

1. Who are you:

Individual/Business

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

Both DW & SP (for tax professionals, representative bodies, RCT middle principals)

3. Please tick the sectors that apply to you:

Construction

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

Very negative - I do not support the proposed direction

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

Proposal to move to a personalised rate of RCT withholding for individuals and a single flat rate of RCT withholding for entities.

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

Removal of access to the 0% rate of RCT, , regardless of the compliance history or risk profile of the contractor would seriously impact our cashflows and ability to raise funding

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?

No comment

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?

No comment

9. Please indicate if you currently operate:

Relevant Contracts Tax (RCT)

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

It will ser4vious impact our cashflows and could result in additional borrowing costs

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.

no

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

From an RCT perspective, the current systems works fine and there is no need to change it.

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

Individual and companies should be able to access 0% deductions if they are tax compliant

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?

No comment

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

No comment

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

additional costs

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

0

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

No

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

Yes, Collsoft

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

Relevant Contracts Tax (RCT)

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

Works fine. Most tax payers are tax compliant and the current RCT rates available are fair.

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

Leave it as 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?

Individual and companies should be able to access 0% deductions if they are tax compliant

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?

No

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?

This would only result in an overpayment of taxes which would serious impact our cashflows

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?

No comment

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 comment

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?

No comment

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

Unknown

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

None

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

24-36 months

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

No comment

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)

None. This will create serious cashflow issues for our company

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?

