

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:

Professional services

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?

Always good to know that Revenue is collecting tax due and that willful defaulters have fewer options to avoid tax. Being deducted by Revenue is better.

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

Withholding tax in general is a blunt instrument that does not account for cashflow issues in a small and micro business. As I read it, the eWHT system does not improve this aspect

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 thought this was already in place? I have had withholding tax deducted by any state or semi-state entity.

- 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?**

Yes - again very blunt in application and does not reflect reality of small engagements with state/semi-state bodies, the value of those services, nor the one-off nature of many. It also ignores issues of cashflow for small/micro businesses. Effectively puts service providers off providing services.

- 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:**
- Professional Services Withholding Tax (PSWT)
- 21. Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?**
- Destroys ability to manage cashflow.
- 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?**

Absolutely not.

- 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?**

Ignores reality of managing a business and especially cashflow.

- 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?**

My business income comes in peaks and troughs, but business expenses are carried through the year. Cashflow is difficult to manage if a payment, designed to cover expenses, is reduced by wht.

- 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?**

Probably in that I'll assume it is an accurate reflection of tax owed. But businesses and self-employed, unlike paye workers, do not have regular income but do have regular expenses.

- 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?**

Already do.

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

Hope very little, except to plan for reduced income through the year which may well impact ability to fund standard business processes and expenses.

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?

Confident.

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 of above

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

not sure

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?

While I laud the intent behind this, and admire the work Revenue does, this system feels very much that it is one designed by process engineers and paye workers with little regard or appreciation for how business income and expenditure work over the period of a year.

