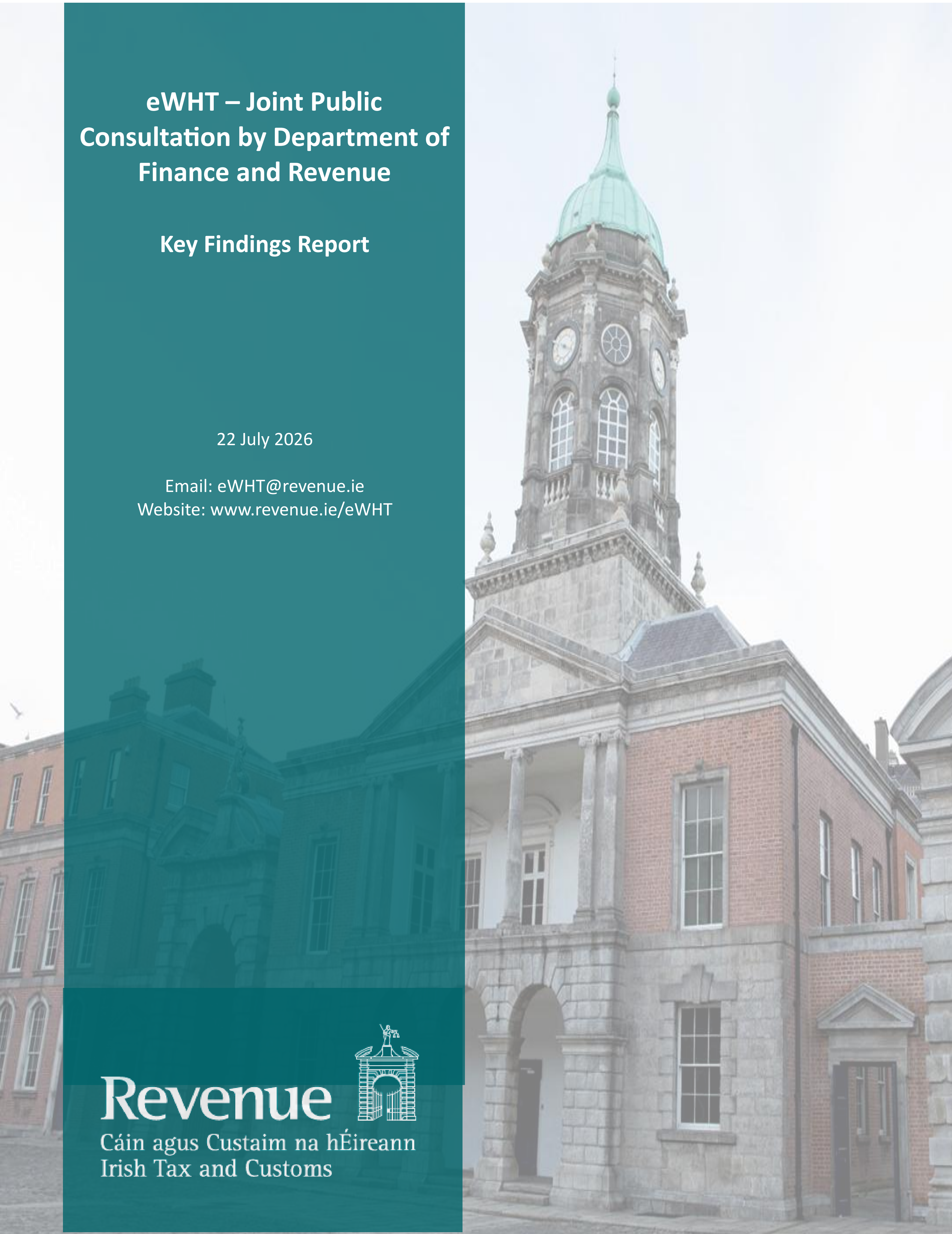

eWHT – Joint Public Consultation by Department of Finance and Revenue

Key Findings Report

22 July 2026

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Revenue
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Irish Tax and Customs

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Executive summary

Introduction

The Department of Finance and Revenue conducted a joint public consultation on the potential introduction of the eWHT model. The consultation sought views from businesses, tax professionals, representative bodies, public sector organisations and other stakeholders on the design, operation and potential impacts of a modernised withholding tax regime. A summary of the consultation proposal is outlined at 1.3 below.

This consultation adopted an innovative and user-centred approach to engagement. In addition to seeking technical and representative views, the consultation was designed to encourage participation from taxpayers who would be directly affected by the proposal, including businesses and individuals with practical experience of operating within the current Relevant Contracts Tax (RCT) and Professional Services Withholding Tax (PSWT) regimes. This approach provided valuable insights into the practical experiences of taxpayers and enabled a broader range of perspectives to inform the consultation findings.

A total of 233 responses were received. Responses were received from prospective Designated Withholders (DWs) and Specified Persons (SPs), businesses operating in relevant sectors, tax professionals, representative bodies, public sector organisations and other interested stakeholders.

Range of Views Expressed

The consultation elicited a broad range of views regarding the proposed eWHT model. While many respondents identified potential benefits associated with the proposal, support was frequently qualified and dependent upon the detailed design and implementation of any future regime. Other respondents expressed significant concerns regarding the potential impact of the proposals on businesses, taxpayers and existing compliance processes.

The findings therefore do not indicate a singular view either in support of or opposition to eWHT. Rather, respondents identified both opportunities and challenges and frequently linked their views to how any future regime would operate in practice.

Recurring Themes Across the Consultation

While views differed across respondent groups and consultation questions, a relatively consistent set of themes emerged throughout the consultation. Administrative burden, cashflow impacts, technology and systems integration, accuracy of deductions, implementation support, refunds and offsets, and the scope and practical operation of the proposed regime were repeatedly referenced by respondents. These themes arose across both positive and negative responses and were often cited as factors that would influence respondents' views regarding the design and implementation of any future eWHT regime.

Potential Benefits Identified

Of the potential benefits associated with a modernised withholding tax framework, reduced administrative effort, simplified compliance processes, greater automation and integration with existing business systems, improved transparency and increased visibility of tax liabilities throughout the year were frequently cited.

Respondents also referred to the potential for improved certainty regarding tax obligations, more accurate alignment between tax deductions and liabilities and reduced year-end tax payment obligations. Opportunities to embed withholding processes within existing accounting, payroll and business management systems were commented on by many respondents, particularly where such integration could reduce manual intervention and improve efficiency.

Key Concerns Identified

The main concerns related to administrative burden, compliance costs and operational complexity. Respondents expressed reservations regarding the need for additional reporting obligations, potential software development costs, staff training requirements and the transfer of additional compliance responsibilities to businesses.

Cashflow impacts emerged as a significant concern throughout the consultation, particularly among taxpayers currently subject to withholding taxes. Respondents highlighted concerns regarding the timing of deductions, withholding rates, access to refunds and credits and the extent to which deductions accurately reflect actual tax liabilities.

Respondents also raised the potential duplication of existing reporting obligations, particularly DAC7, and questioned whether existing information sources should be further utilised before introducing additional withholding requirements.

Technology and Implementation Considerations

Technology and system integration emerged as both an opportunity and a possible challenge. Respondents frequently recognised the potential benefits of embedding withholding processes within existing software systems and identified opportunities to improve accuracy, transparency and compliance through automation and real-time reporting. However, respondents also highlighted implementation costs, software compatibility, data quality, system reliability and the practical challenges associated with integrating new requirements into existing business processes.

Feedback consistently indicated that the success of any future regime would depend on the ability to implement solutions that are proportionate, reliable and capable of operating effectively within the diverse technological environments used by businesses.

Existing Withholding Regimes

Responses indicated a broad understanding of the rationale underpinning existing withholding tax regimes such as RCT and PSWT. These regimes were generally recognised as established compliance mechanisms that support the timely collection of tax and reduce the risk of tax liabilities remaining unpaid. It was also indicated that the current regimes, for many, have become an established part of business processes and RCT specifically is seen to operate effectively.

However, respondents also identified a number of operational challenges associated with the current regimes, including cashflow impacts, refund and offset processes, administrative effort and variance in the alignment of withholding rates with actual tax liabilities. A number of respondents expressed support for the retention of existing features, particularly the current 0% RCT rate.

Key Conditions for Success

Across the consultation, respondents consistently identified a number of factors that could be considered critical to the successful implementation of any future eWHT regime. These included:

- Simplicity and proportionality in system design.
- Clear guidance and practical support for businesses and taxpayers.
- Adequate lead-in periods and phased implementation where appropriate.
- Effective integration with existing software and business systems.
- Minimisation of duplication with existing reporting obligations.
- Timely refund, credit and offset processes.
- Deduction rates that accurately reflect taxpayers' circumstances and liabilities, and
- Ongoing engagement with stakeholders throughout implementation.

Respondents consistently indicated that support for any future regime would be heavily influenced by the extent to which these considerations are reflected in its design and operation.

Conclusion

The consultation identified both opportunities and challenges associated with the proposed eWHT model. Respondents recognised the potential for integrating modern business systems, improved automation, transparency, compliance and tax administration, while also highlighting concerns regarding administrative burden, cashflow impacts, implementation costs and operational complexity. Views expressed throughout the consultation were contingent on receiving more specification about the detailed design, scope and operation of any future regime.

Further exploration of a modernised withholding tax framework, provided that any future regime is designed and implemented in a manner that is proportionate, practical and responsive to the operational realities of businesses and taxpayers, is key. These themes emerged consistently across respondent groups and consultation questions.

