

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

Taxi / ride-hailing services (self-employed)

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?

The stated aim of improving tax compliance and clarity is understandable. However, any benefits depend entirely on strong safeguards: protection of self-employed status, clear appeals processes, transparency of rates, and full platform liability for errors. Without these, the model risks creating taxation without rights rather than fair compliance.

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

My main concerns are the loss of income control for self-employed workers, the risk of incorrect or excessive withholding, and the absence of employment rights. Granting platforms withholding powers without strict liability, transparent rules, and effective appeals creates a serious imbalance of power. There is also a risk that real-time data sharing and automated deductions will be used for surveillance and control rather than tax accuracy.

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 cautious and largely opposed to this type of expansion in the platform economy. Withholding tax may be appropriate where a genuine employer exists, but platforms explicitly deny being employers. Extending withholding in this context risks normalising taxation without rights unless strict limits, opt-outs, and legal accountability are built in.

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?

PSWT was designed for payments by state and semi-state bodies where there is a clear public procurement relationship. It should not be extended to platform-based self-employed work where platforms explicitly deny being employers. Any review must clearly exclude digital platforms unless worker status, rights, and platform liability are legally aligned. Applying PSWT-style mechanisms to platforms without this alignment would formalise taxation without corresponding rights.

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, so there is no direct impact on my business operations at present. However, introducing withholding mechanisms into

platform-based self-employed work would significantly affect cash flow, income predictability, and administrative burden.

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

From a Specified Person perspective, RCT and PSWT are appropriate only in clearly defined contractual or public procurement settings. They are not suitable for platform-based self-employed work where platforms deny employer status and shift all business risk to the worker. Applying these mechanisms without aligning legal status, rights, and obligations would be inappropriate and unfair.

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?

Not applicable. I operate as an individual self-employed worker, not as a corporate entity or partnership. Therefore, PSWT/RCT rates applicable to corporate or partnership structures do not reflect my actual tax liability.

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 platform payments would not be beneficial for my business. It would reduce control over income, distort cash flow, and increase dependence on platform accuracy and systems. Without employment rights or platform accountability, this model shifts risk onto self-employed workers without providing corresponding protections.

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?

Personalised Deduction Rates (PDR) would have a negative impact on cash flow and financial management. Self-employed workers rely on flexible income management to cover business costs, taxes, and periods of low demand. Applying PAYE-style deductions without PAYE-level rights would undermine financial stability and increase business risk.

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?

No. While the regime may reduce the headline amount due at year end, this comes at the cost of reduced cash flow, loss of flexibility, and increased risk during the year. For self-employed workers, managing tax at year end is preferable to continuous deductions imposed without employment rights or cost recognition.

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 already report my income and expenses accurately as part of my annual tax obligations. Requiring frequent or real-time reporting to adjust PDR would add administrative burden without guaranteeing fairness or accuracy, given fluctuating income and costs. Compliance should not depend on continuous reporting to correct a system that is structurally unsuitable for self-employed platform work.

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

I would need to significantly change cashflow planning, accounting practices, and reserve management to deal with unpredictable deductions. Additional administrative tracking and reconciliation would be required to verify platform calculations and resolve errors. These changes would increase complexity and time costs without improving business efficiency.

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

I do not expect meaningful benefits for my business. Any administrative convenience is outweighed by reduced income control, higher risk, and increased dependency on platform systems. For self-employed workers, the proposed regime does not improve costs, processes, or service delivery.

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

A reasonable timeframe would only exist after the legal framework, safeguards, opt-outs, and platform liabilities are clearly defined. Without these, no realistic adaptation period can be set. If implemented at all, a minimum of 12-18 months after final legislation would be required.

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

My confidence is low. Without clearly defined safeguards, opt-outs, and platform accountability, adaptation would be difficult and risky. Confidence would only improve if the legal framework fully protects self-employed status and income control.

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)

Increased accuracy of information submitted to Revenue

Greater certainty in relation to your tax affairs

Better visibility and control of information held by Revenue

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

Industry/professional body support

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?

The proposed eWHT system should not be applied to genuinely self-employed workers without parallel rights, protections, and clear platform liability. Any model must include opt-outs, robust dispute and correction mechanisms, and explicit recognition of variable income and business costs. Without these safeguards, eWHT risks misclassification, cashflow harm, and transferring administrative and financial risk from platforms to individual workers.

