

美国新一轮减税: 三个风险

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本报告导读:

美国减税法案尽管有提振经济的一面,也需要关注减税法案蕴藏的三大风险:融资风险(不合宜的美债供给压力)、经济风险(不公平的收入分配效应)、信任风险(不 友好的国际税收政策)。

投资要点:

- 5月22日美国众议院通过的"大漂亮法案" (OBBB 法案):
 - ✓ 减税延期为美国实体经济投下了一颗"定心九"。OBBB 法案主要延长了 2017 年减税与就业法案(TCJA 法案)中关于个人所得税的减税条款,此外拓展了企业所得税的抵扣范围。由于TCJA 法案的多数条款在 2025 年底到期,OBBB 法案的减税延期起到了稳定居民和企业税收政策预期的作用。
 - ✓ OBBB 法案对赤字的影响比预期更加"温和"。法案预计在未来 10 年共增赤 2.3 万亿美元,比 2 月 25 日通过的预算决议草案 减少 9000 亿美元。主要变化在减支,法案大幅削减了绿色补贴、医保支出、食品补助等福利项目。
 - ✓ 法案本身没有显著改变美国财政的债务扩张路径。由于节奏安排上减税在前、减支在后,赤字率将先突破7%,后回落至6.5%左右。政府债务率的长期趋势也没有发生明显调整,这也符合"伯德法则"对于预算法案增赤的限制规则。
- 尽管法案增赤幅度不大,但美国政府债务扩张依然存在超出长期趋势的可能性,赤字路径尚未可知:
 - ✓ 一是,"先减税、后减支"的节奏安排有着明显的政治迎合特征, 减支在后期的实际执行或大打折扣。
 - ✓ 二是,关税对赤字的扰动,关税会侵蚀个人所得税和企业所得税的税基,对经济的拖累也会对赤字率的分母端造成影响。
 - ✓ 三是, "PAYGO"准则的名存实亡,自动减支的豁免条款或不断增强国会两党对扩张性财政的路径依赖。
- 🔾 市场或忽视了 OBBB 法案蕴藏的三大风险:
 - 融资风险(不合宜的美债供给压力):由于减支安排在预算协调窗口后期,2028年前减税对于美债供给压力尤其高。法案创造了"不合时宜"的美债供给压力,在高通胀、高利率、低储蓄率的环境下,财政扩张容易使财政陷入长债需求短缺和短债成本高企的两难境地,加剧供需错配,提升融资溢价。
 - ✓ 经济风险(不公平的收入分配效应): 部分税改条款具有明显的 累退性,这加剧了美国社会的贫富差距。此外由于多数减税条 款是"延长"而非"新增",需要降低减税对拉动经济的期望。
 - ✓ 信任风险(不友好的国际税收政策): 法案新增"对等所得税"和 "汇款税"对进入美国的资本和劳动要素征税。这两项税收政策 连同关税,会进一步催化对美元体系的不信任交易,对国际收 支格局造成扰动,使美国陷入"美元信用破裂→资本流入放缓→ 增赤成本高企→融资利率抬升/挤出私人投资→经济难回复苏 →美元信用破裂进一步强化"的负反馈循环中。打破这一循环只能依靠美国自身信用的修复。
- 风险提示: 预算协调窗口后期美国财政赤字扩张超预期,关税对美国经济的拖累超预期,美国信用破裂交易进一步强化

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1. 新一轮减税: 变化和影响

5月22日,美国众议院通过2025 财年预算协调法案"One Big Beautiful Bill Act"(简称OBBB 法案,中文译作"大漂亮法案")。预算协调法案在一届美国政府任期中通常只有一个,擘画了未来5年乃至10年的财政赤字路径。

OBBB 法案内容的关键词是"减税",它对 2017 年美国国会通过的"减税与就业法案"(Tax Cut and Jobs Act,TCJA)的相关条款进行了延期和拓展。我们在图 1-3 中列示了 TCJA 法案和 OBBB 法案分别关于个人所得税、企业所得税和国际企业税收制度的主要条款调整情况。