The consultation highlighted the value of seeking engagement directly from taxpayers, in addition to the “traditional” Revenue stakeholders, to understand taxpayers’ lived experiences and practical concerns. The findings of this consultation provide insight into the issues, considerations and practical experiences identified by respondents and will assist in informing any future policy development in this area. The consultation process also availed of the opportunity to build a network of software providers currently or intending to provide technology solutions in this area.

Section 1. Introduction

1.1 Overview
This document is a report on the Department of Finance and Revenue's joint public consultation on eWHT. This Section summarises the context for the consultation and provides information about how it was structured and promoted. Section 2 of the Report provides a high-level profile of the respondents. Section 3 explains the methodology applied in the analysis and production of this report. The key issues which emerged from the responses are identified in Section 4 and a summary of all responses is detailed in Section 5.

1.2 Context for the consultation
The public consultation process was announced by the Minister for Finance in his Budget speech on 7 October 2025. It focused on the modernisation and expansion of withholding taxes and sought the input of businesses, taxpayers, tax agents, software providers, business associations, representative bodies and other stakeholders.

1.3 Overview of the Proposed eWHT Model
The consultation sought views on a proposed new Withholding Tax (eWHT) model intended to modernise the operation of withholding taxes in Ireland through greater digital integration, real-time reporting and automation. The proposal would build on existing withholding tax regimes, including Relevant Contracts Tax (RCT) and Professional Services Withholding Tax (PSWT), and extend withholding tax principles to certain platform-based service payments.

Current Position
RCT and PSWT currently operate as withholding tax regimes in specific sectors. Tax is deducted from certain payments and credited against the recipient's final tax liability. These regimes operate through separate reporting and administrative processes and generally rely on periodic compliance activities rather than real-time integration between business systems and Revenue systems.

Proposed Changes
The proposed eWHT model would replace existing RCT and PSWT withholding processes with a single digital framework, possibly with phased introduction. The model would seek to integrate withholding tax directly into business payment systems, allowing withholding calculations, reporting and tax credits to be applied in real time. An extension of withholding tax obligations to certain platform-based service payments is also under consideration.

Designated Withholders
Under the proposed model, a Designated Withholder (DW) would be responsible for operating eWHT when making payments for relevant services. According to the scope of eWHT implemented, the Designated Withholders could include:

- current RCT principal contractors,
- current PSWT accountable persons, and
- certain platform operators.

Specified Persons

A Specified Person (SP) would be the recipient of a payment subject to eWHT. According to the scope of eWHT implemented, the Specified Persons could include:

- service providers currently subject to RCT,
- providers of professional services currently subject to PSWT, and
- service providers operating through online platforms.

Personalised Deduction Rates

A key feature of the proposal is the introduction of Personalised Deduction Rates (PDRs) for individual service providers i.e. self-employed taxpayers. Rather than applying a single fixed withholding rate, Revenue would calculate an individual deduction rate based on the taxpayer's circumstances and information available to Revenue. The objective would be to align withholding deductions more closely with an individual's expected tax liability. Corporate entities, partnerships and other non-individual entities would not be subject to PDRs and would instead be subject to a flat withholding rate.

Systems Integration and Real-Time Reporting

The proposed model would involve direct integration between Revenue systems and business software used by DWs. This would enable real-time communication of withholding rates, automatic crediting of tax withheld and greater use of pre-populated information in tax returns. Tax agents would continue to be able to act on behalf of their clients under the proposed regime.

The consultation sought views on these proposals, including their potential benefits, challenges, implementation considerations and impacts on businesses, taxpayers and other stakeholders.

1.4 Structure of the consultation

The consultation process provided an opportunity for all interested parties to comment on the proposals set out in the joint Department of Finance/Revenue consultation information hub which was hosted on the Revenue website. This format and presentation for public consultation was a departure from the traditional format used in the past and was intended to present the information in an easy to understand and easy to navigate manner. It was intended that this format would be more accessible and engaging to taxpayers and would encourage direct engagement and therefore enable the process to capture the practical experiences of taxpayers and businesses who would be affected by the proposed changes.

Stakeholders were then invited to submit their views via an online feedback form, examining different aspects to the proposal including targeted questions to the DW and SP cohorts. Again, this format was adopted to encourage targeted response to both policy and tax administration considerations of the proposal and ensure that taxpayers and businesses providing feedback felt encouraged and facilitated to provide their views, however small or specific.

A separate online feedback form was also available to capture details of software providers and businesses who offer or may offer technology solutions in this space allowing Revenue to build its network of stakeholders in its digital development.

231 valid responses were received via the Revenue website's online feedback form with a further 8 PDF submissions received via email. Six of the bodies making submission by PDF had submitted an online form, therefore their PDF submission further supplemented their online response. Therefore, there was a total of 233 responses which informed the consultation process.

Respondents' views were sought on a number of questions (Appendix I), some of which were directed to only DWs or SPs (or their agents/representatives) specifically.

1.5 Promoting the engagement

Following announcement of the public consultation process in the Minister for Finance's Budget speech, and the launch of the eWHT consultation hub on 5 December 2025, a number of channels were used to publicise it and encourage participation, including:

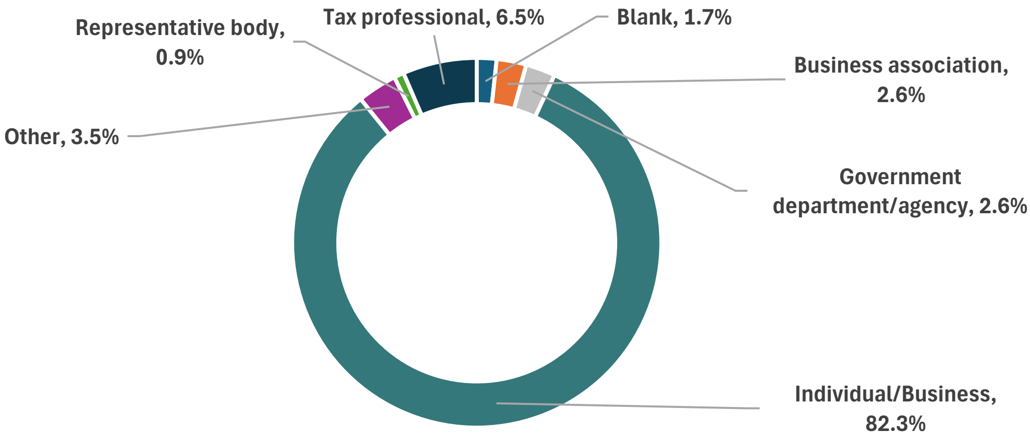
- Press releases were issued on both Revenue.ie and Gov.ie which were picked up by the national media outlets.
- All RCT and PSWT registered businesses received an invitation to participate in the consultation to their Revenue Online Services inbox.
- All platform operators and service providers (registered for Income Tax) reported under DAC7 received an invitation to participate in the consultation to their Revenue Online Services inbox.
- There was direct communication with tax and accounting professional representative bodies, professional firms, industry representative bodies, and unions to both increase awareness of the consultation and invite participation.

We welcomed the fact that a number of tax and accountancy bodies and professional firms sought to raise awareness and enhance their members' response rate to the consultation, and they independently interacted with their membership and clients to engage and respond. Some of these bodies and firms conducted their own independent research among their membership/client base and supplied information on the outcome of this as part of their contribution to the consultation process. This was a helpful additional input.

Section 2. Who replied to this consultation?

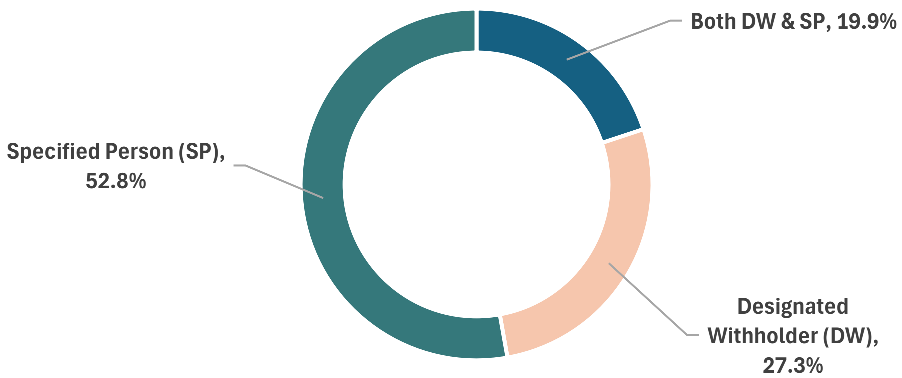
Question 4. Responder Type

When asked "*who are you*" as part of the online survey, a significant majority of responders stated that they were an individual or a business. The next most frequent response associated with a specific responder type was that of a tax professional, followed jointly by a business association and Government department/ agency.
Representative bodies made up 0.9% of the responder types to the online survey. While 1.7% of responders to the survey did not answer the question.



Question 5. eWHT Cohort Type

Responders were asked which of the eWHT cohorts they were "*making a submission in relation to the proposal for.*" A majority stated that a submission was made in relation to the SP cohort of the proposed eWHT model. The cohort of responders making a submission in relation to both DWs and SPs comprise of RCT 'middle principals' and representative bodies, professional bodies and tax agents making submissions on behalf of both SPs and DWs.

