of the flows between the different groups as presented in Figure 4 for the years 2012-2017. Figure 5 analyses the group of non-residents living in Belgium, while figure 6 represents the group of non-residents living in Germany. In the first setting, the influx to the group of non-resident frontier workers (i.e. those who started working in the Netherlands) living in Belgium from the group not working in the Netherlands shows an increasing trend between 2012 and 2017. This finding indicates that the KBB had no negative effect, whereas we would, in theory, expect people residing abroad to forego jobs in the Netherlands due to the introduction of the KBB. In addition, Figure 5 shows that there are no noticeable changes in the other flows either. This is complemented by Figure A.3 in the Appendix showing that there are no evident differences in flows between men and women either. For both men and women, we can see an increase in the number of people who started working in the Netherlands and who have Belgium as their country of residence. Figure A.4 (in the annex) shows the flows for non-residents with Dutch or Belgian nationalities living in Belgium. Here, too, an increase can be seen in the number of people who started working in the Netherlands.

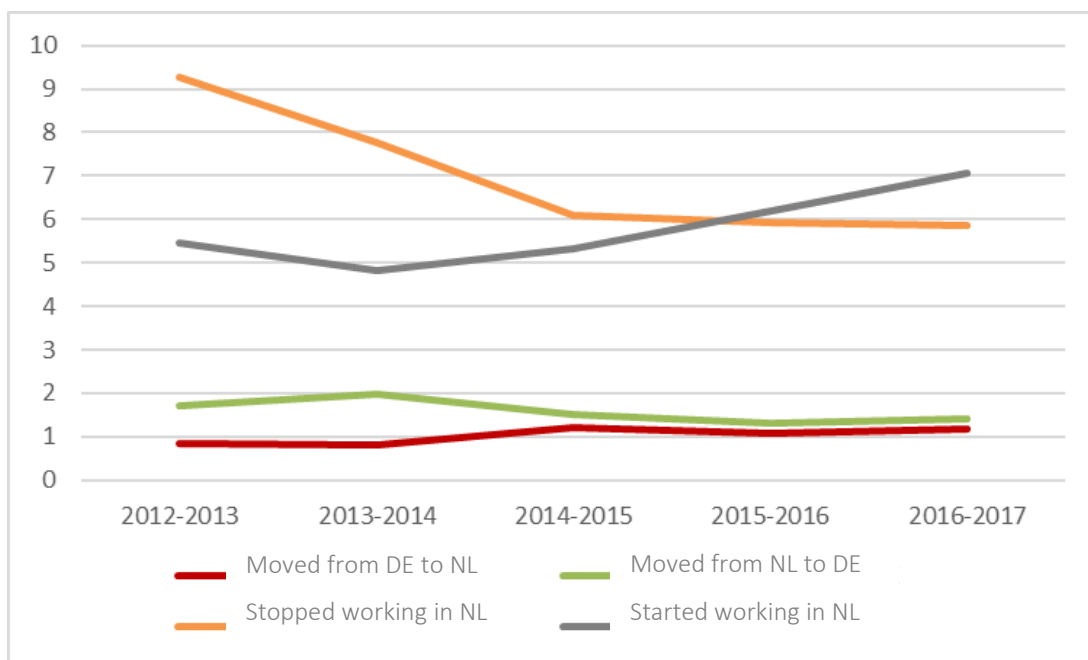
Figure 6 shows that the number of people who started working in the Netherlands also increased among the group of non-residents living in Germany. Indeed, this period marked a decrease in the influx of non-resident workers living in Germany into the group of people not employed in the Netherlands. In other words, over the period 2012-2017, ever fewer non-residents who worked in the Netherlands and lived in Germany stopped working in the Netherlands. The decline in the outflow from and the increase in the influx into the group of non-residents living in Germany indicates that the KBB has no effect, as, in theory, we would expect working in the Netherlands while living abroad to become less attractive as a result of the KBB. The decrease in the number of non-residents living in Germany who stopped working in the Netherlands is mainly driven by men and by the non-residents of German nationality (see figures A.5 and A.6).

Figure 5: Labour mobility and residential mobility of 'non-resident' workers for country of residence Belgium, 2012-2017 (x 1 000)



Source: CBS

Figure 6: Labour and residential mobility of non-resident workers for country of residence Germany, 2012-2017 (x 1 000)



Source: CBS

5. Conclusion

The analysis using the data from 2017 does not show any impact of the qualifying foreign taxpayers obligation (KBB), effective since 1 January 2015, on the number of non-resident employees in the Netherlands. The number of people who live in either Belgium or Germany and work as employees in the Netherlands has been virtually stable since 2015. This supports the conclusion reached in the dossier in the 2018 edition of the Cross-Border Impact Assessment.

The present analysis also investigated the underlying flows from year to year. These flows show that there has been neither a sudden increase in foreign employees moving to the Netherlands since 2015, nor that the Netherlands has suddenly become less attractive as a country of employment for cross-border workers living in the neighbouring countries. In short, we have not found any noticeable changes in residential and labour mobility since the introduction of the KBB.

Although we have not found any evidence that the KBB affects the number of non-resident workers and their behaviour in terms of residential and labour mobility, the legislation may nevertheless put strains on individuals. As a result of the KBB, non-resident workers face administrative burdens that they would not have faced otherwise. In addition, if a person generates income in multiple countries, the KBB requires increased coordination between different organizations in different countries. This can be an intensive administrative process including, for example, language barriers. Also, the KBB may introduce uncertainty, because it is not yet clear whether and when the scheme will be revised (see also Chapter 2).

