

Stamp duty on conveyances

Overview

- 1 The stamp duty on conveyances assessment covers state and territory (state) revenue from stamp duties collected when property is transferred. The concept of property is broad, comprising both real and non-real property.¹
- 2 The category excludes revenue from some state land-based taxes.
 - Taxes on land ownership are assessed in the land tax category.
 - Other land-based taxes are assessed in the other expenses and other revenue categories.² Specifically:
 - property-based fire and emergency services levies are offset against spending on emergency services, which is assessed in the other expenses category
 - the remaining other land-based taxes are assessed equal per capita in the other revenue category.
- 3 The assessment recognises a state's capacity to raise stamp duty on conveyances revenue is influenced by the following.
 - The total value of property transferred — states with an above average share of properties transferred will have greater revenue raising capacity.
 - The distribution of property transferred across value ranges — states with a higher proportion of properties in higher value ranges will have greater revenue raising capacity.

Actual state revenue

- 4 The first step in calculating assessed revenue is identifying actual state revenue.³ Stamp duty on conveyances accounted for 15.1% of total own-source revenue in 2022–23 (Table 1).⁴

Table 1 Stamp duty on conveyances revenue by state, 2022–23

	NSW	Vic	Qld	WA	SA	Tas	ACT	NT	Total
Stamp duty on conveyances (\$m)	9,700	8,991	4,419	2,275	1,210	364	387	162	27,507
Stamp duty on conveyances (\$pc)	1,176	1,338	820	803	659	636	838	643	1,046
Proportion of total own-source revenue (%)	18.5	22.5	9.6	8.2	14.8	15.8	11.0	9.4	15.1

¹ Real property is land and buildings (including houses, apartments, shops and factories). Non-real property comprises property that is not land or buildings. Examples of non-real property include non-fixed plant and equipment, receivables, goodwill, business assets, statutory licences, intellectual property, aquaculture leases, copyright, patents, partnership interests and options to purchase.

² Other land-based taxes comprise property-based fire and emergency services levies, Victoria's Growth Areas Infrastructure Contribution, metropolitan levies, parking space levies and the ACT's Safer Families levy. Property-based fire and emergency services levies are the largest of these revenues, with states raising \$2.0 billion from them in 2022–23.

³ Adjusted budget calculations use ABS Government Financial Statistics data to determine actual state revenue. For further details see the adjusted budget chapter of the *Commission's Assessment Methodology*.

⁴ Tables used in this chapter, unless otherwise stated, use 2022–23 data.

Structure of assessment

5 Table 2 shows the drivers that influence each state’s revenue raising capacity.

Table 2 Structure of the stamp duty on conveyances assessment

Component	Driver	Influence measured by driver
Stamp duty on conveyances	Value of property transferred	States with a greater total value of property transferred have greater revenue capacity.
	Value distribution adjustment	States with proportionally more high value property transferred, which attract higher rates of duty, have greater revenue capacity.

Data

6 The data used in the assessment are outlined in Table 3.

Table 3 Data used in the stamp duty on conveyances assessment

Source	Data	Updated
State revenue offices	Value of property transferred by value range and class of property transferred	Annually
	Revenue from stamp duty on conveyances by value range and class of property transferred	Annually

Note: The adjusted budget data sources are outlined in the adjusted budget chapter of the *Commission’s Assessment Methodology*.

Assessment method

7 The stamp duty on conveyances assessment calculates a state’s capacity to raise stamp duty revenue using its share of the total national value of property transferred. The total value of property transferred is disaggregated into 18 value ranges to capture the progressivity of states’ stamp duty rates.

8 State revenue offices provide annual data on the value of property transferred and the revenue from stamp duty on conveyances. The data are provided for 5 different classes of property transfers. This includes revenues differentially assessed (duty from transactions involving the acquisition of interests in listed entities and other transactions) and revenues assessed equal per capita (duty from the sale of major state assets, corporate reconstructions and non-real property transactions).⁵

Revenues differentially assessed

9 Revenues from transactions involving the acquisition of interests in listed entities and other transactions are differentially assessed using the states’ value of property

⁵ Other transactions include residential and commercial property transactions.

transferred. States provide these data and the revenue from stamp duty on conveyances in 18 value ranges. The ranges are in \$100,000 increments up to \$1.5 million, then from \$1.5 million to \$3 million, \$3 million to \$5 million, and \$5 million plus.

- 10 The Commission rescales the revenue from other transactions, so the total state provided other transactions revenue equals the total audited revenue. The Commission applies the same rescaling ratio to the value of property transferred data. This reflects that if any revenue is missing from the state provided data, the corresponding transaction values are also expected to be missing.
- 11 The Commission includes only 10% of the value of transactions involving the acquisition of interests in listed entities. This is because most states apply a landholder duty rate that is 10% of their general stamp duty rate. The adjusted value of transactions involving the acquisition of interests in listed entities and the rescaled other transactions are added together by value range.
- 12 A state's assessed revenue is the revenue it could raise if it applied the average effective rate of tax to its own value of property transferred. To derive the average effective rate of tax, the national revenue is divided by the national value of taxable land holdings. This process is repeated using the average tax rate and value of property transferred in each value range.
- 13 The assessed revenues for each value range are summed together. The total is then scaled to match category revenue in the adjusted budget. Details on the adjusted budget calculations are in the adjusted budget chapter of the *Commission's Assessment Methodology*.

Revenues assessed equal per capita

- 14 The remaining conveyance duties are assessed equal per capita. Revenue from corporate reconstructions and non-real property transactions are classified in the stamp duty on conveyances category in ABS Government Finance Statistics. These revenues are moved to the other revenue assessment.
- 15 Some revenues from the sale of major state assets are initially classified in the stamp duty on conveyances category in ABS Government Finance Statistics and some are initially classified in the other revenue category. The Commission compares the revenues provided by states to the revenue included in other stamp duties on financial and capital transactions (ABS tax classification 465). If the revenue appears to be included in ABS tax classification 465 the Commission makes no adjustment. If it is not included, the Commission moves the revenue from the stamp duty on conveyances assessment to the other revenue assessment. Details on the adjusted budget calculation are in the adjusted budget chapter of the *Commission's Assessment Methodology*.

- 16 Duties from corporate reconstructions are assessed equal per capita because most states exempt these duties or refund the duties collected.
- 17 Duties from the sale of major state assets are assessed equal per capita because they reflect different state policies on the ownership of assets, including which assets to hold and for how long.
- 18 Duties from non-real property transactions are assessed equal per capita for 2 reasons. Firstly, the interstate distribution of non-real property transactions is very different from the interstate distribution of real property transactions. Secondly, as only 2 states continue to impose this duty, the Commission has no reliable way to estimate the value of non-real property in the 6 states that do not impose these duties.⁶

GST distribution in the 2025 Review

19 Table 4 shows the GST impact of the assessment in the 2025 Review.

Table 4 GST impact of the stamp duty on conveyances assessment, 2025–26

	NSW	Vic	Qld	WA	SA	Tas	ACT	NT	Total effect
	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Stamp duty on Conveyances	-2,755	-206	679	964	867	319	-30	163	2,991
Total (\$m)	-2,755	-206	679	964	867	319	-30	163	2,991
Total (\$pc)	-318	-29	119	316	455	552	-63	633	107

Note: Magnitude and direction of GST impact can change from year to year.

⁶ While New South Wales has abolished duties on most non-real property, it still imposes duty on plant and equipment.