

Where are we now on the Art Bonus?

An evaluation of tax incentives for the protection of Italian cultural heritage

Master Cultural Economics and Entrepreneurship

Erasmus School of History, Culture and Communication

Academic Year 2020-2021

Student name: Sara Coppola

Student Number: 538967

Supervisor: Erwin Dekker

Second Reader: Anna Mignosa

Date: 20 June 2021

Word count: 14629 words

Abstract

In 2014, the Italian Ministry of Culture introduced a new tax incentive: the Art Bonus. Its aim is to promote cultural patronage and involve civil society in the protection of cultural heritage. The new tax break has achieved consistent economic results in a limited period of time: over 450 million euros were raised between 2014 and 2019 thanks to the contributions of nearly fifteen thousand donors, and over two thousand organisations all over Italy have sent their applications. The purpose of this study is to investigate whether the Art Bonus has allowed to widen and diversify the audience of donors and beneficiaries compared to two already existing tax incentives for the arts, the Cultural Patronage Law and the Art.15. After performing a quantitative analysis on donations, taking into account elements such as the type of contributors and recipients, the annual amounts donated and the regional distribution of funds, results have shown that the Art Bonus was half successful. The number of donors has dramatically increased over the years, and new actors are now patrons. Although large corporations and banking foundations continue to be the benefactors responsible for the highest donations, donors such as private individuals, small and medium-sized enterprises and philanthropic foundations have become more and more important. With regards to the recipients, the Art Bonus did not have the same success. Famous cultural heritage institutions, especially those located in northern and central regions, are the ones receiving the largest contributions. Smaller and less known cultural organisations have applied for funding, but their projects have received very little or no support. As a result, not funded or partially funded projects exceed completed projects at a national level. To promote a more inclusive implementation of the Art Bonus, three policy suggestions have been made. First of all, the MiBACT should carefully choose how to communicate with the public. The two marketing campaigns realized in 2015 and 2019 to promote the Art Bonus have neglected the local dimension of cultural heritage, negatively influencing the behavioural response of donors. Furthermore, a carefully structured implementation program should guide the promotion of the tax incentive. Numerous initiatives have been realized between 2014 and 2019, but a coordinated effort is needed and more importantly southern regions should be the target of new information event and workshops. Finally, instead of using public subsidies to support less popular projects, the MiBACT should give smaller organisations the tools to learn how to manage fundraising campaigns. By doing so, they will be given the change to become more financially indipendent and cultivate a stronger relationship with their donors.

Keywords: cultural policy, cultural heritage, tax policy, tax incentives, philanthropy, cultural patronage, private sector, nonprofit sector, civil society, charitable donations, Italy

Index

Chapter 1: Introduction	5
1.1 The Italian cultural policy context	5
1.2 Tax incentives for cultural heritage	6
1.2.1 Cultural Patronage Law	7
1.2.2 Art.15	7
1.2.3 Art Bonus	7
1.3 Objective of the study	9
1.4 Research structure	9
Chapter 2: Theoretical framework	11
2.1 Tax incentives for arts and culture	11
2.1.1 Benefist and drawbacks of tax incentives	12
2.2 Tax impact analysis	14
2.3 Governance and management of cultural heritage	16
Chapter 3: Research Design	19
3.1 Methodology	19
3.2 Data Collection	19
3.2.1 Variables	19
3.2.2 Limitations	21
Chapter 4: Empirical results	22
4.1 Total donations	
4.2 Donors	24
4.2.1 Art Bonus	24
4.2.2 Cultural Patronage Law	27
4.2.3 Art.15	27
4.3 Beneficiaries	28
4.3.1 Art Bonus	28
4.3.2 Cultural Patronage Law	31
4.3.3 Art.15	
4.4 Art Bonus: a half success	33
Chapter 5: Discussion and Conclusion	38
5.1 Design of the tax incentive	
5.2 Implementation process	
5.3 Culture of giving	

41
42
43
47
52
58

Chapter 1: Introduction

1.1 The Italian cultural policy context

Italy is a country rich of natural, historic and artistic assets, whose protection is a constitutional responsibility of the State¹ and one of the main objectives of the Ministry of Culture (Zan et al., 2007). Given the meritorious and public good nature of cultural heritage² (Throsby 1997; Frey 2003), the central government has historically funded, especially through direct subsidies, safeguarding and restoration processes but also management and valorization activities of cultural assets.

With some exceptions³, all these duties initially fell within the competences of the State. However, the demand for greater decentralization by Regions and local authorities led to a division of powers and responsibilities between the central government and territorial entities. With the passage of the Constitutional Law n.3 in 2001⁴, the State has retained the legislative power in the field of protection, but has shared with Regions responsibilities in the field of valorization, promotion and organization of cultural activities (Art.117, Const.Law n.3/2001). This law also formalized the so-called subsidiarity principle (Law n.59/1997)⁵, according to which the State can transfer its administrative functions and tasks to Provinces and Municipalities, the territorial entities closer to the citizens, or to Regions in case they are not able to correctly perform their duties (Art.118, Const.Law n.3/2001) (Nacci, 2014). Therefore, cultural heritage activities account for most of the expences of the Ministry and local authorities. But while the former is responsible for formulating cultural policies and thus deciding how to allocate funds, the latter are in charge of their actual distribution (Bodo and

¹ Article 9, Constitution of the Italian Republic (December 22, 1947): The Republic promotes the development of culture and of scientific and technical research. It safeguards natural landscape and the historical and artistic heritage of the Nation.

² According to article 2 of the Italian Code of Cultural Heritage and Landscape (D.Lgs 22 January 2004, n. 42), "[c]ultural property consists of immovable and movable things which, pursuant to articles 10 and 11, present artistic, historical, archaeological, ethno-anthropological, archival and bibliographical interest, and of any other thing identified by law or in accordance with the law as testifying to the values of civilization". Therefore, the definition of cultural heritage includes the following categories of assets: architectural heritage; collections of cultural institutions such as museums, archives and libraries; naturalistic and historical-scientific heritage like mineralogical, petrographic, paleontological and botanical assets; photographic and audio-visual material photographs, negatives and motion pictures; intangible assets.

³ Law 14 January 1972, n.3. Transfer to ordinary statute Regions of state administrative functions in the field of school assistance and of museums and libraries of local authorities.

⁴ Article 117, Constitutional Law 18 October 2001, n. 3. Amendments to Title V of Part Two of the Constitution.

⁵ Law 15 March 1997, n. 59. Delegation to the Government for the conferral of functions and tasks to the Regions and local authorities, for the reform of the Public Administration and for administrative simplification.

Bodo, 2016).

However, direct funding for the arts began to decline during the 1990s because of the rationalisation of public expenditure, but then decrease even more dramatically after the financial crisis in 2007-2008. Public cultural expenditure reached the peak of 8.052 million euros in 2008, then sharply declined after 2009. Although it has started to grow again from 2014, government budget for culture has not reached the pre-crisis level yet (Bodo and Bodo, 2016, p.69). In this context, the field of cultural heritage has suffered the biggest cuts in relative terms compared to the other cultural sectors: in fact, direct funding decreased from 1.042 to 577 million euros between 2003 in 2013 (Bodo and Bodo, 2016, p.70). This event gave a shock to long-established scenarios, leading "governments [to edge] away from their traditional roles and [to move] toward the market manipulator or facilitator role⁶" (Zimmer and Toepler 2010, p. 190).

Due to cuts in public spending, both the central government and the then Culture Ministry had to adapt their policy mix to further encourage private sector, non-profits and civil society participation in funding the arts. Among the policy instruments chosen by the Ministry of Culture to look for alternative sources of funding, tax incentives for charitable donations have also made an important contribution in economic terms.

1.2 Tax incentives for cultural heritage

The current study will focus on three specific tax breaks established by the Italian Culture Ministry with the aim of promoting donations for cultural heritage: the so-called Cultural Patronage Law⁷, a tax break that will be referred to as the Art. 158 throughout the analysis, and the most recent Art Bonus⁹.

⁶ A liberal State is characterized by a market manipulator behaviour, which sees public intervention as a necessary devil to fix specific market failures that the 'invisible hand' has failed to solve (Cummings and Katz, 1987). In this context, the provision and the funding of arts and culture are mainly a responsibility of private entities (Esping-Andersen and Korpi, 1984), which are encouraged to contribute through supportive tax policies (Hillman Chartrand and McCaughey, 1989).

⁷ Article 100, paragraph 2, letter m, Income Tax Code. Presidential Decree 22 December 1986, n. 917. Charges of social utility.

⁸ Article 15, paragraph 1, letter h, Income Tax Code, Presidential Decree 22 December 1986, n. 917 of. Charges of social utility.

⁹ Art. 83, Legislative Decree 31 May 2014, n. 83. Urgent provisions for the protection of cultural heritage, the development of culture and the revitalization of tourism.

1.2.1 Cultural Patronage Law

The incentive known as Cultural Patronage Law was established in 2000 by the then Ministry for Cultural Heritage and Activities (MiBAC) (1998-2014) and is targeted at persons holders of enterprise's income. They can deduct 100% of donations from their taxable income, as the money given are regarded as social and welfare expenses (Art. 38, Law n.342/2000)¹⁰. Donations must be made in favour of non-profit subjects operating in the field of cultural heritage and the performing arts sector; more specifically, charitable contributions are invested to enable them to carry out institutional tasks and cultural projects. Eligible beneficiaries are the State, Regions, local authorities, public entities or institutions, legally recognized non-profit foundations and associations. The MiBAC has established a maximum ceiling for donations, which amounts to approximately to 139 billion euros per year: should this value be exceeded, all recipients are obliged to pay in equal measure a sum that is equal to 37% of the surplus to tax authorities (Buzzi, 2017). However, this is highly unlikely to happen. Official statistics have in fact shown that contributions made through the Cultural Patronage Law have never reached the predetermined annual value over the past two decades.

1.2.2 Art.15

The Art.15 was introduced in 1997 by the then Ministry of Cultural and Environmental Heritage (1974-1998) and is targeted at natural persons and/or non-commercial entities. The legislator has given these subjects the possibility of deducting 19% of donations from their personal income tax. As for the incentive previously outlined, potential recipients are the State, Regions and local territorial bodies, public bodies or institutions, legally recognized non-profit foundations and associations. However, deductions are applicable in two cases only: if the above-mentioned beneficiaries carry out or promote study, research and documentation activities of significant cultural and artistic value, or if they carry out purchase, maintenance, protection or restoration activities of the items identified by the Code of Cultural Heritage and Landscape (D.Lgs. n.42/2004)¹¹.

1.2.3 Art Bonus

Last but not least, the Art Bonus was introduced by the then Ministry for Cultural Heritage, Activities and Tourism MiBACT (2014-2021) in 2014 as one of the "[u]rgent provisions for the protection of cultural heritage, the development of culture and the revitalization of tourism" (Art. 1, D.Lgs.

¹⁰ Article 38, Law 21 November 2000, n. 342. Liberal donations for cultural projects. Deduction from business income.

¹¹ Legislative Decree 22 January 2004, n. 42. Code of Cultural Heritage and Landscape, pursuant to Art. 10 of Law 6 July 2002, n. 137. Delegation for the reform of the organization of the Government and of the Presidency of the Council of Ministers, as well as of public bodies.

n.83/2014). This new fiscal incentive was supposed to have an initial validity of three years (Law n.106/2014)¹², but it was made permanent from 2015 as a result of its sound performance (Law n.208/2015)¹³.

Contrary to the tax breaks described above, the Art Bonus is a tax credit equal to 65% of charitable contributions that is divided into three equal annual instalments. Both persons holders of enterprise's income, natural persons and non-commercial entities can benefit from it. Although no maximum value for donations was established, the tax credit is recognized to corporate donors within the limit of 5 per thousand of their annual revenues, and to the other contributors within the limits of 15% of their taxable income.

More importantly, the Art Bonus is solely designed to support public cultural heritage. Therefore, eligible beneficiaries belong to the following categories: public authorities, namely the MiC and its associated government institutions, Regions, Municipalities, Provinces, Metropolitan Cities and public administrations of the State; symphonic opera foundations, traditional theatres, concert-orchestral institutions, national theatres, theatres of significant cultural interest, festivals, companies and centres for theatre and dance production and distribution circuits, instrumental complexes, concert companies and choirs, circuses and traveling shows; institutes and places of culture belonging to the public (e.g. museums, libraries, archives, areas and archaeological parks and monumental complexes as defined by Art.101 of the Code of Cultural Heritage and Landscape) (Law 106/2014). Donations to private entities are granted only if they are concessionaires or assignees of publicly owned assets. To be granted the money, these subjects are bound to use them solely for the purpose and the manner established in the project agreement (Italian Fiscal Revenue Agency, circular 24/E/2014)¹⁴.

As for the other incentives mentioned before, contributions can only be devoted to specific interventions: A) the maintenance, protection and restoration of publicly owned cultural assets; B) the support for public institutions and places of culture (e.g. museums, libraries, archives, archaeological areas and parks, monumental complexes, as defined by Art.101 of the Code of Cultural Heritage and Landscape); C) the construction of new structures, the restoration and strengthening of existing ones of the symphonic opera foundations or of public bodies or institutions which, without profit, carry out exclusively activities in the show business.

¹² Law 19 July 2014, n.106. Conversion into law, with amendments, of the Decree Law 31 May 2014, n. 83.

¹³ Law 28 December 2015, n. 208. Provisions for the preparation of the annual and multi-year state budget (2016 Stability Law).

¹⁴ Circular 31 July 2014, n. 24/E, Italian Fiscal Revenue Agency. Article 1 of Decree Law 31 May 2014, n. 83. Tax credit to encourage donations in support of culture: Art Bonus.

1.3 Objective of the study

In light of its significant economic results, the Art Bonus has been recently praised by the Italian Minister of Culture Franceschini as "the strongest [fiscal incentive] in Europe to encourage cultural patronage" (Ministry of Culture, 2021). Countless reports and studies, newspaper articles and press releases of the Ministry have extensively discussed and endorsed the outcomes of the Art Bonus, using statistics and figures such as the amount collected to support and justify their claims.

But although the economic performance of a tax incentive is a sound indicator of its functioning, it is not the only element to consider when assessing its impact. The success or failure of any policy instrument must be measured by reference to its purpose. The Art Bonus was promoted by the then MiBACT to involve the private and non-profit sectors and civil society in the protection of cultural heritage. Therefore, the significance of this incentive must also be addressed by looking at its social and cultural impact, which goes beyond the number of donors and beneficiaries.

Since it would be very complex to conduct an in-depth qualitative study due to the elevated number of subjects in the sample, the research question to answer is: *Has the Art Bonus allowed to widen and diversify the audience of contributors and recipients compared to previous tax incentives?* Hence the need to consider the following sub-question: *Who are the donors and beneficiaries of the other incentives promoted by the Ministry of Culture, the Cultural Patronage Law and the Art. 15?*

1.4 Research structure

The study is structured as follows: the second chapter will present the theoretical concepts necessary to interpret and discuss the findings. After introducing tax incentives as a policy instrument, together with their benefits and drawbacks, the second part of the theoretical framework will explain how to perform a tax policy analysis, both in general and with regard to tax incentives for donations. The final section will describe the governance system of cultural assets in Italy, to understand what role charible contributions for the protection of heritage play in this context.

The research design will be outlined in the third chapter. A quantitative analysis will be performed by applying a before-and-after design. A selected number of variables have been chosen to compare the outcomes of the three tax incentives under study. After that, the limitations of the analysis will be briefly discussed.

The fourth chapter will provide a sampling of the data. After describing the trends of total donations, which will be compared with economic and demographic indicators, the following sections of the chapter will provide a detailed analysis on donors and beneficiaries. The last paragraph will answer to the research question of the study.

Quantitative findings will be interpreted and discussed in light of the theoretical framework and additional sources in the fifth chapter of the thesis. The success or failure of the Art Bonus in widening and diversifying the audience of donors and beneficiaries will be explained by looking at how the MiBACT designed and implemented the tax incentive. A final comment on the evolution of the culture of giving in Italy will be provided by looking at how the heritage system has evolved over the years. The conclusion will provide policy suggestions to address the issues object of the research, will state the limitations of the study and will provide suggestions for future research on the topic.