Although this year's analysis is an extension of the analyses carried out in the 2017 and 2018 Cross-Border Impact Assessments, it still has limitations: Firstly, like in previous years, this year's figures are provisional. One of the reasons for this is that tax returns are only fully processed after a number of years. Another reason is that Statistics Netherlands (CBS) improves its method each year. A second limitation is that we have once again been unable to include income data this year; this means that the size of the group of non-resident employees expected to be affected by the KBB – i.e. those who earn less than 90% of their total income in the Netherlands – cannot be precisely identified. The reasons for this are the same as last year and are largely related to the great labour intensity of accurately processing the relevant tax data. The additional information that we would obtain from this currently cannot, in our view, counterbalance the considerable amount of time and resources that would have to be spent on this processing.

Finally, we recommend continued monitoring of cross-border figures over a longer period of time, as effects may not occur immediately but take place across a longer period of time.

6. Appendix

Table A.1. Number of 'non-resident' workers, by country of residence, citizenship and gender, 2012-2017 (x 1 000)

Table A.1.A: Men

Country of residence			2012	2013	2014	2015	2016	2017
Belgium	Nationality	NL	11,7	11,6	11,9	11,7	11,8	12,0
		BE	9,2	9,1	9,1	9,1	9,4	9,8
		Other	1,1	1,1	1,1	1,1	1,2	1,5
	Total		22,0	21,8	22,1	21,9	22,3	23,3
Germany	Nationality	NL	10,2	10,1	10,4	10,4	10,5	10,7
		DE	15,4	13,3	11,6	10,8	10,5	10,4
		PL	2,2	2,3	2,3	2,7	2,9	3,4
	Other	1,3	1,2	1,2	1,4	1,9	2,4	
Total		29,1	27,0	25,5	25,2	25,7	27,0	
Poland	Nationality	NL	0,9	0,8	0,9	1,0	1,1	1,3
		PL	46,2	43,2	44,3	47,0	51,2	52,7
		Other	1,2	1,5	0,9	0,8	0,8	0,6
	Total		48,3	45,5	46,1	48,7	53,2	54,6
Other	Nationality	NL	3,0	3,0	3,6	3,4	3,6	4,0
		Other	13,2	12,5	13,9	16,4	19,9	24,8
	Total		16,2	15,6	17,5	19,8	23,4	28,8
Total		115,6	109,8	111,2	115,6	124,7	133,7	