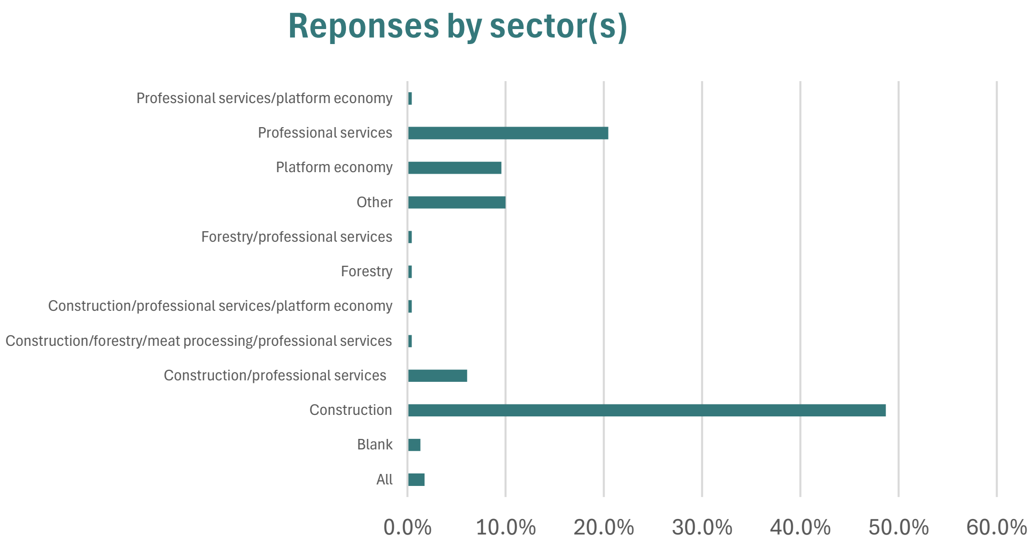


Question 6. Sectoral responders

Responders were asked to select which of the following sectors applied to their submission:

- Construction
- Forestry
- Meat processing
- Professional Services
- Platform Economy
- Other

Feedback to this question indicates that almost half of submissions (48.7%) were made in reference to the construction sector only. Submissions on behalf of the professional services sector only were the second highest on 20.4%, followed by the platform sector only representing 9.6% of responses. The meat processing sector is the least represented sector. 1.3% of responders did not answer the question and 10% selected the "other" option.



Sectoral Representation

A significant proportion of responses were received from businesses operating in sectors currently subject to RCT obligations, particularly construction-related activities. Responses from this cohort influenced a number of themes that emerged throughout the consultation, including cashflow impacts, withholding rates and administrative requirements.

Section 3. Methodology and Interpretation of Findings

Responses to the consultation were reviewed and analysed using qualitative thematic analysis. Open-text responses were examined to identify recurring themes, issues and perspectives raised by respondents across the consultation questions.

Individual responses frequently addressed multiple issues and may therefore be reflected across more than one theme. The thematic findings presented in this report are intended to summarise the issues most commonly raised and should not be interpreted as representing mutually exclusive categories.

The consultation included both structured and open-ended questions. Not all respondents answered every question and levels of engagement varied across different sections of the consultation.

Participation in the consultation was voluntary. As with all public consultations, responses reflect the views of those who chose to participate and may not be representative of the wider population of taxpayers, businesses or stakeholders.

The findings presented in this report summarise views expressed by respondents and should not be interpreted as Government policy or as indicating any decision regarding the future design or implementation of eWHT.

Although views on specific proposals varied considerably, respondents frequently identified similar practical issues across multiple consultation questions, suggesting a high degree of consistency in the themes raised throughout the consultation.

Section 4. Key Themes emerging from the consultation

4.1 Overview

The consultation responses identified several recurring themes that arose across multiple questions and respondent groups. While respondents expressed a range of views regarding the proposed eWHT model, common themes emerged in relation to potential benefits, areas of concern and factors considered important to the design and operation of any future regime.

The themes identified in this section are not intended to represent levels of support for or opposition to the proposed eWHT model. Rather, they reflect issues that arose repeatedly across multiple consultation questions and respondent categories and provide context for the more detailed findings set out in Section 5.

4.2 Potential Benefits Identified by Respondents

Of the potential benefits associated with the proposed eWHT model, reduced administrative effort, increased automation, integration with existing accounting and business management systems, improved visibility of tax liabilities and greater certainty regarding tax obligations were most frequently identified.

> *"Reduced administrative burden, saving time and money. Integration of systems would also be very welcomed as would real-time taxation information."*

Respondents referred to the potential for real-time access and updates to tax record information, improved accuracy in the calculation and collection of tax, enhanced transparency and greater alignment between tax deducted and tax ultimately payable. Opportunities to support cashflow planning, budgeting and the management of year-end tax liabilities were also referenced throughout the consultation.

> *"Paying tax on income received throughout the year as a self-employed person is preferable to receiving a large tax bill at year end."*

4.3 Administrative Burden and Compliance Obligations

Administrative burden was a recurring theme throughout the consultation, with respondents identifying both the potential to reduce administrative effort through greater automation and integration, and the risk of increased compliance obligations associated with implementing a new model. Respondents referred to the potential impact of additional reporting obligations, software and systems changes, staff training requirements and increased compliance responsibilities.

> *"This system could put an unfair administrative burden on small businesses."*

Concerns were also raised regarding the resources required to implement and operate a new withholding framework, including the costs associated with system development, process redesign and ongoing administration. Respondents also highlighted the importance of ensuring that any future eWHT model includes practical processes for managing routine operational issues, e.g. errors, corrections, amendments etc to minimise unnecessary administrative burden.

"Fully assess the effectiveness of DAC7 data before introducing new obligations"

A number of respondents highlighted the importance of minimising duplication with existing reporting obligations and compliance requirements. This was a recurring theme among respondents from the platform sector, who frequently referred to the interaction between the proposed eWHT model and existing EU DAC7 reporting obligations.

4.4 Cashflow Impacts

Cashflow considerations were frequently referenced across responses. Respondents highlighted the impact that withholding deductions can have on working capital, particularly where deductions exceed the taxpayer's final liability or where delays arise in the application of credits, refunds or offsets.

"the 0% rate is a critical mechanism supporting project cashflow management, construction and development financing structures, and overall project viability"

Respondents also referred to the operation of withholding rates, the treatment of expenses and the interaction between withholding deductions and actual tax liabilities.

Some respondents identified potential benefits associated with more regular tax payments and reduced year-end liabilities, while others highlighted concerns regarding the impact of deductions on business cashflow and financial management.

"By embedding the tax into the payout, the money that actually hits my bank account is 'true' profit"

4.5 Technology and Systems Integration

Technology and systems integration emerged as a recurring underlying consideration throughout the consultation. Respondents identified opportunities associated with automation, application programming interfaces (APIs), real-time reporting and the integration of withholding tax processes within existing digital business systems.

"The embedding of eWHT directly into business systems through APIs is particularly appealing and represents a genuine step forward in modernising tax administration"

Responses also highlighted a range of implementation considerations, including software compatibility, data quality, system reliability, cyber security, implementation costs and the capacity of businesses to adopt new technological requirements. Respondents frequently referred to the importance of ensuring that any future regime can be integrated effectively into existing business systems and processes.

> *"The main challenges would relate to system integration, reliability, and the cost of implementation"*

4.6 Accuracy, Transparency and Certainty

Respondents highlighted the importance of accuracy in the operation of any withholding tax regime. This included the accuracy of deduction rates, the alignment of deductions with actual tax liabilities and the quality of information available to taxpayers throughout the year.

> *"Embedding eWHT within normal business systems could create opportunities for improved transparency, more consistent compliance, and better real-time visibility of tax positions for both businesses and Revenue"*

Transparency and visibility were also recurring themes. Respondents referred to the potential benefits of real-time information, increased certainty regarding tax obligations and improved access to information relating to deductions, liabilities, credits and refunds.

4.7 Current Withholding Tax Regimes

The responses highlighted a number of operational considerations associated with the current regimes, including cashflow impacts, withholding rates, administrative requirements, refund and offset processes and the practical operation of the regimes in different business circumstances.

> *"Feedback indicated significant operational challenges with the current RCT and PSWT regimes…respondents describe RCT and PSWT as time consuming, complex, and resource intensive"*

Notwithstanding concerns expressed, responses also highlighted that, for many, the current regimes, have become an established part of their business processes, particularly RCT, which is viewed as operating effectively. Some respondents reported limited or no operational impact, while others identified benefits associated with regular payment patterns.

The consultation responses indicated a broad understanding of the purpose and operation of RCT and PSWT. Respondents described these regimes as mechanisms that support tax compliance and facilitate the collection of tax throughout the year.

4.8 Implementation, Guidance and Support

Respondents emphasised the importance of implementation arrangements and support measures. Important elements included the provision of clear guidance, practical examples, training materials, support services and effective stakeholder engagement.

"A phased and well-supported implementation will be key to its success"

Respondents also highlighted the importance of further consultation, adequate lead-in periods, phased implementation approaches, testing environments and clear communication regarding future obligations. These themes arose consistently across consultation questions and respondent categories.

4.9 Scope and Proportionality

A number of responses referred to the scope and application of the proposed regime. Respondents raised issues relating to the treatment of different taxpayer groups, non-resident persons, platform operators and businesses operating in different sectors.

The importance of proportionality was also referenced throughout the consultation. Respondents referred to the need to balance compliance objectives with administrative requirements, implementation costs and the practical operation of the regime in different business environments. Some respondents suggested that greater use could be made of data already available to Revenue, including information reported under the EU DAC7 reporting framework.