Chapter 2: Theoretical framework

2.1 Tax incentives for arts and culture

Fiscal incentives have two main functions: raising funds destined to public use, and encouraging a desired behaviour. In fact, governments can use this tool to achieve broad non-fiscal goals¹⁵ (Hemels, 2016). Promoting charitable contributions to compensate for the decrease in direct support to the arts, is a clear example of the ancillary function of tax incentives.

Being private patronage through tax incentives a distinguishing feature of US arts policy, most studies on this topic have focused on the American cultural sector. Research have shown that wealthy donors are the ones who benefit the most from tax deductions (Buijze, 2017; Feld et al., 1983; Hemels, 2016; O'Hare and Feld, 1984; Schuster, 1999 and 2006). They tend to have a great influence on art institutions and cultural production in general because of three main reasons: first, since tax-based incentives are indirect public support mechanisms, the government does not take part in the reallocation process of money subtracted from the taxes, which are directly donated by citizens to the chosen recipient (Buijze, 2017), and therefore it cannot directly intervene to correct a potential monopolistic situation; second, tax deductions are, as its name suggests, a deduction from the taxable income and thus they offer higher fiscal advantages to higher income contributors; third, empirical research has shown that philanthropic behaviour tends to be price elastic, meaning that the relative cost of giving decreases as the amount given increases (Bekkers and Wiepking, 2011; List, 2011; Peloza and Steel, 2005; Schuster, 2006).

Hence, to redress this imbalance, governments have set a maximum value of donations made through tax deductions, as it is in the case of the Cultural Patronage Law, and then have gradually introduced more tax credits, such as the Art Bonus. The latter scheme is in fact more equitable than the former, because the credit is calculated based on the entity of the contribution and not based on the income of the contributor. As a result, the amount of taxes to be paid by donors decreases in accordance with the size of the donation (Buijze, 2017). Nevertheless, tax credits also have limits of

¹⁵ Governments can use various monetary and non-monetary instruments to meet cultural policy goals: legislation, more specifically soft and hard regulation (e.g. guidelines and codes of practices, fines and levies); direct subsidies, awards, grants and lottery funds which are items of public expenditure; indirect subsidies, also referred to as tax expenditure; information and marketing campaigns (Hemels, 2017; Klamer et al., 2006 and 2013; Rizzo and Throsby, 2006). While tools of public expenditure, marketing and information campaigns better address clear-cut policy goals (e.g. the renovation of a specific cultural heritage site), the nature of tax expenditure only allows to encourage generic policy objectives such as the promotion of cultural philanthropy (Buijze, 2017; Hemels, 2016; Schuster, 1999).

deducibility to ensure an equal treatment to all contributors, regardless of their income group, as it is in the case of the Art Bonus¹⁶.

2.1.1 Benefist and drawbacks of tax incentives

As any policy instrument, tax incentives can have both positive and negative consequences. For them to be as most efficient and effective as possible, they must be carefully designed, implemented and monitored. These last two concepts will be extended further in the following section on tax policy analysis. Before doing so, it is first necessary to understand what benefits and drawbacks tax incentives can have, both in general terms and in reference to the development of the cultural sector.

As mentioned in the previous paragraph, indirect support mechanisms favour public involvement and therefore facilitates a more democratic decision-making for allocating funds (Buijze, 2017; Hemels, 2016). If instead decisions on their allocation are taken at central and local government levels, there is a chance that public agents would exploit the information asymmetries in the public sector and adopt a rent seeking behaviour (Mazza 2011). To satisfy their self-interest, that is to be reelected, they might decide to support well established artistic organisations and more traditional forms of cultural expressions, not encouraging experimental arts for fear of losing social approval. Public agents would then act as gatekeepers, causing allocation inefficiencies and/or overspending not in line with cultural policy goals and the preferences of a part of the electorate. The same applies to art experts, hired by governments to formulate cultural policy agendas and decide when and how to invest public funds (Mazza 2011).

On the contrary, mechanisms of indirect support enhance individual decision-making, since the single taxpayer has the power to decide who to donate to, how much to give and when (Buijze, 2017; Hemels, 2016; Schuster, 2006). This has in turn a twofold positive effect: first, recipient organisations would be encouraged to satisfy the needs and desires of donors, so as to establish a stable relationship with them and continue to receive funding in the future (Hemels, 2016); second, tax incentives allow to raise funds more quickly and at a lower cost (Buijze, 2017; Hemels, 2016). In fact, tax incentives are more cost efficient and are granted more easily than direct subsidies, grant schemes, and other tools of public expenditure. Organisations asking for direct support often face a time consuming, expensive and complicated bureaucratic process to first receive the funds, and then prove the effectiveness of the programs implemented using them.

However, tax incentives have also received much criticism from economists and policymakers. As mentioned earlier, high-income donors tend to receive the greatest advantages from

¹⁶ Tax-based incentives can also take the form of exemptions, reduced rates, deferrals, gift aid and allocation schemes (Buijze, 2017). Not being relevant for the purposes of this study, these types of tax incentives will not be investigated.

tax-based incentives, especially if the latter are in the form of deductions (Buijze, 2017; Feld et al., 1983; Hemels, 2016; O'Hare and Feld, 1984; Schuster, 1999 and 2006). This fact compromises the principle of fairness of tax policy, feeding a vicious cycle: wealthier donors could influence the provision of cultural services, and organisations benefitting from their contributions are usually famous and established entities, with the result that cultural offerings respond to the tastes of a few and smaller institutions struggle to keep pace with subsidized competitors (Buijze, 2017; Hemels, 2016; Schuster, 1999).

Furthermore, as mentioned at the beginning of the theoretical framework, tax incentives are more efficient in addressing broad policy goals. Although this does not make them less effective than for instance direct subsidies, changing the legislation to design more targeted incentives could be an option to fix this issue. But targeting tax incentives is often very difficult and sometimes not feasible due to political and practical reasons (Hemels, 2016; Schuster, 1999). Interested groups that take full advantage from them would surely lobby against their abolishment or changes to their detriment. Moreover, doing so would further complicate tax legislation, since the primary tax structure gets modified every time an exception is introduced. The situation becomes further complex when implementing tax incentives for culture, because government bodies that oversee tax and fiscal affairs usually work separately from those responsible for cultural affairs. Since officials have different skills and priorities depending on the department they work in, it is sometimes difficult to coordinate policy goals and change or even abolish tax incentives (Buijze, 2017; Schuster, 1999).

An increased coordination between the Ministries of Finance and Culture would certainly contribute to fix coordination problems, but would still not solve two big issues: first, evaluating the cost of tax incentives is a challenging task because it is impossible to predict the exact behavioural response of taxpayers to policy changes, especially if the policy goals to address are broad and no maximum ceiling on tax reductions is applied (Hemels, 2016; Schuster, 1999); second, monitoring the size and direction of financial flows is often problematic because tax incentives are not accounted for in the public budget, which means it can be very difficult to get up-to-date and reliable data – this is especially the case for the non-profit sector – and there is no democratic control over those funds (Buijze, 2017; Hemels, 2016; Schuster, 1999). Nowadays most tax incentives are accounted for as tax expenditure, but still their measurement is not as accurate as it is for direct expenditure (Hemels, 2016).

2.2 Tax impact analysis

Based on the above, the most important elements to consider when designing a tax policy are the following ones: the administrability of the tax system; efficiency, to be measured as the difference between the cost of taxation and revenue generation; equity and fairness. These factors are considered the "three goals of taxation" (Avi-Yonath, 2006, p.1). Their proper configuration and implementation is in fact an essential precondition for the success of a tax policy, which is determined by the degree of achievement of intended non-fiscal objectives (Bird and Wilkie, 2012). Therefore, all of the above elements will serve as evaluation criteria of the overall performance and impact of tax incentives.

It requires the political will of the entire national system and a clear implementation strategy to make a tax system function in an efficient and 'manageable' way. The lack of resources, be them monetary or human, is often pointed out as the source of its inefficiency. However, although this factor would certainly help a tax system to perform better, all three elements are of equal importance and hence it is imperative that they coexist (Bird and Wilkie, 2012). For instance, a tax incentive for donations will be efficient if tax authorities will clearly define: its fiscal and non-fiscal objectives, that is the anticipated revenue and the cause to promote; the profile of contributors and recipients who can benefit from it; the maximum amount that can be donated and deducted from taxable income. Furthermore, all parties involved in the process will have to play their part. Public agencies will have to carefully apply tax rules, check the validity of the information provided by taxpayers and request more details over necessary, measure costs and revenues; in the latter case, the availability of resources such as qualified personnel and funds will be necessary to perform the task. Both taxpayers and potential recipients shall not commit fraud and will have to comply with legal requirements to benefit from the incentive and be granted the donation, respectively. If these conditions are met, the tax system will be reasonably manageable and more likely to perform in an effective way.

The effectiveness of a tax system also depends on its efficient functioning, which means revenue must exceed the cost of taxation. The latter is made of three types of costs: administrative, compliance and efficiency. The first category represents the cost of collecting taxes. When administrative costs rise, compliance costs usually decrease because it can be assumed that taxpayers have provided all the necessary information to public agencies. However, this would not happen if the tax system would be complex and require more resources, time and effort to be managed. In such a case, both administrative and compliance costs would increase. Finally, efficiency costs are the real economic costs generated by behavioural changes of business, individuals and non-profits after a tax measure is implemented. Well-designed tax policy do not cause economic distortions, but instead encouraged taxpayers to adopt the desired behaviour (Bird and Wilkie, 2012). Applying the same reasoning to tax incentives for donations, it is safe to assume that compliance and administrative costs

would rise if policymakers would change the legislation to target specific interest groups: in fact, this would mean more detailed information and data to collect, process and monitor (Buijze, 2017; Hemels, 2016; Schuster, 1999). If the incentive proves to be effective, then efficiency costs will instead decline because the number of contributors and recipients will both have increased, hence contributing to a positive behaviour that will allow to achieve the main non-fiscal objective: encouraging philanthropy.

However, an increase in the number and value of donations does not imply that the desired goal has been achieved. To assess whether the principles of the tax equity and fairness are respected, it is necessary to refer to the concepts of vertical equity and distributional effects. The former implies that the tax system will treat citizens differently based on their economic situation, meaning that those who can afford to pay will be taxed more. On the other hand, distributional effects are usually interpreted as having an impact on income distribution and the realization of non-financial objectives (Bird and Wilkie, 2012). In the specific case of tax incentives for charitable contributions, the value of taxable income will function as the reference point to calculate the extent of the deduction or credit. Furthermore, a maximum ceiling for donations is usually applied. These control mechanisms make sure that higher and lower income donors are treated equally, depending on their disposable income (Hemels, 2016; Schuster, 1999). With regard to the distribution of income, that is donations, there is no real way to predict how the funds will be allocated, even if the government determines which types of entities classify as potential recipients. The fact that big and famous organisations tend to receive more money compared to small and less-known ones, helps to narrow down the field but at the same time hinders the equity of the tax measure and the degree of achievement of its non-fiscal objectives. The latter change depending on the type of tax policy promoted. The policy objective of tax incentive for donations is obviously to promote philanthropy. Most studies on this topic have measured the impact of charitable contributions in quantitative terms: amount given, number and type of donors and beneficiaries are the main indicators. Much research has been done to study the price of elasticity of giving, using variables such as age, sex, income, level of education, place of residence, etc. (Bekkers and Wiepking, 2011; List, 2011; Peloza and Steel, 2005; Schuster, 2006).

However, these indices are insufficient to discuss and assess the non-fiscal objectives of donating. Philanthropy always serves a cause: to determine whether an incentive has made a positive contribution to it, it is essential to explore the founding values of that cause and consider both the limitations and incentives provided by the institutional and socio-cultural context within which the cause is promoted. By doing so, it will be possible to contextualise and debate on the results obtained through quantitative indicators. Therefore, the following paragraph will reflect on the evolution of

the governance and management system of cultural heritage in Italy, to contextualise the culture of giving and hence better understand the impact of the three tax incentives under.

2.3 Governance and management of cultural heritage

Over the last thirty years, the Italian public administration and the cultural heritage sector have undergone profound changes.

While in the 1980s the public sector of Western countries was being reformed by a new market-oriented thinking known as New Public Management (NPM), Weber's bureaucratic model of public administration persisted for the whole decade in Italy. The State continued to regularly and heavily intervene in the economy, managing most public services through a centralized structure. Public organizations were characterized by a strong role hierarchy, standardization of work and strict organizational norms and procedures. In the same way, the Italian Ministry of Culture was the only institutional actor responsible for the protection of public and private cultural heritage, and for the administration of state-owned cultural assets. The latter were managed and supervised through a centralized network of Superintendences (Soprintendenze), peripheral branches of the Ministry. Established in 1907, their duty was to comply with the provisions of central offices and guarantee the protection of cultural heritage in their area of jurisdiction. Therefore, they had very limited autonomy, also because their financial and human resources were provided and managed by ministerial offices (Santagati et al., 2020; Zan et al., 2007). However, as previously mentioned, some exemption were applied; in fact, the management of libraries and some local museums was assigned to Regions and local authorities in 1972 (Law n.3/1972).

The situation changed in the early 1990s, when the fiscal, political and institutional crisis that hit the country pushed the government to adopt the NPM approach (Donato and Gilli, 2011). The entire public sector was subjected to a reform process in order to reduce and rationalise public expenditure. The managerial model of NPM is in fact based on three criteria: efficiency, effectiveness and economy of public service provision (Pollitt and Bouckeart, 2017). Public organizations were then encouraged to adopt private sector principles and tools such as hands-on professionalism, performance standards, emphasis on output control, disaggregation of organizational units and competition (Hood, 1991). However, the NPM approach did not fully substitute the Weberian model of public administration in Italy. On the contrary, the bureucratic logics have grafted on to the new managerial model, with the result that excessive attention has been paid to cost reduction to the detriment of aspects such as quality and innovation in service delivery (Donato and Gilli, 2011, p.202). To a certain degree, the same happened in field of cultural heritage. Private organizations

became a model for cultural institutions, which were asked to contribute to the country's economic recovery and not to put a burden on public finances. Different strategies were applied: outsourcing of cultural activities to private entities; decentralization of state functions to local authorities; managerialisation of cultural organizations; privatization of cultural heritage activities (Dubini et al., 2012; Santagati et al., 2020; Zan et al., 2007).

The Ronchey Law (Law n.4/1993) represents the first step of the cultural heritage system towards change. The provision of ancillary services (e.g. bookshop, restaurant and cafè) was assigned to private entities; after a few years, also the execution of core business activities (e.g. organization of exhibitions and scientific research) was trasferred to the private sector. When the management of some cultural organizations was entrusted to private entities, new forms of participatory governance – Foundations and Institutes – were established to ensure that the Ministry and/or its central offices could still have a say in their administration (Marzano and Castellini, 2018; Zan et al., 2007).

To start a decentralization process and thus improve the management of the heritage system, the State progressively transferred some of its administrative functions and tasks to Regions and local authorities. What happened in 1972 was just a small concession made by the Ministry of Culture to territorial authorities. More changes took place during the 1990s and especially during the 2000s. In the 1990 provinces and municipalities received statutory and financial autonomy (Law n.142/1990)¹⁷. In 1997 Regions became responsible for enhancement of local museums and related cultural services (Law n.59/1997)¹⁸, while administrative function for the promotion of cultural heritage of provincial importance was assigned to Provinces in 2000 (Law n.267/2000)¹⁹. In 1997, the Superintendence of Pompeii was the first peripheral body of the Ministry to became autonomous, although the process did not proceed very smoothly and it took years for it to actually gain a high degree of independence. As mentioned at the very beginning of the study, one of the biggest reforms took place in 2001, when State and Regions started to share responsibilities with regard to the enhancement and valorisation of cultural heritage (Art.117, Law n.3/2001). One of the most recent innovations in terms of governance is the reform of the museum system: after the bill was presented in 2014, the process was officially completed in 2016. The reform led to the creation of 17 independent Regional Museum Centres and the assignment of semi-autonomy status to twenty museums and archaeological sites (Marzano and Castellini, 2018).