Source: CBS

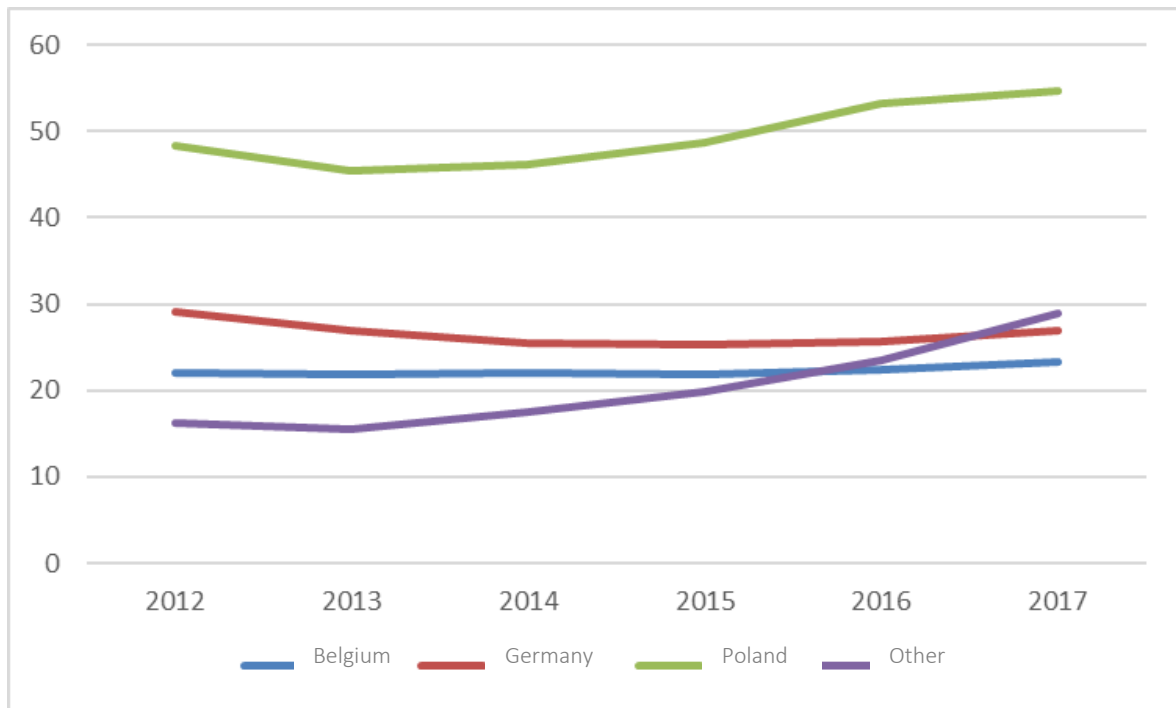
Table A.1.B: Women

Country of residence			2012	2013	2014	2015	2016	2017
Belgium	Nationality	NL	9,2	9,2	9,2	9,1	9,1	9,3
		BE	5,8	5,6	5,5	5,4	5,5	5,6
		Other	0,6	0,6	0,6	0,7	0,7	0,9
	Total		15,6	15,4	15,4	15,2	15,3	15,7
Germany	Nationality	NL	5,9	5,8	5,9	5,8	5,9	5,9
		DE	4,5	4,0	3,8	3,7	3,6	3,7
		PL	1,3	1,2	1,3	1,5	1,7	2,2
	Other	0,4	0,4	0,5	0,6	0,8	1,1	
Total		12,1	11,5	11,5	11,6	12,0	12,8	
Poland	Nationality	NL	0,2	0,2	0,3	0,3	0,4	0,4
		PL	23,9	23,4	24,5	25,6	26,7	26,8
		Other	0,8	1,0	0,6	0,5	0,5	0,4
	Total		24,9	24,5	25,3	26,3	27,6	27,6
Other	Nationality	NL	0,5	0,6	0,9	0,9	1,0	1,1
		Other	2,4	2,3	3,3	3,8	4,8	6,4
	Total		2,9	2,8	4,1	4,7	5,7	7,5
Total		55,6	54,3	56,3	57,8	60,7	63,6	

Source: CBS

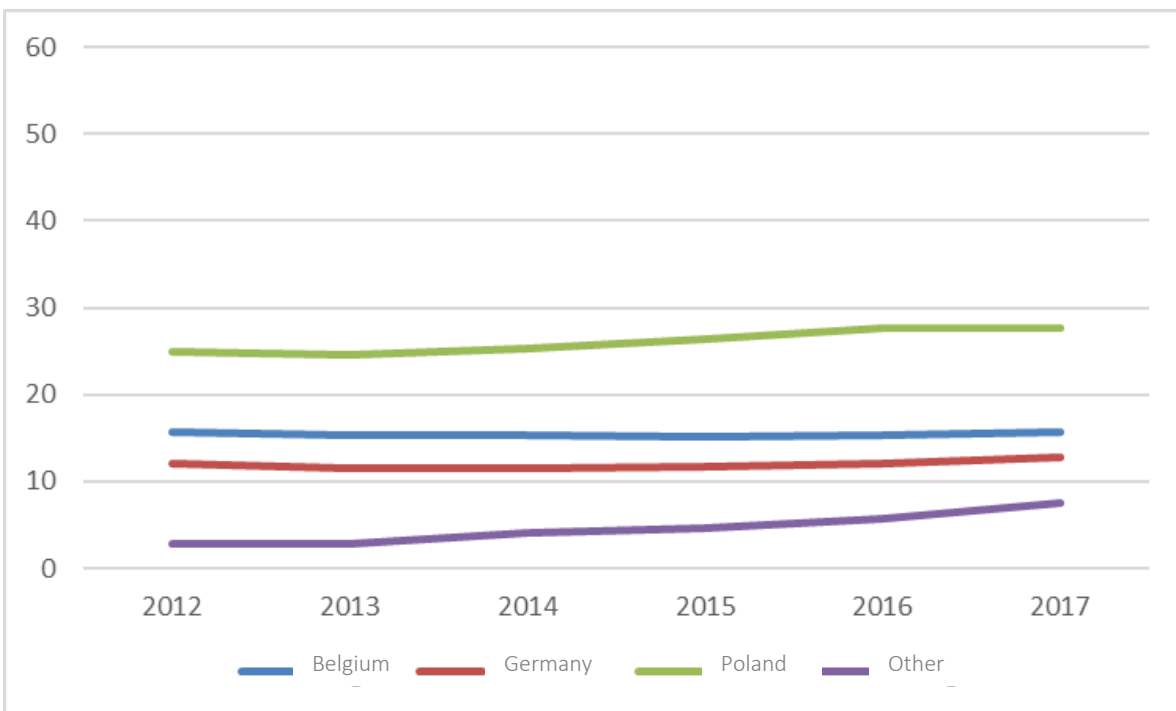
Figure A.1: Number of 'non-resident' workers, by country of residence and sex, 2012-2017 (x 1 000)