图1: 2017 年 TCJA 法案和 2025 年 OBBB 法案关于个人所得税的主要条款

		2017年	TCJA法案实	施前			201	7年TCJA法:	業		2025年0BBB法案
		应私	5收入				应我	护人			
	未婚	申报人	已婚家庭	庭申报人	税率	未婚	申报人	已婚家	庭申报人	税率	
	高于	不高于	高于	不高于	(%)	高于	不高于	高于	不高于	(%)	
	-	9, 525	-	19, 050	10	-	9, 525	-	19,050	10	
税率	9, 525	38, 700	19,050	77, 400	15	,	38, 700	19, 050	77, 400	12	2025年到期的校準安里来久化
PG	38, 700	93, 700	77, 400	156, 150	25	,	82, 500	77, 400	165, 000	22	
	93, 700	195, 450	156, 150	237, 950	28	,	157, 500	165,000	315,000	24	
	195, 450	424, 950	237, 950	424, 950		157, 500	200, 000	315, 000	400,000	32	
	424, 950	426, 700	424, 950	480, 050		200,000	500, 000	400,000	600, 000	35	
	426, 700	- 	480,050			500,000	_	600,000	_	37	
替代最低税(Individual alternative minimum tax,AMT)	AMT会比较		扣减项和其作	口减项而少缴 也税收优惠前 者	/	提高了	AMT计算规则	中的免征的	质度,2025年	到期	TCJA提高的AMT免征额度永久化
标准扫除(Standard deduction)		计算应税收	入时的标准:	扣除额度			可扣除额质	七翻倍,202	!5年到期		TCJA提高的标准扣除额度永久化,此外2028年前标准扣除再提升\$1000
个人及受抚养人扣除 (Personal and denpendent exemptions)	适	用于纳税人	和受抚养人口	的扣除项目		废除,用	儿童税收抵免	项目代替,	2025年到期		永久废除
儿童税收抵免(Child tax credit)	适用于家庭 入家庭抵打		几童的抵扣	项目,但对于	于高收	扣项目, 扌		降低的适用	u其他被抚养/]收入门槛, ‡		TCJA提高的儿童税收抵免额度永久化,此外 2028年前再提高\$500
州和地方政府税收抵 扣(State and local tax deduction)				缴纳给州和: 得税、消费;			改府税收可抵	,扣额度限常	为\$10000, 2	2025年	州和地方政府税收可抵扣额度限制提升到 \$15000 (单身) /\$30000 (已婚家庭) , 对于 最高税率适用32%的纳税人, 可抵扣额度随收 入递减至\$10000, 该条款永久化
房贷利息抵扣(Mortgage interest deduction)		110万美元以	下房贷的利	息可抵扣		降低可抵 元), 2028		額度(110ス	万美元降至75	万美	TCJA对于可抵扣利息的房貸额度限制永久化
项目抵扣限制(Overall limit on itemized deductions)	对于高收/ 步减少	\纳税人, 项	[目可抵扣额	度会随收入均	曾加逐		没有项目抵	扣限制,2 0)25年到期		項目抵扣限制取消水久化,但对于适用37%税 率的人群,可抵扣额度减少2/37,即有效税率 提升至39%
遗产税(Estate tax)		遗产规	模超过门槛:	适用			适用门槛	翻倍, 2025	5年到期		适用门槛再提升,并且永久化
医保惩罚税(Affordable Care Act penalty tax)	《平价医疗 需缴纳惩罚		未购买合格	医疗保险的组	内税人		取消熱	惩罚税,永 ;	文化		-
小费抵扣(Deduction for tips)			-					-			年收入低于\$16万的纳税人可抵扣小费,2028 年到期
加班费抵扣(Overtime compensation deductions)			-					-			加班费免税,2028年到期
车贷利息抵扣 (Deductions for car loan interest)			-					-			计算应税收入时可抵扣至多\$10000车貸利息, 年收入高于\$10万的纳税人抵扣递减,2028年 到期

数据来源: 美国国会, Proskauer Rose LLP, HTI

注: 红字代表减税条款, 蓝字代表增税条款, 图 2-3 同。

减税延期为美国实体经济投下了一颗"定心九"。之所以 TCJA 法案没有将所有减税条款永久化,是因为预算协调程序中存在"伯德规则"的限制:禁止任何超出预算协调窗口期(一般为 10 年)以外的增支或减税,除非其他条款能够完全覆盖窗口期外的财政成本。鉴于该限制,TCJA 中的大多数减税条款将在 2025 年底到期。OBBB 对 TCJA 主要减税条款的永久化起到了稳定居民和企业税收政策预期的作用,并且还提供了额外的暂时性减税政策,如在2028 年(特朗普任期结束)前提升个人所得税标准扣除额度、提升儿童税收抵免额度、增加了三款临时性税收减免政策(小费抵扣、加班费抵扣、车贷利息抵扣)、提高了企业固定资产购置抵扣和利息抵扣额度等。但另一方面,为了平衡预算,OBBB 法案大幅削减了绿色补贴、医保支出、为低收入人群提供的食品补助支出等福利项目。