With regard to managerialisation, it is important to note that Superintendences have gained

¹⁷ Law 8 June 1990, n.142. Sorting of local self-government.

¹⁸ Law 15 March 1997, n.59. Delegation to the Government for the assignment of functions and tasks to the regions and local authorities, for the reform of public administration and administrative simplification

¹⁹ Law 18 August 2000, n.267. Single text of the laws on local government.

more managerial responsibilities to better ensure the protection and conservation of cultural heritage in their territorial jurisdiction. As for privatization, in 2002 the Tremonty Decree regulated the privatization of cultural assets, but to date most part of the national cultural heritage remains owned by the State (Zan et al., 2007).

As mentioned many times, the State is the only actor responsible for the protection and conservation of cultural heritage. However, over the past twenty years the Ministry of Culture has worked in partnership with private organizations and institutions to carry out restoration processes (Dubini et al., 2012; Zan et al., 2007). The Herculaneum Conservation Project is an example of successful public private partnership between the Soprintendenza Speciale per i Beni Archeologici di Napoli e Pompei, the American foundation of Packard Humanities Institute, and the British School of Rome (Dubini et al., 2012). By sharing resources and responsibilities, but more importantly by involving more stakeholders in the process, the State has shown that it is able to better perform its conservation duties.

Chapter 3: Research Design

3.1 Methodology

To answer the research question 'has the Art Bonus allowed to widen and diversify the audience of contributors and recipients compared to previous tax incentives', a before-and-after design will be applied to perform a quantitative analysis on donations.

The before-and-after approach has been chosen because the author will observe the changes in the profile of donors and beneficiaries after the introduction of the Art Bonus. The analysis will test the intervention effectiveness of this new tax incentives on the sample in terms of widening and diversification of subjects contributing to cultural projects. Therefore, a non-experimental design responds to the purpose of the study.

To better understand and elaborate on the findings, statistics from official websites of the MiBACT and the Art Bonus website will be complemented with information from other sources, such as academic articles, research reports and newspaper articles.

3.2 Data Collection

Data on the Cultural Patronage Law and the Art.15 have been collected from official reports of the MiBACT²⁰. These documents provided statistics on regional distribution of donations from 2006 to 2019, and more qualitative information on both contributors and recipients – this was especially the case for the Art.15, since quantitative data on this specific incentive were limited. Additional information on these two tax deductions were found in two empirical researches by Civita Association (2009) and the Study Office of the MiBACT (2010). Although these studies are not recent, their data will serve as a useful benchmark to make a comparison with the findings of the Art Bonus.

Regarding the Art Bonus, the official homonymous website established by the MiBACT, provided detailed regional data on both contributors and recipients from 2014 to 2019.

3.2.1 Variables

The research question of this study refers to two concepts: width and diversification within the groups of donors and beneficiaries of the three tax incentives under study.

²⁰ Ministry of Culture circulars n.117/2007, n.104/2018, n.71/2008, n.266/2010, n.396/2011, n.461/2012, n.377/2013, n.402/2014, n. 402/2014, n.114/2015, n.118/2015, n.93//2017, n.123/2018, n.101/2019, n.97/2020.

The notion of width will be operationalized in terms of increase or decrease of subjects per category over time. The two indicators guiding the analysis will then be the number of benefactors and recipients. Looking at the data, the author noted that some donor have made more than one contribution. This fact will be discussed in the qualitative analysis of the results, but in the quantitative analysis the number of donations was equated to that of donors for practical reasons.

To elaborate on the concept of diversity, the following variables will be considered: type of donor and beneficiary; value of the donation made and received; region of origin of the donor and the beneficiary; population density of the region to which the subjects belongs; employment rate; density of existing businesses, foundations and associations, non-for-profit organisations, banks and financial institutions at regional level; density of cultural organisations and cultural heritage sites at the regional level.

As mentioned in the introduction, donors can be divided into three categories: persons holder of enterprise income (firms), natural persons and non-commercial entities. Given the diversity of subjects belonging to the class of non-commercial entities, the latter will be further divided into the sub-categories: foundations and associations, non-for-profit organizations, public and religious institutions. Banks and financial institutions are another group as donors. Beneficiaries will be classified as reported by the law: State, including the MiBACT; local entities, namely Regions, Provinces, Municipalities, Metropolitan cities; public entities; foundations and associations, performing arts organisations.

The indicator 'amount of donations given and received' will therefore be used to evaluate both the concepts of width and diversification. With reference to the latter, it will allow to verify whether the Art Bonus has favoured a diversification of donors giving money and beneficiaries receiving funds by comparing the total donations of all the three incentives.

Due to the historic and persistent gap between North on one side, and the Centre and South of Italy on the other, the geographic allocation of contributions of the Art Bonus is likely to be similar to the one of the two previous tax incentives. Therefore, the study will have a regional focus to observe in more detail the similarities and differences among donors and beneficiaries, as well as to assess the changing trends within those categories over the years.

Since the regional allocation of donations is influenced by the density of the population, this element will also be considered as a performance indicator of tax incentives. Comparing the number of residents with the number of contributions and the overall amount of donations, it will be possible to estimate what regions have the highest concentration of contributors and recipients.

Businesses, foundations and associations, non-for-profit organisations, banks and financial institutions usually classify as the major donors. Since economic differences between the regions are

due to the different concentration of these subjects on the national territory, the number of contributions must be contextualized and compared with the number of local active firms, foundations and philanthropy organisations. The same goes for the regional density of cultural organizations and heritage sites: the number and type of beneficiaries receiving donations must be compared with the total number of regional cultural organisations and heritage sites to estimate the concentration of recipients at the regional level.

3.2.2 Limitations

Two distinct time frames will be considered in the analysis, since the three tax incentives under study have been established at three different times: data on the Cultural Patronage Law and the Art. 15 are available from 2006 to 2019, while information on the Art Bonus are related to the years 2014-2019.

As previously specified, fully detailed data on the profile of donors and beneficiaries are only available for the Art Bonus. The official reports of the MiBACT do not provide any precise information on benefactors and recipients for the Cultural Patronage Law and the Art.15: only the main donors and beneficiaries are mentioned, together with the total amount of donations. However, the two researches by Civita Association (2009) and the Office Study of the MiBACT (2010) provided more detailed information on contributors and recipients of the two tax deductions in the years 2005-2009. Due to bureaucratic constraints, the author was not able to obtain more detailed information about these two incentives and used publicly available data. However, thanks to the wide variety of information available, it was be possible to identify the profile features of donors and beneficiaries which have benefitted from them.

Finally, since almost all non-for-profit organisations are anonymous, the number of public and religious institutions is too small to make any comparison and private individuals cannot be analysed in terms of differentiation, the author could only test if the number of these subjects has increased or not during the years. On the contrary, the three remaining categories of donors will be analysed to assess the impact of the Art Bonus on their diversification.

Chapter 4: Empirical results

4.1 Total donations

Between 2006 and 2019, the value of donations made through the Cultural Patronage Law amounts to $\[\in \]$ 366.589.664 (Fig.A1, Appx.). In the North of Italy contributions reached $\[\in \]$ 251.885.682, a sum equal to nearly 70% of all money donated by business income holders on the national territory. More than half of donations were collected in Lombardy, followed by Veneto, Emilia-Romagna and Piedmont. $\[\in \]$ 85.270.041 were raised in central regions, but it should be noticed that most money were raised in Lazio and Toscana. Finally, Campania was the region receiving more donations in the South, where a total of $\[\in \]$ 17.558.363,00 (5%) was collected (Tab.A1, Appx).

With regard to the Art.15, donations from private individuals and non-commercial entities have reached quota €188.614.362,05 in the years 2006-2019, but they decreased from 2012 onwards and reached the lowest value in 2019 (Fig.A2, Appx). Therefore, it is reasonable to suppose that the financial crisis in 2008, its aftermath and the institution of the Art Bonus in 2014 significantly contributed to the decline in donations through the Art.15. As specified in the limitations, the Ministry of Culture does not provide any information on regional donation patterns with regard to this tax incentive. However, a study by Civita Association (2009) gives a snapshot of contributions at a regional level in the years 2005-2008. The North of Italy always ranked first for donations in that period of time; Emilia-Romagna, Friuli-Venezia Giulia and especially Piedmont were the other major donors. However, Tuscany had the largest concentration of benefactors: €20.881.046,00 on a national total of €63.181.642,00 were in fact collected in this region in just four years. Instead, private individuals and non-commercial entities in the South only contributed with €71.150,00 during this time (Tab.A2, Appx).

Regarding the Art Bonus, donations have increased throughout the country from 2014 to 2019. A total of €460.746.718,19 was raised in only five years, but it should be considered that this incentive was targeted at all three categories of donors thus far mentioned: business income holders, private individuals and non-commercial entities. The geographic allocation of contributions confirmed again the historic economic gap between the North of Italy on one side, and the Centre and the South on the other (Fig.A3, Appx). In fact, northern regions got €383.716.082 in the years 2014-2019, a sum equivalent to 83% of total donations at the national level. Lombardy was confirmed "the queen of the Art Bonus" (Chierchia, 2020) with contributions amounting to €199.416.868,60; Piedmont, Emilia-Romagna and Veneto followed, but at distance. Donations in the Centre of Italy were equal to €67.837.673,10, corresponding to 15% of overall amount. It is worth noticing that central regions contributed less in percentage terms to the total donations than they did through the Cultural

Patronage Law (15% versus 25%). As it happened for the latter incentive, Tuscany alone collected €45.418.661,98, a sum equal to 66% of the money donated by contributors living in the Centre. Instead, the South received €9.192.962,84, the remaining 2% of the total, that was mainly made up of contributions from Campania and Puglia (Tab.A3, Appx).

As mentioned in the methodology, the trend and geographical distribution of donations made with these three incentives can be compared with the following data at a regional level: population density; employment rate; concentration of commercial activities, foundations and associations, non-for-profit organisations, banks and financial institutions; density of cultural heritage.

Northern regions of Italy, with the exception of Campania, Lazio and Tuscany, have registered the highest population density during the years under investigation (Tuttitalia, n.d.). As for the employment rate, in 2018 the percentage of employed people on the total population aged 20-64 was equal to nearly 70% in the North, 65% in the Centre and 50% in the South (Openopolis, 2018). Furthermore, people working in northern regions tend to have higher salaries as the cost of living is higher in these areas. As higher-income individuals tend to donated more and more often than low-income ones, these statistics confirm what shown by the regional donation patterns of the Art.15. The same is likely to happen to the Art Bonus. However, the current study is unable to fully test this hypothesis as data on the income of donors were not available for any of the incentives under study. Nevertheless, this trend will be further considered later in the analysis.

Concerning the distribution of commercial activities, 2017 statistics provided by the Italian Institute of Statistics (ISTAT) showed that 50% of national firms are located in the North, in particular in North-West regions. The other 22% of businesses is located in southern regions and the remaining 22% in central ones (ISTAT 2019, p.518). However, considering that southern regions are numerically superior and more densely populated – which implies a higher concentration of the workforce – than central regions, the density of productive activities is greater in the Centre. These data confirm the preliminary results of the Cultural Patronage Law and the Art Bonus, as Lombardy, Veneto, Piedmont and Emilia-Romagna are cited as the regions with the largest donations.

Based on data of the census of non-for-profit institutions performed by ISTAT, in 2015 Lombardy, Lazio, Veneto, Piedmont, Emilia-Romagna and Tuscany had the highest number of registered foundations, associations and non-for-profit organizations (social cooperatives and non-profit institutes having other legal forms). In the South, the presence of the latter two was significant in Sicily, Campania and Puglia (ISTAT 2017, p.6). Preliminary findings on total donations once again confirm these statistics, as almost all the above-mentioned regions were mentioned among those receiving the most significant contributions.

Finally, with regard to the regional distribution of cultural heritage sites and organizations, in

2017 only 7% of Italian municipalities did not have any cultural asset on their territory. North, Centre and South share an equal percentage of cultural heritage properties, although they tend to be more concentrated in specific regions (e.g. Emilia-Romagna, Tuscany, Lazio, Puglia and Sicily) (Fig.A4, Appx). Therefore, the uneven distribution of donations on the national territory is partly due to the greater density of cultural assets in certain regions. However, inhomogeneous donation patterns are also highly influenced by the elements previously discussed, and which will be analysed in more detailed in the following paragraphs.

4.2 Donors

4.2.1 Art Bonus

The following graphs provides an overview of regional donations pattern with regard to the Art Bonus (Fig.1).

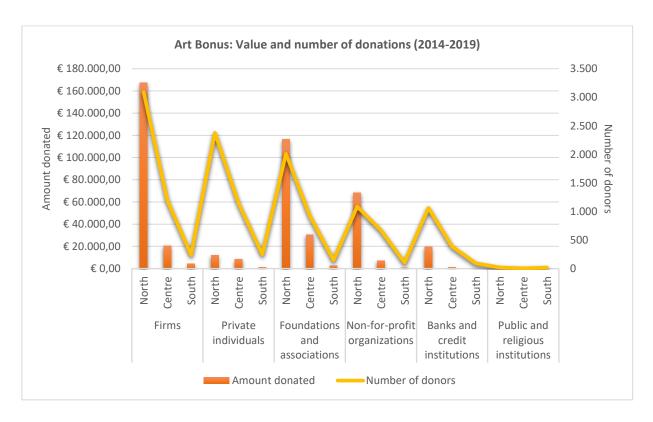


Figure 1: Art Bonus, value and number of contributions by category of donor per geographic area. Source: Prepared by the author based on data of the official website of the Art Bonus.

Business income holders appear to be the major donors in all Italy, especially in the North of Italy (Fig.1). The rate of donating companies has in fact progressively risen between 2014 and 2019 in this area, reaching quota 2.522 after five years. Over this period they collected €167.426.950,84, a sum equal to 87% of overall contributions from firms in all Italy (Fig.B1, Appx). Lombardy is the region with the largest volume of donations, followed by Emilia-Romagna and Veneto (Tab.B1, Appx). It is to be noticed that half of these contributions were made by small and especially mediumsized enterprises, particularly in the three regions of the North West cited above. However, contributions from large-scaled enterprises were still significant in monetary terms, particularly in Friuli-Venezia Giulia and Liguria. The major donors that have been identified are active in sectors such as energy, gas and public utilities, manufacturing and industrial machinery, transport and car, food and beverage. Most of these businesses operate in the regional and national sphere with the exception of some food and beverage companies such as Barilla and Sanpellegrino, which have gained increasing global market shares over the years. In Central Italy, business income holders gave €20.544.373,93 through the Art Bonus (Fig.B1, Appx). Tuscany ranks as the first and most generous contributor, followed by Marche, Lazio and Umbria (Tab.B1, Appx). Numerous small and mediumsized enterprises made donations to support regional and local cultural heritage in this area, while large enterprises mainly contributed to projects in Lazio. As in the North of Italy, big donors are active in important and profitable fields such as energy, gas and public utilities, food and beverage, pharmaceutical industry, manufacturing and car industry, fashion and luxury. The latter is one of the richest and most dynamic sectors in this geographic area; the largest donations were in fact made by Salvatore Ferragamo and Prada in Tuscany, and by Bruno Cucinelli in Umbria. Although businesses figure as the major donor also in the South, only €4.225.035,42 were collected in five years (Fig.B1, Appx). Contributions have slightly increased in Calabria, Puglia and Sicilia from 2014 to 2019, while Campania had a sharp rise of both donors and donations during the last year (Tab.B1, Appx). Firms in the other southern regions did not play a significant role. Almost all benefactors are small and medium-sized businesses, with very few exceptions of large-sized companies like the fashion brand Dolce & Gabbana in Sicily.

More and more private individuals made donations through the Art Bonus, contributing a total of €21.446.994,41 in the years 2014-2019 (Fig.B2, Appx). Although the North of Italy received the largest contributions, which were mostly concentrated in Lombardy and Emilia-Romagna, the money donated by people counts for little (around 2%) of the overall donations collected in the northern regions. However, the most generous benefactors were from the central regions: a higher percentage of the population benefitted from the new tax incentive, so much that their money counted for 13% of all donations in this area (Tab.B2, Appx). Lazio, which received over € 2.000.000 in 2018, is the

first region for number of contributors and contributions, followed by Toscana, Marche and then Umbria. Private individuals making donations have also marginally increased in the South during the period under investigation; despite a small decrease in 2019 and different regional growing trends over time, contributions from this category of donors amounted to 11% of total donations in the South. Overall, donors and donations are concentrated in Campania and especially in Puglia (Tab.B2, Appx).