Figure A.1.A: Men



Source: CBS

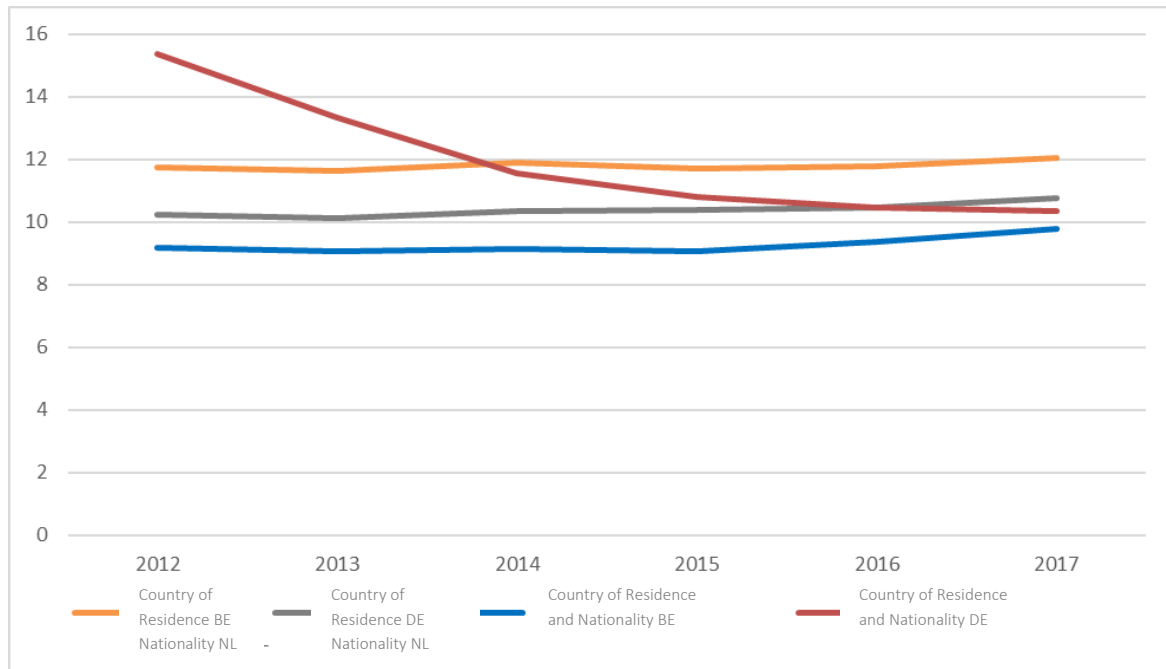
Figure A.1.B: Women



Source: CBS

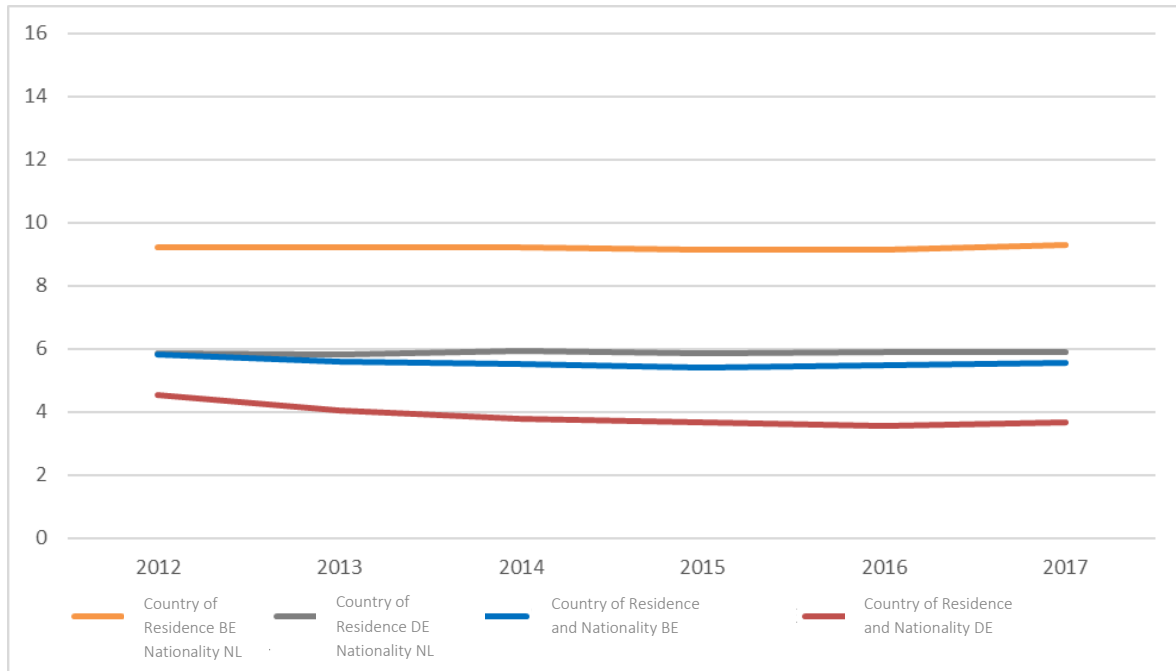
Figure A.2: Number of 'non-resident' workers, by country of residence, nationality and gender, 2012-2017 (x 1 000)