图2: 2017年 TCJA 法案和 2025年 OBBB 法案关于企业所得税的主要条款

	2017年TCJA法案	实施前		2017年TCJA法案	2025年0BBB法業
税率	应税收入 高于 - 50,000 75,000 100,000 335,000 10,000,000 15,000,000		税率 (%) 15 25 34 39 34 35 38 35	统一为21%,永久化	-
替代最低税(Corporate alternative minimum tax)	与个人所得税的替代最低税规则	类似		取消替代最低税规则,永久化	-
穿透型企业(Pass- through business)	穿透型企业是指将税收归集到企 的企业类型,包括业主制企业、 率39.6%			最高税率降至29.6%,并提供20%的收入抵扣,2025年 到期	将收入抵扣从20%提高到23%,条款永久化;此外将穿透型企业的适用税率拓展至商业投资公司(Business development company),纳税人从商业投资公司获取分红的有效税率从37%降至28.49%
固定资产购置抵扣	2017年可抵扣50%,随后年份递	威,直至2020年:	为0	可全额抵扣(费用化),2023年开始可抵扣额度递减,直至2027年为0	2025年到2029年的特定类型固定资产购置可比全额抵扣,2030年后不抵扣;此外2029年前创造业、农业、采掘业的固定资产投资还可额外再抵扣100%(bonus depreciation allowance)
利息抵扣	可全额抵扎	2		营业收入超过2500万美元的企业限制抵扣30%的EBIT	将限制改为30%的EBITDA,即提高利息抵扣限额,2029年到期
利润损失下的税收返 还	利润损失可全额抵扣,并可追溯 损失抵扣可以保留20年	两年税收返还,	利润	限制利润损失抵扣幅度为80%,不可追溯税收返还,但可以永久保留损失抵扣,永久化	-
研发费用抵扣	可以全额抵扣(豐	用化)		2022年开始研发费用需分5年摊销	研发费用可以全额抵扣(费用化),2029年至 期

数据来源:美国国会,Proskauer Rose LLP,HTI

图3: 2017年 TCJA 法案和 2025年 OBBB 法案关于国际企业税收制度的主要条款

	2017年TCJA法案实施前	2017年TCJA法業	2025年0BBB法案
税制	全球税收制度:对跨国公司的全球利润征税,海外利润直至汇回国内前都免税,汇回国内后征税,可以抵扣已在海外缴纳的税	属地税收制度: 主要对跨国公司在国内赚取的利润征税,海外利润可以抵扣。TCJA引入参与免税制度 (participation exemption),允许美国跨国公司从其外 国子公司获得的股息免于美国国内税收	-
全球无形资产低税收 NGlobal intangible ow-taxed income,GILTI)	-	旨在降低企业利用知识产权将利润转移出美国的动机。 GILTI是指外国收入超过有形资产规模10%的部分(即认 为10%是正常回报单,超过的部分被认为与知识产权回报 或利润转移有关)。此外允许抵扣50%的GILTI税款,剩 余部分按21%的法定公司税率征税,并将将外国税收抵免 限制在外国所得税的80%。2025年到期。	水久化
ト国衍生无形收入 Foreign derived ntangible income,FDII)	-	旨在激励企业将知识产权及其相关利润引入美国并在美国保留。外国衍生收入是指公司在美国的收入中与商品或服务出口相关的份额,外国衍生无形收入等于外国衍生收入补除用于赚取外国衍生收入的有形资产价值的10%(同样FDII假定正常回报率为10%,超过部分与知识产权回报有关)。FDII的37.5%可用于抵扣应税收入,即FDII的实际税率为13.125%。2025年到期。	永久化
说基侵蚀和泛滥用税 Base erosion and anti- buse tax,BEAT)	-	旨在防止在美国运营的国内外公司通过将利润转移出美国来逃避国内纳税义务。适用条件为营救超过5亿美元的大型跨国公司,并且总部位于美国的公司向关联外国公司支付的款项超过税收总和除额的3%。若满足以上条件,公司需将支付款项加回原应税收入,并按10.5%缴纳所得税。2025年到期。	永久化