4.10 Perspectives of Specific Respondent Groups

While a number of themes emerged consistently across respondent groups, certain issues were raised more prominently by specific cohorts. Respondents operating within existing withholding tax regimes frequently referenced cashflow impacts, withholding rates and refund processes as well as penalties. Respondents commenting on PDRs more frequently referenced tax planning, budgeting and the management of preliminary tax obligations.

"I like the idea of 'Pay-As-You-Go' tax. It's hard to save up a huge lump sum for a tax bill at the end of the year, and its stressful wondering if you have saved enough... This makes me feel more like a 'normal' worker with a steady tax situation."

4.11 Summary

The consultation responses identified recurring themes relating to the potential benefits, challenges and implementation considerations associated with the proposed eWHT model. While views varied across respondent groups and questions, the recurrence of these themes across multiple consultation questions suggests that respondents' views were shaped less by individual policy features and more by a number of common underlying considerations in relation to administrative burden, cashflow impacts, technology and systems integration, accuracy and transparency, implementation support and the scope and operation of any future regime.

These themes provide context for the detailed findings presented in the following chapter and reflect issues that arose repeatedly throughout the consultation process.

Section 5. Summary of Responses

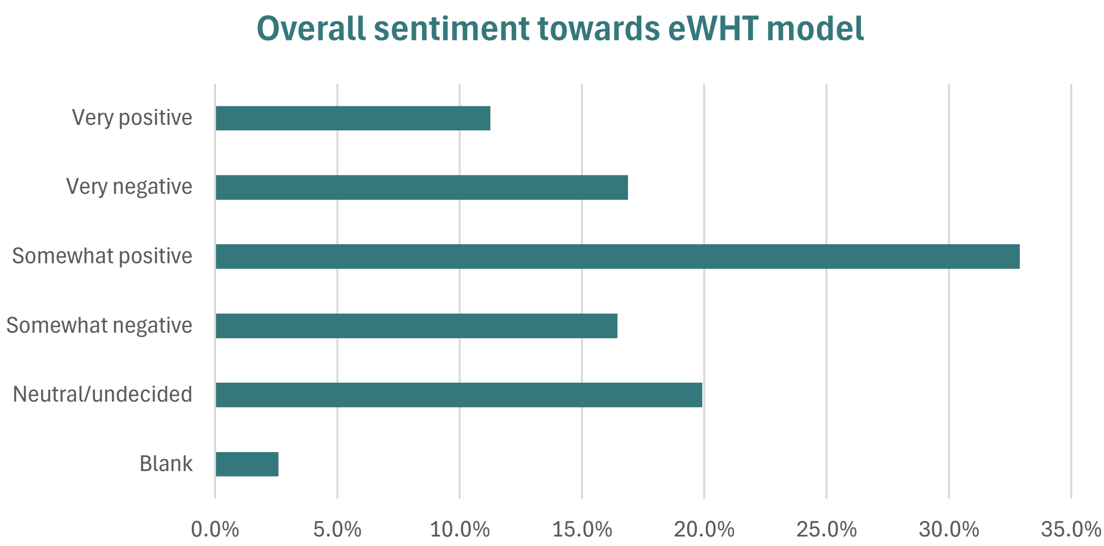
The findings presented in this section summarise the views expressed by respondents to each consultation question. The thematic analysis reflects issues raised by respondents and does not imply endorsement of any particular view. Individual responses frequently contained multiple themes and may therefore be reflected across more than one category.

Question 7. Overall sentiment to proposed eWHT model

All responder types to the online questionnaire were asked to describe their overall reaction to the proposed eWHT system by selecting one of the following five responses –

- Very positive – I strongly support the proposed direction
- Somewhat positive – I think it's a good idea overall
- Neutral / undecided – I need to know more before forming a view
- Somewhat negative – I have some concerns about aspects of the proposal
- Very negative – I do not support the proposed direction

At this initial point of engagement, 44.2% of responders to the online survey are supportive of the proposed eWHT system and believe it to be a good idea overall. 19.9% of responders are undecided as to their current sentiment and require more information before forming a view. 16.5% of responders stated they had concerns about aspects of the proposal, while 16.9% do not support the proposed direction. 2.2% of overall responders did not answer this question.



Question 8. Appealing aspects of the model

All responder types to the online questionnaire were asked, *"What aspects of the proposed model appeal most to you, and why?"*

The benefits identified by respondents broadly related to four themes: improved visibility, accuracy and certainty regarding tax obligations; reduced administrative burden and simplified compliance processes; greater integration with existing software and business systems through automation and application programming interfaces (APIs); and improved cashflow management and tax planning.

Improved visibility and certainty

A frequently identified benefit was the potential for improved visibility of tax information and greater certainty regarding tax obligations. Respondents referenced the availability of real-time information, increased transparency, improved accuracy and a closer alignment between tax deducted and actual tax liabilities. Some respondents also considered that the proposed model could provide greater certainty in relation to tax obligations throughout the year.

Reduced administrative burden

Respondents also identified the potential for a reduction in administrative effort and the simplification of compliance processes. Feedback referenced reduced administrative burden, streamlined processes, fewer queries, simplified compliance obligations and greater efficiency in the administration of withholding tax requirements.

Systems integration

The integration of eWHT within existing business systems was also identified as a potential benefit. Respondents referenced the use of APIs, integration with accounting and business software, automation of processes and the potential for pre-populated returns. These respondents considered that embedding withholding processes within existing systems could support more efficient administration and reduce manual intervention.

Cashflow and financial planning

A further theme related to cashflow management and tax planning. Respondents identified benefits associated with improved cashflow predictability, budgeting for preliminary tax obligations and the potential reduction of large year-end tax payments. Some respondents also referenced the potential benefits of PDRs, particularly where these were considered to improve the alignment between tax deducted and actual tax liabilities.

Question 9. Reservations about the proposed approach

All responder types to the online questionnaire were asked, *"What concerns or reservations do you have about the proposed approach?"*

The concerns identified by respondents broadly related to five themes: cashflow impacts and withholding rates; administrative burden, compliance obligations and complexity; technology, implementation and operational readiness; scope, eligibility and practical application; and governance, certainty and system administration.

Cashflow impact and withholding rates

A frequently raised concern related to the potential financial impact of the proposed model. Respondents referenced cashflow implications, the removal of the current 0% RCT rate, the operation of flat-rate deductions, the accuracy and application of deduction rates, the allocation of deductions and the potential for over-withholding. Concerns were also raised regarding the treatment of expenses, income fluctuations and the extent to which deductions would align with actual tax liabilities.

Administrative burden and compliance obligations

Respondents also identified concerns relating to administrative burden and compliance obligations. Feedback referenced the potential for increased reporting requirements, duplication of existing obligations, additional compliance responsibilities for businesses, increased reporting frequency and the management of supplier classifications. Concerns were also raised regarding operational complexity, accountability and responsibility for withholding obligations, increased customer and subcontractor queries and the potential loss of flexibility or control over tax administration processes.

Technology and implementation

The implementation of the proposed model within existing business systems was another significant theme. Respondents referenced technology and implementation costs, software redesign requirements, software compatibility, IT literacy and training requirements, system reliability and change management considerations. Concerns were also raised regarding data quality, the accuracy of third-party data, audit trail requirements and the practical challenges associated with implementing the proposed model within existing systems and business processes.

Scope and application

A further theme related to the scope and practical application of the proposed model. Respondents sought clarity regarding the treatment of non-resident operators, foreign suppliers and overseas principals, as well as the application of the model in different business circumstances. Other issues raised included the treatment of trading losses, contractor and employee distinctions, infrequent reporters, non-PSWT invoices, joint assessment interactions and the scope of inclusion and exclusion within the proposed regime.

Administration

Respondents also raised concerns relating to governance and the administration of the proposed model. Feedback referenced the operation of refund, credit and amendment processes, error correction mechanisms, Revenue responsiveness and data protection considerations. Concerns were also raised regarding regulatory fragmentation, international competitiveness, barriers to market entry, the potential for mismatches and the overall certainty and administration of the proposed model.

Question 10. Expansion of withholding tax

All responder types were asked, *"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?"*

Respondents expressing support for the proposed expansion generally referenced the policy objectives underpinning the proposal. These respondents considered that the expansion could support greater fairness, transparency and compliance within the tax system. Some respondents indicated that the proposal could improve the integrity of the withholding tax regime, while others considered that it could make compliance processes easier or more effective. A small number of respondents also referenced the potential for more accurate deduction rates and improved alignment between tax deducted and tax ultimately payable.

A significant proportion of responses expressed qualified or conditional support. These respondents were generally open to the concept of expanding withholding taxes in principle but indicated that their views would depend on the detailed design and operation of the model. Issues identified by this group included the scope of the proposed regime, the operation of deduction rates, the treatment of non-resident service providers, repayment and refund processes, the accuracy of third-party data and the practical operation of the model within existing business systems. Respondents within this group frequently highlighted the importance of clear guidance, robust operational processes and sufficient flexibility within the proposed framework.

Respondents expressing concerns or opposition most frequently referenced the potential administrative and compliance burden associated with the proposal. These concerns included additional reporting obligations, increased complexity, duplication of existing reporting requirements and the creation of new reclaim and compliance processes. Cashflow impacts were also frequently referenced, particularly in relation to deduction rates, delays in repayments, the risk of over-withholding and the financial impact of deductions being applied throughout the year. Concerns were also raised regarding the practical implementation of the proposed model. Respondents referenced implementation costs, technology and systems requirements, usability considerations, the identification of parties within complex transactions, data accuracy and error correction processes. A smaller number of respondents questioned the proportionality of the proposal, expressing concerns regarding its interaction with existing compliance measures, its impact on competition and market participation, and the potential creation of barriers to entry for some businesses.