Figure A.2.A: Men



Source: CBS

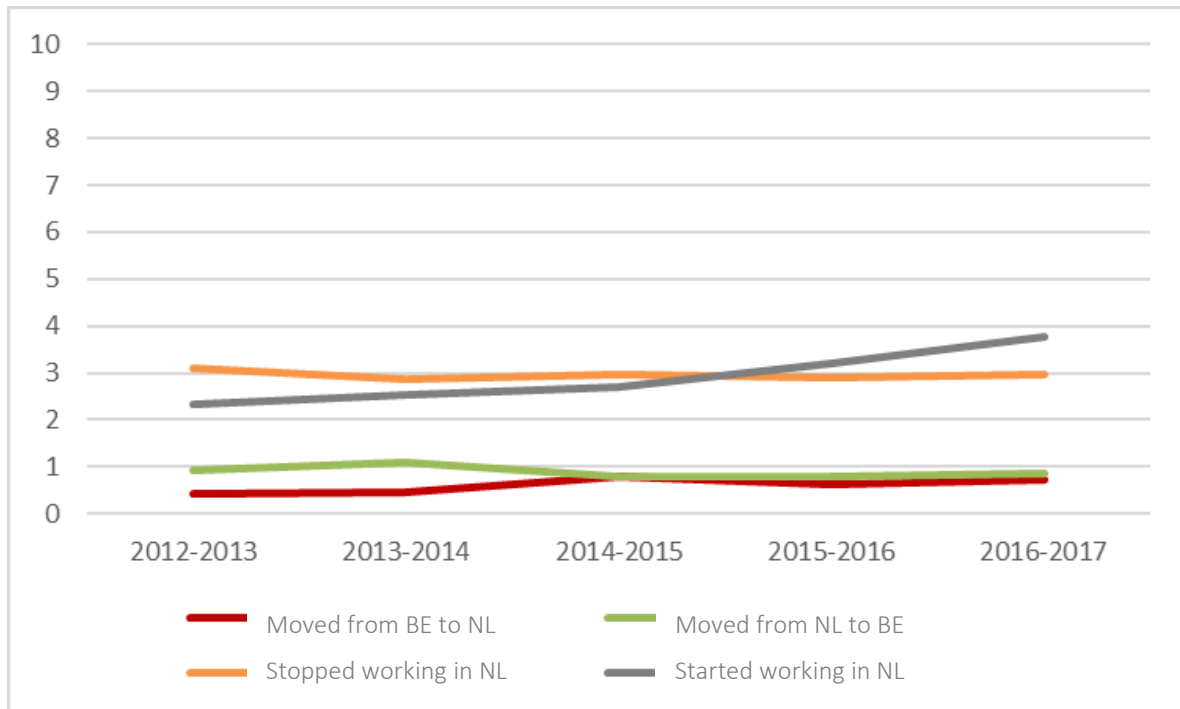
Figure A.2.B: Women



Source: CBS

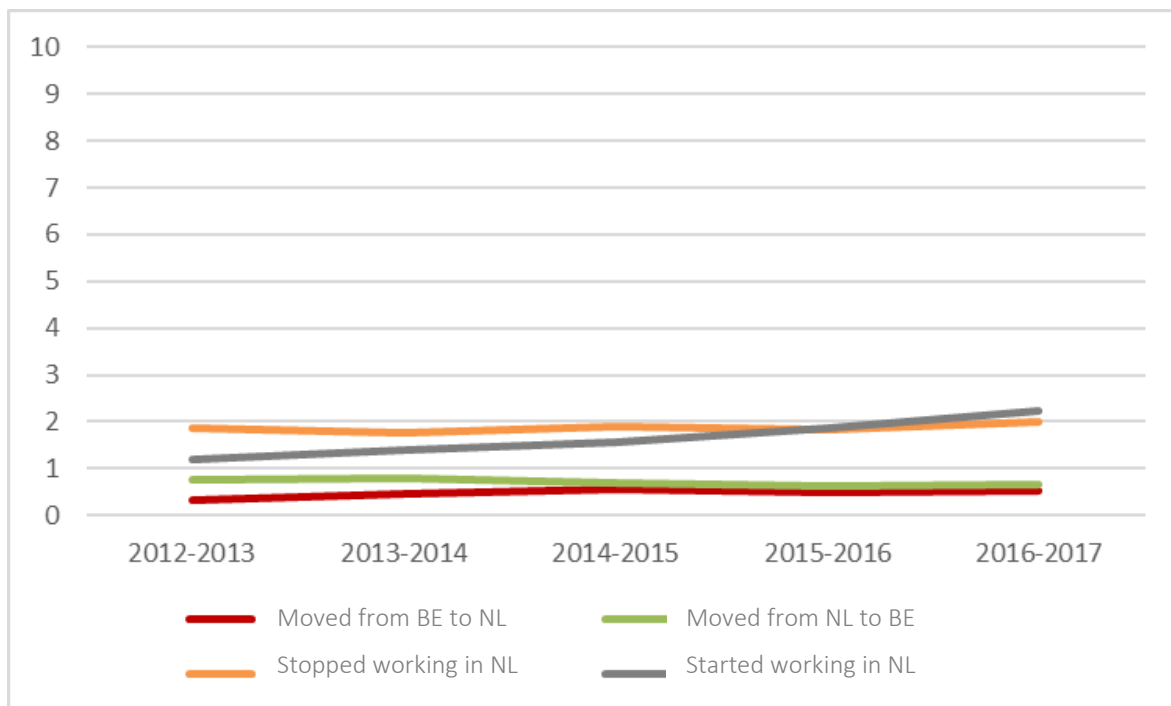
Figure A.3: Labour mobility and residential mobility of 'non-resident' workers for country of residence Belgium, by gender, 2012-2017 (x 1 000)

