

1. Who are you:

Individual/Business

2. Are you making a submission in relation to the proposals for a:

Designated Withholder (DW)

3. Please tick the sectors that apply to you:

Platform economy

4. After reading about the proposed new eWHT system, how would you describe your overall reaction?

Somewhat negative - I have some concerns about aspects of the proposal

5. What aspects of the proposed model appeal most to you, and why?

Connecting to Deliveroo's systems via API has the potential to be a modern, more efficient way to transfer data, but that is subject to an extensive list of requirements (detailed further at question 17) for these efficiency gains to be realised. We are concerned that if these requirements aren't met, burdens will actually increase, alongside the associated tech lift for us to comply with the new withholding requirements. Furthermore, while an eWHT system has the potential to establish a central, digitised filing process, which could prove less resource-intensive and reduce the administrative burden than Form 46G, it will still require Deliveroo to source information from across the business to create a complete record for filing. That being said, if an eWHT system can pre-populate returns for taxpayers and reduce the number of returns required from Deliveroo, it would also stand to reason that it could streamline and improve the process of reconciliation. However, it is unlikely that an eWHT would eliminate the requirement for riders to submit tax returns themselves (since Deliveroo is unlikely to be their only source of income), nor make DAC7 redundant. Therefore its appeal is limited.

6. What concerns or reservations do you have about the proposed approach?

The proposed approach would require a significant investment in adapting existing tech, as we use an in-house system to process rider payments, and there would need to be the functionality to apply personalised rates. Adding another reporting requirement, in addition to Form 46G and DAC7 (which both require annual and quarterly breakdowns) creates more admin. There will need to be efficiencies to reduce this burden, potentially by aligning the frequency and content of returns or by eliminating one. Should an eWHT be pursued, we would like to see commitment by the Irish Revenue to minimise duplication of effort between 46G, DAC7 and eWHT operations. We are also concerned about the frequency of reporting - Deliveroo makes payments weekly, but to notify Revenue of payments to Specified Persons (SPs) at this cadence would not be viable. We would urge Revenue to allow flexibility for Designated Withholders to choose the payment and reporting cadence. This applies to expense payments too. As the returns to Revenue are unlikely to align with the frequency of outgoing payments to SPs, we would need to reconcile invoice details with what we withhold. We also have concerns regarding API maturity and available testing space, and would urge Revenue to make support (via helpdesks or similar) available to Designated Withholders. We would be grateful for clarification on how any inaccuracies in rates will be handled, and what platforms' role in this will be. Ideally, directing service providers (i.e., riders in our case) to the Government, rather than re-issuing invoices, would be a more straightforward process. Separately, certain features like instant 'cash-out' (where riders self-generate an invoice based on their fees to date) have the potential to complicate the process, and delay payments to riders. Further detail on this can be found at question 23. Overall, we are concerned that a move to eWHT would increase the cognitive load on low-skilled workers significantly, and likely see an increase in concerns from riders that Deliveroo is withholding an incorrect rate. Our payments team would be subject to additional queries, thereby increasing workload.

7. The proposed eWHT model seeks to expand withholding tax to payments to service providers where a suitable withholder exists. How do you feel generally about this type of expansion?

Given the nature of working patterns in the platform economy, our concern is that it risks being inaccurate, and would not sufficiently limit the number of - or prevent - individuals needing to claim back tax. This is a significant burden for low-skilled workers who would be required to work out whether they're being taxed correctly. We consider that for those working few or irregular hours (as is common in the platform economy), or who do not spend a full tax year working in Ireland, it is unlikely that they will seek to claim back withheld amounts.

- 8. In relation to PSWT specifically, this currently applies to payments made by state and semi-state bodies for certain services. Do you have a view on how it is targeted and if the types of payments it applies to should be reviewed?**

N/A

- 9. Please indicate if you currently operate:**

- 10. From the perspective of a DW, how does the current application of PSWT and/or RCT impact on your business operations?**

N/A

- 11. If you are a Platform Operator, does your organisation have any experience of applying taxes to transactions, for services operating on your platform, in other jurisdictions? If yes, please provide information of the jurisdiction and details of the tax.**

As a global platform operator, Deliveroo has extensive experience managing diverse tax compliance frameworks across multiple jurisdictions. Specifically, we have operationalised DAC7 (EU Directive 2021/514). We currently manage the collection and reportin

- 12. From the perspective of a DW, what are your views on the application of RCT and/or PSWT, as the case may be?**

N/A

- 13. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?**

N/A

14. The proposal aims to embed eWHT processes directly into accounting, payroll, or other business management systems. How beneficial do you think this would be for your business?

The proposed embedded eWHT process is only beneficial if APIs are well-designed, reliable, and integrate with standard business software. The following key requirements in our view is crucial to allow any benefit from the proposed eWHT processes: RESTful APIs with comprehensive documentation OAuth 2.0 or equivalent modern authentication (not certificate-only like current ROS) Sandbox environment with realistic test scenarios Bulk/batch processing capability for high-volume operators Asynchronous processing options with webhook callbacks Clear error codes and resolution guidance SLA commitments for API availability and response times Our concern is that any regime that does not fulfil these requirements (to a high standard) would increase burdens for platform operators. We remain sceptical that these can be implemented as described.