Overall, responses indicated a range of views regarding the proposed expansion of withholding taxes. While some respondents supported the policy objective and identified potential benefits in terms of compliance, transparency and fairness, others expressed concerns regarding administrative burden, cashflow impacts, implementation complexity and the practical operation of the model. A substantial proportion of respondents indicated that their views would depend on the detailed design, scope and implementation of any future regime.

Question 11. Views on current PSWT regime

All responder types were asked, *"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?"*

Cashflow impact, deductions and credits

The most frequently raised theme related to the financial impact of withholding and the operation of the credit and repayment system. Respondents referenced cashflow implications, the timing of credits, offsets and refunds, the operation of applicable deduction rates and the potential introduction of a 0% rate in certain circumstances. Some respondents also suggested that greater recognition should be given to compliance history when determining withholding obligations.

Scope and targeting

A second recurring theme related to the scope and targeting of PSWT. Respondents commented on whether the current categories of payments subject to PSWT remain appropriate and whether the regime should be reviewed to reflect different business models and taxpayer circumstances. Suggestions included reviewing the scope of payments subject to withholding, considering exemptions for certain non-resident providers and introducing thresholds below which withholding would not apply.

Administrative burden and operation

Administrative burden and complexity also featured in responses. Respondents referenced compliance costs, operational impacts and the importance of avoiding additional complexity for businesses. Some respondents considered that any review of PSWT should prioritise simplification and minimise additional reporting or administrative requirements.

Clarity and certainty

A further theme related to clarity and certainty regarding the operation of the regime. Respondents highlighted the importance of clear guidance, transparency regarding the scope of the charge and consistency in the application of withholding obligations.

While some respondents considered that the current PSWT regime is operating effectively and does not require significant amendment, others supported a review of its scope and operation to address concerns relating to cashflow, targeting, administration and the treatment of different categories of taxpayers.

Question 13. Impact PSWT/ RCT on business operations – DW

Current RCT principals and PSWT accountable persons were asked, *"from the perspective of a DW, how does the current application of PSWT and/or RCT impact on your business operations?"*

Responses to this question reflected a range of experiences regarding the operation of the current PSWT and RCT regimes.

Administration and operation

A recurring theme related to the administrative and operational impacts of the current regimes. Respondents referenced the time required to comply with withholding obligations, the administrative effort involved in managing deductions and reporting requirements, and the operational complexity associated with the regimes. While some respondents considered these obligations to be a routine part of conducting business, others viewed them as burdensome or time-consuming. A small number of respondents also referenced operational risks, barriers to entry and concerns regarding the application of higher RCT rates.

Cashflow

Cashflow impacts were also frequently identified. Respondents referenced the effect of withholding on working capital, delays in accessing credits and offsets, and the time taken to obtain refunds. Some respondents indicated that withholding arrangements could create cashflow pressures, particularly where deductions were not immediately available to offset tax liabilities. Concerns were also raised regarding the operation of the 35% RCT rate and the impact of withholding on business cashflow more generally.

System usability and guidance

A further theme related to the operation of Revenue systems and administrative processes. Respondents referenced delays associated with Revenue processes, difficulties arising from the timing of repayments and offsets, and concerns regarding the efficiency of existing administrative arrangements. Some respondents considered that guidance relating to PSWT and RCT could be clearer, while others referenced challenges associated with system usability and the scope of the current regimes.

Routine operation

Notwithstanding these concerns, a number of respondents indicated that the current regimes operate effectively and have become an established part of their business processes. Some respondents reported limited or no operational impact, while others identified benefits associated with regular payment patterns and the role of withholding regimes in supporting tax compliance and timely filing obligations.

Overall, responses indicated that while many DWs have integrated PSWT and RCT into their existing business processes, concerns remain regarding administrative effort, cashflow impacts, the efficiency of repayment and offset mechanisms, and the operation of supporting systems and guidance.

Question 14. Platform operators and withholding tax in other jurisdictions

Prospective DWs were asked*, "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."*

A total of five respondents provided a response to this question.

Responses indicated that direct experience of applying income tax withholding regimes similar to the proposed eWHT model is limited among platform operators. Most respondents referenced experience with information reporting obligations, particularly DAC7, and the collection and reporting of indirect taxes such as VAT or GST in other jurisdictions.

A recurring theme was the significant investment required to implement tax-related reporting and compliance obligations within platform systems. Respondents described experience of developing processes to collect, verify and report information to tax authorities and highlighted the operational and technical complexity associated with implementing such requirements across multiple jurisdictions.

A smaller number of respondents referenced direct experience with income tax withholding regimes. These respondents indicated that the implementation and operation of withholding tax requirements can involve significant technical, administrative and compliance challenges, including systems development, operational changes and ongoing support requirements.

Overall, respondents indicated that while platform operators may have experience of tax reporting and indirect tax collection obligations, direct experience of applying income tax withholding regimes is less common. Where such experience exists, respondents described implementation as complex and resource intensive.

Question 15. Application of current PSWT and RCT withholding – DW

Current RCT principals and PSWT accountable persons were asked*, "from the perspective of a DW, what are your views on the application of RCT and/or PSWT, as the case may be?".*

A recurring theme in responses to this question was that RCT and PSWT are established withholding regimes that are generally understood and embedded within existing business processes. A number of respondents described the regimes as a routine part of conducting business and indicated that they operate effectively in practice. Respondents referenced RCT as a proportionate and risk-based compliance mechanism, while others considered that both regimes support tax compliance and assist in ensuring the correct collection of tax liabilities.

Notwithstanding this, respondents also identified a number of administrative and operational challenges. Feedback referenced the administrative effort associated with managing withholding obligations, compliance costs and the complexity of operating the regimes in practice. Some respondents considered the regimes cumbersome or overly burdensome, while others suggested that simplification measures could improve their operation. Concerns were also raised regarding supplier reactions to deductions and the administration of withholding obligations in specific sectors and business models.

Cashflow impacts were another recurring theme. Respondents referenced the impact of withholding on suppliers, delays in obtaining refunds and offsets, and the interaction between RCT, VAT and other tax liabilities. Concerns were also raised regarding the operation of higher RCT rates, the speed of repayments and the potential financial impact of withholding arrangements on businesses.

A further theme related to clarity and consistency in the application of the regimes. Respondents highlighted the importance of clear guidance and noted uncertainty regarding the scope of certain provisions and the distinction between different categories of workers and suppliers. Some respondents considered that additional guidance could improve understanding and administration of the regimes, while others identified challenges associated with the application of RCT to non-resident or non-registered entities.

Overall, responses indicated that RCT and PSWT are generally regarded as established compliance mechanisms that are integrated into business operations. However, respondents also identified opportunities to improve the operation of the regimes through greater clarity, simplification, improved administration and more timely repayment and offset processes.

Questions 16. Understanding of RCT and PSWT regimes – DW

Current RCT principals and PSWT accountable persons were asked, *"What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?"*

Among those who responded, there was a broadly consistent understanding of the purpose of RCT and PSWT as mechanisms designed to support tax compliance and facilitate the timely collection of tax liabilities.

Compliance and protection of Exchequer revenues

The most frequently referenced theme related to compliance and the protection of Exchequer revenues. Respondents described RCT and PSWT as compliance mechanisms that ensure tax is collected at source, reduce the risk of tax remaining unpaid and encourage taxpayers to maintain their tax affairs in order. Several respondents considered the regimes to be risk management tools that help Revenue monitor compliance and reduce opportunities for tax avoidance or non-compliance. Some respondents also referenced the role of PSWT in ensuring that State and semi-State bodies engage with tax-compliant suppliers and service providers.

Collection of tax

A second recurring theme related to the collection of tax throughout the year. Respondents described withholding taxes as a means of spreading tax payments over time through deductions at source rather than relying solely on end-of-year payments or self-assessment. Responses referenced the use of deductions as credits against future tax liabilities, the reduction of large year-end tax payments and the role of withholding in supporting the timely collection of tax.

Targeted withholding for higher risk sectors and transactions

Respondents also identified the targeted nature of withholding taxes. Some referenced the origins of RCT as a measure designed to address compliance risks within the construction sector, while others considered withholding taxes to be particularly appropriate in sectors or transactions where there is an increased risk of tax liabilities not being paid. A small number of respondents also referenced the role of withholding taxes in providing assurance regarding supplier compliance.

While most responses focused on the purpose and operation of the regimes, some respondents expressed reservations regarding the administrative burden associated with withholding taxes or questioned whether such measures remain necessary in all circumstances. Others noted that the regimes are generally well understood and operate effectively where taxpayers maintain compliant tax affairs.

Overall, respondents who answered this question generally understood RCT and PSWT as withholding mechanisms designed to support compliance, protect Exchequer revenues and facilitate the timely collection of tax liabilities through deductions applied at source.

Question 17. Benefits of embedding eWHT processes directly into business systems – DW

Prospective DWs were asked*, "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?"*

Administrative efficiencies and automation

Among respondents who identified potential benefits, the most frequently referenced theme related to administrative efficiencies. Respondents considered that embedding eWHT processes within existing business systems could reduce administrative effort, streamline compliance activities and make it easier to manage withholding tax obligations. Some respondents also indicated that the proposal could reduce paperwork, save time and support more efficient business processes.

Improved accuracy, compliance and control

A second theme related to improvements in compliance, accuracy and business control. Respondents suggested that integrating eWHT within existing systems could improve the accuracy of withholding calculations, support compliance with tax obligations and increase transparency regarding tax liabilities and deductions. Some respondents also considered that embedded processes could support improved cashflow management and provide greater visibility of tax information.

