

3 Tax incentives... or subsidies for business R&D?

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6 Accepted: 8 February 2014
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8 **Abstract** We study whether firms' actual use of
9 R&D subsidies and tax incentives is correlated with
10 financing constraints -internal and external- and
11 appropriability difficulties and investigate whether
12 both tools are substitutes. We compare the use of both
13 policies by SMEs and by large firms and find significant
14 differences both across instruments and across firm
15 size. For SMEs, financing constraints are negatively
16 correlated with the use of tax of credits, while they are
17 positively associated with the likelihood of receiving a
18 subsidy. The use of legal methods to protect intellec-
19 tual property is positively correlated with the proba-
20 bility of using tax incentives, but not with the use of
21 subsidies. For large firms external financing constraints
22 are correlated with instrument use, but results regard-
23 ing appropriability are ambiguous. Our findings

suggest that (1) direct funding and tax credits are not 24
perfect substitutes in terms of their ability to reach 25
firms experiencing barriers associated to market fail- 26
ures; (2) one size may not fit all in innovation policy 27
when the type or intensity of market failure differs 28
across firm size, and (3) subsidies may be better suited 29
than tax credits to encourage firms, especially young 30
knowledge-based firms, to start doing R&D. 31

Keywords SMEs · Innovation · R&D · Tax 32
incentives · Subsidies · Policy mix 33

JEL Classifications H25 · L26 · L60 · O31 · 34
O38 35

1 Introduction 39

Tax incentives and direct funding through grants and 40
loans are two policy instruments currently used in 41
many countries to stimulate business R&D. While 42
direct public funding of private R&D has a long 43
tradition, tax incentives have spread gradually across 44
countries. OECD estimates of the relative weight of 45
each instrument as a share of GDP in 2009 show that 46
Canada, The Netherlands and Japan rely mostly on tax 47
incentives. France, Denmark, Spain, the United 48
Kingdom and the United States use both instruments 49
simultaneously, while exclusive reliance on direct 50
funding is still preferred in Sweden, Finland or 51
Germany (OCDE 2011a). 52

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53 The main economic rationale for using any of these
 54 tools rests on the notion that market failures reduce or
 55 may even deter private R&D investment. These
 56 failures derive mostly from knowledge spillovers
 57 and from asymmetric information. The first lead to
 58 revenue appropriability difficulties as a result of
 59 imitation by rivals; asymmetric information between
 60 investors and inventors may result in financing
 61 constraints.¹ Sunk costs generate additional barriers
 62 to starting R&D activities. Extensive empirical evi-
 63 dence supports these hypotheses. Which particular
 64 form public support should adopt to correct for market
 65 failure is, however, a matter of debate. Do tax credits
 66 and subsidies succeed in reaching in practice firms
 67 affected by these sources of market failure? Are there
 68 any conditions where one is to be preferred to the
 69 other, or is there an “optimal mix” of both instru-
 70 ments?² While there is substantial empirical research
 71 that has separately estimated the effects that R&D
 72 subsidies and R&D tax incentives have on private
 73 R&D investment and on some outcomes, to the best of
 74 our knowledge an explicit and comparative analysis of
 75 both tools remains to be done.

76 We aim at providing evidence on these questions by
 77 analyzing who uses R&D tax credits and direct funding
 78 when both are available to firms. Research has so far
 79 focused on testing whether public support increases or
 80 on the contrary crowds out private R&D investment,
 81 supplying estimates of the degree of additionality or
 82 “bang for the buck”. While testing for crowding out
 83 (negative additionality) is certainly a highly relevant
 84 yardstick to assess public support, positive additional-
 85 ity may not be necessary nor sufficient for evaluating
 86 its effectiveness. We need to know whether the use of
 87 each of these tools, and the extent of additionality, are
 88 related to lack of appropriability and/or to financing
 89 constraints deterring innovation activities.

90 To illustrate this point, assume that an impact
 91 evaluation with firm-level data finds that subsidy
 92 supported firms on average barely increase their
 93 private R&D investment, or that the share of sales of

94 new products, a standard indicator of innovation
 95 outcomes used in the literature, is not significantly
 96 different from a control group of non-supported firms.
 97 Estimated additionality would be close to 0, yet should
 98 the conclusion be that the policy is not effective?
 99 Possibly not if subsidized firms applied for and
 100 obtained support precisely in anticipation of imitation
 101 (high spillovers), and introduce innovations that are
 102 quickly imitated. In the case of tax credits, observing
 103 that firms increase their private R&D investment may
 104 not be sufficient to claim this policy to be a success.
 105 While firms whose R&D projects are well protected
 106 against imitation will be able to claim the tax credit and
 107 use it to increase their investment in other appropriable
 108 projects (producing positive additionality), those firms
 109 whose potential projects are affected by high spillovers
 110 and generate low private profits may be left out.

111 Consequently, to evaluate each of these two forms of
 112 public support we should ask directly whether their use
 113 is associated to the presence of these market failures. We
 114 claim that if limited appropriability and financing
 115 constraints affect a firm’s R&D investment decisions,
 116 and if policies are designed to target this type of firms,
 117 we then should observe a positive correlation between
 118 indicators of these barriers as perceived by a firm and the
 119 probability that it will use an R&D tax credit or have
 120 direct support or both. If both tools are substitutes, these
 121 correlations should be similar in sign and magnitude.

122 We contribute to the literature in several respects.
 123 First, we explicitly ask whether program participation is
 124 related to indicators of sources of market failure. We
 125 believe that this may provide useful insights for assessing
 126 the effectiveness of innovation policies and for interpret-
 127 ing results that are obtained in impact studies. Second, we
 128 compare the use of subsidies and tax incentives by firms
 129 that can potentially use both and test whether both
 130 policies exhibit similar correlation patterns between
 131 indicators of market failures and the actual use of each
 132 tool. This provides insights about the equivalence of both
 133 tools. Finally we investigate whether access to each type
 134 of public support differs for large firms and SMEs.

135 Using firm-level data from two waves of the Spanish
 136 Community Innovation Survey (CIS), 2003–2005 and
 137 2006–2008, which provide information on the use of
 138 R&D subsidies and R&D tax credits, we find some
 139 differences both across tools and firm size. SMEs
 140 facing financing constraints (whether internal or
 141 external) are less likely to use R&D tax credits.
 142 Instead, they are more likely to use direct public

1FL01 ¹ Appropriability refers to the degree to which a firm captures
 1FL02 the value or returns created by innovation (Cassiman and
 1FL03 Veugelers 2002).

2FL01 ² The concern about the design of an optimal policy mix is
 2FL02 expressed in OECD’s documents on innovation policy (see
 2FL03 OECD 2010, chapter 4) and in the testimony by the OECD for
 2FL04 the US Senate Committee on Finance, OECD 2011b.

143 funding exclusively. Regarding appropriability, SMEs
144 that use legal methods to protect their intellectual
145 property are more likely to use tax incentives or both
146 instruments. For large firms we also find that finan-
147 cially constrained firms are less likely to use tax
148 incentives, but use of each type of support is apparently
149 unrelated to appropriability as captured by use of IP
150 protection. What is common to both types of firms is
151 that previous R&D experience is highly correlated with
152 the use of tax incentives, but much less (for SMEs), or
153 not at all (for large firms), with the likelihood of using
154 subsidies only. Young knowledge-intensive firms,
155 whether small or large, are as well more likely to have
156 access to grants than to tax credits. These results
157 suggest that subsidies, unlike tax credits, may be able to
158 induce new R&D investment and thus affecting R&D
159 decisions at the extensive margin.

160 From our results we can infer some policy impli-
161 cations: direct funding and tax credits, given their
162 current design, do not have the same ability to address
163 the main sources of private R&D underinvestment,
164 and hence are not perfect substitutes. Direct support to
165 SMEs seems to be a more appropriate tool for
166 addressing underinvestment related to market failures.
167 Some key differences between both tools may explain
168 this result, as we discuss below.

169 The paper is organized as follows: in the next
170 section we review previous work most closely related
171 to our research question. In Sect. 3 we describe some
172 relevant facts revealed by the data. In Sect. 4 we
173 discuss some hypotheses regarding the use of R&D tax
174 credits and direct support. In Sect. 5 we present our
175 empirical analysis, while in Sect. 6 we perform some
176 robustness tests. Section 7 concludes.

177 2 Previous evidence

178 Many firm level studies provide evidence that produc-
179 tivity responds both to a firm's own investment in R&D
180 as well as to other firms' R&D, the latter being a measure
181 of R&D spillovers across firms (Hall et al. 2010). There
182 is also evidence that SMEs face an innovation financing
183 gap, while results are mixed for large firms (Hall and
184 Lerner 2010). Even if the case for intervention seems to
185 be well established, available policy instruments may
186 have drawbacks. Direct public support through subsi-
187 dies reduces the private costs of investing in R&D, but
188 places high information requirements on the public

agency awarding them and may allow for discretionary
behaviour. Tax credits and allowances may appear to be
a neutral, simple and non-interfering tool, but the
specific design is important, as they might be easily
claimed for projects that yield high private returns and
would have been carried out anyway, while socially
valuable projects might not be developed. Empirical
evaluation of the take-up and impact of both tools may
thus help to improve policy design.

198 A substantial volume of empirical research has
199 estimated the impact (additionality) of direct support
200 and of R&D tax incentives on the level of private R&D
201 investment. The effects of each tool have been studied
202 mostly in isolation, with the few exceptions discussed
203 below. Where firms use both, individual estimates may in
204 fact overestimate additionality. Regarding tax incentives,
205 some findings are of interest. The first is the differential
206 effect on private R&D across firm size. Lokshin and
207 Mohnen (2012) estimate that 1\$ of foregone tax generates
208 3.2\$ of private R&D in the case of SMEs, while it
209 generates 0.80\$ of investment by large firms. The second
210 is the positive relationship between use of tax credits and
211 a firm's financial capability found by researchers who use
212 propensity score matching methods (PSM) to estimate
213 additionality. These methods entail the estimation of a
214 program participation equation, and where proxies for the
215 firm's global financial capacity are taken into account,
216 they are found to be positively related to participation
217 (Corchuelo and Martínez-Ros, 2010; Czarnitzki et al.
218 2011; Kobayashi 2013).

219 Propensity score methods have also been widely used
220 to assess the effects of direct support on business R&D
221 or other outcomes (Cerulli 2010). Program participation
222 equations typically include as determinants firm size
223 and other firm characteristics, but as with tax credits, the
224 link to sources of market failures has not been inves-
225 tigated.³ Gelabert et al. (2009) come closest to this by
226 looking at the relationship between additionality of

³ Project and firm level data have been used by Huergo and
Trenado (2010) to study the allocation process of subsidized
loans in Spain, distinguishing between the firm's application
and the agency's awarding decisions. They find that exporters
are more likely to apply, while conditional on applying the
agency is more likely to award support according to the firm's
technical capability and export potential. Differences between
SMEs and large firms and the role of appropriability are not
considered. Hussinger (2008) uses a credit rating index and finds
that firms with better rating are more likely to obtain direct
public funding in Germany.

227 direct support and appropriability, finding a counterintuitive inverse correlation. Takalo et al. (2012) are the first to provide a theoretical model for the R&D subsidy allocation process, including firm's application and agency's granting decisions, and the private R&D investment decision. Their model allows them to make some inferences about the role of spillovers in Finland's R&D subsidy programs. Using firm and project level data, they find that technical challenge is the most significant and important variable in the agency's subsidy rate decision, and that support generates benefits beyond private returns. However, financing constraints are assumed away and a comparative analysis with R&D tax credits cannot be performed because this instrument is not used in Finland.