数据来源: 美国国会, Proskauer Rose LLP, HTI

OBBB 法案对赤字的影响比预期更加"温和"。众议院在 5 月 22 日通过的版本预计在未来 10 年共增加赤字 2.3 万亿美元,而 2 月 25 日通过预算决议的增赤幅度达到 3.3 万亿美元。主要变化发生在筹款委员会负责的减税事务上,对绿色补贴的大幅削减超出事前预期,使得减税对赤字的增幅减少 7300 亿美元,此外能源与商务委员会(也与绿色补贴削减有关)和司法委员会也大幅削减了非必要支出,增赤的减少幅度也都在 1000 亿美元以上。





图4: OBBB 法案对赤字的影响比预期更加"温和"

数据来源:美国国会预算委员会,HTI

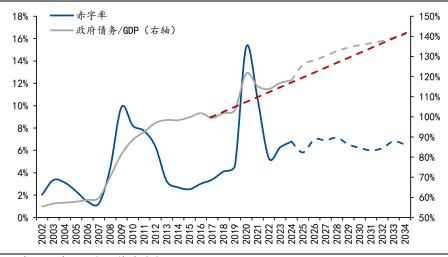
OBBB 法案本身没有显著改变美国财政的债务扩张路径。法案年均增赤幅度为 9.7%,但由于节奏安排上减税在前、减支在后,2028 年财政赤字率将由如今的 6%突破 7%,随后缓步回落至 6.5%左右。OBBB 法案也没有明显改变政府债务率(政府债务/GDP)的长期趋势,2028 年前政府债务率加速上升,此后回到趋势线附近,这也符合"伯德法则"对于财政增赤的限制规则。



图5: OBBB 法案下美国财政赤字率预计维持在 6.5-7%

数据来源:美国国会预算委员会,HTI

图6: OBBB 法案没有显著改变美国财政的债务扩张路径



数据来源:美国国会预算委员会,HTI

尽管法案增赤幅度不大,但美国政府债务扩张依然存在超出长期趋势的可 能性,赤字路径尚未可知:

一是,"先减税、后减支"的节奏安排有着明显的政治迎合特征。法案将对经济产生负面影响的减支延迟到了下一届总统任期开始(2028 年)之后,而下一届总统有可能再通过另一个预算协调法案对减支进行再延迟。这样一来,减支在后期的实际执行或大打折扣,财政赤字路径也变得更加具有扩张性。

二是,关税对赤字路径的扰动。一方面,关税征收会抬升企业生产成本,挤压生产要素报酬,从而侵蚀个人所得税和企业所得税的税基。按照各生产要素收入比例和现行税率计算,关税对其他税种的侵蚀比例达到约 25%,占GDP 比重 0.6%。另一方面,关税对于经济的拖累也对赤字率的分母端造成影响,2026 年财政赤字率有可能因此接近 8%。

三是,"PAYGO"准则的名存实亡。"PAYGO"(pay as you go)准则是 1990年《预算执行法》确立的增赤限制规则,它要求任何减税或增支的提案都要与另一项减赤的提案相弥补,否则将触发自动减支条款。OBBB 法案在众议院通过后,美国国会预算委员会指出若后续没有立法抵消年均 2300 亿美元的赤字增加,将有可能触发自动减支指令。然而,自动减支的执行存在豁免情况,如 2009 年经济复苏法案被国会指定为"紧急需求支出",因而豁免于自动减支。在国会两党对扩张性财政的路径依赖不断增强的背景之下,"PAYGO"对财政纪律的约束名存实亡。





图7: "先减税、后减支"的特征令赤字路径仍存不确定性

数据来源:美国国会预算委员会,HTI

2. 融资风险: 不合宜的美债供给压力

减税对经济起到提振作用的同时,我们也需要关注本次减税法案可能带来的一些风险和挑战。

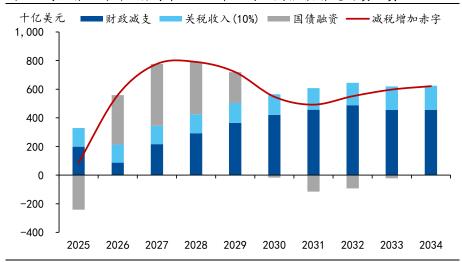
对于未能实现预算平衡的 OBBB 法案,减税需要依赖额外的国债融资。由于减支安排在预算协调窗口后期,2028年前减税对于美债供给压力尤其高。即便计入可能征收的 10%对等关税收入,国债融资也需要上升至少 20%以满足减税需求。