Contributions from foundations and associations have also progressively risen in all Italian regions, but most subjects and money are concentrated in the North (Fig.B3, Appx). In this area, their donations increased from 11 in 2014 to 349 in 2019. Piemonte has the largest number of donating foundations and the highest volume of contributions, followed by Lombardy, Emilia-Romagna and Veneto (Tab.B3, Appx). Most donors were banking foundations, followed by philanthropic institutions. Fondazione Compagnia di San Paolo (Turin), which gave a significant amount of money to Piemonte and other regions (especially Liguria). But Fondazione Compagnia di San Paolo was not the exception, other important philanthropic foundations in the North have made numerous donations between 2014 and 2019, too ²¹. However, the Centre of Italy is the area where this class of benefactors share the largest amount of money donated: 45% against 30% and 29% in the North and South, respectively. Data confirmed once again the dominant presence of foundations and associations in this area. Toscana was the region with the highest concentration of donors and donations. Almost all foundations in the central region are banking foundations (Tab.B3, Appx). Instead, foundations and associations contributed to 9% of all contributions in the South. Their number has marginally risen over five years in all regions except for Basilicata and Molise, but the most consistent growth happened mostly in the first few years. Sardinia, Abruzzo and Campania are the ones which received the largest donations (Tab.B3, Appx). Donors were nearly all foundations, mostly of banking origin, while there were very few small associations giving money. It is worth noticing that there was also a consistent number of associations which made donations through the Art Bonus: most of them were small local organization, but there were also national associations such as the Rotary Club.

Non-for-profit organizations are important donors for central regions (Fig.B4, Appx.), especially for Lazio, Marche and Toscana (Tab.B4, Appx.). Almost all donations were made in the last region. Although their contributions were not highly significant in monetary terms, the number of donating non-profits has slightly risen also in the North and South between 2014 and 2019 (FigB4,

_

²¹ Philanthropic foundations making numerous donations through the Art Bonus: Fondazione Cariparma in Emilia-Romagna; Fondazione Friuli, Fondazione CRT and Fondazione CRTrieste in Friuli-Venezia Giulia; Fondazione Carige and Fondazione Carispezia in Liguria; Fondazione Cariplo, Fondazione Cariverona and Fondazione AEM in Lombardia; Fondazione CRC, Fondazione CRT and Fondazione Cariplo in Piemonte; Fondazione Caritro in Trentino-Alto Adige; Fondazione Cariverona and Fondazione di Venezia in Veneto.

Appx.). Lombardy has registered the highest number of donors and the largest volume of contributions. Emilia-Romagna, Piemonte and Veneto follow (Tab.B4, Appx.). Non-profit organizations active have made significant contributions in the South, but their number is still very small (FigB4, Appx.).

In conclusion, contributions from banks and financial institutions were more numerous in the North, while in central and southern regions only showed a marginal rise over the years (Fig.B5, Appx.). Although the number of smaller local banks and insurance companies which benefitted from the Art Bonus has grown in five years, especially in Emilia-Romagna and in the South, the largest contributions were made by national banks and national credit institutions: UBI Banca S.p.A., Intesa Sanpaolo S.p.A., Assicurazioni Generali S.p.A., Unione di Banche Italiane S.p.A. In the North, Liguria and Valle d'Aosta did not receive any contributions from this type of donors, whose donations reached instead consistent volumes in Veneto, Lombardy and Piedmont. In central regions, there are only a few financial institutions making donations; data showed a steady or even negative trend from 2014 to 2019, with the only exception of Toscana. As for the South, Campania that received contributions (Tab.B5, Appx).

4.2.2 Cultural Patronage Law

As stated in the limitations, comprehensive data on the number and type of business income holders who donated through the Cultural Patronage Law are unfortunately not available in the official reports of the MiBACT.

Only major contributors are mentioned, and they are large well-known enterprises. Their number has slightly decreased from 2014, a fact that might be associated with the popularity of the Art Bonus. The donors mentioned in official documents are active in a wide variety of sectors: energy, gas and public utilities; renewable energy, environment and waste management; fashion and luxury; manufacturing and industrial machinery; transportation and automotive; investment management; publishing.

In each report it is briefly mentioned that small and medium-sized enterprises tended to support less-known foundations and associations, but their presence and contributions were still marginal compared to those of larger and more powerful donors.

4.2.3 Art.15

As for the previous incentive, no detailed information on donors of the Art.15 are available. However, it was possible to draw their profile and their regional distribution between 2005 and 2009 by combining statistics from previous studies. Benefactors were mainly represented by non-commercial entities (Fig.B6, Appx) and more specifically by banking foundations (Fig.B7, Appx) (Official Study

of MiBACT, 2010). This fact is also confirmed by the official reports of the MiBACT, which described them as the major donors, with the exception of Fondazione Cariplo (Lombardy) and Fondazione Compagnia di San Paolo (Piedmont), which are non-profit philanthropic institutions. Toscana, Piemonte and Emilia-Romagna are the regions with the highest number of foundations and therefore the highest amount of contributions, while the South did not receive any contributions from this class of donor.

The number of private individuals making donations through the Art.15 had marginally increased in the South, sharing a percentage of donations that is quite consistent (11%) despite a small decrease in 2019 and different regional growing trends over time. Overall, donors and donations are concentrated in Campania and especially in Puglia.

Therefore, non-commercial entities, especially banking foundations, have benefitted much more than private individuals of this tax incentive, although both the number and the value of donations of the former started to decrease from 2012 onwards.

4.3 Beneficiaries

4.3.1 Art Bonus

More and more organizations have applied for funds through the Art Bonus platform in the years 2014-2019. The North had the largest number of requests, which have more than doubled between 2017 and 2019, reaching a total of 1.206 applications. Instead, in the Centre and South of Italy, the number of projects asking for donations was significantly smaller and increased at a much lower speed: 677 and 249 applications, respectively (Fig.2).

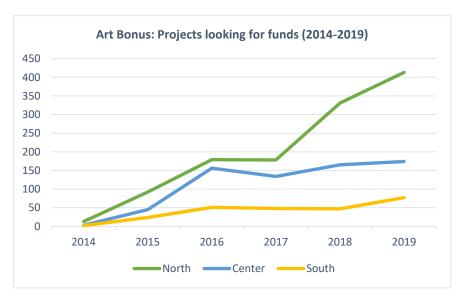


Figure 2: Number of projects asking for donations through the Art Bonus. Source:

Prepared by the author based on data of the official website of the Art Bonus.

Public authorities, especially Municipalities, were the luckiest recipients and the ones with the largest number of applications: 701 in the North, 419 in the Centre and 101 in the South, for a total of 1.221 recipients (Fig.C2, Appx). Donations reached a total of €104.990.389,09, 73% and 25% of which were collected in the North and Centre of Italy, while only the remaining 2% of the funds was dedicated to projects in the South. It should be noted that the number of applying recipients in southern regions has started to slow down since 2017, while applications continued to growth in the rest of the country, where donations were used to restore historical villas and palaces, castles, theatres, municipal architectures, gardens and parks. A wide variety of medium and small organizations (e.g. religious buildings, libraries and archives, institutions owning artistic and historical artefacts in need for restoration) also applied for funding, but many of them receive only small contributions or even no donations. 249 projects in the North (35,5%), 235 in the Centre (56%) and 75 (74%) in the South have been remaining at a standstill for years due to missing funds.

The MiBACT is the second beneficiary after Municipalities (Fig.C2, Appx). The number of applications under this category has risen all over Italy, especially in 2018 and 2019. Many medium and small organizations, but also other big and well-known institutions, asked for funds; they can be classified as museums, archives, libraries, archaeological sites, historical villas and palaces. The MiBACT received €6.683.033,23 over five years. Nearly half of donations was collected and invested in the Centre of Italy, while northern and southern regions shared a similar amount of contributions. In fact, Toscana (33), Lazio (32), Emilia-Romagna (21), Calabria (19), Campania (17) and Veneto (16) were the regions with the highest concentrations of applications. National museums and galleries such as the Museum of Capodimonte in Naples (Campania), the Uffizi Gallery and the Museum of Santa Croce in Florence (Tuscany), the Royal Museums of Turin (Piemont), the Royal Palace of Genoa (Liguria) and the National Gallery of Modern and Contemporary Art of Rome (Lazio) are some of the beneficiaries receiving contributions over €100.000. Archaeological sites such as the Amphitheatre of Volterra (Tuscany), the Temple of Nettuno in Paestum (Campania), the Baths of Caracalla in Rome (Lazio) and religious architectures such as the Basilica of St. Augustine in Campo Marzio in Rome (Lazio) are also among the luckiest recipients. Therefore, well-known cultural institutions were the ones benefitting the most from the Art Bonus. Although the number of organizations not receiving any donation is limited, it should be noted that most submissions receive only partial funding which often covers only a very small fraction of the project costs.

Regional entities made just five requests over five years, four in Lazio and one in Puglia. In this case, funds were needed to restore some architectural buildings and artistic artefacts.

With regard to the beneficiaries belonging to the category of Provinces, their number has remained steady over the years. Applications came from historical villas and palaces, educational

institutions, libraries, archives and museums. The recipients receiving the largest funds were located in some northern regions (Emilia-Romagna, Lombardy, Liguria and Veneto) and especially in Tuscany. Six out of eleven organizations located in this region have received all or most of the funds they requested; only one recipient did not receive any contribution, and the remaining ones were partially funded. Fourteen applications have been made by provincial organizations in the North: only three were fully funded, while the rest did not receive any donation.

As for institutions under the category 'other public administrations', the number of submissions increased in the North and Centre over the years, but not in the South. 90% of all donations were received by norther regions (especially Piemonte, Veneto and Trentino Alto Adige), although central regions submitted more projects. Once again, beneficiaries can be classified as museums, historical villas and palaces, building architecture, but there were also numerous libraries and small-medium museums asking for funds. Very few projects were fully funded: 50% of organizations in the North received half of what they needed, while 60% and 71% of recipients in the Centre and South did not receive any donations. There are very few subjects receiving full support, and half of them were medium-sized institutions asking for limited contributions.

Concessionaires of public cultural assets could also benefit from the Art Bonus. Their applications have increased in the years 2014-2019, but geographical differences are quite significant: the number of organizations asking for funds has triplet from 2017 and 2019 in the North, but it has grown less and at a lower speed in the Centre and has remained basically unchanged in the South. As for municipal institutions, the biggest beneficiaries were represented by famous monuments or well-known cultural organizations. Examples are the Ducal Palace of Genoa (Liguria), the Royal Palace of Venaria (Piedmont), the Royal Gardens of Venice (Veneto), the Egyptian Museum of Turin (Piedmont) and Fondazione La Triennale in Milano (Lombardy). A total of 266 projects have been applying for funds in five years: 147 in the North, 54 in the Centre and 65 in the South. Considering the latter geographic area, 52% of the organizations did not receive any donation and 41% has got partial funds, meaning that only a small percentage of projects were completed. The situation is different in the North and Centre of Italy, where half of initiatives got partially financed.

Among performing arts organizations, symphonic opera foundations received the largest donations at the national level: most of them started asking for funds in 2014 and 2015 but collected them over the years. There are 14 symphonic opera foundations in Italy: among 13 submissions, seven were from institutions in the North of Italy, while the remaining ones were equally distributed between central and southern regions.

As symphonic opera foundations, most theatres of traditions started collecting funds since

2015, but the number of applications continued to slowly increase until 2019. To date 29 theatres of tradition have been recognized: those receiving the largest donations are in the North (especially in Emilia-Romagna) and Centre of Italy. Teatro Marrucino in Chieti (Abruzzo) was the only institutions in the South which applied for funds but did not receive any.

The same applies for the next recipient. There are fourteen concert and orchestra institutions in Italy: six in the North, three in the Centre and five in the South. Only nine applied for funding, but only those located in northern and central regions received some contributions.

Instead, all seven national theatres got nominated and received some funds from the Art Bonus, although there is a significant difference between the value of donations got by northern regions and the amount collected in the Centre and South.

The number of theatres of relevant cultural interest sending submissions has considerably increased between 2018 and 2019, especially in the Centre of Italy. However, around 70% of projects had partial funds and three out of four non funded organizations were in the South. Only Fondazione Teatro Piemonte Europa in Turin (Piedmont) received all the amount requested.

Although applications from theatres and production centres have risen, especially in 2018-2019 and in the North, famous organizations get the largest donations, while small or amatorial theatres and production companies struggled to attract donors and often received only a low percentage of contributions.

Few organizations and dance production centres participated to the Art Bonus initiative. Nearly one third of projects did not receive donations, while the remaining ones got partially funded. The same goes for distributions circuits, whose submissions were however equally distributed throughout the national territory.

On the other hand, festivals received significant donations. They have become more and more popular over the past few years, and their number is steadily rising at a national level. Examples of are Fondazione Festival dei Due Mondi Onlus in Spoleto (Umbria), or historical music institutions such as Fondazione Accademia Musicale Chigiana Onlus in Siena (Tuscany). However, festivals in the South got much lower contributions in comparison with those in the North and Centre.

4.3.2 Cultural Patronage Law

As for the donors, the precise number and type of recipients of the Cultural Patronage Law is not fully available in the documents of the MiBACT. However, combining the information reported in the reports, it was possible to identify the beneficiaries which received donations most frequently between 2006 and 2018. According to official statistics, the value of donations have progressively declined during this time, although contributions have started to rise again in recent years (Fig.C1, Appx). Still, the amount of money that major recipients got was equal to approximately half – and

sometimes more – of the total contributions collected through this tax deduction. Therefore, a restricted fraction of subjects enjoyed more than 50% of all contributions, while the remaining part was destined to less-known cultural organizations.

Recipients in the North of Italy got 70% of all donations, while the Centre and the South received 25% and 5% of the total respectively. The beneficiaries mentioned in the reports were famous foundations, such as Fondazione Accademia Nazionale di Santa Cecilia in Rome (Lazio) that received €16.175.835, and Fondazione Giorgio Cini Onlus in Venice (Veneto), which got € 6.500.000. However, most recipients were symphonic opera foundations. The most iconic theatres in almost all regions are cited among the beneficiaries. To name but a few, Fondazione Teatro alla Scala in Milan (Lombardy) received €87.475.000, Fondazione Teatro di San Carlo in Naples (Campania) got €7.298.833, Teatro La Fenice in Venice (Veneto) took €5.832.585 and Teatro Carlo Felice in Genoa (Liguria) collected €6.644.000. The list continues, and the names on it are well known to anyone in Italy. Official data support these trends, showing that donations were mostly made in favour of the performing arts and entertainment field until 2013, while the field cultural heritage received less money. In 2014, contributions had an equal distribution between the two sectors, but a turnaround in the choice of donors occurred in 2015 and cultural heritage started to receive more contributions (Fig.3).

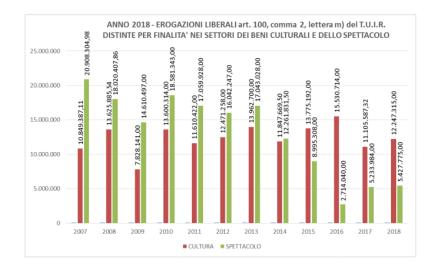


Figure 3: Target sectors of donations: cultural heritage (red) and performing arts and entertainment (green).

Source: Official report of the MiBACT (2019), p.2.

However, foundations and symphonic opera foundations were not the only institutions which benefitted from the Cultural Patronage Law. For instance, municipalities — mainly located in Lombardia, Toscana, Emilia Romagna, Piemonte and Veneto — received contributions for a total of € 14.840.295,32 throughout the period considered, although the value of donations began to decrease in 2015, dropping significantly from €1.808.180 in 2006 to € 217.278 in 2018.