242 Only a small number of authors estimate and compare the additionality of both types of support. Haegeland and Moen (2007) find that in Norway the additionality of tax credits is higher than the additionality of grants. Berubé and Mohnen (2009) find that Canadian firms that claim tax credits and also receive subsidies introduce more new products and made more world-first product innovations than firms that use tax credits only. Marra (2008) finds that tax credits increase private investment more than subsidies for manufacturing firms in Spain. Finally, Foreman-Peck (2012) finds that SMEs that receive support in the UK grow faster, and that both types of support increase innovation.

255 Why additionality varies across tools, and whether firms that participate in each of these programs are those more likely to experience financing constraints or appropriability difficulties is not investigated in these studies. We believe that paying more attention to who has access to support is a relevant issue in assessing the ability of each policy to address R&D related market failures. As discussed above, estimates of input or output additionality do not provide sufficient insights into policy effectiveness beyond discarding crowding-out effects. Tax incentives and direct support differ in some dimensions that are important to firms and affect their ability to offset market failures. Before we discuss this thoroughly in Sect. 4, we first briefly describe some facts revealed by our data concerning policy use.

270 3 The data: some facts

271 R&D tax incentives and direct support have been
272 simultaneously available to firms in Spain at least

273 since the early eighties, although a major legal change
274 increasing tax incentives took place in 1995. Tax
275 incentives are mostly provided through deductions
276 from the firm's corporate tax liability. There is a
277 (small) tax credit for innovation (non-R&D) expenditures as well. From 2006 to 2008, the total volume of tax credits was somewhat above €300 million yearly. The number of firms claiming tax credits was 3,621 in 2006, falling to 3,150 in 2008.⁴ Direct support, mostly channelled through a public agency (CDTI), provides grants and loans for firms' R&D and innovation projects. In 2006 the volume of support provided by CDTI was €800 million (€1,090 million in 2007, and €766 million in 2008) and about 1,000 projects were funded. Direct support is thus at least twice as large as the volume of tax credits, although it reaches a smaller number of firms.

290 Our empirical analysis is based on data from the
291 PITEC, a firm-level panel data set developed by the
292 Spanish Statistical Office (INE) as a by-product of the
293 European Community Innovation Survey (CIS).⁵ It
294 collects information related to innovation activities of
295 firms with more than ten employees in manufacturing
296 and service industries. Answering the survey is
297 mandatory in Spain, and the response rate is high
298 (about 90 %). We use data from the surveys conducted
299 from 2005 to 2008, and focus on manufacturing firms.
300 Some questions refer to a 3 years period (2003–2005;
301 2004–2006; and so on) while others refer to the survey
302 year. In particular questions on barriers to innovation
303 and use of intellectual property protection mechanisms,
304 which will be central in our analysis, refer to a
305 3-year period.

306 Firms are regularly asked whether they receive
307 R&D subsidies (non-reimbursable funds) from each
308 different level of the public administration. In 2008 the
309 survey included some questions related to R&D tax
310 incentives as well: whether the firm took into account
311 the potential tax credit when planning R&D

⁴ In the Appendix we provide a more detailed account of both policy tools and information sources. Using information from the National Statistical Institute on the number of firms that conduct in-house R&D activities, we estimate that the number of claimants is about 25 % of potential claimants.

⁵ PITEC is the acronym for "Panel de Innovación Tecnológica en las Empresas". A description of the survey can be found at the following link (in Spanish): <http://www.ine.es/>. Mairesse and Mohnen (2010), discuss some of the Community Innovation Survey features and shortcomings.

investment, and whether it had claimed tax credits in 2008 and each of the previous 4 years.⁶

We classify a firm as having an R&D subsidy if it received one during the period 2006–2008, and similarly for tax incentives. We split the sample in two firm-size groups, SMEs and large firms, both for statistical and conceptual reasons.⁷ We observe four types of firms according to the use they make of each policy tool. 62 % of SMEs (45 % of large firms) did not use any support during the period 2006–2008, while 9 % of SMEs (20 % of large firms) used both. We also observe that some use only subsidies (8 % of SMEs; 10 % of large firms) and some only tax credits (21 % of SMEs and 26 % of large firms). Overall, using tax credits is more frequently observed among large firms.⁸

How do these patterns arise? A preliminary description suggests that the type of support used and firms' perception of barriers to innovation might be correlated. In the survey firms are asked to rank a series of potential barriers to innovate, among them financing constraints, both internal and external, demand uncertainty and the extent to which the market is dominated by established firms. Lack of internal and external finance, together with uncertain demand, are the barriers most often perceived as important. SMEs are more sensitive to all barriers than large firms. The simple correlation among the first three barriers is high (about 0.7), while it decreases across the remaining barriers.

Table 1 below shows the percentage of firms that considered each barrier to be of high importance in 2003–2005 by support status in 2006–2008, as well as their use of legal intellectual property protection

mechanisms. This description suggests a positive correlation between the type of support used and firms' perception of financing constraints, particularly for SMEs. It also appears to be correlated with the use of protection mechanisms, past R&D experience and human capital. In the next section we provide some arguments as to why these patterns may arise.⁹

4 Direct and indirect R&D support: some differences and hypotheses

We believe that some differential features related to the design and timing of R&D subsidies and tax incentives may have an influence on when a firm is more likely to benefit from each.¹⁰ We next describe these features and their implications, and then sketch the firm's decision problem, linking it to the observed patterns of instrument use.

4.1 Features of direct and indirect support

Direct public funding is obtained only if the firm submits an application to the public agency and the agency decides favourably after screening and ranking the proposals. The requirements set by subsidy awarding agencies are usually related to the innovative content of the proposal, the technical ability of the firm to carry it out, and the project's market potential.¹¹

⁶ The total number of firms that declare using tax incentives in 2008 in PITEC is 1742 (manufacturing and services). We estimate that our sample covers thus about 55 % of all claimants that year.

⁷ In the PITEC different sampling procedures are used for large firms (200 or more employees) and SMEs. All large firms are surveyed. For SMEs, all firms that have received any form of public support for R&D, have reported R&D expenses in the current or past years and a stratified random sample of non-R&D performing firms are surveyed. Innovators are over represented in this sample: over 50 % of SMEs in the PITEC

⁸ According to data provided by the tax authorities (Agencia Estatal de la Administración Tributaria and Dirección General de Tributos), large firms' share of total R&D deductions is about 73 %.

⁹ In our sample, not all firms that were investing in in-house R&D in 2005 claimed tax credits in subsequent years (36 % of SMEs and 57 % of large firms did). Many firms, mostly SMEs, declare that the main reason for not claiming is that their R&D expenditure is too low; while some large firms declare that their type of R&D did not fit eligible expenditures.

¹⁰ While some theoretical literature has compared patents, prizes and subsidies as innovation policy tools (Wright 1983; Fu et al. 2012), to the best of our knowledge tax incentives have not been explicitly included in these comparisons.

¹¹ There are significant differences across countries in the specific design of direct support. In the United States, the description of SBIR program, which targets SMEs (see <http://www.sbir.gov>) states that R&D risk and fixed costs are key motivations for the program. Public agencies involved with the program set R&D topics in solicitations. In Finland, the public agency Tekes values the degree of novelty and research intensity of projects but does not appear to target particular fields (<http://www.tekes.fi>). The Spanish case is similar to the Finnish. See Huergo and Trenado (2010) for a detailed description of the Spanish case.

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Table 1 R&D support status in 2008 and innovation barriers

	SMEs <i>N</i> = 3,626				Large firms <i>N</i> = 811			
	No support	Only subsidies	Only tax credits	Use both	No support	Only subsidies	Only tax credits	Use both
<i>Innovation barriers (% firms)</i>								
<i>Financing Constraints</i>								
All	40	48	30	39	23	36	22	29
Internal	32	41	21	28	15	27	12	17
External	29	33	23	31	17	33	15	24
Demand risk	21	19	20	20	11	20	13	16
Dominant firms	20	19	20	25	15	20	17	12
Lack of information	14	10	11	15	7	13	8	12
Lack of personnel	14	10	12	13	7	11	6	7
Protect innovations	30	44	44	48	27	54	41	52
<i>Firm features</i>								
Firm size	50	51	63	70	505	729	527	819
No. employees								
Employees with higher education (%)	15	30	20	28	10	17	14	15
Relative productivity	.88	.98	1.1	1.0	1.1	1.1	1.3	1.3
Did R&D in 2005 (%)	68	91	89	95	46	92	85	96

Firms that do not intend to innovate because they declare that innovating is not necessary are dropped from the sample. Lack of information includes both market and technological information. Relative Productivity is computed as the ratio of firm's sales/employee over the industry mean

370 The agency may rate projects along several additional
371 dimensions, such as ability to contribute social value,
372 collaboration with public research labs or with
373 universities, and financing constraints. If the agency
374 is able to assess these items, it can tailor the magnitude
375 and duration of direct support to the particular features
376 of the project, although a maximum subsidy rate is
377 often set in practice. The firm runs the project once
378 funding has been approved, and the agency provides a
379 down-payment to start it.¹² Subsidy application may
380 not be costless, as preparing a good proposal requires
381 at least the use of time and qualified labour; it also
382 entails disclosure of information.

383 R&D tax incentives do not require the approval of a
384 specific project by a government agency. Provided as
385 tax credits—a deduction from the firm's tax liability—
386 or as tax allowances—a deduction from taxable income—
387 they are targeted to all R&D performers, irrespective

of project features and quality as long as expenses 388
qualify as a research and development according to the 389
tax code. To be able to benefit from it the firm must 390
have a positive tax liability, unless a refund system is 391
established.¹³ The cost of claiming tax credits may be 392
lower than the cost of applying for subsidies, since a 393
firm must file for taxes every year anyway; it just has to 394
keep proper records. 395

Tax credits deducted from the corporate tax liability 396
are in fact an ex-post prize for successful innovation 397
outcomes, while when they are applied to the corporate 398
wage and social contribution taxes they act as a subsidy 399
to R&D effort, regardless of the project's outcome. 400
This difference may be important for firms' decisions, 401

12FL01 ¹² Once the firm has had a project proposal approved, it may be
12FL02 able to obtain additional funding from the private sector.
12FL03 Agency approval may act as a quality certification, as shown in
12FL04 Takalo and Tanayama (2010).

¹³ This obviously depends on the specific design of R&D tax 13FL01
incentives. In Spain and France firms that invest in R&D can 13FL02
obtain a deduction from their tax liability, which therefore has to 13FL03
be positive at some point (both systems contain carry-forward 13FL04
provisions). In the Netherlands the R&D deduction is applied to 13FL05
wages paid to R&D staff, and in the UK SMEs can get a cash 13FL06
refund; the deduction is thus independent of the firm's tax 13FL07
position in these countries. 13FL08

because in the first case the firm's tax position is uncertain at the time of making the R&D decision. We will focus here exclusively on the possible differences between subsidies and tax credits applied to the corporate tax liability because this matches the legal environment that firms in our sample face.

This description points at several potentially relevant differences between both tools in three respects: (1) actual eligibility; (2) magnitude and certainty of support, and (3) timing of support.¹⁴ In terms of eligibility, while all privately profitable R&D projects will qualify for a tax credit, it is likely that only a subset exhibiting high degree of novelty, risk or spillover capacity would qualify for a subsidy. Conversely, of those qualifying for a subsidy, some may not be able to claim tax credits if expected private profits are low and unable to lead to a positive or significant deduction.

With respect to the magnitude and certainty of support, although both tax incentives and subsidies reduce the cost of R&D, subsidies provide more certainty on the extent of this reduction for the firm. If awarded, the firm knows the amount of support it will get before it starts the project, whereas in the case of tax incentives effective support depends on the firm's ex-post tax position. The actual tax liability may turn out to be smaller than the potential tax credit, especially in the case of SMEs and young firms. In addition, the type and amount of subsidy may be tailored to specific features of the project, i.e., whether it generates spillovers (with grants), or faces financing constraints (with loans), or both. Tax credits instead will be higher in absence of spillovers and financing constraints.