政府融资需求增加对应储蓄供应,或求诸于内,或诉诸于外。2017年以来,美国国内储蓄率呈现趋势性下滑,这进一步强化了经常账户逆差、资本账户顺差的国际收支格局。正是在这个过程中,美国财政扩张的融资需求很大程度上由外部投资者供应。然而,这一融资结构极其脆弱——当外部投资者对财政可持续性产生质疑,美国财政扩张的代价就体现在不断上升的国债风险溢价上,除非美国国内的"储蓄-投资"结构能够迅速扭转,以使国内投资者承接政府融资需求。

OBBB 法案显然创造了"不合时宜"的美债供给压力,不合宜之处体现在:1) 关税加重了对美国通胀前景的担忧,而高通胀作为债务"隐性违约"的主要手段,降低了投资者继续持有美债的意愿;2)美国尚处高利率环境下,这使愿意持有美债的投资者对于未来美国经济增长的要求更高,同时也容易让政府陷入长债需求短缺和短债成本高企的两难境地;3)在国内储蓄率尚未企稳回升的阶段进行财政扩张,容易加剧美债供需错配,提升融资溢价。



图8: 减税增加的财政赤字在 2028 年之前主要依赖增发国债融资



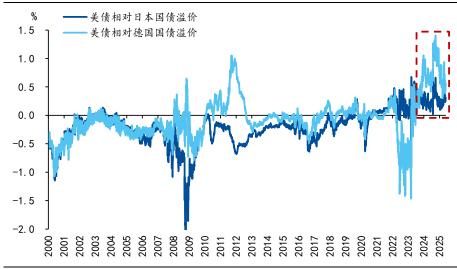
数据来源:美国国会预算委员会,HTI

图9: 决定国际收支格局的"储蓄-投资"结构短期内难以逆转



数据来源: Wind, HTI

图10: 美国财政扩张的代价体现在投资者对风险溢价的要求上



数据来源: Wind, HTI



3. 经济风险: 不公平的收入分配效应

OBBB 法案可能有加剧美国贫富差距的风险。从居民部门的收入分配效应来看,到 2027年,最高收入群体(收入最高 10%分位的居民)的收入将增长4%,而最低收入群体(收入最低 10%分位的居民)的收入将下降 2%,2029年后下降幅度还将有所扩大。

部分税政条款具有明显的累退性。一是提升了税收减免或抵扣上限,包括提高了州和地方税收抵扣上限、遗产税适用收入门槛、取消项目抵扣限制等,任何提升抵扣上限的税政都主要惠及高收入群体;二是税收减免在预算协调窗口后期主要采取削减福利支出进行融资,本质上是用低收入群体补贴高收入群体,从而产生极不公平的收入分配效应;三是提升穿透型企业收入抵扣以及拓展适用企业范围,归根到底是在降低富裕家庭的税率,因为这类企业的股东大多都是高收入居民。

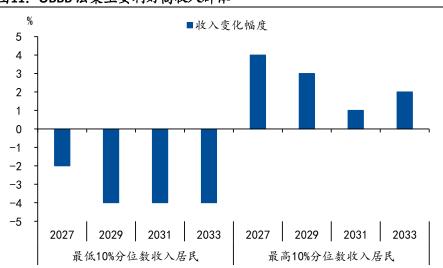


图11: OBBB 法案主要利好高收入群体

数据来源:美国国会预算办公室,HTI

OBBB 法案的大多数减税条款是"延长"而非"新增",导致尽管财政赤字增加,但经济上的边际影响却远不如减税开始时。更何况回头来看,2017年 TCJA 法案对经济增长的促进效应也不明显。以企业投资为例,TCJA 法案对企业购置固定资产实施了全额抵扣政策,但法案实施后两年,建筑和设备投资占GDP 比重并未显著增加,而未在税收减免范围内的知识产权投资仍保持增长。跨国比较结果也未凸显 TCJA 法案对美国企业投资的促进作用,2017-2019年美国投资占 GDP 比重增长在 G7 国家中明显落后。因此,此次减税法案对经济增长的拉动效应存疑,况且许多税收优惠政策是临时性的,这也会抑制企业做出连续、长期的投资决策。