System quality, implementation and software

A recurring theme identified by respondents was this hat the extent of any benefit would depend on the design and operation of the proposed system. Feedback referenced the importance of system reliability, software compatibility and the quality of integration with existing accounting, payroll and business management systems. Some respondents indicated that the proposal could be beneficial if implemented effectively and with clear operational processes.

Costs and complexity

A recurring concern related to implementation costs and operational complexity. Respondents referenced the potential need for new software, software modifications, additional training requirements and increased reliance on external software providers. Concerns were also raised regarding implementation costs, cyber security risks, operational complexity and the possibility that the costs of implementation could outweigh the benefits for some businesses.

A number of respondents also noted that insufficient information was available to fully assess the likely impact of the proposal.

Overall, responses indicated that respondents recognised the potential for embedded eWHT processes to improve efficiency, compliance and accuracy. However, views were often conditional on the practical design, cost and operation of the proposed system, with many respondents indicating that the overall benefit would depend on whether implementation could be achieved in a proportionate and cost-effective manner.

Question 18. Opportunities for businesses and wider industry created by embedding eWHT within natural business systems

Prospective DWs were asked, *“in your view, what opportunities could embedding eWHT within natural business systems create for your business or the wider industry?”*

The opportunities identified by respondents broadly related to three themes: administrative efficiencies and reduced compliance burden; improved compliance, accuracy and transparency; and enhanced cashflow management and tax administration.

Administrative efficiencies

The most frequently referenced opportunity related to administrative efficiencies. Respondents considered that embedding eWHT processes within existing business systems could reduce administrative effort, streamline processes and improve operational efficiency. Feedback referenced reduced administrative burden, time savings and the potential to automate aspects of withholding tax administration.

Improved compliance, accuracy and transparency

A second theme related to improvements in compliance, accuracy and transparency. Respondents suggested that integrating eWHT within existing business systems could support compliance with tax obligations, improve the accuracy of withholding calculations and provide greater transparency regarding tax liabilities and deductions. Some respondents also considered that embedded processes could enhance overall tax management and reduce the risk of errors

Improved cashflow management and tax administration

A further opportunity identified by respondents related to cashflow management and the administration of tax liabilities. Responses referenced improved cashflow planning, greater visibility of tax obligations and the potential for more effective management of tax liabilities throughout the year.

Overall, respondents who identified opportunities associated with the proposal generally considered that embedding eWHT processes within existing business systems could support more efficient administration, improve compliance outcomes and provide businesses with greater visibility and control over their tax obligations.

Question 19. Challenges in adopting an embedded within natural systems approach

Prospective DWs were asked, *"what challenges do you think your business might face in adopting this embedded within natural systems approach?"*

The challenges identified by respondents broadly related to technology and systems integration, implementation costs and resource requirements, operational impacts and cashflow considerations.

Technology and systems

The most frequently referenced theme related to technology and systems integration. Respondents highlighted the need to integrate eWHT processes with existing accounting, payroll and business management systems and noted the potential requirement for significant system changes. Feedback referenced software redesign, data accuracy, system reliability, integration with existing processes, audit trail requirements and the need to accommodate corrections, reversals and exception handling. Some respondents also highlighted the importance of ensuring compatibility with other initiatives, including e-invoicing.

Costs, resources and skills

A second theme related to implementation costs and resource requirements. Respondents referenced the costs associated with software development and implementation, training requirements and the need to maintain the necessary skills and expertise to operate the proposed system. Several respondents noted that smaller businesses may have limited IT infrastructure or resources available to support implementation and expressed concerns that the proposal could disproportionately benefit organisations with greater capacity to invest in technology.

Operational and administrative impact

Operational and administrative impacts were also frequently identified. Respondents highlighted the importance of a seamless implementation and referenced potential increases in administrative effort, additional compliance obligations and the need to manage supplier classifications and withholding obligations. Some respondents also noted the potential for increased queries from suppliers and customers and highlighted the importance of minimising disruption to existing business processes.

Cashflow and business impact

Cashflow impacts were another recurring theme. Respondents referenced concerns regarding the effect of automatic deductions on cashflow, the timing of deductions and the potential impact on working capital. A small number of respondents also raised concerns regarding competitiveness, suggesting that implementation costs and operational requirements could affect Ireland's attractiveness as a place to do business or could influence participation by some platform operators.

Overall, respondents indicated that the successful adoption of an embedded eWHT model would depend on the ability to integrate the system effectively within existing business processes while managing implementation costs, operational impacts and training requirements. Respondents also highlighted the importance of ensuring that the proposed model is proportionate and capable of being adopted by businesses with varying levels of technological capability.

Question 20. Estimated number of monthly payments to prospective SPs

Prospective DWs were asked, *"What is the estimated number of payments that you make to SPs each month?"*

Responses indicated considerable variation in the volume of payments made to specified persons each month, reflecting the diverse range of businesses and organisations that may be affected by an eWHT regime. While a number of respondents did not provide a specific estimate, those who did respond reported payment volumes ranging from a small number of transactions per month to several thousand.

For the purposes of analysis, responses have been grouped into three broad categories: organisations operating Relevant Contracts Tax (RCT), organisations operating Professional Services Withholding Tax (PSWT), and platform operators. A number of respondents operate both RCT and PSWT and are therefore reflected across both categories where relevant.

RCT cohort

Among respondents operating RCT, the majority reported relatively low volumes of monthly payments, with many indicating fewer than 50 payments per month and a significant proportion reporting between 1 and 20 payments. A smaller number of respondents reported payment volumes between 50 and 200 payments per month, while a limited number of larger construction and engineering businesses reported several hundred payments per month.

One respondent operating both RCT and PSWT reported making between 5,000 and 6,000 payments per month.

PSWT cohort

Among respondents operating PSWT, payment volumes also varied considerably. Lower payment volumes were reported by some organisations, including public bodies and educational institutions, while larger public sector organisations reported substantially higher transaction volumes.

As noted above, one respondent operating both RCT and PSWT reported making between 5,000 and 6,000 payments per month.

Platform operators

Responses from platform operators reflected the highest transaction volumes overall. While one platform operator reported fewer than 50 payments per month, other platform operators reported payment volumes in excess of 500 transactions per month, with some indicating that they process several thousand payments monthly.

Overall, responses indicate that the volume of payments potentially within scope of an eWHT regime varies significantly depending on the size, sector and business model of the respondent. While many respondents reported relatively low monthly payment volumes, a smaller number of organisations, particularly larger businesses, public bodies and platform operators, reported substantially higher transaction volumes.

Question 21. Software currently used for processing payments and or managing finances

Prospective DWs were asked, *"Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?"*

A clear majority of DW respondents across all sectors use some form of software for financial management, though the sophistication varies greatly.

Out of the cohort of prospective DW respondents who provided a clear answer, a vast majority stated that they use software for processing payments or managing finances. While a minority indicated they use manual methods, non-integrated systems, or outdated software. This feedback is summarised by prospective eWHT DW cohorts as follows.

RCT cohort

Respondents from this cohort, primarily made up of respondents from the construction sector, demonstrated a wide variety of software usage, ranging from large Enterprise Resource Planning (ERP) systems in larger firms to common Small and Medium Enterprise (SME) accounting packages and manual processes. There is a divergence between large operators using integrated ERPs, and smaller businesses relying on streamlined accounting packages.

PSWT cohort

This cohort, primarily composed of government departments, public bodies, and semi-state companies, consistently reported using large-scale, integrated ERP systems. Unlike the mixed landscape in the RCT construction sector, enterprise-level systems are predominately used by DWs in the PSWT cohort.

Platform operators

Platform operators reported using complex, often custom-built, global technology stacks rather than standard off-the-shelf accounting software. These respondents emphasised that their payment systems are global, highly complex, and not designed for jurisdiction-specific tax withholding.

Question 22. Employer status and payroll software packages

Prospective DWs were asked, *"Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?"*

The vast majority of responders to this question stated that they were an employer. With regards to method of payroll reporting:

- 68% named a specific software package,
- 11% indicated their payroll is managed by an accountant or a third-party provider, and
- 21% stated they were not an employer.

While a wide range of payroll solutions are in use, a few key providers dominate the landscape for prospective DWs currently operating RCT and PSWT. The platform economy presents a more fragmented picture regarding direct PAYE operations.
This feedback is summarised by prospective eWHT DW cohorts as follows:

RCT cohort

This cohort represents the largest group of responders. The feedback indicates a near-universal status as PAYE employers, utilising a diverse range of commercial payroll software. A small minority explicitly stated they were not an employer. While several indicated their payroll is outsourced to an accountant or a third-party service.

PSWT cohort

This cohort, which includes many government agencies and large professional bodies, also confirmed they are predominantly PAYE employers, with a small minority indicating that their payroll is outsourced.
There is some overlap with the RCT cohort, as some public bodies operate both regimes.

Platform operators

This cohort provided the most varied responses regarding PAYE employer status, reflecting different operational models.
Some platforms confirmed they are PAYE employers, using specific software or outsourcing the function. Notably, two major platforms explicitly stated they are not PAYE employers in their survey responses.

Question 24. Impact PSWT/ RCT on business operations – SP

Current RCT subcontractors and PSWT specified persons were asked, *"Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?"*

Cashflow impact

The most frequently identified impact related to cashflow. Respondents referenced the effect of withholding taxes on working capital and the timing of access to funds, with a number of respondents indicating that withholding arrangements can restrict cashflow until credits, offsets or refunds become available. Concerns were also raised regarding the length of time taken to process refunds and offsets, with some respondents indicating that delays in accessing withheld amounts can have a significant impact on business operations.

