

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?

The aspects that appeal most to me are the move towards real-time taxation, increased transparency, and the aim of reducing end-of-year tax shocks for self-employed workers. A PAYE-style approach that spreads tax payments throughout the year and provides clearer visibility of one's tax position would be beneficial for cash flow planning and compliance. The use of platform systems to automate reporting and reduce manual paperwork is also positive, provided it genuinely simplifies obligations for workers.

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

My main concern is how platform operators design and communicate their tax and VAT arrangements to workers. Current practices, such as the use of reverse-charge VAT mechanisms that are not clearly explained to drivers, increase complexity, cognitive load, and the risk of accidental non-compliance. There is a risk that eWHT could unintentionally push additional administrative and VAT burdens onto drivers if platforms are not required to adopt transparent, worker-friendly models. In particular, requiring taxi drivers to register for VAT solely to access a digital platform is unnecessary where alternative models already exist. Platform-level handling of

VAT and tax obligations, such as charging VAT on platform commissions, provides greater clarity and safety for workers and better aligns with the objectives of simplification and reduced compliance burden

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?

I am generally supportive of expanding withholding tax where a suitable and well-regulated withholder exists, as this can improve compliance, reduce end-of-year tax shocks, and provide greater certainty for self-employed workers. However, this expansion must be designed so that responsibility sits primarily with the withholder and does not transfer unnecessary administrative or VAT burdens onto service providers. Transparency, clear communication, and worker-friendly platform design are essential to ensure the expansion achieves its intended benefits.

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?

As a taxi driver providing services via online platforms, PSWT does not directly apply to my work. I do not have a detailed view on how PSWT is currently targeted for state and semi-state bodies. However, any review or expansion of withholding regimes should ensure that obligations are proportionate, clearly targeted, and do not unintentionally increase complexity or administrative burden for self-employed workers.

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?

I am not currently subject to PSWT or RCT, as I provide taxi services via online platforms. As a platform worker, my experience is more relevant to the proposed expansion of withholding taxes to the platform economy rather than the existing PSWT or RCT regimes.

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

As a Specified Person working in the platform economy, RCT and PSWT do not apply directly to my work. These regimes appear to be designed for specific sectors and payment relationships, such as construction and payments by state or semi-state bodies. From my perspective, they are not suitable models for platform-based taxi services, and applying similar approaches to the platform economy without careful redesign could increase complexity rather than reduce it.

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?

This question does not apply to me. I operate as an individual taxi driver in the platform economy and am not a corporate, partnership, or other entity subject to PSWT or RCT. As such, these rates do not reflect my tax position.

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?

Embedding taxation directly into how I am paid could be beneficial if it is implemented in a transparent and accurate way. A system that automatically accounts for tax at the point of payment could reduce end-of-year tax shocks and simplify compliance. However, the benefit depends on clear communication,

accurate calculations, and ensuring that the system does not reduce visibility over earnings or transfer additional administrative or VAT burdens onto drivers.

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?

Paying tax on income as I go through personalised deduction rates could improve financial planning by spreading tax liabilities more evenly throughout the year and reducing large lump-sum payments. This could provide greater certainty and make budgeting easier. However, it is important that PDR calculations accurately reflect expenses and fluctuating income typical of platform work, and that drivers have clear visibility and control to understand how rates are calculated and adjusted.

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?

Yes, if implemented accurately and transparently, the new regime could have a positive effect on end-of-year Income Tax return filing and preliminary tax obligations. Paying tax as income is earned, combined with pre-populated tax returns, should reduce large end-of-year liabilities and simplify the filing process. However, this depends on accurate PDR calculations, proper recognition of allowable expenses, and clear visibility for workers so that errors can be identified and corrected during the year rather than at year end.

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?

I would be likely to report my income and business expenses to improve the accuracy of my PDR, provided the reporting process is simple, clear, and integrated into existing systems. Accurate recognition of expenses is essential for platform workers with variable costs such as fuel, insurance, maintenance, and platform fees. Ease of use, transparency, and confidence that the information will be correctly reflected in the PDR calculation will be key factors in encouraging regular and accurate reporting.

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

As an individual taxi driver, the main changes would relate to adapting to new reporting and visibility tools rather than changes to my core business operations. I would need clear guidance, simple digital tools, and adequate lead-in time to understand how deductions are calculated and how expenses can be reflected accurately. Any required changes should be minimal and largely handled through platform systems, rather than placing additional administrative responsibilities on individual drivers.

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

If implemented effectively, the new regime could reduce administrative burden, improve cash-flow planning, and lower the stress associated with end-of-year tax liabilities. Greater transparency and real-time visibility of my tax position would make it easier to budget and focus on providing services rather than managing paperwork. Reduced uncertainty around tax obligations could also lower professional costs and allow more time and attention to be given to day-to-day service delivery.

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

A reasonable timeframe would be at least 6 to 12 months from the point that full guidance, platform updates, and support tools are made available. This would allow individual drivers sufficient time to understand the changes, adapt to new systems, and adjust their financial planning, particularly given the variable income and expenses typical of platform work.

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

I am reasonably confident that my business could adapt within a reasonable timeframe, provided that clear guidance, effective communication, and user-friendly systems are in place. The level of confidence would be higher if the majority of the

technical and administrative changes are handled through platform systems, with adequate support available for individual drivers during the transition period.

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

Increased accuracy of information submitted to Revenue

Greater certainty in relation to your tax affairs

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

Clear guidance for software providers and a testing environment

Mailshots and guidance on the Revenue website

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?

The eWHT system will work best for the platform economy if it is implemented at platform level, with platforms acting as the designated withholder and handling tax calculations, deductions, and reporting automatically. Individual drivers should not be required to engage in additional administrative tasks or complex reporting beyond normal business record-keeping. In particular, VAT treatment should be handled consistently by platforms, rather than requiring individual drivers to register or manage VAT obligations purely for the purpose of using an app. Where platforms already calculate fares, commissions, and fees, integrating withholding and VAT at source is the simplest and safest approach. A system that relies on platform integration, clear rules, and minimal driver intervention will improve compliance, reduce errors, and ensure fairness across the sector while allowing drivers to focus on providing services rather than managing tax administration.