Timing of support: subsidies usually provide upfront funding for R&D projects, while tax incentives provide a compensation after the project has been privately funded. To benefit from a tax credit, and independently of whether they are applied to the corporate tax or to wage or social security contribution taxes for R&D employees, the firm must be able to fund the project in advance. As young firms and SMEs may often lack internal and external funding, they are less likely to benefit from this instrument.¹⁵ In addition, R&D subsidies not only provide up-front

funding for R&D, but also may provide a signal of the quality of a project to potential private investors. Subsidies may therefore have a certification effect, unlike tax credits, facilitating access to external finance (Meuleman and De Maeseneire 2012).

4.2 Firms' R&D decisions and policy instrument use

We can approximate the firm's decision problem that generates the observed program participation patterns as follows. Assume that a firm produces a standard product and obtains profits π_0 without conducting R&D. It will decide whether to conduct R&D at time t , leading to a new product or a new process, depending on the expected stream of additional profits. To do so it will take into account the possibility of obtaining a grant and/or a tax credit, and will have expectations about the likelihood and size of each type of support. Applying for and obtaining each type of support might involve some costs (preparing a grant application requires time; claiming tax credits involves additional record keeping costs and may increase the risk of a tax inspection).

Each R&D investment project x_{it} will be characterized by a specific level of spillovers. In the case of R&D leading to product innovation, appropriability is full when the firm faces the shifted market demand for the product generating revenues \bar{R}_t . If imitation is fast and substantial, the firm will face only a share of the demand and revenues will be smaller. Let λ_{it} be a parameter capturing the degree of appropriability, with $0 \leq \lambda_{it} \leq 1$. We can write firm's expected revenue as: $R_{it}^e = \lambda_{it} \bar{R}_t(x_{it}, z_{it})$, where z_{it} a vector of firm and industry characteristics. The firm may face as well R&D financing constraints, captured by a parameter $\theta_i \geq 0$, the risk premium it has to pay. The firm's R&D investment cost depends on the market interest rate, r , and on θ_{it} : $C_{it} = (1 + r + \theta_{it})x_{it}$. We also should allow for the possibility that the firm has to incur R&D sunk costs, F , if it has not previously invested in R&D. We can define a dummy variable d_{it-1} that indicates previous R&D investment status.¹⁶

¹⁴ A similar ongoing discussion in the US concerns provision of support for college education through tax credits versus through grants or loans. See Long (2004).

¹⁵ Hajivassiliou and Savignac (2011) find evidence suggesting that constrained firms are less likely to start innovative projects.

¹⁶ Previous empirical work (González et al. 2005; Mañez-Castillejo et al. 2009; Arqué and Mohnen 2012), provides evidence that sunk costs are an entry barrier for some firms. Aw et al. (2011), who study the relationship between R&D and exporting in a dynamic setting, also find evidence consistent with the presence of sunk costs in both activities.

485 The firm has beliefs about the agency's subsidy
 486 granting rules. If the agency behaves as a benevolent
 487 social planner, the firm expects the subsidy to depend
 488 negatively on the degree of appropriability (i.e.,
 489 positively related with external benefits generated by
 490 the project), and positively on financing constraints,
 491 thus will be given by $S^e(\lambda_{it}, \theta_{it}; q_{it}, x_{it})$ with
 492 $\frac{\partial S^e}{\partial \lambda_{it}} < 0, \frac{\partial S^e}{\partial \theta_{it}} > 0$ where q is the quality (novelty) of
 493 the project.¹⁷ In addition, the firm takes into account
 494 the expected present value of the tax credit it could
 495 claim conditional on the corporate tax liability being
 496 positive. Since taxable income (gross profits) is a
 497 function of λ_{it} and θ_{it} , the expected size of the tax
 498 credit, given a statutory deduction rate δ , is given
 499 by $T_{t+1}^e = E(\delta x_{it} | (R_{it}^e(\lambda_{it}, x_{it}, z_{it}) - (1 + r + \theta_{it})x_{it} -$
 500 $F_i(1 - d_{i,t-1}) > 0))$. The present value of the expected
 501 tax credit $\beta T_{t+1}^e(\lambda_{it}, \theta_{it}, x_{it})$, where β is the discount
 502 rate, will increase with appropriability, and decrease
 503 with financing costs: $\frac{\partial T_{t+1}^e}{\partial \lambda_{it}} > 0, \frac{\partial T_{t+1}^e}{\partial \theta_{it}} < 0$. Figure 1 illus-
 504 trates the expected subsidy and expected tax credit
 505 rates per 1\$ invested in R&D as a function of λ , for a
 506 given level of θ . As θ increases, the expected tax credit
 507 function would shift downwards.

508 The firm's expected profit function in period t is
 509 then:

$$\tilde{\Pi}_{it}^{RD} = \left\{ \begin{array}{l} R_{it}^e(\lambda_{it}; x_{it}, z_{it}) - C_{it}(r_t, \theta_{it}; x_{it}) \\ + S_{it}^e(\lambda_{it}, \theta_{it}; q_{it}, x_{it}) + \\ \beta T_{it+1}^e(\lambda_{it}, \theta_{it}; x_{it}) - F_i(1 - d_{i,t-1}) \end{array} \right\} \quad (1)$$

510 The firm will decide whether to invest in R&D and
 512 how much to invest so as to maximize expected
 513 profits. The discrete decision will be a function of the
 514 expected subsidy, expected tax credit and expected
 515 fixed costs. Let's define expected gross profits
 516 without support and without sunk costs: $\Pi_{G,t} =$
 517 $\lambda_{it} \bar{R}(x_{it}, z_{it}) - (1 + r + \theta_{it})x_{it}$. There will be the

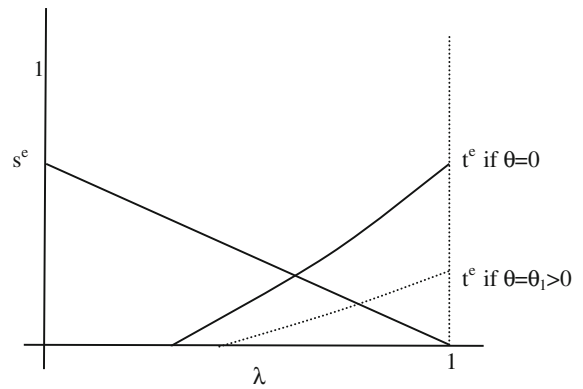


Fig. 1 Expected grant and tax credit rates. *Note* In practice agencies set a maximum subsidy rate below 1. There may also be a minimum subsidy rate. The figure shows that for low values of λ a firm will use only subsidies, conditional on positive expected profits, while for higher values it will use both. For values close to 1 a firm may use only tax credits, if either the agency sets a minimum subsidy level or the costs to the firm of applying are not negligible

518 following cases, depending on the values of $\lambda, \theta,$
 519 F and $d_{i,t-1}$.¹⁸

- (a) With high appropriability and no financing constraints ($\lambda = 1$ and $\theta = 0$), the firm's expected subsidy will be 0. There will be some level of R&D investment such that expected gross profits are positive, and so will be the expected tax credit. If the firm was investing in R&D in the previous period, it will not have to incur sunk costs. It will then perform R&D and claim the tax credit. If it was not previously investing, then it will invest in R&D only if $\Pi_{G,t} + \beta T^e(\lambda, \theta; x) > F$. We thus expect firms with high appropriability and with previous R&D experience to claim R&D tax credits. These firms would be unlikely to obtain subsidies if the agency's goals are mostly dealing with market failures.
- (b) For $\lambda = 1$ but $\theta > 0$: as θ increases, gross profits fall. For small values of θ , the expected tax credit may still be positive. In this case for some firms it may still be optimal to invest in R&D and claim the credit. However, for large values of θ , gross profits will be small or negative, so the tax credit could not be claimed. In that case a firm would invest only if the agency provides support to

17FL01 ¹⁷ EU communications concerning innovation policy appeal to
 17FL02 market failures as one of the motivations for public support.
 17FL03 This is public information, so it is not unreasonable to formulate
 17FL04 the expected subsidy this way. In addition, public agencies
 17FL05 usually publish annual reports and other periodical publications
 17FL06 that provide some information about the support that has been
 17FL07 granted. For instance in Spain the agency publishes yearly a list
 17FL08 of projects and firms that have obtained support; from this
 17FL09 information, as well as on agency information describing
 17FL10 eligibility for support, a firm can build realistic expectations
 17FL11 regarding the likelihood of obtaining a grant and/or a loan for a
 17FL12 project.

¹⁸ To simplify notation, subscripts are omitted hereafter.

544 financially constrained firms, enabling them to
 545 use the tax credit in addition.¹⁹

546 (c) For the extreme case where $\lambda = 0$, indepen-
 547 dently of the value of θ , the optimal R&D
 548 investment would always be 0 unless the
 549 expected subsidy at least covers the whole
 550 project cost as well as the sunk cost if the firm
 551 did not invest in R&D previously. In those cases
 552 the firm would perform R&D only if granted a
 553 subsidy.

554 (d) When $0 < \lambda < 1$, the expected subsidy is
 555 positive but falls as λ increases. Figure 1
 556 suggests that for some intermediate values of λ ,
 557 and in the absence of financing constraints, a firm
 558 will be able to use both instruments. However, as
 559 financing constraints increase (large θ), the firm
 560 will rely mostly on subsidies. As λ falls, the
 561 expected tax credit falls independently of θ , so
 562 the firm will rely more on subsidies only.

563 (e) Firms will be unlikely to use any support in the
 564 following situations: (1) when sunk costs are
 565 high enough to make expected profits negative
 566 even with if expected subsidy and tax credit are
 567 positive; (2) when expected tax credit or subsidy
 568 are too low relative to costs of using support.²⁰

569 This discussion suggests that we should expect the
 570 following correlation patterns between the use of each
 571 type of support and appropriability and financing
 572 constraints: (1) the exclusive use of tax credits will be
 573 negatively correlated with financing constraints and
 574 positively with appropriability and previous R&D
 575 experience; (2) the exclusive use of subsidies will be
 576 highly correlated with high financing constraints and/
 577 or low appropriability; (3) the use of both tax credits

and subsidies will be correlated with low financing 578
 constraints and low appropriability difficulties, and (4) 579
 the use of no support will be negatively correlated with 580
 previous R&D experience. To the extent that SMEs are 581
 more likely to face both financing and appropriability 582
 constraints than large firms, the predicted correlations 583
 are expected to be stronger in the first case. 584

5 Empirical analysis: variables, empirical model 585 and results 586

5.1 Variables and empirical model 587

Our purpose is to test whether the use of each policy 588
 instrument is correlated with indicators of appropri- 589
 ability and financing constraints with the signs 590
 predicted in the discussion above. We use two non- 591
 overlapping waves of the PITEC to construct our 592
 variables. The dependent variables are *Tax incentives*, 593
 which is a binary variable that equals 1 if a firm 594
 declares having claimed R&D tax credits any year 595
 within the period 2006–2008, and *Direct support*, 596
 which equals 1 if the firm has obtained direct funding 597
 from the Central Administration any year within this 598
 period.²¹ Only subsidies (grants) are included in this 599
 definition; loans and public contracts are excluded. 600
 Both variables are defined over a 3 years period 601
 because tax credits may be carried forward, and direct 602
 support may spread over more than 1 year.²² 603

The survey does not provide information about 604
 whether a firm applied for but did not obtain direct 605
 support; consequently, observed status captures not 606
 only a firm's decision to apply but also the public 607
 agency's preferences. While knowing which firms are 608
 rejected applicants would be of interest for further 609

19FL01 ¹⁹ In the corporate taxation literature, Keuschnigg and Ribi
 19FL02 (2010) predict that R&D tax credits will not only encourage
 19FL03 innovation but also relax financing constraints and help
 19FL04 innovative firms to exploit investment opportunities to a larger
 19FL05 extent. Edgerton (2010), however, finds that the responsiveness
 19FL06 to investment tax incentives varies with firm cash flows. We
 19FL07 believe that even without knowledge spillovers, SMEs and
 19FL08 young firms that are financially constrained will be less likely to
 19FL09 benefit from R&D tax credits. Large firms, however, can have
 19FL10 positive taxable income from other activities, and the expected
 19FL11 tax credit may be more predictable, helping them mitigate mild
 19FL12 appropriability or financing constraints.