Other information about the class of recipients of this tax deduction can be found in a detailed research made by the Ufficio Studi of the MiBACT (2010), even if data are only available from 2005 to 2009. Still, the study confirms the trends discussed until now: most recipients were foundations and associations, usually located in Northern and Central regions, except for some important cultural institutions in the South of Italy (e.g. Fondazione Teatro di San Carlo in Naples, Campania). Local entities and especially municipalities shared a consistent percentage of donations over the years, especially those located in the North. State and public entities were the beneficiaries receiving the least donations.

4.3.3 Art.15

The only available data on recipients of the Art.15 are provided by the study of Civita Association (2009), which take into consideration a period of time from 2005 to 2009 (Fig.4)

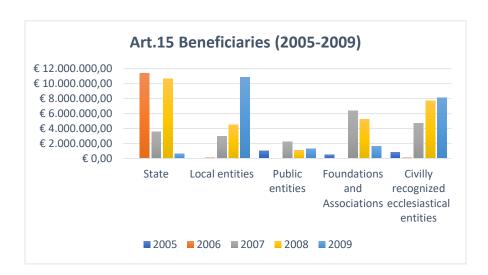


Figure 4: Donations by type of beneficiary.

Source: Prepared by the author based on Civita

Association (2009)

Both the amount donated, and the number of recipients doubled in those years. Local entities, civilly recognized ecclesiastical entities, foundations and associations were the subjects receiving most of donations. Although these data are not recent and it is not possible to comment a potential increase/decrease and diversification of subjects within categories of recipients, it is interesting to notice the preferences of donors ten years ago. Private individuals tended to give more to ecclesiastical entities and foundations and associations, which were also greatly supported by non-commercial entities.

4.4 Art Bonus: a half success

Has the Art Bonus allowed to widen and diversity the audience of donors and beneficiaries compared to previous tax incentives?

Considering donors, the answer is a confident yes, although there is room for improvement especially with regard to the dimension of diversification. Large corporations were the major contributors of the Cultural Patronage Law, while the role of SMEs was irrelevant. With regard to the Art.15, donations from private individuals were insignificant compared to those of non-commercial entities and especially those of banking foundations located in Tuscany, Piedmont and Emilia-Romagna. Instead, data on the Art Bonus have shown that SMEs make up for more than half of contributions from business income holders, in particular in northern and southern regions. Furthermore, private individuals hold the second position per number of donations in all Italy; they have also contributed more in monetary terms than banks and credit institutions. In fact, only big national banks such as Intesa Sanpaolo and UBI Banca, and credit insurance companies such as Assicurazioni Generali have made modest contributions in the North and Centre; however, it is worth mentioning that many local banks and small insurances have donated to cultural organizations in the South. Non-profits and banking foundations continue to play an important role, especially in the central Italy where most are located, but more and more philanthropic foundations are also contributing to cultural projects. For instance, Fondazione Compagnia di San Paolo (Piedmont) was declared the most generous donor of Italy in 2017 by 'Il Sole 24Ore', the major Italian economic and financial newspaper (La Gatta, 2017). Many associations donated to local organizations as well. Therefore, it can be concluded that the number of donors, in particular that of citizens and business income holders, has greatly increased thanks to the Art Bonus. As regards the heterogeneity of subjects, although more SMEs, local banks, smaller associations and non-profits are donating to the Art Bonus, it is undeniable that large companies and foundations are the donors most benefitting from the tax credits granted by the new incentive, as they did with the tax deductions of the Cultural Patronage Law and Art.15. The price elasticity of giving is lower for them than for middle-income donors, and therefore they tend to and will continue to donate more and more often.

Looking on the other hand at beneficiaries, the answer to the research question is unfortunately no. Foundations, and more specifically symphonic opera foundations located in the North and Centre of Italy, were the major recipients of the Cultural Patronage Law. Data on performing arts organizations showed that the same institutions are also taking great advantage from the Art Bonus. For instance, Fondazione Teatro alla Scala in Milan (Lombardy) is the cultural institution among all applicants that received the highest donations from both incentives: €87.475.000 between 2006 and 2018 through the former tax deduction, and €136.753.863,48 between 2014 and 2019 through the new tax credit. It is undeniable that this type of cultural institutions have to bear management costs far higher than those of small or medium-sized organizations, as Baumol and Bowen (1966) taught us. However, it is equally evident that a monopoly is becoming increasingly consolidated; this

situation is further exacerbated by the fact that donating to these institutions is of enormous benefit to the image of large companies, banks and foundations. The same applies for recipient organizations under the categories of public authorities, which also receive the majority of donations through the Art.15 incentive. Municipalities, the MiBACT, Provinces and other public administrations received a large number of funds, almost all of which served to finance restoration projects of historical villas and palaces, national museums and galleries, theatres, castles and other architectures buildings, gardens and parks. Only the most established institutions have been able to complete their projects or at least to finance a large part of them thanks to the Art Bonus, especially those located in northern and central regions.

Numerous small and medium organizations submitted their applications to the Art Bonus platform, but many of them only got limited funding and most of them did not receive funding at all. This was the case especially in the South, were nearly half of the projects nominated are not funded (Fig.5). Sadly, just a small portion of the cultural projects nominated all over Italy have been completed, although their number slowly but steadily grows every year (Fig.6). Nevertheless, the number of projects not funded and partially funded continue to increase at a much higher speed. This is the case especially for concert and orchestra institutions, small and medium theatres of relevant cultural interest, and dance production centres. The only exception is represented by festivals, especially those taking place in the Centre: their submissions have increased between 2014 and 2019, and many donors — especially private individuals and local SMEs — have made more and more donations for them. To conclude, many cultural organizations have applied for donations, but very few have been able to complete their restoration projects. Only the most famous institutions have been able to do this, while most small and medium-sized organizations have received little or nothing. Therefore, if the Art Bonus has favoured an increase in beneficiaries, efforts to diversify this category have been in vain because only a small number of recipients have benefitted from this incentive.

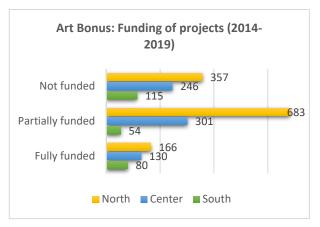
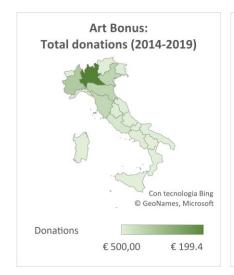


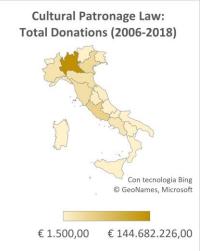


Figure 5: Art Bonus, geographic distribution of projects funded, partially funded and nonfunded. Source: Prepared by author from Art Bonus website.

Figure 6: Art Bonus, number of projects nominated all over Italy. Source: Prepared by author based on Art Bonus website.

It should also be noted that disparities between regions have become even more prominent after the introduction of the Art Bonus. The gap in terms of value of donations has increased: the Centre has moved away from the North that holds the records for contributions, and the South has turned away from the rest of Italy (Fig.7,8 and 9).





Art.15:
Total Donations (2005-2008)

Con tecnologia Bing © GeoNames, Microsoft

Total

€ 0,00 € 20.881.046,0

Figure 7: Art Bonus, overall donations collected on a regional basis from 2014 to 2019. Source: Prepared by author from Art Bonus website

Figure 8: Cultural Patronage Law, overall donations from business income holders collected on a regional basis from 2006 to 2018. Source: Prepared by author from MiBACT data

Figure 9: Figure 10: Art.15, overall donations from private individuals and noncommercial entities collected on a regional basis from 2005 to 2008. Source: Prepared by author from Civita Association (2009).

Chapter 5: Discussion and Conclusion

5.1 Design of the tax incentive

The main difference between the Art Bonus and the other two tax incentives under study is their form. The Cultural Patronage Law and the Art.15 are tax deductions, which explains why large corporations and banking foundations have donated more than SMEs and private individuals (Buijze, 2017; Feld et al., 1983; Hemels, 2016; O'Hare and Feld, 1984; Schuster, 1999 and 2006). To ensure a more equal treatment of donors, the MiBACT has opted for a tax credit structure for the Art Bonus (Avi-Yonath, 2006; Bird and Wilkie, 2012; Buijze, 2017). As shown by the results, this fair choice has favoured both an increase and a diversification of donors.

The creation of a website entirely dedicated to Art Bonus was another positive element. Donors and beneficiaries have access to a portal where the text of the law is reported in a concise and effective manner. The criteria for donation and submission of projects are explained in detail. This was especially helpful to the category of beneficiaries, because the Art Bonus – unlike the other two incentives – can only be granted to projects aimed at the protection public cultural heritage. Having a more precise objective and a narrower target, the law is more complex to interpret; the case of concessionaires of public cultural heritage, who are private owners of public assets, is an exemplary case of exception to the legal requirements. The result is administrative costs well spent, since the creation of the site made it possible to: reduce compliance costs, because donors and beneficiaries have all the necessary information available; monitor the progress and allocation of donations in detail, which was only partially possible for the other two incentives under study, contributing to the transparency in the management of funds. Furthermore, the website also reports the donations made by the MiBACT and other public authorities to projects, which will allow future studies to investigate the relationship between public spending and private donations.

5.2 Implementation process

A few mistakes were made during the implementation stage of the Art Bonus. To spread its message and involve civil society stakeholders, the MiBACT launched two institutional communication campaigns in 2015 and in October 2019. The first marketing campaign, entitled "Art Bonus. Become a patron too", promoted cultural heritage preservation as the medium to safeguard the national identity and pass it on to future generations (Fig.10). The spot appealed to the educational function of patronage, eliciting strong social emotions such as pride and sense of belonging. Instead, the second spot leverages on the intimate dimension of cultural heritage, with the slogan "We are all patrons. Donate emotions". The short clip shows people lost in contemplation of famous cultural heritage

artefacts and sites: the frescos from Pompei, the David of Donatello at the Bargello Museum in Florence, the Campano Amphitheatre of Santa Maria Capua Vetere in the ancient city of Capua, the Garden of Fluid Sculptures of the Royal Palace of Venaria in Turin and the Opera House in Rome (Fig.11)



Figure 10: Posters of the launch campaign of the Art Bonus, 2015 ²². Source: Art Bonus website.



Figure 11: Clips of the second campaign of the Art Bonus, October 2019. Source: Art Bonus website.

²² The photographic technique used to create the images, in which the most significant cultural heritage sites are superimposed on various subjects, reflects the living concept of cultural heritage.

Citizens are the target of both campaigns; looking at the results, it can be said with certainty that the marketing strategy adopted by the MiBACT was successful. In fact, the number of donations from natural persons is lower than that of businesses only. But who did they donate to? Mostly to famous cultural heritage sites and institutions, the same portrayed in the advertising campaigns. This observation is not meant to diminish the individual's freedom of choice. Many people have in fact donated to local cultural organizations, but in the author's opinion a gross but fatal error was made in the design of the spots. Images and words have a strong persuasive power, especially if they leverage cultural and social values that are important to the individual. The monuments shown in the advertising campaigns are a symbol of Italy and a source of pride for its citizens. But what is the real meaning of cultural patronage? What kind of heritage do we want to preserve for future generations? Does the archaeological park of Pompeii have a higher social and cultural value than a municipal library or theatre? It is here that the author believes the MiBACT has made a communication error: if the goal of the Art Bonus is to involve people in the protection of cultural heritage, it is necessary to refer to their everyday reality as well. Promoting cultural patronage means encouraging the cocreation of value: in order to do so, the process must start from the reality of the oikos. The next natural step is to involve the civil and business community, which will be united in the awareness of the cultural and social value of a cause (Klamer, 2016). This is the "societal receptivity" Schuster (1999) talked about: for the Art Bonus to be effective, people must understand that cultural heritage is made by small and large, famous and unknown cultural institutions, and that they have the power to make a positive change for themselves and the life of their community by making a small contribution.

The lack of a structured and inclusive national promotion plan of the Art Bonus was another negative element. Why was this incentive more successful in the North than the rest of the country? Factors such as the density of the population, the concentration of commercial activities and the different economic conditions of the regions cannot alone explain the reason why donations were so concentrated in one geographic area. In fact, the greater promotion of the Art Bonus and its fiscal advantages in northern regions is a likely cause of the much lower levels of donations in the Centre and South of Italy. An example of this is the 'Art Bonus Road Show: Patrons of Today for the Italy of Tomorrow', a project promoted by the MiBACT, the National Association of Italian Municipalities (ANCI) and Arcus, the in-house company of the Ministry of Culture (Art Bonus, 2015). In 2015, some info days and workshops were organized with the aim of raising awareness on cultural patronage, but also to train public local administrations to formulate territorial cultural development strategies through the application of the Art Bonus. The events were addressed to a more general audience: representatives of other ministries and local businesses, trade associations, the press,

banking foundations, managers of public places of culture, schools and ordinary citizens. Transmit technical expertise of fundraising, create collaborative public and private networks, disseminate the civic and ethical values of the protection of cultural heritage were among the objectives of such initiative, too. A few events were organized in Prato (Tuscany), Mantua (Lombardy), Ascoli Piceno (Piedmont) and Parma (Emilia-Romagna): most of them took place in the North as can be seen, leaving most central and all southern regions behind. The seminary 'Art Bonus, promoting cultural heritage' organized by the City of Palermo (Sicily) in 2019, was a first step to address the issue and fill the information gap in the region (Confcommercio Enterprises for Italy Palermo, 2019).

5.3 Culture of giving

Despite the mistakes or good practices adopted by the MiBACT in the design and implementation of the Art Bonus, for a solid culture of giving to prosper it is necessary that the Ministry takes a step back. What has been happening over the past thirty but especially twenty years is a good start in this direction. For instance, the outsourcing of ancillary and core business activities to private entities has promoted the participation of business income holders, and the same goes for the establishment of public private partnerships in the field of heritage protection. This progressive involvement of the private sector has motivated firms of all dimensions to give their additional contribution through donations. Other components of society have also perceived these changes in the attitude of the Ministry, and this is the case especially for citizens. Although their donations are lower in quantitative terms compared to those of other donors, their increasing presence as contributors is a good sign for the birth of rooted culture of giving.

As Schuster claimed, "an underlying societal receptivity to the goals of a tax incentive must be developed prior to its creation to induce desired behaviour" (Schuster 1999, p.64). This is slowly but steadily happening. For the process to evolve in a positive way it is necessary that the Ministry brings to fruition the decentralization process by involving as many stakeholders as possible. Only this way they will feel empowered and able to make a difference.

5.3.1 Policy recommendations

Based on the analysis just conducted, the author has three policy suggestions.

First, the MiBACT should design a more inclusive marketing campaigns to promote the Art Bonus, focusing on what Municipalities and Provinces have to offer. As previously said, social receptivity is the foundation of any social and cultural development. The new financing measures for heritage will be fruitful only if taxpayers will understand the value of the context in which they live; after that, they will be more willing to get involved in the process of cultural value realization.

Second, a national program for the promotion of the Art Bonus must be designed and implemented. An example to this regard might be the Cultural Patronage Program realized by the Dutch government. As for the Art Bonus, the aim of this program is to promote cultural patronage, involve citizens to stimulate their willingness to donate and make organizations aware of their funding possibilities. This is done through a series of coordinated workshops, publications and a website. There is no lack of similar initiatives in Italy: the Art Bonus has its own website, and citizens can vote online their favourite Art Bonus project of the year during the 'Art Bonus Competition' contest. Therefore, the only thing missing in Italy is a structured implementation plan and the Dutch model could be a useful example to consider.

Third, the MiBACT should provide small and medium-sized cultural organizations, especially those located in southern regions, with specific tools in order to learn how to manage fundraising campaigns. By doing so, organizations will not have to rely on public subsidies only but will be more independent, cultivating a more direct relationship with their donors.

5.3.2 Limitations and suggestions for future research

As mentioned in the research design, the lack of complete and exhaustive data on the Cultural Patronage Law and the Art.15 has not allowed the author to perform a more structured and detailed study of tax incentives for culture in Italy.

The current analysis has been performed through a quantitative approach. Future research could adopt a qualitative design to better understand the reasons behind cultural donating behaviour in Italy, especially because the last empirical researches date back to the early 2000s.