Figure A.3.A: Men



Source: CBS

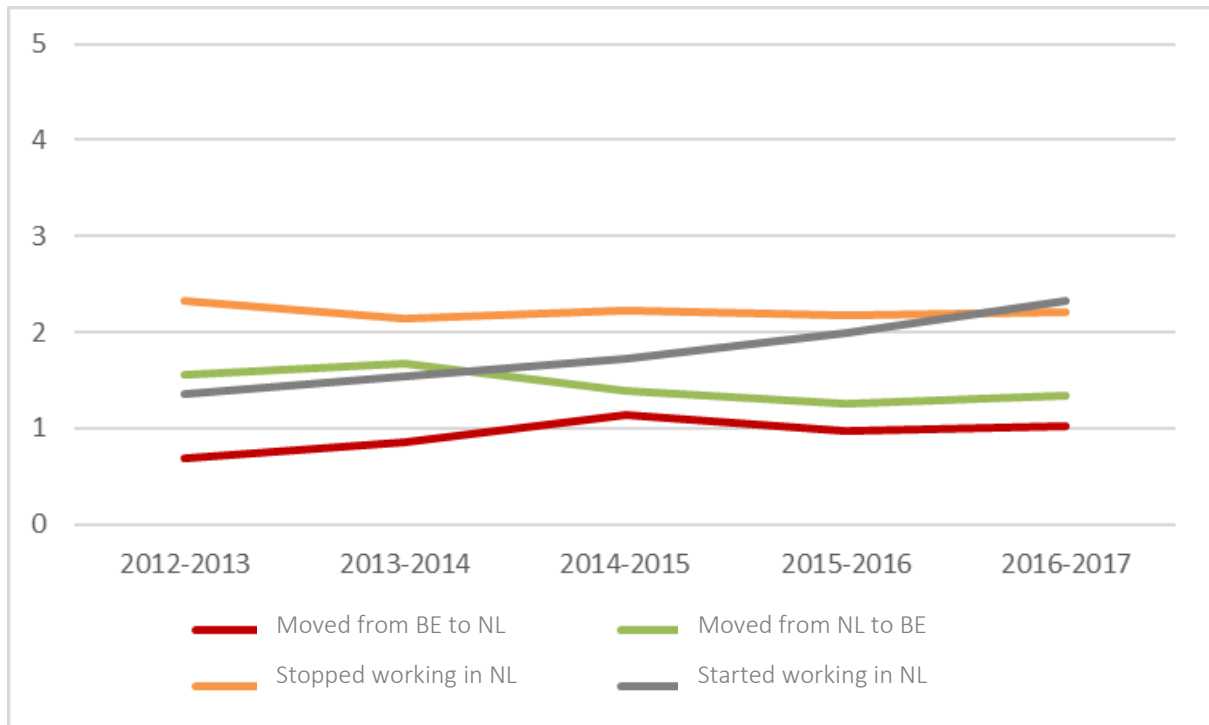
Figure A.3.B: Women



Source: CBS

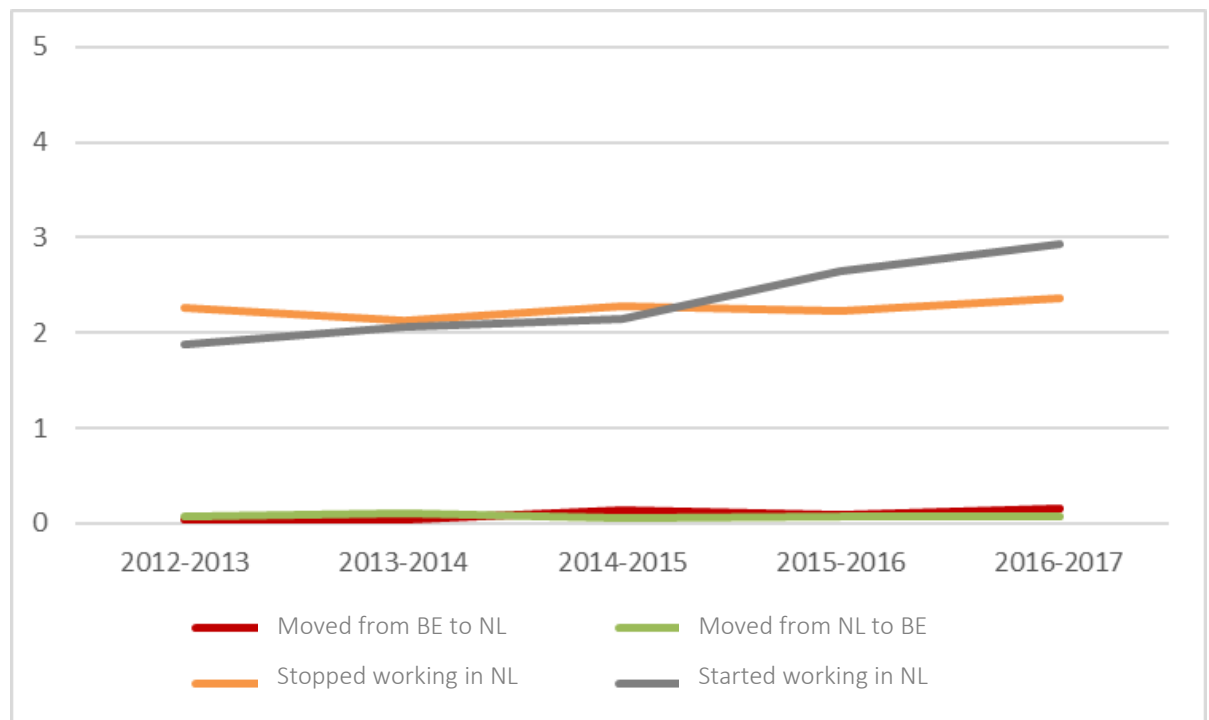
Figure A.4: Labour mobility and residential mobility of 'non-resident' workers for country of residence Belgium, by nationality, 2012-2017 (x 1 000)