20FL01 ²⁰ In practice, some firms may perform incremental R&D that
 20FL02 would not qualify for a subsidy, but might qualify for a tax
 20FL03 credit. Compliance costs and fear of a tax audit may deter some
 20FL04 of those firms from claiming tax credits. See also footnote 12.

21FL01 ²¹ Regional or local governments do not provide R&D tax
 21FL02 incentives. Regarding direct support, some firms may obtain
 21FL03 additional funds from local, central or European administra-
 21FL04 tions, but eligibility criteria for support may differ across
 21FL05 government levels, so aggregation over jurisdictions might
 21FL06 distort results (Blanes and Busom 2004). Since R&D tax
 21FL07 incentives are a policy implemented at the Central government
 21FL08 level, they should be compared to direct support provided by the
 21FL09 same government level.

22FL01 ²² We later test for the sensitivity of results to changes in the
 22FL02 definition of the dependent variables, and to the use annual
 22FL03 observations.

611 policy analysis, what we are interested in here is
 612 whether obtaining support and our measures of
 613 innovation barriers are correlated, which would reflect
 614 the ability of the public agency to select from the pool
 615 of applicants those firms or projects that should be
 616 supported from a social perspective. Non applicants,
 617 and rejected applicants would fail to fulfil these
 618 requirements.

619 Our core independent variables are constructed as
 620 follows. As a proxy for *financing constraints* (θ) we
 621 use a direct measure obtained from a survey question
 622 about the importance given by the firm to difficulties in
 623 financing innovation with internal or external funds. In
 624 the literature, cash flow has been frequently used as a
 625 proxy for financing constraints in R&D investment
 626 equations, but as this measure has been subject to
 627 criticism, some researchers have recently turned to
 628 using measures of financing constraints derived from
 629 direct questions in surveys (Gorodnichenko and
 630 Schnitzer 2013; Hajivassiliou and Savignac 2011;
 631 Hottenrott and Peters 2012).²³ Direct measures may in
 632 turn have other shortcomings, such as subjectivity and
 633 endogeneity. We address these concerns by (1)
 634 measuring the relative importance of each barrier
 635 with respect to the average importance of all barriers
 636 for that firm and testing for endogeneity of this
 637 measure; (2) using lagged indicators of barriers, (2)
 638 dropping from the sample firms that declare that there
 639 is no need to innovate as the main reason for not doing
 640 so.²⁴ Because of the observed high correlation
 641 between the importance of internal and external
 642 barriers, we aggregate them in a single measure,
 643 although in Sect. 6 we present separate estimates for
 644 each.

645 Direct measures of *appropriability* (λ) are hard to
 646 come by. In most existing empirical work either firm's
 647 belief on the effectiveness of legal protection methods,
 648 or their actual use, have been accepted as the standard
 649 indicator of outgoing spillovers (Cassiman and

650 Veugelers 2002). We also take this approach, for lack
 651 of better alternatives, and define a binary variable
 652 which takes the value of 1 if the firm has used any
 653 (copyrights, trademarks, design or patent). There will
 654 be some ambiguity on how to interpret this variable,
 655 since firms which do not use these mechanisms may
 656 have alternative ways of appropriating revenues.²⁵ In
 657 order to control for some industry-level features that
 658 might affect individual appropriability we introduce
 659 the percentage of firms that believe that information
 660 from other firms in the field is an important source of
 661 ideas for own innovation projects, as well as the ratio
 662 of firms that introduce a novelty at the market level to
 663 firms that introduce novelty at the firm level, as a
 664 measure of the importance of imitation.

665 We take into account a set of other variables and
 666 controls since other factors condition firms' decisions
 667 regarding R&D. As a simple indicator of whether the
 668 firm faces R&D entry sunk costs (Mañez-Castillejo
 669 et al. 2009) we include two binary variables reflecting
 670 past R&D experience: whether the firm performs R&D
 671 in a continuous way, and whether it does so occasion-
 672 ally. As young firms may face in particular high sunk
 673 costs, we add a binary variable for firms that are
 674 5 years of age or younger in knowledge intensive
 675 industries. We also take into account additional
 676 barriers to innovate as perceived by the firm: the
 677 existence of an established dominant firm, which may
 678 discourage other firms' R&D (Cabral and Polak 2012);
 679 the degree of demand risk, lack of personnel and lack
 680 of information; human capital, a driver of the ability of
 681 a firm to generate ideas and high quality R&D projects
 682 (Leiponen 2005; Arvanitis and Stucki, 2012). A firm's
 683 labor productivity relative to industry average is
 684 included for two reasons: recent work shows that a
 685 firm's incentives to innovate may be affected by its
 686 position relative to the technological frontier (Aghion
 687 et al. 2009); and returns to innovation may be higher
 688 for more productive firms (Aw et al. 2011). Additional
 689 control variables are included to account for other
 690 possible sources of heterogeneity: exporter status, firm

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23FL01 ²³ Hajivassiliou and Savignac (2011) use a French firm-level
 23FL02 data set that includes subjective, direct indicators of financing
 23FL03 constraints similar to ours as well as objective but indirect
 23FL04 indicators such as leverage ratio, cash flow or the profit margin.
 23FL05 They find that they are highly correlated.

24FL01 ²⁴ In our sensitivity analysis, we will redefine financing
 24FL02 constraints as a binary variable equal to 1 if the firm considers
 24FL03 that lack of internal or external funds is of high importance. We
 24FL04 also construct a control variable that captures the firm's overall
 24FL05 perception of difficulties (*awareness of constraints*).

25FL01 ²⁵ Secrecy may be a preferred option for some projects or firms.
 25FL02 The survey does not include any direct question related to the
 25FL03 firm's concern for imitation by rivals, which would provide a
 25FL04 direct indicator of expected appropriability difficulties. Firms
 25FL05 are only asked about the actual use of legal protection
 25FL06 mechanisms. We assume that use of these mechanisms signals
 25FL07 that a firm believes that threat of imitation is important and that
 25FL08 using legal protection may prevent it at least to some extent.

691 size, regional location, type of industry (by knowledge
692 intensity). All variables are defined in Table 7 in the
693 appendix, while Table 8 provides descriptive statistics
694 by policy use status.

695 Since we focus on testing whether the observed
696 patterns of use of the policy instruments can be related
697 to firm level indicators of market failures as discussed
698 above, we use for our baseline specification a bivariate
699 probit model, which implies that subsidy and tax credit
700 participation status are two random variables that may
701 be determined separately, although allowing for
702 correlation between the random terms across both
703 participation variables.²⁶ The empirical model is:

$$S = 1 \quad \text{if } S^* = b_s X + e_s > 0, \quad S = 0 \text{ otherwise} \quad (2)$$

$$705 \quad T = 1 \quad \text{if } T^* = b_t X + e_t > 0, \quad T = 0 \text{ otherwise} \quad (3)$$

707 where S stands for obtaining a grant or subsidy, and
708 T stands for claiming a tax credit. The random terms
709 are assumed to be jointly distributed as a bivariate
710 normal $BN(\mathbf{0}, \mathbf{1}, \rho)$; variables in X are lagged. This
711 model generates four possible mutually exclusive
712 situations a firm can be in: no support (0,0); uses only
713 tax credits (0,1); uses only a direct subsidy (1,0) and
714 uses both a grant and claims a tax credit (1,1), and
715 therefore four sets of corresponding joint probabilities.
716 We will report below the average of marginal effects
717 for each observation, computed at each value of
718 x (AME), on the joint probability.

719 An alternative specification consists of using a
720 multinomial probit model (MNP) with four mutually
721 exclusive alternatives. It imposes the assumption that
722 each pair of subsidy and tax credit status is viewed by
723 the firm as a distinct alternative to other pairs, and that
724 the alternative with the highest value is chosen. We
725 estimate this model later and report results in Sect. 6.

726 We separately estimate the model for SMEs and for
727 large firms for several reasons. A thick body of
728 research compares SMEs and large firms in several
729 dimensions: performance, governance, innovation and
730 R&D, access to finance are some of them. Access to
731 finance may be difficult for SMEs because of their
732 limited collateral, and, for those who in addition are

young, by lack of reputation; sunk costs may vary
across firm size, as well as the ability to appropriate
returns from innovation.²⁷ In addition, the design of
both instruments may differ across firm size as a result
of the policy-makers' wish to encourage SMEs to
participate in those programs.²⁸ Finally, different
sampling procedures are used for firms with less than
200 employees and firms with 200 or more (see
footnote 7).

5.2 Results: baseline estimation

Before estimating the bivariate probit model, we test
for the endogeneity of the lagged financing constraints
indicator with the control function approach, using
firm age as the exclusion restriction. We do not reject
the null of exogeneity; the results of the set of
exogeneity tests are shown on Table 9. We then
estimate the bivariate probit model for subsidies and
tax incentives. We obtain a low but positive and
significant correlation between the residuals of both
equations, suggesting that some common unobserved
variables affect the use of both instruments in the same
direction.²⁹

Tables 2, 3 and 4 report the estimated average
marginal effect of a change in each explanatory
variable on the joint probability of each of the four
possible situations a firm may be in. We first discuss
the marginal effects on the probability of using only
tax credits and of using only direct support, as we
expect the results of these two cases to offer a sharper
picture of the potential differences between both tools
than the other two.

For SMEs, being *financially constrained* reduces
the probability of using only tax credits by about 5 %
points (pp), while it increases the probability of using
only direct support also by about 3 pp. These results
are consistent with the expected patterns discussed in

²⁷ Regarding SMEs and access to financing for innovation, see Beck et al. (2008), Hall and Lerner (2010) and Canton et al. (2013).

²⁸ In the case of tax incentives, different credit rates or different caps may be applied to SMEs, as is our case.

²⁹ We perform several tests. We test for equality of coefficients of our core variables across the two equations in the bivariate model. The null is rejected in the case of SMEs, but not for large firms. Chi square tests not reported in the tables but are available on request. As a specification test, we perform a test for normality of residuals (Chiburis 2010).

26FL01 ²⁶ Dependent variables are obtained from PITEC 2008 survey,
26FL02 while independent variables are taken from PITEC 2005 in
26FL03 order to deal at least partially with potential endogeneity issues.