Furthermore, it would be interesting to study the relationship between public support and private giving. Findings could help policymakers to better target public expenditure.

References

Art Bonus (n.d.). *Gli interventi*. Retrieved from: https://artbonus.gov.it/lista-interventi.html.

Avi-Yonah, R.S. (2006). The three goals of taxation. *Tax Law Review*, 60(1), 1-28. Retrieved from: https://repository.law. umich.edu/articles/40.

Baumol, W.J. (2011). Application of welfare economics to the arts. In Towse, R. (Ed.), *Handbook of Cultural Economics*, 370-377. Edward Elgar Publishing.

Bekkers, R. H. F. P. & Wiepking, P. (2011). A literature review of empirical studies of philanthropy eight mechanisms that drive charitable giving. *Nonprofit and Voluntary Sector Quarterly*, 40(5), 924-973.

Bird, R.Ch. & Wilkie, J.S. (2012). *Designing tax policy: constraints and objectives in an open economy*. Working Paper 12-24, International Center for Public Policy. Atlanta, Georgia. Retrieved from: https://core.ac.uk/download/pdf/71425599.pdf.

Bodo, C. & Bodo, S. (2016). *Compendium of cultural policies and trends in Europe. Italy country profile*. Council of Europe and European Institute for Comparative Cultural Research. Retrieved from: https://www.culturalpolicies.net/wp-content/uploads/pdf_full/italy/italy_052016.pdf.

Buijze, R. (2017). *Philanthropy for the arts in the era of globalisation. International tax barriers for charitable giving*, 39-50 (Doctoral Dissertation, Erasmus University Rotterdam, Rotterdam, Netherlands). Retrieved from: https://repub.eur.nl/pub/103275/Philanthropy-for-the-Arts-in-the-Era-of-Globalisation-Renate-Buijze.pdf.

Buzzi, A.M. (2017). *Arte e nuovo mecenatismo*. Organismo Indipendente di Valutazione della performance, Ministero dei Beni e delle Attività Culturali e del Turismo. Retrieved from: https://storico.beniculturali.it/mibac/multimedia/MiBAC/documents/1508943424078_Guida_MIBA CTArtMECE_On-line_ed_ott_2017.pdf.

Centro Studi Civita, Comitato Tecnico-Scientifico per l'Economia della Cultura del Mibac & Ufficio Studi del Ministero per i Beni e le Attività Culturali (2009). *Donare si può? Gli Italiani e il mecenatismo culturale diffuso*. Retrieved from: https://www.civita.it/AssociazioneCivita/Attivita/Pubblicazioni/Impresa-Cultura/Donare-si-puo-Gli-Italiani-e-il-mecenatismo-culturale-diffuso/Volume-Donare-si-puo-Gli-Italiani-e-il-mecenatismo-culturale-diffuso

Chierchia, V. (January 28, 2020). Lombardia regina dell'Art bonus. Il Sole 24 Ore. Retrieved from: https://www.ilsole24ore.com/art/lombardia-regina-dell-art-bonus-ACVAfuEB?refresh_ce=1.

Cummings, M.C., and Katz, R.S. (1987). *The patron state: government and the arts in Europe, North America, and Japan*, 3-16. Oxford, Oxford University Press.

Donato, E. and Gilli, E. (2011). Un approccio "multi-scala" per la gestione del patrimonio culturale italiano. *Il Capitale culturale, Studies on the Value of Cultural Heritage*, 2, 197-225.

Dubini, P., Leone, L. and Forti, L. (2012). Role Distribution in Public-Private Partnerships. *International Studies of Management & Organization*, 42:2, 57-75.

Esping-Andersen, G., and Korpi, W. (1984). Social policy as class politics in post-war capitalism: Scandinavia, Austria, and Germany. In Goldthorpe, J. (Ed.), *Order and Conflict in Contemporary Capitalism*, 179-208. Oxford, Clarendon Press.

Frey, B. (2003). Arts & Economics: Analysis & Cultural Policy. Heidelberg, Springer Nature.

Frey, B. (2011). Public support. In Towse, R. (Ed.), *Handbook of Cultural Economics*, 370-377. Edward Elgar Publishing.

Hemels, S. (2016). Tax Incentives as a Creative Industries Policy Instrument. In Hemels, S. and Gozo, K. (Eds.), *Tax Incentives for the Creative Industries*, 33-64. Singapore, Springer Nature.

Hillman Chartrand, H., and McCaughey, C. (1989). The arm's length principle and the arts: an international perspective. Past, present and future. In Cummings, M.C., Schuster, J.M. and Davidson, J.M. (Eds.), *Who's to Pay? for the Arts: The International Search for Models of Support*, 43-80. New York: ACA Books.

Hood, C. (1991). A Public Management for all seasons? *International Journal of Public Administration*, 69(1), 3-19.

Institute of Italian Statistics (2017). *Censimento permanente degli istituti non-profit. Primi risultati*. Retrieved from: https://www.istat.it/it/files/2017/12/Nota-stampa-censimento-non-profit.pdf.

Institute of Italian Statistics (2019). *Imprese*. Retrieved from: https://www.istat.it/it/files/2019/12/C14.pdf.

Klamer, A. (2016). Doing the Right Thing: A Value Based Economy. London: Ubiquity Press.

Klamer, A., L. Petrova & A. Mignosa (2006). *Financing the Arts and Culture in the European Union*. European Parliament Think Thank, Brussel. Retrieved from: www.culturalpolicies.net/web/files/134/en/Financing_the_Arts_and_Culture_in_the_EU.pdf

Klamer, A., Mignosa, A. & Petrova, L. (2013). Cultural heritage policies: A comparative perspective. In Rizzo, I. and Mignosa, A. (Eds.), Handbook on the economics of cultural heritage, 37-86. Cheltenham, Edward Elgar Publishing.

La Gatta, C. (February 21, 2017). *Art Bonus: la Compagnia di San Paolo è il mecenate più generoso d'Italia*. Il Sole 24 Ore, Arteconomy. Retrieved from: https://www.ilsole24ore.com/art/art-bonus-compagnia-san-paolo-e-mecenate-piu-generoso-d-italia--AEIqc4Z

List, J. A. (2011). The market for charitable giving. *The Journal of Economic Perspectives*, 25(2), 157-180.

Marzano, M. and Castellini, M. (2018) The Reform of the Italian Ministry of Cultural Heritage: Implications for Governance of the Museum System. *The Journal of Arts Management, Law, and Society*, 48:3, 206-220.

Mazza, I. (2011). Public choice. In Towse, R. (Ed.), *Handbook of Cultural Economics*, 362-369. Cheltenham, Edward Elgar Publishing.

Ministro della Cultura (April 10, 2021). *Franceschini: Agevolazione fiscale funziona, oltre 555 milioni di € raccolti* [Press release]. Retrieved from: https://artbonus.gov.it/franceschiniagevolazione-fiscale-funziona,-oltre-555-milioni-di-%E2%82%AC-raccolti.html.

Nacci, M. (2014). L'innovazione dell'amministrazione dei beni culturali in Italia: caratteristiche e criticità. Il Capitale culturale. Studies on the Value of Cultural Heritage, 4, 189-220.

O'Hare, M. & Feld, A. L. (1984). Indirect Aid to the Arts. *The ANNALS of the American Academy of Political and Social Science*, 471 (1), 132–143.

Openpolis (December 31, 2017). *Il contributo dei comuni alla tutela e alla valorizzazione di beni e attività culturali*. Retrieved from: https://www.openpolis.it/il-contributo-dei-comuni-alla-tutela-e-alla-valorizzazione-di-beni-e-attivita-culturali/.

Openpolis (December 31, 2018). *Il divario tra nord e sud Italia sul tasso di occupazione*. Retrieved form: https://www.openpolis.it/numeri/il-divario-tra-nord-e-sud-italia-sul-tasso-di-occupazione/.

Peloza, J., & Steel, P. (2005). The price elasticities of charitable contributions: A meta-analysis. *Journal of Public Policy & Marketing*, 24(2), 260-272.

PwC (2017). Spotlight: Defining success. What KPIs are driving the tax function today? Tax Function of the Future series: A focus on today. Retrieved from: https://www.pwc.com/gx/en/tax/publications/assets/pwc_tax_function_of_the_future_tax_function_KPI_sept17.pdf.

Rizzo, I. & Throsby, D. (2006). Cultural heritage: economic analysis and public policy. In Ginsburgh, V. and Throsby, D. (Eds.), *Handbook of the economics of art and culture*, Vol. 1, 983-1016. Amsterdam, Elsevier.

Santagati, M.E., Bonini Baraldi, S. and Zan, L. (2020). Understanding decentralization: deconcentration and devolution processes in the French and Italian cultural sectors. *International Journal of Public Sector Management*, 33(4), 435-460.

Schuster, J.M. (1999). The Other Side of the Subsidized Muse: Indirect Aid Revisited. *Journal of Cultural Economics*, 23, 51-70.

Schuster, J.M. (2006). Tax incentives in cultural policy. In Ginsburgh, V. and Throsby, D. (Eds.), *Handbook of the economics of art and culture*, Vol. 1, 1254-1298. Amsterdam, Elsevier.

Throsby, D. (1997). Seven questions in the Economics of Cultural Heritage. In: Hutter, M. et al., (eds.). Economic Perspectives on Cultural Heritage. Edward Elgar.

Throsby, D. (2001). Economics and Culture. Cambridge: Cambridge University Press.

Throsby, D. (2010). The Economics of Cultural Policy. Cambridge: Cambridge University Press.

Tuttitalia (n.d.). *Statistiche*. Retrieved from: https://www.tuttitalia.it/statistiche/.

Ufficio Studi del Ministero per i Beni e le Attività Culturali (2010). Il sostegno privato per i beni e le attività culturali. Retrieved in May 2020 from: https://www.beniculturali.it/mibac/multimedia/UfficioStudi/documents/1293019933344_NL_2010_5_20-12-2010.pdf

Zan, L., Bonini Baraldi, S. and Gordon, C. (2007) CULTURAL HERITAGE BETWEEN CENTRALISATION AND DECENTRALISATION. *International Journal of Cultural Policy*, 13:1, 49-70.

Zimmer, A. & Toepler, S. (1996). Cultural Policies and the Welfare State: The Cases of Sweden, Germany, and the United States. *The Journal of Arts Management, Law, and Society*, 26 (3): 167-193. doi: 10.1080/10632921.1996.9942961.

Appendix A: Total donations

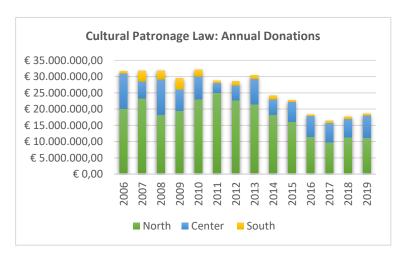


Figure A2: Cultural Patronage Law, geographical distribution of donations from business income holders per year.

Source: Prepared by the author from MiBACT data.

	2005	2007	2000	2000	2012	2011	2012	2212
	2006	2007	2008	2009	2010	2011	2012	2013
Emilia-Romagna	€ 1.353.259	€ 1.389.461	€ 1.718.778	€ 3.125.285	€ 1.532.694	€ 2.035.216	€ 2.529.412	€ 2.911.262
Friuli-Venezia Giulia	€ 1.242.655	€ 928.877	€ 800.923	€ 869.220	€ 310.530	€ 209.400	€ 427.500	€ 398.863
Liguria	€ 936.500	€ 920.000	€ 822.710	€ 258.250	€ 962.000	€ 1.550.000	€ 1.257.000	€ 1.106.500
Lombardy	€ 11.628.023	€ 15.669.868	€ 10.550.164	€ 10.571.862	€ 13.880.342	€ 15.888.288	€ 13.129.790	€ 12.642.516
Piedmont	€ 461.989	€ 1.407.778	€ 1.258.725	€ 1.651.668	€ 2.073.678	€ 2.036.234	€ 2.626.520	€ 1.281.012
Trentino-Alto Adige	€0	€0	€ 40.000	€ 2.000	€ 8.500	€ 11.000	€0	€3.000
Veneto	€ 4.425.277	€ 3.067.551	€ 3.103.583	€ 2.961.425	€ 4.294.162	€ 3.302.279	€ 2.793.128	€ 3.223.275
Valle d'Aosta	€0	€0	€0	€0	€0	€0	€0	€ 1.500
Lazio	€ 2.419.414	€ 2.537.669	€ 7.764.735	€ 4.386.767	€ 4.652.375	€ 1.449.600	€ 1.747.900	€ 5.171.533
Marche	€ 450.370	€ 644.890	€ 851.660	€ 972.925	€ 1.020.212	€ 500.300	€ 158.779	€ 158.990
Umbria	€ 50.345	€ 123.085	€ 90.105	€ 150.175	€ 65.225	€0	€ 1.067.659	€911.250
Tuscany	€ 8.061.109	€ 1.950.703	€ 2.202.889	€ 1.190.233	€ 1.370.150	€ 1.092.803	€ 1.636.583	€ 1.611.650
Abruzzo	€0	€ 3.000	€0	€0	€0	€ 20.000	€0	€0
Basilicata	€ 15.902	€ 14.740	€ 17.176	€ 24.095	€ 15.399	€0	€ 33.350	€ 24.500
Campania	€ 540.163	€ 2.950.571	€ 2.523.325	€ 3.109.848	€ 1.984.440	€ 549.230	€ 1.070.450	€ 779.820
Calabria	€ 25.000	€0	€0	€0	€0	€ 6.500	€ 11.550	€ 14.400
Molise	€0	€0	€0	€0	€0	€ 1.500	€0	€0
Puglia	€0	€0	€ 29.550	€ 39.700	€ 11.950	€ 14.000	€ 15.864	€ 15.750
Sardinia	€ 805	€0	€0	€ 1.000	€0	€0	€ 1.500	€ 500
Sicily	€ 20.500	€ 149.500	€ 70.000	€ 125.000	€0	€ 4.000	€ 4.170	€ 120.000

2014	2015	2016	2017	2018	2019	Total donations
€ 2.838.780	€ 1.666.053	€ 904.949	€ 631.053	€ 1.281.135	€ 676.279,00	€ 24.593.616
€ 170.000	€ 76.000	€ 31.500	€ 66.000	€ 63.000	€ 16.000,00	€ 5.610.468
€ 1.100.000	€ 1.340.000	€ 698.000	€ 283.500	€ 150.000	€ 1.345.000,00	€ 12.729.460
€ 9.183.632	€ 10.374.649	€ 7.643.755	€ 5.822.057	€ 7.697.280	€ 6.963.098,00	€ 151.645.324
€ 1.894.052	€ 1.272.563	€ 1.581.450	€ 2.096.528	€ 1.335.000	€ 1.314.000,00	€ 22.291.197
€ 1.000	€0	€0	€0	€ 3.000	€ 0,00	€ 68.500
€ 3.113.617	€ 1.371.087	€ 637.185	€ 963.163	€ 873.355	€ 816.530,00	€ 34.945.618
€0	€0	€0	€0	€0	€ 0,00	€ 1.500
€ 2.627.800	€ 3.750.450	€ 4.413.800	€ 3.310.900	€ 1.068.525	€ 2.452.620,00	€ 52.167.888
€ 102.380	€ 90.780	€ 79.845	€71.900	€ 14.470	€ 34.350,00	€ 5.151.851
€808.060	€ 951.550	€ 1.024.000	€ 755.610	€ 1.101.150	€ 908.000,00	€ 8.006.214
€ 1.199.500	€ 1.336.583	€ 939.050	€ 1.725.900	€ 3.435.705	€ 3.528.013,00	€ 31.280.871
€0	€0	€0	€ 2.000	€0	€ 0,00	€ 25.000
€21.610	€ 19.415	€ 13.150	€ 18.280	€ 10.500	€ 0,00	€ 228.117
€ 1.035.870	€ 513.970	€ 307.070	€ 575.680	€ 640.470	€ 514.796,00	€ 17.095.703
€ 6.500	€0	€0	€0	€ 1.500	€ 0,00	€ 65.450
€0	€0	€0	€0	€0	€ 0,00	€ 1.500
€7.700	€ 7.400	€0	€ 8.500	€0	€ 24.000,00	€ 174.414
€1.500	€0	€0	€0	€0	€ 0,00	€ 5.305
€0	€0	€0	€ 8.500	€0	€ 0,00	€ 501.670

Table A1: Cultural
Patronage Law,
donations allocation per
region and per year.
Source: Prepared by the
author from MiBACT
data.