Figure A.4.A: Dutch nationality



Source: CBS

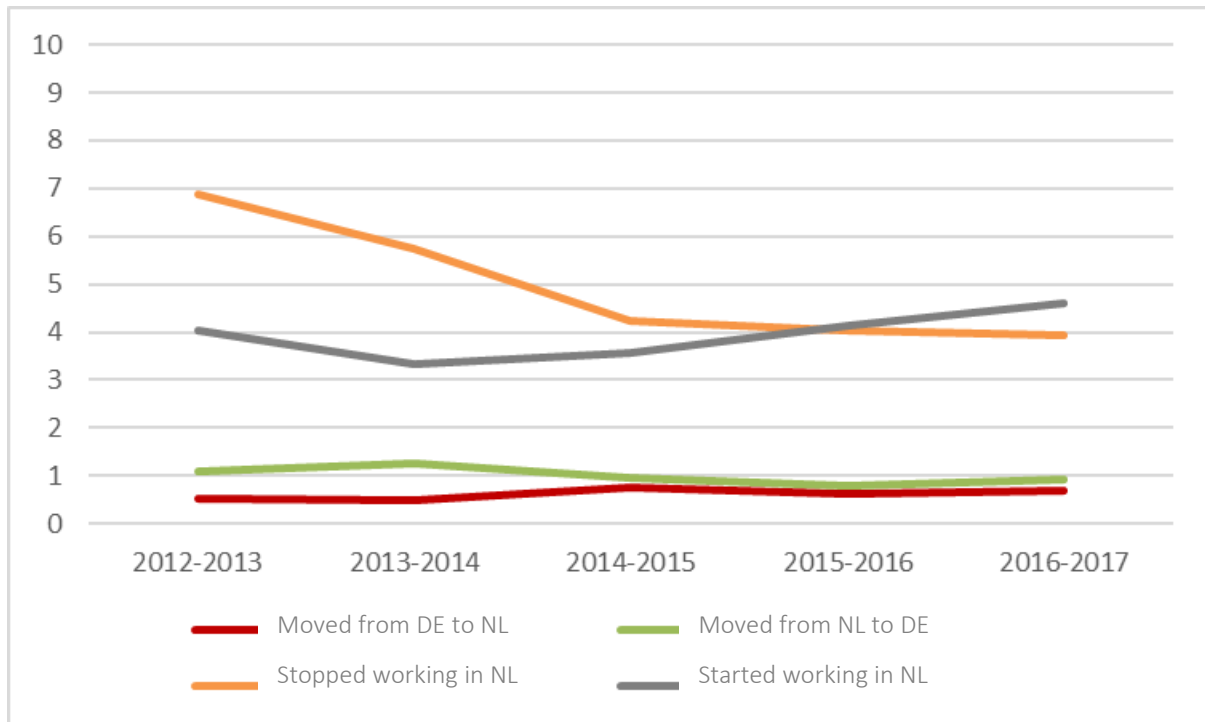
B: Belgian nationality



Source: CBS

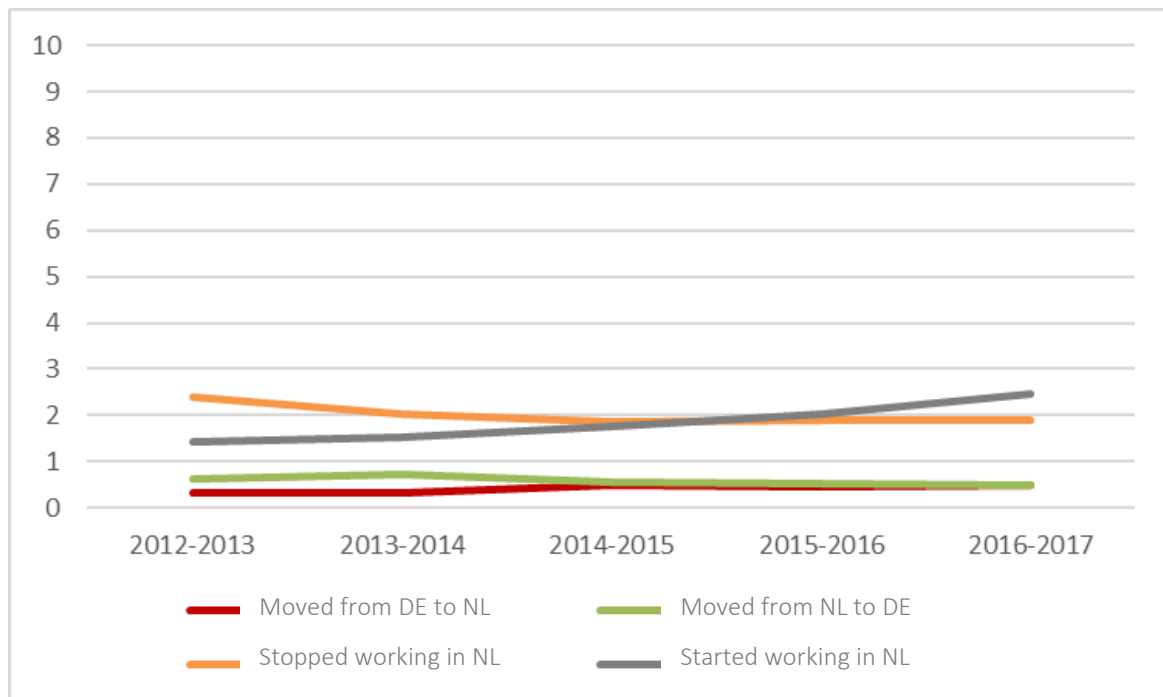
Figure A.5: Labour mobility and residential mobility of 'non-resident' workers for country of residence Germany, by gender, 2012-2017 (x 1 000)