Table 2 SMEs—Bivariate probit regression—Marginal Effects

	Both instruments	Only subsidies	Only tax credits	None
Financing constraints	0.004 (0.007)	0.027*** (0.007)	-0.053*** (0.013)	0.021 (0.016)
IP protection	0.018*** (0.006)	0.004 (0.007)	0.021* (0.012)	-0.043*** (0.013)
Dominant firm	0.000 (0.006)	0.003 (0.006)	-0.006 (0.011)	0.003 (0.013)
Demand risk	0.002 (0.006)	-0.005 (0.007)	0.014 (0.012)	-0.011 (0.012)
Low skill emp.	-0.069*** (0.016)	-0.038** (0.017)	-0.027 (0.026)	0.134*** (0.031)
High skill emp.	0.064*** (0.011)	0.041*** (0.012)	0.012 (0.022)	-0.117*** (0.024)
Considers TI	0.072*** (0.007)	-0.008 (0.006)	0.134*** (0.011)	-0.197*** (0.012)
Stable R&D	0.094*** (0.010)	0.025** (0.010)	0.095*** (0.017)	-0.213*** (0.019)
Occasional R&D	0.050*** (0.011)	0.016 (0.012)	0.044** (0.019)	-0.111*** (0.022)
Fixed investment	0.035*** (0.009)	0.010 (0.009)	0.035** (0.016)	-0.080*** (0.018)
Relative productivity	0.015*** (0.004)	-0.007* (0.004)	0.041*** (0.008)	-0.049*** (0.009)
Group	0.018** (0.008)	0.012 (0.008)	0.002 (0.015)	-0.033* (0.017)
Private domestic	0.026** (0.013)	0.001 (0.012)	0.040* (0.022)	-0.067** (0.027)
Exporter	0.014* (0.008)	-0.009 (0.008)	0.043*** (0.014)	-0.049*** (0.017)
Size: $x < 20$ emp.	-0.035*** (0.011)	0.009 (0.011)	-0.077*** (0.019)	0.103*** (0.022)
Size: $20 \leq x < 50$	-0.024** (0.009)	-0.007 (0.009)	-0.023 (0.017)	0.053*** (0.019)
Size: $50 \leq x < 100$	-0.014 (0.009)	0.003 (0.009)	-0.029* (0.017)	0.040** (0.020)
New*Hightec	0.019 (0.033)	0.056** (0.025)	-0.095* (0.051)	0.020 (0.074)
New*Medhigh	0.001 (0.020)	-0.009 (0.020)	0.022 (0.035)	-0.014 (0.042)
Tech Park	0.042** (0.021)	0.013 (0.017)	0.040 (0.035)	-0.095** (0.047)
Hightec	0.038*** (0.014)	-0.009 (0.015)	0.081*** (0.027)	-0.109*** (0.030)
Medhigh	0.021** (0.009)	-0.013 (0.009)	0.062*** (0.016)	-0.069*** (0.018)

Table 2 continued

	Both instruments	Only subsidies	Only tax credits	None
Medlow	0.004 (0.009)	-0.006 (0.009)	0.019 (0.016)	-0.018 (0.018)
Support: local	0.071*** (0.007)	0.050*** (0.007)	0.003 (0.012)	-0.124*** (0.014)
Support: EU	0.060*** (0.013)	0.064*** (0.014)	-0.048* (0.027)	-0.076** (0.030)
Industry innovativeness	0.102*** (0.032)	0.079** (0.032)	-0.011 (0.058)	-0.170** (0.068)
<i>N</i>	2,241	273	778	334

Dependent variables: *S* = obtaining a subsidy and *T* = claiming a tax credit

Each column shows estimated average marginal effects of covariates on each joint probability. The total number of observations is 3,626; log pseudolikelihood = -3,212.04; Wald $\chi^2(58) = 1,064.5$; $\rho = 0.25$ (SE = 0.03). Regional binary variables have been included. The omitted firm size category is 100–199 employees

***, ** and * Significance at the 1, 5 and 10 % level, respectively

769 Sect. 4 above. Regarding *appropriability*, we find that
770 SMEs that have protected IP in the preceding period
771 are more likely to use tax incentives. This result is also
772 consistent with the predicted pattern. The fact that
773 high productivity and export status, along with
774 protection, are positively correlated with the use of
775 tax credits corroborates the hypothesis that this
776 instrument acts as a prize for success. The probability
777 of using only grants is found to be independent of
778 protection status. This is a somewhat surprising result,
779 as a negative sign could be expected. This outcome
780 may be attributed to a number of factors, but lacking
781 information on the nature of the approved projects, it
782 would be premature to extract any conclusions,
783 beyond what the estimated coefficient says, which is
784 that protection is unrelated to the use of grants, in
785 contrast to tax incentives.³⁰

786 We test for interaction effects between appropri-
787 ability and financing constraints by including an
788 interaction term in the estimated equations. We find
789 that the effect of using protection on some of the joint
790 probabilities varies depending on the intensity of

financing constraints. In particular, the probability of
using only tax incentives is higher for firms that protect
than for firms that do not protect, and falls as financing
constraints increase, but more so for firms that do not
protect. Figure 2 shows the estimated probabilities for
different values of financing constraints and each
protection state. While the probability of using only tax
credits if the firm protects and has a low level of financing
constraints is 27 %, and falls to 22 % if financial
constraints are high, when the firm does not protect, with
low financing constraints the probability is 22 %, while
with high constraints it falls to 14 %. This shows that
protection enhances *appropriability*, allowing firms to
generate profits so that tax credits are likely to be claimed,
even with financial constraints. Protection offsets some-
what the negative effects of financing constraints.³¹

Table 2 shows as well that previous R&D experi-
ence increases the likelihood of using only tax credits
by 10 pp. if the firm is a continuous performer, and by
4 pp. if it does it occasionally. The likelihood of using
only grants increases only slightly with experience,

³⁰ One possible explanation is that past protection use is an imperfect approximation to *appropriability* of approved projects; a second possibility is that it may be difficult for the agency to evaluate the degree of *appropriability* of an R&D project, so that financing constraints carry more weight in the decision rule; it is also possible that firms do not submit proposals for R&D projects that do not reach some *appropriability* threshold.

³¹ The inclusion of the interaction term does not affect the average marginal effect of remaining variables. An alternative way to test for interaction effects is to create a binary variable for each combination of *appropriability* difficulties and financing constraints. Estimation results show that relative to firms that protect and do not face important financing constraints, those that suffer from both problems are 7 pp. less likely to use tax credits only, 2 pp. more likely to use a subsidy only, and 2 pp. less likely to use both types of support.

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Table 3 Large firms—Bivariate probit regression—Marginal effects

	Both instruments	Only subsidies	Only tax credits	None
Financing constraints	0.008 (0.029)	0.050** (0.021)	-0.087** (0.035)	0.029 (0.038)
IP protection	0.021 ^a (0.020)	0.016 (0.016)	-0.021 ^a (0.027)	-0.016 (0.026)
Dominant firm	-0.017 (0.019)	-0.015 (0.016)	0.021 (0.026)	0.011 (0.025)
Demand risk	-0.006 (0.019)	0.016 (0.016)	-0.032 (0.028)	0.021 (0.026)
Low skill emp.	-0.088* (0.046)	0.021 (0.035)	-0.069 ^a (0.056)	0.136** (0.055)
High skill emp.	0.029 (0.047)	-0.001 (0.048)	0.012 (0.082)	-0.040 (0.063)
Considers TI	0.086*** (0.020)	-0.065*** (0.014)	0.147*** (0.023)	-0.168*** (0.024)
Stable R&D	0.243*** (0.032)	0.009 (0.019)	0.068** (0.031)	-0.320*** (0.034)
Occasional R&D	0.135*** (0.041)	0.012 (0.026)	0.025 (0.044)	-0.172*** (0.049)
Fixed investment	-0.012 (0.040)	-0.014 (0.027)	0.021 (0.046)	0.005 (0.049)
Relative productivity	0.043*** (0.016)	-0.008 (0.012)	0.030 ^a (0.020)	-0.064*** (0.021)
Group	0.039 ^a (0.025)	0.013 (0.017)	-0.010 (0.028)	-0.042 (0.033)
Private domestic	0.104*** (0.023)	0.030* (0.018)	-0.018 (0.030)	-0.116*** (0.029)
Exporter	0.032 ^a (0.029)	-0.003 (0.023)	0.016 (0.038)	-0.045 (0.037)
Size: $200 \leq x < 400$ emp.	-0.112*** (0.034)	-0.053** (0.024)	0.057 ^a (0.041)	0.109** (0.044)
Size: $400 \leq x < 700$	-0.066* (0.036)	-0.064** (0.027)	0.093** (0.046)	0.038 (0.047)
Size: $700 \leq x < 1,000$	-0.066 (0.045)	-0.033 (0.032)	0.037 (0.056)	0.062 (0.058)
New*Hightec	0.045 (0.134)	0.176** (0.083)	-0.300** (0.147)	0.079 (0.179)
New*Medhigh	-0.180* (0.103)	0.057 (0.096)	-0.165 (0.166)	0.287** (0.138)
Tech Park	0.019 (0.063)	0.064 ^a (0.047)	-0.108 ^a (0.082)	0.025 (0.084)
Hightec	0.029 (0.042)	0.004 (0.037)	0.003 (0.062)	-0.036 (0.054)
Medhigh	0.076*** (0.026)	0.015 (0.019)	-0.001 (0.033)	-0.090*** (0.033)

Table 3 continued

	Both instruments	Only subsidies	Only tax credits	None
Medlow	0.066** (0.026)	0.018 (0.019)	-0.010 (0.032)	-0.074** (0.034)
Support: local	0.115*** (0.021)	0.049*** (0.016)	-0.048* (0.028)	-0.116*** (0.029)
Support: EU	0.090*** (0.034)	0.086*** (0.027)	-0.124*** (0.047)	-0.052 (0.046)
Industry innovativeness	0.140 ^a (0.096)	0.020 (0.067)	0.012 (0.115)	-0.172 ^a (0.124)
<i>N</i>	161	83	209	358

Dependent variables: *S* = obtaining a subsidy and *T* = claiming a tax credit

Each column shows estimated average marginal effects of covariates on each joint probability

The total number of observations is 811; log pseudolikelihood = -796.99; Wald $\chi^2(58) = 416.9$; $\rho = 0.22$ (SE = 0.07). Regional binary variables have been included. The omitted firm size category is 1,000 or more employees

^a Considering that our sample of about 800 firms with 200 or more employees is large relative to the total number of firms this size in the manufacturing industries—which in 2005 was of about 1,400 firms, according to the Spanish Statistical Office (DIRCE)—, it would be appropriate to use a finite population correction, which recalculates the standard errors of the estimates taking into account the size of the sample relative to the population. When using this method, we find indeed that some more variables become significant: this is indicated with the superscript a

***, ** and * Significance at the 1, 5 and 10 % level, respectively

812 and not at all if the firm is an occasional R&D
813 performer. Tax credits are more thus likely to benefit
814 stable R&D performers that do not have to incur in
815 sunk costs. An even stronger difference across both
816 instruments is observed with respect to young firms in
817 high-tech industries: while the likelihood of this firms
818 using tax credits only is almost 10 pp lower than
819 otherwise, the likelihood that they obtain a grant is
820 6 pp. higher. This suggests that subsidies may induce
821 firms, especially young and knowledge-based, to
822 invest in R&D, while tax incentives alone are unlikely
823 to do so.

824 There are some other interesting differences across
825 both tools. A high level of human capital increases the
826 probability of using direct support only. A firm's
827 relative productivity is positively correlated to the
828 probability of using tax incentives only, but negatively
829 with the probability of receiving subsidies. Firms in
830 the smallest size intervals (<20 employees) are less
831 likely to use tax incentives, while they do not show any
832 disadvantage relative to larger firms in the use of
833 subsidies. Firms in high-tech and medium-high tech-
834 nological intensity are more likely to use tax incen-
835 tives only, while having received support from local
836 and European administrations increases the likelihood
837 of obtaining subsidies, but not tax incentives. To the

838 extent that European institutions fund projects at pre-
839 competitive stages, and thus more likely to generate
840 spillovers, this result would strengthen the hypothesis
841 that subsidies can be more helpful at addressing
842 knowledge spillovers than tax incentives.

843 We next look at the other two groups of firms: those
844 that do not use any support, and those that use both tax
845 credits and direct support. We find that human capital
846 and previous experience in R&D are among the most
847 important determinants of using both kinds of support,
848 along with protection. The likelihood of not using any
849 support is higher for firms with very low levels of human
850 capital, without previous R&D experience, low relative
851 productivity and domestic market oriented. These last
852 two results are in line with Takalo et al. (2012) as well as
853 with Aw et al. (2011) in that productivity and exporting
854 status increase the reward of R&D investments.

