

1. Who are you:

Individual/Business

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

Specified Person (SP)

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 positive - I think it's a good idea overall

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

Potential to simplify administrative burden on individual tax payers (accounting for amount withheld etc)

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

General: apparent conflict in the explanatory notes between "a new flat rate for deductions" and the notion of "a Tax-payer specific deduction rate", which in some circumstances could be 0% Specific: I am tax-resident and non-domiciled in Ireland. I receive property income from AirBnB in respect of a property in England. I receive the payments to a UK bank account, pay UK income tax, and I do not remit this income to Ireland. My concern is that Irish Revenue could ask AirBnB as a platform to withhold Irish tax on income remitted to me as an Irish resident, and the system will not incorporate the non-dom subtlety. While I do not doubt the situation would all be resolved eventually with my receiving a refund, it has clear potential to increase rather than diminish the administrative burden on me. Unless it will be straightforward to obtain a 0% personal rate. But it is conceivable I might in future receive income (eg consulting) in Ireland, which might well be within scope of withholding tax. So will the personal rate be specific to the withholder, so that, for

example, AirBnB would deduct at 0% while an organisation contracting my consulting services in Ireland would deduct at whatever rate Revenue calculates?

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?

In principle positive. In practice, needs to be sophisticated enough to meet the promise to reduce not increase administrative burden, eg the specific situation described in box 9.

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?

I have some experience of the current system. It would be a great improvement if deductions were attributable to the taxpayer concerned so Revenue knew this in advance, rather than the taxpayer having to keep the paper forms and submit the total deducted in the tax return. In general my view is the concept is a good one for the reasons stated in the briefing materials, and all practicable expansion (ie where admin burden is reduced not increased) would be welcome.

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?

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.

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

- 13. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?**
- 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?**
- 15. In your view, what opportunities could embedding eWHT within natural business systems create for your business or the wider industry?**
- 16. What challenges do you think your business might face in adopting this embedded within natural systems approach?**
- 17. What is the estimated number of payments that you make to SPs each month?**
- 18. Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?**
- 19. Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?**
- 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?**
- 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?**

Provided the PDR is approximately correct, the impact will be positive. But see answer to Q9 that identifies a circumstance where I'm concerned the PDR might not be correct.

- 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?**

It all depends on meeting the promise of lower rather than higher administrative burden.

- 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?**

Very

29. What changes do you expect to have to implement in your business in order to be ready for the proposed eWHT regime?

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

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

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

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

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

Helpdesk or dedicated Revenue contact

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?