Figure A.5.A: Men



Source: CBS

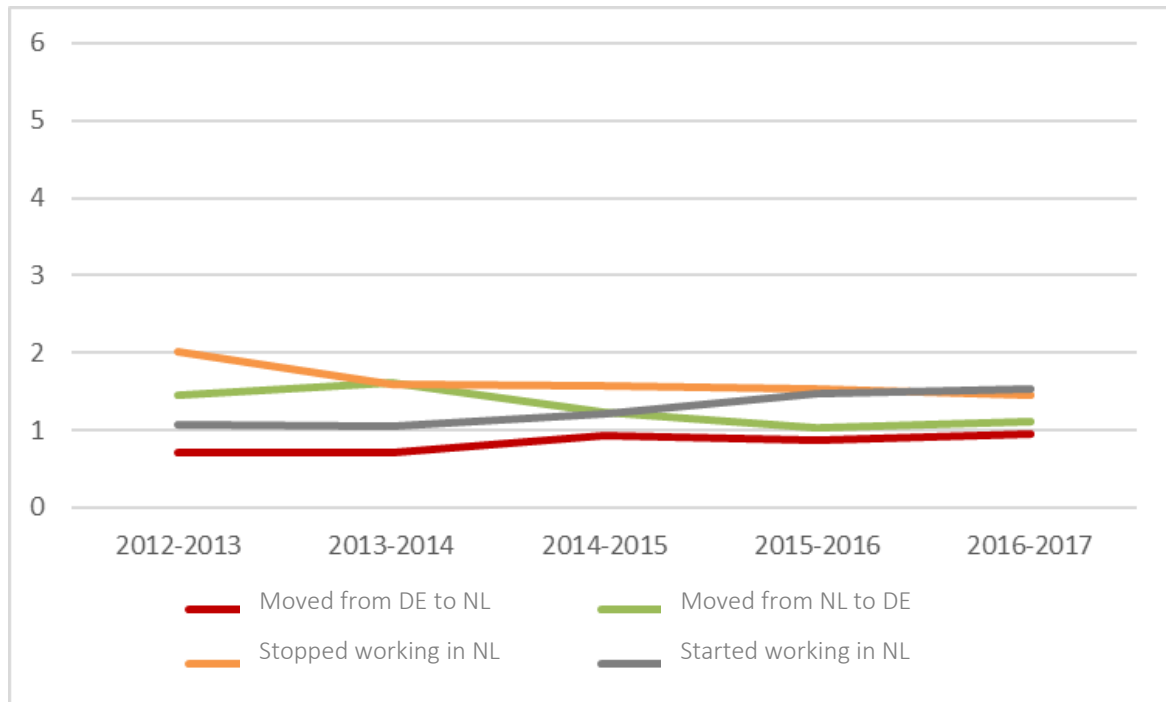
Figure A.5.B: Women



Source: CBS

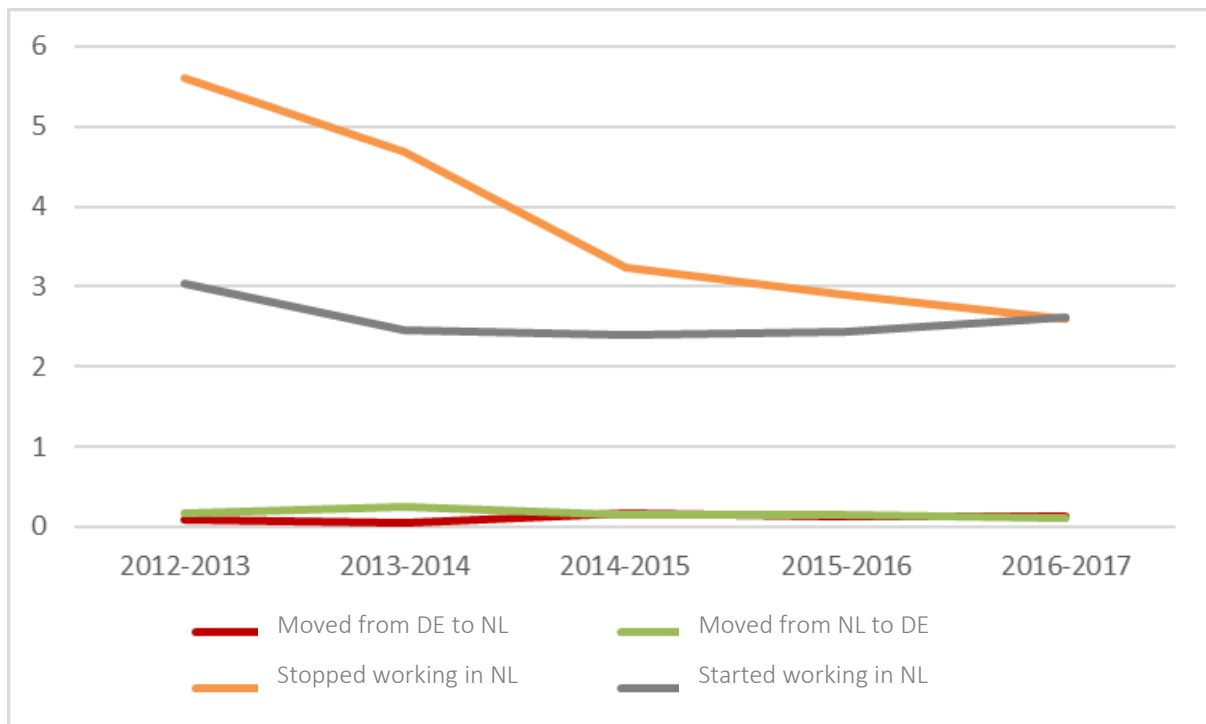
Figure A.6: Labour mobility and residential mobility of 'non-resident' workers for country of residence Germany, by nationality, 2012-2017 (x 1 000)

Figure A.6.A: Dutch nationality



Source: CBS

B: German nationality



Source: CBS

ITEM is an initiative of Maastricht University (UM), the Dutch Centre of Expertise and Innovation on Demographic Changes (NEIMED), Zuyd Hogeschool, the city of Maastricht, the Meuse-Rhine Euregion (EMR) and the (Dutch) Province of Limburg.

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