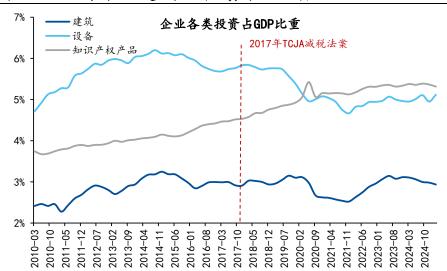
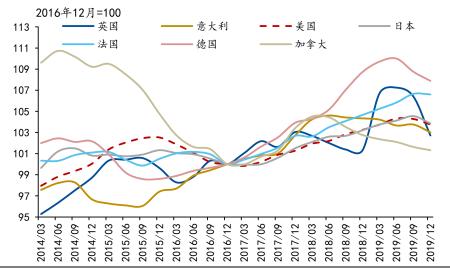


图12: TCJA 法案对企业建筑和设备投资的促进不明显

数据来源: Wind,HTI





数据来源: CEIC, HTI

注:图中展示的是各国投资与 GDP 占比的标准化数据(2016年12月=100)。

4. 信任风险:不友好的国际税收政策

特朗普政府征收对等关税的思路还渗透到了 OBBB 法案中。法案公布了两项极不友好的国际税收政策。第一项是"对等所得税"政策,它针对的是美国反对的三项外国税收:低税率利润税、数字服务税和利润转移税。在美国政府看来,低税率利润税降低了美国企业的竞争优势,数字服务税掠夺了美国政府对企业的征税权,利润转移税则阻碍美国企业将利润汇回国内。如果美国财政部认定某国对美国企业征收了所谓的"域外歧视性税收",则将对该国企业、个人或政府在美国的收入征税,税率将从5%起步,并在四年内逐步提升至20%。

另一项税收政策针对非公民汇款。法案提出,任何向外汇出的款项,均需收取 5%的"汇款税",这相当于对他国向美国的服务贸易出口征收 5%关税。



以上两项税收政策实际上是对进入美国的资本和劳动要素征税。一方面,与关税类似,部分税收负担会转移到国内的资本和劳动要素报酬上来。从实施范围来看,"对等所得税"不亚于"对等关税": 法案中提到的三类"歧视性税收"涵盖大多数欧盟成员国,以及澳大利亚、加拿大、韩国、挪威、瑞士和英国等国家,这些国家在2024年对美国的直接投资占比接近80%。

另一方面,这两项税收政策连同关税,会进一步催化对美元体系的不信任交易。以各种繁杂名义对进入美国的生产要素征税,无疑是在侵蚀美元霸权体系所仰仗的"自由流通和自由交易"原则。同时,这也对美国面临的国际收支格局造成扰动,使其陷入"美元信用破裂→资本流入放缓→增赤成本高企→融资利率抬升/挤出私人投资→经济难回复苏→美元信用破裂进一步强化"的负反馈循环中。打破这一循环只能依靠美国自身信用的修复。

5. 风险提示

预算协调窗口后期美国财政赤字扩张超预期,关税对美国经济的拖累超预期,美国信用破裂交易进一步强化

附录 APPENDIX

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	截至 2025 年 3 月 31 日	海通国际股票研究i	平级分布	截至 2024 年 12 月 31 日海通国际股票研究评级分布			
	优于大市	中性	弱于大市	优于大市	中性	弱于大市	
		(持有)			(持有)		
海通国际股票研究覆盖率	92.2%	7.5%	0.3%	91.9%	7.6%	0.4%	
投资银行客户*	3.3%	3.5%	0.0%	2.1%	2.2%	0.0%	

^{*}在每个评级类别里投资银行客户所占的百分比。

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中性,未来12-18个月内预期相对基准指数变化不大,基准定义如下。根据 FINRA/NYSE 的评级分布规则,我们会将中性评级划入持有这一类别。

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各地股票基准指数:日本-TOPIX,韩国-KOSPI,台湾-TAIEX,印度-Niftv100:其他所有中国概念股-MSCI China.

	Haitong International Equit as of Ma	ty Research Rating: arch 31, 2025	s Distribution,	Haitong International Equity Research Ratings Distribution, as of December 31, 2024			
	Outperform	Neutral (hold)	Underperform	Outperform	Neutral (hold)	Underperform	
HTI Equity Research Coverage	92.2%	7.5%	0.3%	91.9%	7.6%	0.4%	
IB clients*	3.3%	3.5%	0.0%	2.1%	2.2%	0.0%	

^{*}Percentage of investment banking clients in each rating category.

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