15. In your view, what opportunities could embedding eWHT within natural business systems create for your business or the wider industry?

There is the opportunity to reduce the need for reconciliation on payments, if this is validated within Revenue's system when information is sent via API. This would mean information collected for the purposes of DAC7 would be being done throughout the year. However, this is unlikely to outweigh the increased burdens and investment needed in our systems to produce an overall benefit.

16. What challenges do you think your business might face in adopting this embedded within natural systems approach?

- Legacy system integration: our AR and AP processes span multiple systems (in-house build system, NetSuite, procurement, treasury), not designed for real-time tax authority interaction; - API reliability dependency: Business-critical payment processes cannot tolerate API downtime without proper fallback procedures and offline alternatives; - Change management: Finance and operations teams need training on new processes; parallel running periods would increase business cost; - Timeline pressure: If implementation deadline is aggressive, resource competition with other regulatory programmes (e.g., e-invoicing mandates). - Data Reconciliation Complexity: Moving to a monthly remission cycle (by the 23rd of the following month) based on real-time polling requires robust internal audit trails to ensure the tax withheld matches the deduction authorisations received. - Rider Education (The "Personalised" Challenge): Explaining to thousands of self-employed

riders why their net payment now varies based on a 'personalised deduction rate' will create a high cognitive load and administrative support demand for our teams.

17. What is the estimated number of payments that you make to SPs each month?

Around 32k per month (on the basis we have around 8k riders in Ireland)

18. Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?

Our rider payment system is in-house built

19. Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?

Yes, we are an employer for PAYE, and we use CloudPay.

20. Please indicate if you currently receive payments which are subject to deduction of:

21. Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?

22. From the perspective of a SP, what are your views on the application of RCT and/or PSWT, as the case may be?

23. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?

N/A

- 24. Where you are an SP operating as a corporate/partnership or other entity, do the current rates that apply to PSWT and RCT reflect your actual liability on the income received?**
- 25. The proposal aims to embed taxation directly into how you get paid by the DW. How beneficial do you think this would be for your business?**
- 26. Where you are an SP operating as an individual worker, the proposal aims to implement personalised deduction rates (PDR), which means you will pay tax on your income as you go, similar to how employees are taxed under PAYE. What impact do you think PDR will have on your cashflow and financial management?**
- 27. Do you think this new regime, including the PDR will have a positive effect on your end of year Income Tax return filing and preliminary tax payment obligations?**
- 28. The accuracy of PDR is improved by the regular reporting by you to Revenue of your income and business expenses. How likely are you to report your income and expenses to improve the accuracy of your PDR?**
- 29. What changes do you expect to have to implement in your business in order to be ready for the proposed eWHT regime?**

Only from a tech perspective, there should be change management and business transformation concerns too:

1. Technical integration: Build API connectivity to Revenue eWHT services from payment systems
2. Data capture: Ensure SP master data such as tax reference numbers are collected and validated
3. Process redesign: Modify payment workflows to incorporate real-time rate requests
4. Training: Educate finance, operations, and support teams on new procedures
5. Testing: Comprehensive UAT across all payment scenarios
6. Documentation: Update policies, procedures, and service provider communications

There will also be tech build requirements via in-house software to ensure our teams know the withholding rate to apply. This is further complicated by instant 'cash-out' features, which interact with the cadence of notifying Revenue ahead of payment. In practice, this is

likely to require either receiving a withholding rate at the time riders are onboarded (i.e., well in advance of riders completing deliveries or a 'cash-out' feature being available) or a process to adjust payments/the amount withheld periodically. If the latter, this would ideally align with the Designated Withholders' chosen reporting cadence.

30. What benefits do you expect the new regime to have on your business processes, costs and delivery of your business services?

Reduced manual intervention in payment processing; automated reconciliation depending on implementation quality.

31. What would you consider a reasonable timeframe for your business to adapt to the proposed new system?

Depending on the timely publication of complete API specifications and stable sandbox environment. At least 24 months currently given concurrent introduction of e-invoicing due to go-live in 2026 and 2027.

32. How confident are you that your business could adapt to the new system within a reasonable timeframe?

N/A - dependent on whether the advance notice and timeframe above is given, and whether there are clear requirements from ROS and sufficient tech support.

33. In terms of the management of your business, which outcomes from this new regime are the most important for you? (Select a maximum of 3)

Reduced administrative workload

Seamless integration of taxation with your business systems

34. What supports from Revenue would be of most benefit to you in transitioning to the new regime? (Select a maximum of 3)

Training or awareness sessions

Helpdesk or dedicated Revenue contact

Clear guidance for software providers and a testing environment

- 35. Is there anything else you'd like to share about how the proposed eWHT system could best meet the needs of your business or sector?**