855 Table 3 shows estimation results for large firms. We
856 find a significant, positive correlation between financing
857 constraints and the likelihood of using subsidies only,
858 while the correlation is negative with using tax incen-
859 tives only. Magnitudes are even a little higher than for
860 SMEs. When we distinguish between internal and
861 external financing constraints (see Table 5 below) we
862 find that large firms' status is highly sensitive to external
863 but not to internal constraints. Use of IP protection is

Table 4 All firms—Bivariate probit regression—Marginal effects

	Both instruments	Only subsidies	Only tax credits	None
Financing constraints	0.007 (0.008)	0.030*** (0.007)	-0.057*** (0.013)	0.019 (0.015)
IP protection	-0.002 (0.006)	-0.000 (0.006)	-0.002 (0.010)	0.004 (0.011)
Dominant firm	0.003 (0.006)	-0.002 (0.006)	0.007 (0.011)	-0.008 (0.011)
Demand risk	0.020*** (0.006)	0.006 (0.006)	0.012 (0.011)	-0.038*** (0.012)
Low skill emp.	-0.072*** (0.016)	-0.027* (0.015)	-0.032 (0.024)	0.131*** (0.027)
High skill emp.	0.064*** (0.012)	0.029** (0.012)	0.018 (0.022)	-0.111*** (0.023)
Considers TI	0.078*** (0.006)	-0.018*** (0.006)	0.136*** (0.010)	-0.196*** (0.011)
Stable R&D	0.119*** (0.010)	0.025*** (0.009)	0.096*** (0.015)	-0.239*** (0.017)
Occasional R&D	0.065*** (0.012)	0.017 (0.011)	0.044** (0.018)	-0.126*** (0.020)
Fixed investment	0.034*** (0.010)	0.006 (0.009)	0.029* (0.015)	-0.069*** (0.017)
Relative productivity	0.022*** (0.005)	-0.003 (0.005)	0.035*** (0.008)	-0.054*** (0.010)
Group	0.025*** (0.008)	0.016** (0.007)	-0.004 (0.013)	-0.037** (0.015)
Private domestic	0.042*** (0.011)	0.015 (0.010)	0.020 (0.017)	-0.078*** (0.020)
Exporter	0.019** (0.008)	-0.007 (0.008)	0.039*** (0.013)	-0.051*** (0.015)
Size: $x < 20$ emp.	-0.069*** (0.017)	-0.028* (0.015)	-0.026 (0.028)	0.124*** (0.033)
Size: $20 \leq x < 50$	-0.058*** (0.016)	-0.046*** (0.014)	0.027 (0.026)	0.077** (0.031)
Size: $50 \leq x < 100$	-0.048*** (0.016)	-0.036** (0.014)	0.018 (0.027)	0.066** (0.032)
Size: $100 \leq x < 200$	-0.027 (0.017)	-0.039*** (0.015)	0.050* (0.028)	0.015 (0.033)
Size: $200 \leq x < 400$ emp.	-0.004 (0.017)	-0.018 (0.015)	0.033 (0.028)	-0.011 (0.034)
Size: $400 \leq x < 700$	0.027 (0.020)	-0.019 (0.018)	0.074** (0.035)	-0.083** (0.039)
Size: $700 \leq x < 1,000$	0.031 (0.027)	0.002 (0.025)	0.035 (0.046)	-0.067 (0.052)
New*Hightec	0.035 (0.037)	0.064** (0.026)	-0.094* (0.052)	-0.006 (0.073)

Table 4 continued

	Both instruments	Only subsidies	Only tax credits	None
New*Medhigh	-0.011 (0.023)	-0.015 (0.020)	0.018 (0.035)	0.007 (0.042)
Tech Park	0.042** (0.021)	0.022 (0.016)	0.006 (0.033)	-0.071* (0.042)
Hightec	0.037** (0.014)	-0.009 (0.014)	0.065*** (0.025)	-0.093*** (0.027)
Medhigh	0.031*** (0.009)	-0.006 (0.008)	0.052*** (0.014)	-0.077*** (0.016)
Medlow	0.013 (0.009)	0.001 (0.008)	0.015 (0.014)	-0.028* (0.016)
Support: local	0.082*** (0.007)	0.050*** (0.006)	-0.005 (0.011)	-0.127*** (0.012)
Support: EU	0.066*** (0.012)	0.071*** (0.012)	-0.071*** (0.024)	-0.067*** (0.025)
Industry innovativeness	0.107*** (0.032)	0.068** (0.029)	-0.012 (0.051)	-0.163*** (0.060)
<i>N</i>	494	346	981	2,601

Dependent variables: *S* = obtaining a subsidy and *T* = claiming a tax credit

Each column shows estimated average marginal effects of covariates on each joint probability

The total number of observations is 4,402; log pseudolikelihood = -3,926.39; Wald $\chi^2(66) = 1,477.18$; $\rho = 0.25$ (SE = 0.03). Regional binary variables have been included. The omitted firm size category is 1,000 or more employees

***, ** and * Significance at the 1, 5 and 10 % level, respectively

864 basically unrelated to the use of these instruments. The
865 most distinctive differences between firms that use only
866 tax incentives and firms that use only subsidies are the
867 role of human capital, whose importance is now smaller,
868 except for the probability of using none of the instru-
869 ments, and export status. We also find that firms that
870 have previous R&D experience are more likely to use
871 tax incentives only, or both forms of support, but
872 experience is not correlated to the probability of using
873 subsidies only. Young firms in knowledge intensive
874 industries are also more likely to rely on subsidies rather
875 than in tax incentives, in line with the result obtained for
876 SMEs. When possible interactions are taken into
877 account, we find that firms that protection does not
878 affect the correlation between the likelihood of using
879 only one instrument and the intensity of financing
880 constraints.

881 Table 4 shows the results for the whole sample,
882 merging both firm-size groups. We find that the
883 estimates corresponding to the importance of financing
884 constraints are significant and have the same sign as in

885 the two separate subsamples. But estimates for
886 protection are not significant now, and the different
887 importance of human capital for SMEs and large firms
888 is concealed.

889 To sum up, our results suggest that tax credits are
890 less likely than subsidies to benefit firms that face
891 financing constraints.³² Direct support and tax incen-
892 tives would therefore not be substitutes for addressing
893 them.³³ The ability to protect IP helps SMEs to benefit
894 from tax credits, but not large firms. Tax incentives
895 might provide some compensation to financially
896 unconstrained firms that are affected by at most mild
897 appropriability difficulties.

³² Our results differ from Gelabert et al. (2009) with respect to the relationship between financing constraints and the likelihood of using subsidies. This might be partly explained by differences in sample composition, as theirs consists of firms that reported positive internal R&D expenditure at least one of these years in all sectors, and average firm size is large.

³³ In particular, our finding that financially constrained SMEs are less likely to use tax credits is in line with Edgerton 2010.

898 **6 Robustness analysis**

899 In this section we explore the robustness of our results
900 to the following changes (1) different subsamples of
901 firms; (2) alternative definition of financing con-
902 straints; (3) alternative definitions of the dependent
903 variables, and (4) use of a different econometric model.

904 We begin by re-estimating the baseline model for
905 three different subsamples of firms. The first sub-
906 sample includes only firms that had introduced
907 products new to the market in 2005 or before, because
908 this particular subset may be more sensitive to
909 appropriability issues; second, we restrict the sample
910 to firms that were doing R&D in 2005, and finally we
911 estimate the model for firms in high tech and medium
912 tech manufacturing sectors.³⁴ Second, we change the
913 way we calculate financing constraints; we first
914 distinguish between internal and external constraints;
915 and second, instead of computing the relative impor-
916 tance of each particular constraint for the firm, we
917 generate a binary variable for each barrier which
918 equals 1 when the barrier is of high importance to the
919 firm, and include an index of overall barriers. Third,
920 we change the definition of dependent variables:
921 instead of both referring to the 2006–2008 period, we
922 use the status observed in 2007/8. As a further test we
923 re-estimate the model using an alternative variable on
924 public support available in the survey which includes
925 not only grants but other types of support, such as
926 public loans. We finally estimate a multivariate probit
927 model, where each one of the four alternatives
928 regarding policy use is a random variable and the
929 choice of an alternative involves an explicit compar-
930 ison with the other three.

931 Table 5 reports estimated average marginal effects
932 for the core independent variables of interest, financing
933 constraints and IP protection, obtained using the differ-
934 ent specifications.³⁵ The estimates remain stable for
935 SMEs: financing constraints are always negatively
936 correlated to the use of tax incentives only, while they
937 increase the likelihood of using direct support only. As
938 for appropriability, firms that have used legal protection

939 methods are more likely to use tax incentives, whether
940 alone or in combination with subsidies. The estimates
941 obtained when using a different period, different
942 variables for direct support, or for financing constraints,
943 and the multivariate probit model are all very similar.
944 For the sample of large firms, results for financing
945 constraints are mostly robust to changes in the compu-
946 tation of variables or to estimation model. The main
947 additional insight from this exercise is that it is
948 difficulties in external funding, rather than lack of
949 internal resources, that are correlated with the use of
950 each instrument. Appropriability becomes a significant
951 variable when using as dependent variable for direct
952 support a variable that includes both public grants and
953 loans, suggesting that it is likely that the agency's
954 requirements for these two types of direct support differ.

6.1 Some further results: change of support status 955

956 While the data does not allow us to estimate a dynamic
957 model, we can complement our analysis by testing
958 whether changes in support status across the two
959 periods are related to appropriability, financing con-
960 straints and previous R&D experience. Table 6 below
961 reports the proportion of firms by support status in
962 2005 and their status in period 2006–2008. It shows
963 that about 20–25 % of those firms were not using any
964 support in 2005 did obtain some during the next
965 period. Most often they obtained a subsidy in the case
966 of large firms. There is a higher stability in using both
967 instruments across periods among large firms.

968 We define support status in 2006–2008 as a discrete
969 dependent variable with four possible values: 0 (no
970 support), 1 (only subsidy), 2 (only tax incentives) and
971 3 (both) and use a multinomial logit model to estimate
972 the probability of transition of firm i from the state 0
973 (no support) to the state j ' next period. This probability
974 is given by:

$$\begin{aligned} \text{Prob}(S_{it} = j' | S_{it-1} = 0) \\ = (\exp(x_{it-1}\beta)) / \left(\sum_j \exp(x_{it-1}\beta) \right) \end{aligned}$$

976 where $i = 1, \dots, N$, and $j' = 0, 1, 2, 3$; the vector of
977 independent variables is the same as in the previous
978 section. We estimate these probabilities only for
979 SMEs, as the number of large firms in each cell
980 becomes too small. We find that the probability of
981 switching from no support to using only subsidies in

34FL01 ³⁴ We also check whether changing the definition of SMEs
34FL02 from those with <200 employees to those with <250 and
34FL03 turnover less than €50 million, in line with the standard Eurostat

35FL01 ³⁵ Remaining variables as in the baseline. Detailed results are
35FL02 available on request.