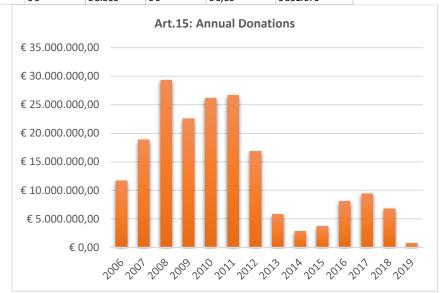


Figure A3: Art.15, donations from private individuals and non-commercial entities per year.

Source: Prepared by the author from MiBACT data.

	2005	2006	2007	2008	Total donations
Emilia-Romagna	€ 1.222.932	€ 231.160	€ 4.043.118	€ 4.652.371	€ 10.149.581
Friuli-Venezia Giulia	€ 6.165	€ 162.938	€ 513.732	€ 5.735.865	€ 682.835
Liguria	€0	€0	€0	€ 2.171.858	€ 2.171.858
Lombardy	€ 4.390	€ 51.564	€ 583.334	€ 382.178	€ 1.021.466
Piedmont	€0	€0	€ 9.633.212	€ 10.631.079	€ 20.264.291
Valle d'Aosta	€0	€0	€ 100	€0	€ 100
Veneto	€ 6.450	€0	€710.116	€ 6.000	€ 722.566
Trentino-Alto Adige	€0	€0	€0	€0	€0
Lazio	€0	€0	€ 1.500.000	€ 1.016.000	€ 2.516.000
Tuscany	€ 1.103.402	€ 11.214.510	€ 3.812.357	€ 4.803.341	€ 20.933.610
Marche	€ 11.000	€ 56.983	€0	€ 29.237	€ 97.220
<u>Umbria</u>	€0	€0	€0	€0	€0
Abruzzo	€0	€0	€0	€0	€0
Basilicata	€ 5.025	€0	€ 3.800	€0	€ 8.825
Calabria	€ 2.500	€0	€ 175	€0	€ 2.675
Campania	€0	€0	€ 16.630	€ 12.500	€ 29.130
Molise	€ 11.000	€0	€0	€0	€ 11.000
Puglia	€ 12.500	€0	€ 60.000	€0	€ 72.500
Sardinia	€0	€0	€0	€0	€0
Sicily	€ 5.650	€0	€ 29.000	€0	€ 34.650

Table A2: Art 15, snapshot of donations allocation per region and per year.

Source: Prepared by the author from data of Civita Association (2009).

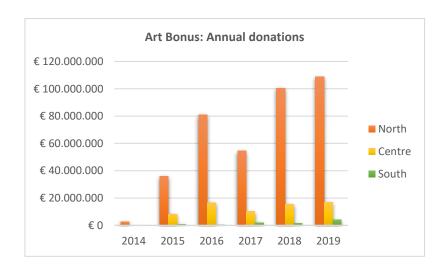


Figure A4: Art Bonus, geographical distribution of donations per year.

Source: Prepared by the author from data of the Art Bonus website.

	2014	2015	2016	2017	2018	2019	Total donations
Emilia-Romagna	€ 2.172.800	€ 6.538.756	€ 7.595.273	€ 8.702.492	€ 10.425.505	€ 13.992.192	€ 49.427.017
Friuli-Venezia Giulia	€ 0	€ 557.000	€ 562.043	€ 816.396	€ 1.631.617	€ 1.396.390	€ 4.963.446
Liguria	€ 0	€ 920.500	€ 1.145.990	€ 2.439.727	€ 3.672.032	€ 4.352.170	€ 12.530.420
Lombardy	€ 12.000	€ 18.363.040	€ 32.436.593	€ 28.929.086	€ 60.296.432	€ 59.379.718	€ 199.416.869
Piedmont	€ 44.000	€ 1.816.632	€ 32.448.262	€ 8.911.596	€ 15.903.673	€ 9.156.812	€ 68.280.975
Trentino Alto-Adige	€ 0	€0	€ 14.188	€ 19.600	€ 464.100	€ 480.545	€ 978.433
Valle d'Aosta	€ 0	€0	€ 500	€ 0	€0	€ 0	€ 500
Veneto	€ 583.570	€ 7.782.801	€ 6.787.909	€ 4.756.410	€ 8.165.314	€ 20.021.919	€ 48.097.923
Lazio	€ 0	€ 2.673.604	€ 3.619.185	€ 1.882.774	€ 2.911.458	€ 2.591.034	€ 13.678.054
Marche	€ 19.611	€ 350.141	€ 750.443	€ 595.017	€ 1.119.066	€ 897.749	€ 3.732.026
Tuscany	€ 39.720	€ 5.283.366	€ 12.122.090	€ 7.629.089	€ 10.393.687	€ 9.950.711	€ 45.418.662
Umbria	€ 0	€0	€ 115.080	€ 226.056	€ 1.146.332	€ 3.521.462	€ 5.008.930
Abruzzo	€ 0	€ 34.000	€ 0	€ 880	€0	€ 966.143	€ 1.001.023
Basilicata	€ 0	€ 0	€ 0	€ 2.000	€0	€ 0	€ 2.000
Calabria	€ 0	€ 0	€ 5.200	€0	€ 93.000	€ 11.500	€ 109.700
Campania	€ 178.000	€ 455.402	€ 46.355	€ 471.635	€ 490.200	€ 1.568.098	€ 3.209.690
Molise	€ 0	€ 0	€ 0	€ 893	€0	€ 15.000	€ 15.893
Puglia	€ 0	€ 491.550	€ 174.616	€ 808.130	€ 345.170	€ 709.660	€ 2.529.126
Sardinia	€ 0	€ 350	€ 304.265	€ 675.000	€ 360.100	€ 505.250	€ 1.844.965
Sicily	€ 0	€ 5.000	€ 36.300	€ 81.500	€ 151.915	€ 205.850	€ 480.565

Table A3: Art Bonus, donations allocation per region and per year.

Source: Prepared by the author from data of the Art Bonus website.

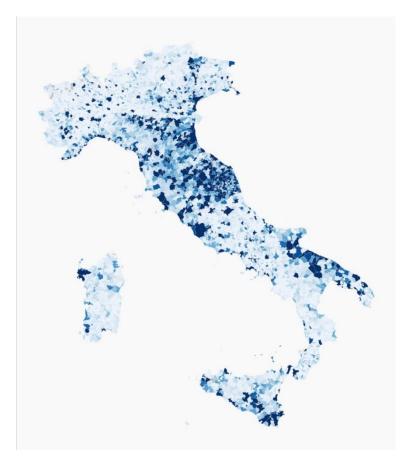


Figure A5: Number of cultural assets in Italian municipalities (2017). Source: Openpolis (2017).

Appendix B: Donors

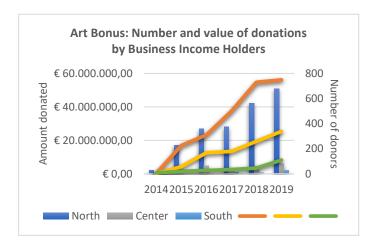


Figure B1: Art Bonus, number and value of donations by business income holders (graph legend – number of donors: orange North, yellow Centre, green South) *. Source:

Prepared by the author from data of the Art Bonus website.

	2014	2015	2016	2017	2018	2019	Total
Emilia-Romagna	€ 2.000.000,00	€ 3.108.766,77	€ 3.628.953,00	€ 3.927.559,32	€ 6.074.146,44	€ 5.121.473,00	€ 23.860.898,53
EIIIIIa-KUIIIagiia	1	81	102	154	207	235	780
Friuli-Venezia Giulia	€ 0,00	€ 300.000,00	€ 301.543,00	€ 658.000,00	€ 497.000,00	€ 367.300,00	€ 2.123.843,00
Fituii-Vellezia Giulia	0	1	5	10	12	7	35
Liguria	€ 0,00	€ 920.500,00	€ 1.143.740,00	€ 2.279.185,00	€ 2.315.808,00	€ 2.537.962,00	€ 9.197.195,00
Liguita	0	8	18	21	29	31	107
Lombardy	€ 0,00	€ 8.053.190,00	€ 16.361.420,00	€ 16.684.958,00	€ 27.859.159,00	€ 37.668.494,50	€ 106.627.221,50
Lombardy	0	87	78	220	326	324	1035
Piedmont	€ 0,00	€ 236.000,00	€ 2.957.517,00	€ 2.039.489,04	€ 1.470.440,03	€ 804.227,67	€ 7.507.673,74
Fleditiont	0	11	75	41	50	33	210
Trentino Alto-Adige	€ 0,00	€0,00	€ 0,00	€ 17.600,00	€ 306.100,00	€ 316.700,00	€ 640.400,00
Trefftillo Arto-Adige	0	0	0	5	15	40	60
Valle d'Aosta	€ 0,00	€0,00	€ 0,00	€0,00	€ 0,00	€0,00	€ 0,00
valle d Aosta	0	0	0	0	0	0	0
Veneto	€8.220,00	€ 4.438.830,07	€ 2.591.901,09	€ 2.478.190,00	€ 3.762.817,91	€ 4.189.760,00	€ 17.469.719,07
veneto	2	38	32	48	91	79	290
Lazio	€ 0,00	€ 1.729.000,00	€ 2.514.346,36	€ 541.035,00	€ 659.335,70	€ 895.046,89	€ 6.338.763,95
Lazio	0	23	49	39	37	75	223
Marche	€ 19.610,76	€ 210.600,00	€ 574.842,00	€ 351.602,00	€ 645.723,68	€ 567.021,20	€ 2.369.399,64
Marche	1	22	82	60	114	107	386
Tuscany	€ 15.000,00	€ 851.250,00	€ 1.699.011,00	€ 1.193.186,33	€ 2.284.799,00	€ 2.136.676,54	€ 8.179.922,87
Tuscally	1	12	37	72	77	122	321
Umbria	€ 0,00	€0,00	€ 10.080,00	€ 77.332,00	€ 988.111,40	€ 2.580.764,07	€ 3.656.287,47
OHIDHA	0	0	1	8	31	35	75
Abruzzo	€ 0,00	€0,00	€ 0,00	€0,00	€ 0,00	€ 5.000,00	€ 5.000,00
ADTUZZO	0	0	0	0	0	1	1
Basilicata	€ 0,00	€0,00	€ 0,00	€ 2.000,00	€ 0,00	€0,00	€ 2.000,00
Dasilicata	0	0	0	1	0	0	1
Campania	€ 0,00	€0,00	€ 3.500,00	€0,00	€83.000,00	€ 9.000,00	€ 95.500,00
Campania	0	0	2	0	11	6	19
Calabria	€ 111.600,00	€ 78.950,00	€ 20.580,00	€ 355.934,98	€ 428.700,00	€ 1.301.290,00	€ 2.453.454,98
Calabila	8	14	7	11	17	67	124
Molise	€ 0,00	€0,00	€ 0,00	€0,00	€ 0,00	€ 10.100,00	€ 10.100,00
Monse	0	0	0	0	0	2	2
Duelie	€ 0,00	€ 85.000,00	€ 145.100,00	€ 391.220,00	€ 40.400,00	€ 595.860,44	€ 1.257.580,44
Puglia	0	4	13	10	4	27	58
Sardinia	€ 0,00	€ 200,00	€ 0,00	€ 225.000,00	€ 31.600,00	€0,00	€ 256.800,00
Sardinia	0	1	0	1	8	0	10
Cicily	€ 0,00	€ 5.000,00	€31.000,00	€ 49.500,00	€ 70.000,00	€ 145.500,00	€ 301.000,00
Sicily	0	1	5	12	6	7	31

Table B1: Art Bonus, amount donated by and number of business income holders per region and per year. Source: Prepared by the author from data of the Art Bonus website.

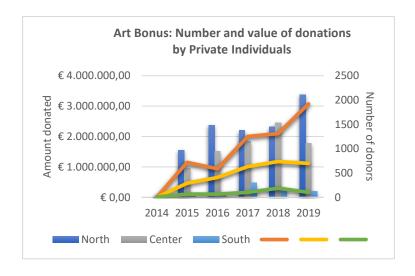


Figure B2: Art Bonus, number and value of donations by private individuals *.

Source: Prepared by the author from

Source: Prepared by the author from data of the Art Bonus website.

	2014	2015	2016	2017	2018	2019	Total
Emilia-Romagna	€ 0,00	€ 197.564,10	€ 258.007,20	€ 315.678,30	€ 661.333,30	€ 1.555.436,40	€ 2.988.019,30
Ellilla-Kolliagila	0	163	180	237	273	938	1.791
Friuli-Venezia Giulia	€ 0,00	€ 97.000,00	€ 95.500,00	€ 102.215,00	€ 80.500,00	€ 64.800,00	€ 440.015,00
Filuli-Vellezia Giulia	0	53	52	60	56	48	269
Liguria	€ 0,00	€0,00	€ 2.250,00	€ 9.000,00	€ 23.762,00	€ 18.162,00	€ 53.174,00
Liguita	0	0	3	7	14	12	36
Lombardy	€ 7.000,00	€ 1.220.002,00	€ 1.172.775,00	€ 1.546.501,08	€ 1.307.057,76	€ 1.366.673,58	€ 6.620.009,42
Lombardy	1	473	152	883	706	686	2.901
Piedmont	€ 0,00	€ 10.945,00	€ 711.121,32	€ 72.317,89	€ 48.158,10	€ 214.658,79	€ 1.057.201,10
Fledillont	0	16	152	37	73	136	414
Trentino Alto-Adige	€ 0,00	€0,00	€ 400,00	€ 2.000,00	€ 5.000,00	€ 72.032,00	€ 79.432,00
Trefftiffo Arto-Adige	0	0	1	2	1	59	63
Valle d'Aosta	€ 0,00	€0,00	€ 500,00	€ 0,00	€0,00	€ 0,00	€ 500,00
valle u Aosta	0	0	1	0	0	0	1
Veneto	€ 0,00	€ 31.191,00	€ 135.235,00	€ 155.874,40	€ 189.437,85	€ 88.640,23	€ 600.378,48
veneto	0	13	47	25	187	41	313
Lazio	0,00	871.604,00	1.060.838,26	1.233.442,00	2.117.122,00	1.425.539,37	0,00
Lazio	0	212	244	350	462	438	1.706
Marche	0,00	4.081,00	98.101,00	57.014,54	95.092,50	99.295,25	€ 353.584,29
Marche	0	22	69	51	149	84	375
Tuscany	0,00	87.806,00	254.043,32	446.944,55	153.453,00	148.856,00	€ 1.091.102,87
Tuscarry	0	55	83	179	73	106	496
Umbria	€ 0,00	€0,00	96.500,36	102.475,00	82.860,20	104.987,00	€ 386.822,56
Ullibria	0	0	12	51	52	71	186
Abruzzo	€ 0,00	€0,00	€0,00	€ 880,00	€0,00	€ 59.175,87	€ 60.055,87
Abiuzzo	0	0	0	4	0	3	7
Basilicata	€ 0,00	€0,00	€0,00	€ 0,00	€0,00	€ 0,00	€0,00
DdSIIICdLd	0	0	0	0	0	0	0
Campania	€ 6.400,00	€ 26.452,22	€ 19.275,00	€ 45.350,00	€0,00	€ 69.427,61	€ 166.904,83
Campania	8	64	23	12	0	67	174
Calabria	€ 0,00	€0,00	€ 1.700,00	€0,00	€0,00	€ 0,00	€ 1.700,00
Calabila	0	0	2	0	0	0	2
NA-line	€ 0,00	€0,00	€0,00	€ 793,44	€0,00	€ 4.900,00	€ 5.693,44
Molise	0	0	0	4	0	7	11
Duglio	0,00	1.600,00	22.745,62	396.910,00	202.670,00	43.800,00	€ 667.725,62
Puglia	0	1	25	75	61	15	177
Candinia	€ 0,00	€ 150,00	4.265,00	€ 0,00	28.500,00	5.250,00	€ 38.165,00
Sardinia	0		14		111	5	132
Civile	€ 0,00	€ 0,00	€ 5.300,00	€ 32.000,00	€ 65.315,00	€ 25.350,00	€ 127.965,00
Sicily	0		2		16	5	

Table B2: Art Bonus, amount donated by and number of private individuals per region and per year.

