

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:

Construction

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

Neutral/undecided - I need to know more before forming a view

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

N/A

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

Section 1: Cash Flow and Corporate Deduction Rates â€"As a limited company in the construction sector, we currently maintain a high level of tax compliance, which grants us a 0% RCT rate. This 0% rate is essential for our business to maintain the liquid cash flow necessary for day-to-day operations, including purchasing materials and meeting overheads. â€"We are concerned by the proposal of a 'Flat Rate' deduction for corporate entities. Any move away from the current 0% rate for compliant firms would result in the State withholding our working capital, effectively acting as an interest-free loan to the government. We strongly advocate that the new eWHT system preserves the 0% deduction rate for highly compliant limited companies to avoid destabilising their financial health." â€"Section 2: Technological Transition and API Costs â€"The transition to real-time reporting via API will require significant investment in updated accounting software. For many construction SMEs, this represents both an administrative burden and an increased monthly software cost. â€"We request that Revenue provides a robust transition period of at

least 18 months to allow firms to align their digital systems. Additionally, we suggest that Revenue maintains a manual input option on ROS (Revenue Online Service) for companies that do not yet have API-integrated software, ensuring that 'digitalisation' does not become a barrier to business for smaller contractors." â€”Section 3: Efficiency of Real-Time Offsets â€”"We support the goal of moving toward a 'right tax at the right time' model through automatic offsets. However, for this to benefit the taxpayer, these credits must be visible and usable in real-time. We propose that any tax withheld under the eWHT system should be immediately visible as a credit balance on our ROS account, allowing us to use those credits to pay other liabilities (such as VAT or Employer PAYE/PRSI) in the same month the deduction occurred."

- 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?**
- 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?**
- 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:**

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?**

- 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?**
- 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?**

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)

Greater certainty in relation to your tax affairs

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)

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?

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Transition and API Costs – "The transition to real-time reporting via API will require significant investment in updated accounting software. For many construction SMEs, this represents both an administrative burden and an increased monthly software cost. – We request that Revenue provides a robust transition period of at least 18 months to allow firms to align their digital systems. Additionally, we suggest that Revenue maintains a manual input option on ROS (Revenue Online Service) for companies that do not yet have API-integrated software, ensuring that 'digitalisation' does not become a barrier to business for smaller contractors." –

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