Table 5 Robustness analysis—Average marginal effect of financing constraints and appropriability on the likelihood of support status

Type of support	Financially constrained				Protect			
	None	TC	S	TC + S	None	TC	S	TC + S
Panel A: SMEs								
<i>Baseline</i>		-.05	.03		-.04	.02		.02
1. Dep var as in baseline, Subsample of firms that introduced Products new to the market in 2003–2005		-.06	.04					
2. Dep. var. as in baseline, Subsample of firms that did R&D in 2005		-.05	.03					
3. Dep. var. as in baseline Subsample of firms in high and medium–high tech industries		-.07	.03					
4. Dep. var. as in baseline	.04	-.04	.02	-.02	-.04	.02		.02
Internal financing constraints		-.03	.01		-.04	.02		.02
External financing constraints		-.05	.03		-.04	.02		.02
Change in computation of financing constraints: binary indicators								
5. Change in dependent variables: Subsidy and TI in 2007/8, whole sample		-.05	.03		-.05	.03		.02
6. Change in dependent variables: Subsidies + loans and TI 2006–2008		-.05	.03		-.04	.02		.02
7. Multinomial probit estimation Whole sample, variables as in baseline		-.06	.02			.03		.02
Panel B: large firms								
<i>Baseline</i>		-.08	.05					
2. Dep. var. as in baseline Subsample of firms that did R&D in 2005		-.11	.07					
3. Dep. var. as in baseline Subsample of firms in high and med–high tech industries		-.12	.07					
4. Dep var. as in baseline External financing constraints		-.05	.03					
Change in computation of financing const: binary indicator (for external constraints)		-.09	.05					
5. Change in dependent variables: Subsidies + loans and TI 2007/8		-.08	.04					
6. Change in dependent variables: Subsidies and loans, and TI 2006–2008		-.08	.06			-.05	.04	.05
7. Multinomial probit estimation Whole sample; variables as in baseline		-.07	.06					

Only significant estimates are reported; blank cells indicate a non-significant estimate has been obtained. For large firms estimation with the subsample of firms introducing new products could not be performed because the number of observations in some of the categories was too small (< 45 firms)

Table 6 Frequency of change of support status

Support status in 2005	Support status 2006–2008 (in %)											
	SMEs						Large firms					
	None	S	TC	S + TC	Total	<i>N</i> firms	None	S	TC	S + TC	Total	<i>N</i> firms
None	81	7	8	3	100	2678	77	11	8	4	100	462
S	35	43	5	17	100	189	16	61	8	16	100	51
TC	6	1	74	19	100	712	2	0	65	32	100	245
S + TC	2	4	18	76	100	115	0	0	11	89	100	62

None = no subsidy, no tax credit; S = subsidy, no tax credit; TC = No subsidy, tax credit, S + TC = subsidy and tax credit

982 the next period increases by 2 pp. with financing
 983 constraints and firms using IP protection, but by 8 pp.
 984 for firms with high human capital. The probability of
 985 switching from no support to using only tax incentives
 986 is positively correlated with using IP protection, being
 987 a stable investor in R&D, and having a high relative
 988 productivity. These results are mostly in line with the
 989 baseline results for SMEs.

990 7 Conclusions and implications

991 R&D policies are expected to address certain market
 992 failures and lead to increased private R&D effort.
 993 Previous empirical research has studied the effects of
 994 support on recipient firms in order to test for crowding
 995 out effects, using the concept of additionality. How-
 996 ever, this approach is a necessary step to evaluate the
 997 impact of R&D subsidies or R&D tax credits, it does
 998 not answer the question of whether these instruments
 999 reach firms that face those specific types of constraints
 1000 that lead to R&D underinvestment. We compare the
 1001 use by SMEs and large firms of these two tools, to test
 1002 directly their correlation with two potential barriers to
 1003 innovation, financing constraints and appropriability,
 1004 and with R&D entry costs. To the best of our
 1005 knowledge this is the first time that this policy
 1006 question is explicitly addressed and that both policy
 1007 instruments are compared.

1008 Using data from two waves of the Spanish CIS
 1009 survey, 2003–2005 and 2006–2008, we find, for
 1010 SMEs, a clear association between specific sources
 1011 of market failure and the type of support used. For
 1012 each instrument the sign of this relationship is the
 1013 opposite: the probability of using tax incentives falls
 1014 as financing constraints (whether internal or external)
 1015 increase, while the likelihood of using direct funding

1016 increases. Regarding the association with appropri- 1016
 1017 ability, SMEs that are able to protect their innovations 1017
 1018 are more likely to use tax incentives, even if financing 1018
 1019 constraints increase. 1019

1020 For large firms we find that difficulties in external 1020
 1021 access to funds are positively correlated with the use of 1021
 1022 subsidies, and negatively to the use of tax credits. We 1022
 1023 do not find appropriability to be related to the use of 1023
 1024 exclusively one of the policy tools; but previous R&D 1024
 1025 experience is highly correlated with using both tools or 1025
 1026 tax incentives only.³⁶ What is common to both large 1026
 1027 firms and SMEs is that they both are more likely to use 1027
 1028 tax incentives (alone or along with subsidies) when 1028
 1029 they have previous R&D experience, and that young 1029
 1030 firms in knowledge intensive industries are less likely 1030
 1031 to use tax incentives than subsidies. This suggests that 1031
 1032 direct support may induce non-R&D doers and young 1032
 1033 firms to invest in R&D, while tax credits are unlikely 1033
 1034 to do so. 1034

1035 These findings have some policy implications. 1035
 1036 First, R&D tax incentives and R&D subsidies do not 1036
 1037 appear to be equivalent tools for SMEs. Our evidence 1037
 1038 supports the hypothesis that tax incentives provide a 1038
 1039 reward to firms that do not face important financing 1039
 1040 constraints and whose projects enjoy high appropri- 1040
 1041 ability, while they are likely to leave out projects that 1041
 1042 should be supported. Tax incentives, nevertheless, 1042
 1043 might be potentially useful in addressing mild appro- 1043
 1044 priability difficulties of firms that are not financially 1044
 1045 constrained. In that sense, direct support and tax 1045
 1046 incentives could be complementary for a particular 1046

³⁶ To the extent that large firms have lower appropriability and internal financing difficulties; there might be more room for some crowding out as found by Lokshin and Mohnen (2012).

subset of firms or projects.³⁷ Second, our results imply that one size may not fit all in innovation policy, as the type of market failure faced by firms differs across firm size. And third, both for large firms and SMEs, R&D subsidies are more likely to reach firms that do not have previous R&D activity or are young and knowledge intensive. Direct support might be more appropriate than tax credits when the main policy goal is to increase the number of firms that perform R&D (an effect on extensive margin). Tax credits may instead help R&D performers to continue or increase the intensity of this activity (an effect on the intensive margin).

Our work also illustrates that innovation policy analysis could be improved if surveys provided enhanced indicators of some constraints, particularly of the fear or risk of imitation as a potential barrier to innovate. As the design and administration of innovation surveys is spreading across countries, revising or introducing some questions in light of existing results may have a significant payoff.

Acknowledgments This research has been supported by Instituto de Estudios Fiscales, Ministerio de Ciencia e Innovación (Projects ECO2009-08308 and ECO2009-10003), Generalitat de Catalunya 2009SGR0600; and Junta de Extremadura (Project IB10013). Ester Martínez Ros benefited from a grant from Bankia to visit UNU-MERIT while working on this project. We are grateful to anonymous referees for their helpful comments.

Appendix A: Main features of R&D tax incentives and direct support in Spain

Tax incentives

R&D Tax incentives for R&D investment have been in place in Spain since the early eighties, but the major legal change dates from 1995, when a new law on corporate taxation was introduced. The definition of R&D eligible expenses follows the OECD Frascati Manual guidelines. Tax incentives

³⁷ The use of multiple policy instruments to address private underinvestment in R&D may be optimal in a second-best world with multiple market failures, coupled with informational, political and administrative capacity constraints. These issues have been considered in the design and implementation of environmental policies (Bennear and Stavins 2007), and may be relevant for innovation policy as well.

are basically provided through deductions from corporate taxable income (100 % of current R&D expenditures, and 100 % write off of R&D fixed assets except buildings) and from the firm's tax liability (the tax credit). The tax credit offered is a hybrid of an incremental and a volume based system. In 1999 (Act 55/99) non-RD technological innovation expenditures were included as eligible for tax credit at a 10 or 15 % rate, depending on the type of expenditure. Tax credit rates were initially 20 % of R&D volume, and 40 % of the excess on average R&D expenditures of the two preceding years, with a cap of 35 % of the tax liability. In 2001 (Act 24(01)) both rates were increased (to 30 and 50 % respectively), as well as the cap (to 50 % for SMEs if the credit was greater than 10 % of the tax liability). In 2004, in addition, firms could deduct 20 % of the labour cost of employees assigned exclusively to R&D tasks. Rates were somewhat reduced in 2007 and 2008. From 2007 onwards, firms could use the alternative option of deducting from the social security tax 40 % of the liability corresponding to R&D employees. Excess credit can be carried forward up to 15 years. Firms that obtain R&D and innovation subsidies can claim tax credits on all R&D expenditure remaining after subtracting 65 % of the subsidies received.

Direct support to R&D and innovation through CDTI

The annual reports of the main funding agency, CDTI, provide the following information about direct support during the period 2006–2008. In 2006, CDTI contributed 802 million € to 1032 projects, out of 1434 applications. Most of the funding (50 %) was allocated to technological development projects; 14 % to technological innovation projects (mostly adoption of innovations); 9 % to cooperative industrial research, 25 % to large public–private research consortia (CENIT projects). The first three types offered 0-interest loans and up to a 20 % grant, depending on the features of the project. CENIT projects were offered grants of up to 50 % of the R&D budget; these are 4 year-long projects, with budgets between 20 to 40 million €. Loans were offered to new technology based firms of up to 70 % of the budget of the project, with maximum funding of 400 thousand € (Neotec Projects). In 2007, CDTI contributed 1,090 million €

1132 to 1,111 projects. In 2008, projects i) and ii) were
 1133 combined in a single category so as to comply with EU
 1134 state aid rules. Total CDTI funding decreased to
 1135 766 million € that were allocated to 1,124 projects.
 1136 The grant rate was increased to 25 %. CDTI also
 1137 provides advice about using tax incentives to firms that
 1138 obtain direct support. *Sources*: Dirección General de
 1139 Tributos and CDTI's annual reports, several years.

1140 Appendix B

1141 See Tables 7, 8, 9 and Fig. 2

Table 7 Definition of independent and control variables

Financing constraints Dominant firm Demand risk	For each of these perceived innovation barriers, we compute the ratio between the rating given by the firm to that particular barrier and the average rating of all barriers declared by the firm
Awareness of constraints	An index of a firm's global perception of barriers to innovation. Computed by adding the rankings given by the firm to each barrier, and rescaling it so that it takes values in a 0 to 1 range; larger values indicate that a firm perceives a high overall level of barriers
IP protect	Binary variable equal to 1 if the firm has used any legal intellectual property protection mechanisms (copyrights, trademarks, design or patent)
Relative productivity (log of)	A measure of productivity distance of the firm relative to the mean of its sector of activity. Manufacturing is classified into 30 subsectors, and for each we compute the average labour productivity as sales per employee. Each firm's labor productivity in 2005 is divided by the average of its subsector
Low skill employees	Binary variable equal to 1 if firm has no employees with a higher education degree
High skill employees	Binary variable equal to 1 if firm more than 40 % of employees have higher education
Medium skill employees	Binary variable equal to 1 if firm has a positive share of employees with higher education but below 40 %

Table 7 continued

Fixed investment	Binary variable equal to 1 if the firm invested in physical capital in 2005, as a proxy for demand expectations
Considers TI	Binary variable equal to 1 if firm takes into account potential tax credit when making R&D decisions
Group membership	Binary variable; 1 if firm belongs to a group
Private domestic ownership	Binary variable; 1 if firm's ownership is private and domestic
Exporter	Binary variable; 1 if firm exports
Stable R&D	Binary variable; 1 if firm reported being continuously engaged in R&D
Occasional R&D	Binary variable; 1 if firm reported being occasionally engaged in R&D
Firm size	Four binary variables are defined for each size intervals defined according to the number of employees as follows. For SMEs: <20; between 21 and 50; between 51 and 100 and between 101 and 199. For large firms, the size intervals are: between 200 and 400; between 401 and 700; between 701 and 1,000, and more than 1,000
New firm	Binary variable equal to 1 if firm was created after year 2000
Tech park	Binary equal to 1 if firm is located in a technological park
Regional location	Three dummy variables for location in the following regions are defined: Madrid, Catalonia, Andalusia
Industry dummies	Four dummy variables are defined following the OECD classification of manufacturing industries in four groups according to technological intensity: high tech, medium-high tech, medium-low tech, and low tech
Support: local	Binary variable; 1 if firm received support from local government in the period 2003–2005
Support: regional	Binary variable; 1 if firm received support from European Union in the period 2003–2005
Industry innovativeness	Ratio of the number of firms introducing innovations new to the market relative to the number of firms introducing innovations new only to the firm at the industry level (26 industries)