Source: Prepared by the author from data of the Art Bonus website.

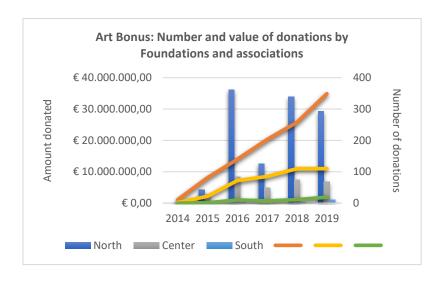


Figure B3: Art Bonus, number and value of donations by foundations and associations *. Source: Prepared by the author from data of the Art Bonus website.

	2014	2015	2016	2017	2018	2019	Total
Emilia-Romagna	€ 85.000,00	€ 1.598.641,45	€ 2.024.338,23	€ 3.043.770,42	€ 2.059.986,14	€ 5.438.733,00	€ 14.250.469,24
Emina-Romagna	4	28	29	30	34	60	185
Friuli-Venezia Giulia	€0,00	€ 150.000,00	€ 165.000,00	€ 56.181,00	€ 994.116,71	€ 963.290,38	€ 2.328.588,09
Friuli-venezia Giulia	0	1	1	14	7	17	40
Liguria	€ 0,00	€ 0,00	€ 0,00	€ 130.542,48	€ 1.332.461,97	€ 1.771.046,41	€ 3.234.050,86
Liguria	0	0	0	7	10	21	38
Lombardy	€5.000,00	€ 1.798,00	€ 2.095.268,48	€ 888.377,00	€ 13.694.509,88	€ 7.908.448,76	€ 24.593.402,12
Loilibaruy	1	5	7	22	53	24	111
Piedmont	€ 44.000,00	€ 1.504.948,76	€ 28.476.646,41	€ 6.356.851,16	€ 12.024.699,87	€ 7.104.959,01	€ 55.512.105,21
Pleamont	3	42	88	120	128	121	502
Trentino Alto-Adige	€0,00	€0,00	€ 13.788,00	€0,00	€ 153.000,00	€ 88.812,83	€ 255.600,83
Trentino Alto-Adige	0	0	1	0	2	6	9
) (-IIII)+-	€0,00	€ 0,00	€ 0,00	€ 0,00	€ 0,00	€ 0,00	€0,00
Valle d'Aosta	0	0	0				
	€ 0,00	€ 1.038.939,84	€ 3.372.113,18	€ 2.077.345,23	€ 3.669.858,26	€ 5.982.414,53	€ 16.140.671,04
Veneto	0	5	14	10	25	100	154
1:-	€0,00	€ 0,00	€ 26.000,00	€ 54.200,00	€ 26.000,00	€ 171.000,00	€ 277.200,00
Lazio	0	0	2	6	2	5	15
N. da wala a	0,00	99.960,02	71.500,00	142.400,00	180.750,00	165.438,89	€ 660.048,91
Marche	0	5	12	14	13	18	62
T	24.719,52	2.735.117,09	8.339.826,68	4.641.321,41	7.183.534,54	5.656.202,72	€ 28.580.721,96
Tuscany	2	17	57	60	82	79	297
Umbria	€0,00	€ 0,00	€ 8.500,00	46.249,10	64.860,00	835.711,34	€ 955.320,44
Umbria	0	0	1	5	13	8	27
A1.	€0,00	€ 0,00	€ 0,00	€ 0,00	€ 0,00	€ 897.867,36	€ 897.867,36
Abruzzo	0	0	0	0	0	7	7
De ell'este	€0,00	€ 0,00	€ 0,00	€0,00	€ 0,00	€0,00	€0,00
Basilicata	0	0	0	0	0	0	0
Carranta	€0,00	€ 350.000,00	€ 6.500,00	€ 30.350,00	€ 1.500,00	€ 133.330,00	€ 521.680,00
Campania	0	1	2	2	2	6	13
Calabata	€0,00	€ 0,00	€ 0,00	€0,00	€8.000	€ 2.500	€ 10.500,00
Calabria	0	0	0	0	3	4	7
NAULT	€0,00	€ 0,00	€ 0,00	€0,00	€ 0,00	€0,00	€0,00
Molise	0	0	0	0	0	0	0
Describer.	€0,00	€ 0,00	€ 6.770,30	€ 20.000,00	€ 600,00	€ 0,00	€ 27.370,30
Puglia	0	0	7	2	2	0	11
Canadiania	€0,00	€ 0,00	€ 300.000,00	€ 450.000,00	€ 300.000,00	€ 100.000,00	€ 1.150.000,00
Sardinia	0	0	1	3	1	1	6
CI -II	€ 0,00	€ 0,00	€ 0,00	€ 0,00	€ 16.600,00	€ 30.000,00	€ 46.600,00
Sicily	0	0	0	0	3	1	4

Table B3: Art Bonus, amount donated by and number of foundations and associations per region and per year. Source: Prepared by the author from data of the Art Bonus website.

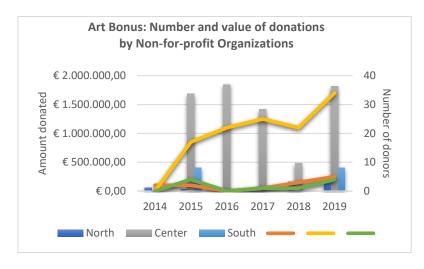


Figure B4: Art Bonus, number and value of donations by non-for-profit organizations *.

Source: Prepared by the author from data of the Art Bonus website.

	2014	2015	2016	2017	2018	2019	Total
		€ 1.633.783,41		€ 1.411.984,00		€ 1.788.099,21	€ 8.191.499,86
Emilia-Romagna	5	11	14	18	20	15	83
	€ 0,00	€ 0.00	€0,00	€0,00	€ 60.000.00	€ 1.000.00	
Friuli-Venezia Giulia	0	0	0		1	1	
	€ 0,00	€0,00	€0,00	€ 21.000,00	€ 0,00	€ 0,00	€ 21.000,00
Liguria	0	0	0		0	0	1
	€ 0,00	8.987.050,00	12.690.050,00	9.509.249,45	12.678.205,12	11.770.101,00	€ 55.634.655,57
Lombardy	0	12	9	19	25	14	79
Diadasas	€ 0,00	€ 64.738,00	€ 30.000,00	€ 166.803,90	€ 522.042,00	€ 174.300,00	€ 957.883,90
Piedmont	0	3	3	8	7	2	23
Trentino Alto-Adige	€ 0,00	€ 0,00	€0,00	€0,00	€0,00	€ 0,00	€ 0,00
Trefftiffo Arto-Adige	0	0	0	0	0	0	C
Valle d'Aosta	€ 0,00	€0,00	€0,00	€0,00	€0,00	€ 0,00	€ 0,00
valle u Austa	0	0	0	0	0	0	C
Veneto	€ 575.350,00	€ 2.233.840,00	€ 633.660,00	€0,00	€ 0,00	€ 184.954,39	€ 3.052.454,39
veneto	0	8	4	0	0	4	16
Lazio	€ 0,00	€ 73.000,00	€ 18.000,00	€ 53.801,50	€ 55.000,00	€ 97.448,13	€ 297.249,63
Lazio	0	9	8	14	14	16	61
Marche	€ 0,00	€ 500,00	€0,00	€ 17.000,00	€ 10.000,00	€ 500,00	€ 28.000,00
ivial cite	0	1	0	1	1	1	4
Tuscany	€ 0,00	€ 1.609.192,42	€ 1.827.209,42	€ 1.345.936,39	€415.500,00	€ 1.716.976,05	€ 6.914.814,28
Tuscarry	0	7	14	10	7	17	55
Umbria	€ 0,00	€0,00	€0,00	€ 0,00	€ 0,00	€ 0,00	€ 0,00
Ollibila	0	0	0	0	0	0	С
Abruzzo	€ 0,00	€ 0,00	€0,00	€ 0,00	€ 0,00	€ 4.100,00	€ 4.100,00
Abiuzzo	0	0	0	-	0	2	2
Basilicata	€ 0,00	€ 0,00	€0,00	€0,00	€ 0,00	€ 0,00	€ 0,00
Dasilicata	0	0	0	0	0	0	(
Campania	€ 0,00	€0,00	€0,00	€ 0,00	€ 0,00	€ 50,00	€ 50,00
Campania	0	1	2	2	2	1	1
Calabria	€ 0,00	€0,00	€0,00	€ 0,00	€ 0,00	€ 0,00	€ 0,00
Culdbild	0	0	0	0	0	0	(
Molise	€ 0,00	€ 0,00	€0,00	€ 100,00	€ 0,00	€ 0,00	€ 100,00
WIOTISC	0	0	0	1	0	0	1
Puglia	€ 0,00	€ 404.950,00	€0,00	€ 0,00	€ 1.500,00	€ 0,00	€ 406.450,00
i ugiiu	0	4	0	0	1	0	5
Sardinia	€ 0,00	€ 0,00	€0,00	€0,00	€ 0,00	€ 400.000,00	€ 400.000,00
Jaranna	0	0	0	0	0	1	1
Sicily	€ 0,00	€ 0,00	€0,00	€0,00	€ 0,00	€ 0,00	€ 0,00
Sicily	0	0	0	0	0	0	(

Table B4: Art Bonus, amount donated by and number of non-for-profit organisations per region and per year. Source: Prepared by the author from data of the Art Bonus website.

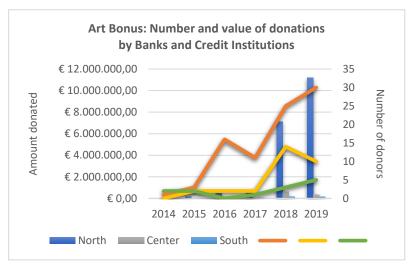


Figure B6: Art Bonus, number and value of donations by banks and credit institutions *.

Source: Prepared by the author from

data of the Art Bonus website

	2014	2015	2016	2017	2018	2019	Total
Emilia-Romagna	€ 10.300,00	€0,00	€ 33.880,00	€ 3.500,00	€0,00	€ 87.800,00	€ 135.480,00
Emilia-Komagna	1	0	3	1	0	3	8
Friuli-Venezia Giulia	€0,00	€ 10.000,00	€0,00	€0,00	€ 0,00	€0,00	€ 10.000,00
Friuli-venezia Giulia	0	1	0	0	0	0	1
Liguria	€0,00	€0,00	€0,00	€0,00	€ 0,00	€0,00	€0,00
Liguria	0	0	0	0	0	0	0
Lombardy	€ 0,00	€ 100.000,00	€ 117.080,00	€ 300.000,00	€ 4.742.500,00	€ 666.000,00	€ 5.925.580,00
Lombardy	0	1	2	3	10	9	25
Piedmont	€ 0,00	€0,00	€ 272.977,00	€ 276.134,00	€ 1.838.333,00	€ 858.667,00	€ 3.246.111,00
Pleamont	0	0	9	6	11	9	35
Trentino Alto-Adige	€0,00	€0,00	€0,00	€0,00	€ 0,00	€ 3.000,00	€ 3.000,00
Trefftiffo Afto-Adige	0	0	0	0	0	1	1
Valle d'Aosta	€0,00	€0,00	€0,00	€0,00	€ 0,00	€0,00	€0,00
valle d Aosta	0	0	0	0	0	0	0
Veneto	€0,00	€ 40.000,00	€ 55.000,00	€ 45.000,00	€ 543.200,00	€ 9.574.900,00	€ 10.258.100,00
veneto	0	1	2	1	4	8	16
Lazio	€0,00	€0,00	€0,00	€0,00	€ 54.000,00	€0,00	€ 54.000,00
LdZIU	0	0	0	0	2	0	2
Marche	€0,00	€ 35.000,00	€ 1.000,00	€ 26.000,00	€ 186.500,00	€ 65.493,60	€ 313.993,60
Marche	0	2	1	1	7	4	15
Tuesday	€0,00	€0,00	€ 2.000,00	€ 1.200,00	€ 356.400,00	€ 292.000,00	€ 651.600,00
Tuscany	0	0	1	1	4	6	12
I I made at a	€0,00	€0,00	€0,00	€0,00	€ 10.000,00	€0,00	€ 10.000,00
Umbria	0	0	0	0	1	0	1
A la musea e	€0,00	€ 34.000,00	€0,00	€0,00	€ 0,00	€0,00	€ 34.000,00
Abruzzo	0	2	0	0	0	0	2
Desiliants	€0,00	€ 0,00	€ 0,00	€0,00	€ 0,00	€ 0,00	€ 0,00
Basilicata	0	0	0	0	0	0	0
Commonia	€ 60.000,00	€0,00	€0,00	€ 40.000,00	€ 60.000,00	€ 60.000,00	€ 220.000,00
Campania	2	0	0	1	1	2	6
Calabria	€0,00	€0,00	€0,00	€0,00	€ 2.000,00	€0,00	€ 2.000,00
Calabria	0	0	0	0	1	0	0
NA-II	€0,00	€ 0,00	€ 0,00	€0,00	€ 0,00	€ 0,00	€ 0,00
Molise	0	0	0	0	0	0	0
Duelle	€0,00	€0,00	€0,00	€0,00	€ 100.000,00	€ 70.000,00	€ 170.000,00
Puglia	0	0	0	0	1	2	3
Canalinia	€0,00	€0,00	€ 0,00	€0,00	€ 0,00	€0,00	€ 0,00
Sardinia	0	0	0	0	0	0	0
Ct -tt-	€ 0,00	€ 0,00	€ 0,00	€ 0,00	€ 0,00	€ 5.000,00	€ 5.000,00
Sicily	0	0	0	0	0	1	1

Table B5: Art Bonus, amount donated by and number of non-for-profit organisations per region and per year. Source: Prepared by the author from data of the Art Bonus website.

		2005	2006	2007	2008	2009
Non commercial antitios	€ 2.333.584,00	€ 11.600.034,00	€ 19.723.596,00	€ 29.193.364,00	€ 22.463.529,00	
ı	Non-commercial entities	36	30	147	188	243
ı	Private individuals	€ 45.430,00	€ 65.557,00	€ 105.056,00	€ 115.020,00	€ 90.719,00
ı	Private murviduais	36	2	24	24	27

Table B6: Art.15, amount donated by type of donor and number of donations from 2005 to 2009. Source: Adapted from Office Study of the MiBACT (2010), p.11.

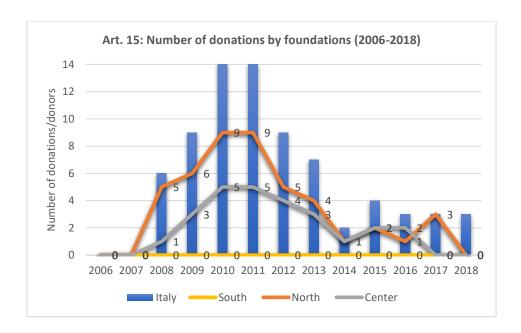


Figure B6: Art.15, number of donations made by foundations.

Source: Prepared by author from MiBACT data.

Appendix C: Beneficiaries

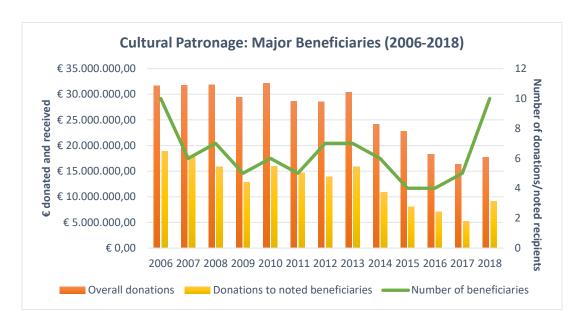


Figure C1: Cultural Patronage Law, comparison between overall donations and number of contributions destined to a selected number of noted beneficiaries. Source: Prepared by the author based on MiBACT reports.