Operation of withholding system

A second recurring theme related to the operation of withholding rates. Respondents noted that the current 0% RCT rate can significantly reduce the operational impact of withholding taxes and, as a result, some reported little or no impact on their business activities. However, concerns were raised regarding the difference between the 0% rate and higher deduction rates, particularly for businesses entering the regime or moving between compliance categories. Some respondents also considered that the current PSWT rate is too high or that withholding deductions do not always align with their ultimate tax liability.

Administrative burden

Administrative burden was also identified as a factor affecting business operations. Respondents referred to the effort associated with managing withholding tax credits, reconciling deductions against tax liabilities and engaging with repayment, refund and offset processes. While raised less frequently than cashflow impacts, these administrative requirements were identified as an ongoing operational consideration.

Certainty and fulfilling tax obligations

A smaller number of respondents identified positive aspects of the current withholding tax regimes. These respondents considered that withholding taxes support tax compliance, facilitate tax planning and reduce the risk of large end-of-year tax liabilities. Some respondents also noted that the regimes operate predictably and are integrated into existing business processes.

Overall, responses indicated that the principal operational impact of the current PSWT and RCT regimes relates to cashflow, particularly where refunds, offsets or credits are not available in a timely manner. Administrative requirements and the operation of withholding rates were also identified as important considerations, while a number of respondents acknowledged the role of withholding taxes in supporting compliance and spreading tax liabilities throughout the year.

Question 25. Application of current PSWT and RCT withholding - SP

Current RCT subcontractors and PSWT specified persons were asked, *"from the perspective of a SP, what are your views on the application of RCT and/or PSWT, as the case may be?*

Cashflow impacts

The most frequently identified theme related to cashflow and the operation of refund processes. Respondents referenced the impact of withholding taxes on working capital, the time taken to receive refunds and the administrative effort associated with reclaiming overpaid tax. Several respondents indicated that delays in processing refunds can create cashflow pressures, particularly where withholding deductions exceed the taxpayer's ultimate liability.

Administrative burden

Administrative burden was also identified as a significant issue. Respondents referenced the effort required to manage withholding deductions, monitor tax credits and engage with refund and compliance processes. Some respondents considered that the current regimes could be streamlined or automated to reduce administrative effort and improve efficiency.

Operation of withholding taxes

A further theme related to the operation of withholding rates and the scope of the regimes. Respondents raised concerns regarding the level of certain deduction rates, particularly the 35% RCT rate, and noted that withholding deductions do not always align with their final tax liabilities. Concerns were also expressed regarding the application of PSWT in certain circumstances, including its application to foreign companies, while some respondents considered that aspects of the current regimes are overly broad or unclear in scope.
A smaller number of respondents highlighted issues relating to clarity and consistency in the operation of the regimes. These included uncertainty regarding the application of RCT, confusion regarding withholding rates, differences between accruals and payments-based treatment and the need for greater transparency regarding taxpayers' overall tax positions.

Compliance and certainty

Notwithstanding these concerns, a number of respondents identified positive aspects of the current arrangements. These included the role of withholding taxes in supporting compliance, providing greater certainty regarding tax liabilities and facilitating the payment of tax throughout the year. Some respondents also indicated that the current regimes operate effectively where tax affairs are up to date and compliance obligations are well understood.

Overall, responses indicated that SPs recognise the role of RCT and PSWT in supporting compliance and facilitating the collection of tax liabilities. However, respondents also identified a range of operational challenges, particularly in relation to cashflow impacts, refund processes, administrative burden and the operation of withholding rates.

Question 26. Understanding of RCT and PSWT regimes – SP

Current RCT subcontractors and PSWT specified persons were asked, “What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?”

Among those who responded, there was a broadly consistent understanding of the purpose of RCT and PSWT as withholding mechanisms designed to support tax compliance and facilitate the timely collection of tax liabilities.

Compliance

The most frequently referenced theme related to compliance. Respondents described RCT and PSWT as measures intended to improve compliance, reduce the risk of tax underpayment and support the collection of tax in sectors or activities considered to present a higher compliance risk. Several respondents specifically referenced the role of withholding taxes in encouraging compliant behaviour and ensuring that tax liabilities are met.

A smaller number of respondents referenced the targeted application of withholding taxes, noting that the regimes are intended to address compliance risks in specific sectors and business activities where there is an increased risk of tax liabilities remaining unpaid.

Collection of tax

A second recurring theme related to the collection of tax throughout the year. Respondents commonly described RCT and PSWT as mechanisms that enable tax to be collected at source, rather than solely through end-of-year payments. Responses referenced the role of withholding taxes in facilitating the early collection of tax, spreading tax payments over time and reducing the risk of significant tax liabilities arising at year end.

Respondents also highlighted the role of withholding taxes as a prepayment mechanism. Feedback referenced the use of withheld amounts as credits against future tax liabilities and the ability of the regimes to support the gradual payment of tax obligations throughout the year.

Overall, respondents demonstrated a strong understanding of RCT and PSWT as mechanisms designed to support compliance, collect tax at source and facilitate the timely payment of tax liabilities through deductions that can be credited against a taxpayer's final tax position.

Question 27. Current rates of PSWT/ RCT and actual Income Tax liability on the income received by corporates/ partnerships/ other entities

Current RCT subcontractors and PSWT specified persons were asked*, "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?"*

Responses to this question indicated differing views on whether the current PSWT and RCT withholding rates accurately reflect the final tax liabilities of corporate entities, partnerships and other business structures. However, the predominant view among respondents was that the current rates do not accurately reflect their actual tax liability.

The most frequently raised concern was that the applicable withholding rates are higher than the tax ultimately payable on the income received. Respondents indicated that this can result in tax being withheld in excess of their final liability and may give rise to repayment or offset requirements before their tax position is fully reconciled.

A smaller number of respondents considered that the current withholding rates are lower than their eventual tax liability. Some respondents also noted that business expenses and other deductible costs can vary significantly, making it difficult for a fixed withholding rate to accurately reflect their final tax position.

A number of respondents expressed support for the continued availability of the current 0% RCT rate and considered that it appropriately reflects the circumstances of compliant taxpayers.

Overall, responses suggest that many SPs do not consider the current withholding rates to be fully aligned with their actual tax liabilities. Concerns were primarily focused on situations where withholding deductions exceed the tax ultimately payable and where a fixed rate does not adequately reflect differences in business costs and profitability.

Question 28. Benefits of embedding eWHT processes directly into business systems – SP

Prospective SPs were asked, *“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?”*

Responses reflected a range of views regarding the potential benefits of embedding taxation directly into payment processes. The themes identified broadly related to improved certainty and visibility of tax obligations, administrative efficiencies, cashflow management and the importance of accurate operation of the proposed model.

Improved certainty and visibility of tax obligations

A frequently referenced theme was the potential for greater visibility and certainty regarding tax liabilities. Respondents considered that real-time withholding could provide a clearer understanding of tax obligations throughout the year, improve transparency and support more effective budgeting and financial planning. Some respondents also indicated that the proposal could reduce the risk of large year-end tax liabilities and provide greater predictability regarding tax payments.

Administrative efficiencies

Administrative efficiencies were also identified as a potential benefit. Respondents suggested that embedding withholding within payment processes could streamline compliance activities, reduce administrative effort and simplify the management of tax obligations. A number of respondents considered that automation could improve efficiency and reduce the need for manual intervention. Cashflow implications featured prominently in responses, although views differed regarding the likely impact.

Cashflow management

Some respondents considered that more regular tax deductions could assist with budgeting and cashflow planning, while others expressed concerns regarding the effect of withholding on working capital and the potential reduction in flexibility associated with receiving payments net of tax deductions.

Accurate operation

A further recurring theme related to the importance of accuracy in the operation of the proposed model. Respondents emphasised that any benefits would depend on deductions being calculated correctly and on the availability of accurate, timely information regarding withholding rates and tax liabilities. Concerns were also raised regarding the potential for over-withholding and the consequences of deductions that do not accurately reflect a taxpayer's final tax position.

Overall, responses indicated that respondents recognised potential benefits in terms of certainty, transparency, administrative efficiency and tax planning. However, views were often qualified by concerns regarding cashflow impacts, flexibility and the need for the proposed system to operate accurately and reliably in practice.

Question 29. Impact of PDR on cashflow and financial management?

Prospective SPs were asked, *"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?"*

Responses reflected a range of views regarding the potential impact of PDRs on cashflow and financial management. The themes identified broadly related to cashflow impacts, budgeting and tax planning, certainty and transparency, and the practical operation of the proposed model.

Cashflow impacts

The most frequently referenced theme related to cashflow. A number of respondents expressed concern that PDRs could reduce available working capital and negatively affect day-to-day cashflow. Concerns were also raised regarding the potential impact of deductions being applied throughout the year and the effect this could have on financial flexibility. However, other respondents considered that PDRs could improve cashflow management by spreading tax payments more evenly throughout the year. These respondents suggested that the proposal could reduce the need for large end-of-year tax payments and support more effective budgeting and financial planning.

Certainty and transparency

A further theme related to certainty and transparency. Respondents indicated that PDRs could provide greater visibility of tax liabilities and improve understanding of tax obligations as income is earned. Some respondents considered that this could assist with tax planning and reduce uncertainty regarding year-end liabilities.