Table 8 Sample descriptive statistics by support and size

Variable	No support		Only subsidies		Only tax incentives		Both	
	Mean	SD	Mean	SD	Mean	SD	Mean	SD
<i>SMEs</i>								
Financing constraints	1.24	0.46	1.34	0.49	1.17	0.42	1.249	0.47
Dominant firm	1.15	0.53	1.14	0.48	1.17	0.51	1.225	0.55
Demand risk	1.18	0.51	1.16	0.51	1.21	0.50	1.18	0.45
Employees with higher education (%)	15.32	16.25	30.25	25.47	20.02	16.65	27.71	20.49
Low skill emp.	0.16	0.36	0.02	0.15	0.04	0.19	0.02	0.12
High skill emp.	0.04	0.20	0.19	0.40	0.08	0.27	0.18	0.39
IP protection	0.30	0.46	0.44	0.50	0.44	0.50	0.48	0.50
Awareness of constraints	0.51	0.23	0.52	0.22	0.50	0.21	0.52	0.21
Stable R&D	0.43	0.50	0.69	0.46	0.70	0.46	0.82	0.38
Occasional R&D	0.25	0.44	0.22	0.41	0.19	0.39	0.13	0.34
New*High	0.01	0.08	0.03	0.18	0.00	0.04	0.03	0.18
New*Medhigh	0.02	0.14	0.03	0.16	0.03	0.17	0.04	0.19
Tech Park	0.01	0.11	0.04	0.19	0.02	0.14	0.09	0.28
Fixed investment ^a	0.75	0.43	0.86	0.34	0.87	0.34	0.92	0.27
Relative productivity (log) ^a	-0.40	0.78	-0.47	1.356	-0.12	0.67	-0.17	0.71
Group	0.20	0.40	0.26	0.44	0.29	0.46	0.35	0.48
Private domestic	0.93	0.26	0.95	0.23	0.93	0.26	0.90	0.30
Exporter ^a	0.66	0.48	0.70	0.46	0.82	0.39	0.83	0.37
Size: $x < 20$ emp.	0.29	0.45	0.33	0.47	0.17	0.37	0.17	0.38
Size: $20 \leq x < 50$	0.34	0.47	0.29	0.46	0.35	0.48	0.28	0.45
Size: $50 \leq x < 100$	0.22	0.41	0.23	0.42	0.26	0.44	0.27	0.45
Size: $100 \leq x < 200$	0.13	0.33	0.13	0.34	0.20	0.40	0.25	0.43
Hightec	0.07	0.25	0.16	0.37	0.12	0.32	0.22	0.41
Medhigh	0.30	0.46	0.32	0.47	0.40	0.49	0.41	0.49
Medlow	0.29	0.45	0.23	0.42	0.24	0.43	0.19	0.39
Lowtec	0.21	0.40	0.15	0.36	0.14	0.35	0.09	0.29
Support: local	0.25	0.43	0.59	0.49	0.35	0.48	0.57	0.50
Support: EU	0.03	0.16	0.10	0.30	0.03	0.17	0.11	0.31
Industry innovativeness	0.45	0.12	0.50	0.12	0.48	0.13	0.51	0.14
<i>LARGE</i>								
Financing constraints	1.14	0.35	1.25	0.42	1.11	0.32	1.17	0.42
Dominant firm	1.17	0.55	1.15	0.48	1.21	0.57	1.08	0.41
Demand risk	1.14	0.47	1.18	0.48	1.17	0.48	1.18	0.45
Employees with higher education (%)	9.69	12.20	17.22	16.57	14.34	14.19	15.83	15.49
Low skill emp.	0.20	0.40	0.06	0.24	0.04	0.20	0.01	0.08
High skill emp.	0.01	0.12	0.05	0.22	0.04	0.20	0.04	0.19
IP protection	0.27	0.44	0.54	0.50	0.41	0.49	0.52	0.50
Awareness of constraints	0.39	0.25	0.49	0.25	0.44	0.20	0.46	0.21
Stable R&D	0.35	0.48	0.80	0.41	0.74	0.44	0.89	0.32
Occasional R&D	0.11	0.32	0.12	0.33	0.11	0.31	0.07	0.25
New*High	0.00	0.05	0.02	0.15	0.00	0.00	0.01	0.11
New*Medhigh	0.01	0.09	0.01	0.11	0.00	0.07	0.00	0.00

Table 8 continued

Variable	No support		Only subsidies		Only tax incentives		Both	
	Mean	SD	Mean	SD	Mean	SD	Mean	SD
Tech Park	0.01	0.11	0.06	0.24	0.01	0.10	0.04	0.19
Fixed investment ^a	0.89	0.31	0.94	0.24	0.94	0.24	0.94	0.23
Relative productivity (log)	-0.16	0.72	-0.07	0.60	0.06	0.62	0.04	0.64
Group	0.69	0.46	0.86	0.35	0.80	0.40	0.76	0.43
Private domestic	0.64	0.48	0.71	0.46	0.62	0.49	0.77	0.42
Exporter ^a	0.80	0.40	0.87	0.34	0.88	0.33	0.90	0.30
Size: $200 \leq x < 400$ emp.	0.67	0.47	0.47	0.50	0.56	0.50	0.50	0.50
Size: $400 \leq x < 700$	0.18	0.39	0.25	0.44	0.28	0.45	0.25	0.43
Size: $700 \leq x < 1,000$	0.07	0.25	0.11	0.31	0.09	0.28	0.08	0.27
Size: $x \geq 1,000$	0.08	0.27	0.17	0.38	0.07	0.26	0.17	0.38
Hightec	0.05	0.21	0.20	0.41	0.14	0.35	0.12	0.33
Medhigh	0.25	0.44	0.30	0.46	0.31	0.46	0.41	0.49
Medlow	0.28	0.45	0.28	0.45	0.25	0.44	0.26	0.44
Lowtec	0.20	0.40	0.08	0.28	0.13	0.34	0.04	0.20
Support: local	0.16	0.36	0.48	0.50	0.23	0.42	0.56	0.50
Support: EU	0.03	0.18	0.23	0.42	0.04	0.20	0.16	0.37
Industry innovativeness	0.42	0.12	0.50	0.17	0.46	0.12	0.48	0.15

Descriptive statistics correspond to the final sample used for estimation after deleting observations with some missing value. Variables marked ^a refer to year 2005; otherwise they refer to the period 2003–2005. The share of highly educated employees refers to 2006, the first year this variable becomes available

Table 9 Exogeneity of financing constraints

	Blundell–Smith				Rivers–Vuong			
	Subsidies		Tax incentives		Subsidies		Tax incentives	
	χ^2	<i>P</i> value	χ^2	<i>P</i> value	Coeff (SE)	<i>P</i> value	Coeff (SE)	<i>P</i> value
SMEs	.65	.42	.31	.57	-.69 (.86)	.42	-.43 (.78)	.58
Large	.14	.70	.21	.64	-1.5 (4.0)	.69	1.7 (3.9)	.66
All firms	1.98	.16	.001	.97	-1.24 (.90)	.17	-.03 (.82)	.97

We test for endogeneity of financing constraints using two procedures: the Blundell–Smith test as implemented in Stata through the command “probexog”, and the Rivers–Vuong test. We perform them for each of our dependent variables separately. Following BS, since the financing constraints are a continuous variable but claiming a tax credit (or obtaining a subsidy) is binary, the suspected endogenous variable is expressed as a linear projection of a set of instruments, and the residuals from the first-stage regression are added to a probit model for the binary variables. The instruments used are firm age and being a subsidiary of an American firm. Similarly the Rivers–Vuong test involves regressing the suspect variable on all independent variables and the instruments, and then including both the observed, potentially endogenous variable and the residuals in a probit regression. Under the null hypothesis, these residuals should have no explanatory power

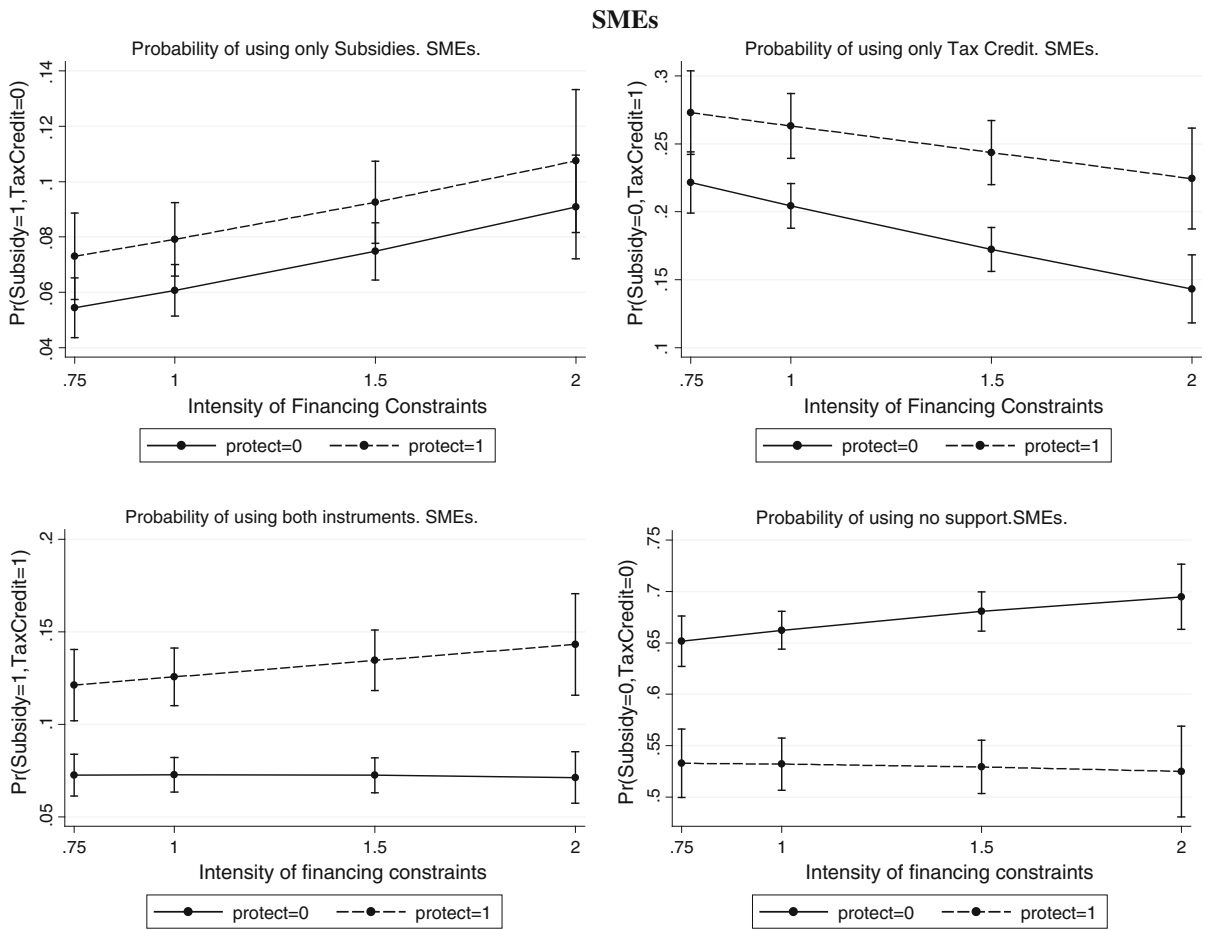


Fig. 2 Interaction effects between appropriability and financing constraints for SMEs

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