Operation of the system

Several respondents highlighted the importance of the design and operation of the proposed system. Feedback referenced the need for stable and accurate deduction rates, flexibility to reflect changing circumstances and confidence that deductions would align with taxpayers' actual liabilities. Concerns were also raised regarding the administrative effort required to report expenses and maintain accurate deduction rates where income or deductible costs fluctuate over time.

Overall, responses indicated differing views on the likely impact of PDRs. While some respondents considered that PDRs could improve budgeting, transparency and the management of tax liabilities, others expressed concerns regarding cashflow impacts, flexibility and the ability of deduction rates to accurately reflect their individual circumstances.

Question 30. Positive effects on end of year return filing and Preliminary Tax payment obligations

Prospective SPs were asked, *“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?”*

Responses reflected a range of views regarding the potential impact of the proposed regime and PDRs on end-of-year Income Tax return filing and preliminary tax obligations. The themes identified broadly related to the reduction of year-end tax liabilities, improvements in tax administration and planning, and the importance of ensuring that PDRs operate accurately.

Improved planning for tax

The most frequently identified benefit related to the potential reduction in end-of-year tax liabilities. Respondents considered that the proposed approach could reduce the size of balancing payments and preliminary tax obligations by collecting tax throughout the year. Some respondents suggested that this could improve financial planning and reduce the need to make large tax payments at year end.

Simpler and more predictable tax administration

A second theme related to greater certainty and predictability in managing tax obligations. Respondents indicated that a pay-as-you-go approach could provide a clearer understanding of tax liabilities throughout the year and support more effective budgeting and financial management. Some respondents also considered that the proposal could simplify compliance processes and reduce the administrative burden associated with managing end-of-year tax obligations. A small number of respondents identified pre-populated returns as a potential benefit.

Importance of accurate and reliable PDR

However, many responses highlighted that the success of the proposed regime would depend on the accuracy of Personalised Deduction Rates. Respondents emphasised the importance of ensuring that deduction rates accurately reflect individual circumstances and tax liabilities. Concerns were raised that inaccurate rates could result in under- or over-deductions during the year, potentially reducing the anticipated benefits of the proposed approach.

A smaller number of respondents expressed concerns regarding the potential cashflow impact of deductions being applied throughout the year and questioned whether the proposed regime would improve their overall tax position.

Overall, responses indicate that many respondents see potential benefits in a system that collects tax on a real-time basis and reduces year-end tax liabilities. However, support for the proposal was frequently linked to the ability of PDRs to operate accurately and reflect taxpayers' individual circumstances, with respondents emphasising that the effectiveness of the regime would depend on its practical implementation.

Question 31. Likelihood of reporting other income and expenses improve accuracy of PDR

Prospective SPs were asked, *“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?”*

Responses reflected a range of views regarding the reporting of income and expenses to support the operation of PDRs. The themes identified broadly related to administrative burden, ease of use, proportionality and the potential benefits of improved accuracy.

Administrative burden

The most frequently referenced theme related to administrative burden. Respondents expressed concerns regarding the additional time and effort that may be required to regularly report income and business expenses. Some respondents indicated that the reporting requirements could increase compliance obligations, while others noted that the process could give rise to additional costs, including the potential need for professional assistance.

Reporting process

A second recurring theme related to the design and usability of the reporting process. Respondents emphasised that their willingness to provide information would depend on the process being straightforward, user-friendly and easy to integrate into existing business practices. Several respondents highlighted the importance of simplicity and clear guidance to support ongoing reporting obligations.

Benefits to reporting

Some respondents indicated that they would be willing to provide income and expense information where this would improve the accuracy of their PDR and assist in managing their tax obligations. A number of respondents considered that more accurate deduction rates could support cashflow management and reduce the likelihood of under- or over-deductions throughout the year.

However, a proportion of respondents indicated that they would only provide additional information where required or where the benefits clearly outweighed the administrative effort involved. Concerns were also raised regarding the time commitment associated with regular reporting and the potential costs of maintaining accurate and up-to-date information.

Overall, responses indicate that respondents recognise the potential benefits of providing income and expense information to improve the accuracy of PDRs. However, willingness to do so was frequently linked to the simplicity of the reporting process, the administrative effort required and the extent to which improved accuracy would deliver tangible benefits for taxpayers.

Question 32. Expected changes required to business for eWHT readiness

All responders were asked, *"What changes do you expect to have to implement in your business in order to be ready for the proposed eWHT model?"*

The changes identified by respondents broadly related to systems and software updates, bookkeeping and financial management processes, staff training and resource requirements, and changes to existing business workflows.

Systems and software requirements

The most frequently referenced theme related to systems and software. Respondents anticipated that existing accounting, payroll and business management systems would need to be updated to accommodate eWHT processes. Feedback referenced software upgrades, changes to reporting functionality, system integration requirements and the need to ensure compatibility with existing software solutions. A number of respondents indicated that they would rely on software providers to incorporate the necessary functionality into their existing systems.

Financial management processes

A second theme related to bookkeeping and financial management processes. Respondents identified the need to maintain more regular and up-to-date financial records, with some indicating that bookkeeping processes would need to be strengthened to support the operation of the proposed regime. Cashflow planning was also frequently referenced, with respondents highlighting the need to adapt financial management practices to accommodate real-time withholding arrangements.

Training and resources

Training and resource requirements were another recurring theme. Respondents anticipated the need to train staff on new processes and systems, while some indicated that additional personnel or external professional support may be required. Several respondents noted that guidance and training materials provided by Revenue would be important in supporting implementation.

Respondents also identified potential changes to existing workflows and administrative processes. These included adapting business procedures, incorporating new reporting requirements and ensuring that operational processes align with the proposed eWHT model. While some respondents anticipated significant changes, others considered that only limited adjustments would be required, particularly where existing systems and processes are already highly automated.

Overall, responses indicate that businesses expect preparation for an eWHT regime to involve a combination of system changes, process updates, staff training and enhanced financial management practices. The scale of the changes anticipated varied depending on the size, complexity and existing technological capability of the respondent's business.

Question 33. Benefits of new regime on business processes, costs and delivery of business services

All responders were asked, *"What benefits do you expect the new regime to have on your business processes, costs and delivery of your business services?"*

The benefits identified by respondents broadly related to administrative efficiencies, improved certainty and transparency, cashflow management and the increased use of automation and digital processes.

Administrative efficiencies

The most frequently referenced theme related to administrative efficiencies. Respondents anticipated that the proposed regime could streamline workflows, reduce administrative effort and generate time savings through the automation of withholding tax processes. Some respondents also considered that the proposal could simplify existing procedures and reduce the need for manual intervention in the administration of tax obligations.

Certainty and transparency

A second recurring theme related to certainty and transparency. Respondents indicated that greater visibility of tax liabilities and deductions could provide increased certainty regarding their tax position throughout the year. Feedback also referenced improved transparency, reduced concern regarding year-end tax liabilities and a clearer understanding of tax obligations as they arise.

Cashflow management

Cashflow management was another commonly identified benefit. Respondents considered that the proposed regime could support improved cashflow planning, reduce the size of end-of-year tax payments and provide greater predictability in relation to tax liabilities. Some respondents also referenced the importance of timely crediting and offsetting of deductions in realising these benefits.

Digitalisation and automation

A further theme related to automation, digitalisation and improved accuracy. Respondents highlighted the potential benefits of integrating eWHT processes into existing systems through automation, application programming interfaces (APIs) and digital access to tax information and claims. Some respondents also considered that greater automation could improve accuracy and reduce the likelihood of errors.

While many respondents identified potential benefits, a smaller number expressed concerns regarding possible increases in costs or reductions in cashflow arising from the operation of the proposed regime. Some respondents also noted that the impact may vary depending on the nature of their business and existing payment arrangements.

Overall, respondents who identified benefits associated with the proposed regime generally considered that it could improve administrative efficiency, provide greater certainty regarding tax obligations, support cashflow management and increase the automation and accuracy of tax administration processes.

Question 34. Expected time frame for adaption to proposed eWHT system

All responders were asked, *“what would you consider a reasonable timeframe for your business to adapt to the proposed new system?”*

Across all consultation responses, there was a sizeable portion of responders who felt that business could adapt within 12 months, roughly 34%. An adaption period of 2+ years was signalled by 12% of responders.

RCT cohort

<u>Expected Implementation Periods</u>

- 0-6 months - this was the most common timeframe, expressed by 33% of respondents.
- 6-12 months - this was expressed by 22% of respondents.
- 12-18 months – this was expressed by 20% of respondents.
- 2+ years – this timeframe was expressed by roughly 15%, primarily representative bodies and larger firms.

PSWT Cohort

<u>Expected Implementation Periods</u>

- 0-6 months – this was the most common timeframe, expressed by 41% of responders.
- 6-12 months - this was expressed by 20% of respondents.
- 12-18 months – this was expressed by 15% of respondents.
- 2+ years - this was expressed by 10% of respondents.

Platform Operators

<u>Expected Implementation Periods</u>

- 0-6 months – this was expressed by 29% of respondents.
- 6-12 months – this was expressed by 13% of respondents.
- 12-18 months – this was expressed by 13% of respondents.
- 2+ years – this was the most common timeframe, expressed by 33% of respondents.

Question 35. Confidence in adapting to the proposed new system

All responders were asked, *“How confident are you that your business could adapt to the new system within a reasonable timeframe?”*

Overall, responses indicated a relatively high level of confidence in businesses' ability to adapt to a new eWHT regime within a reasonable timeframe. However, respondents frequently noted that successful implementation would depend on the availability of appropriate support, guidance and sufficient lead-in time.

Communication and guidance

A recurring theme related to the importance of clear communication and guidance. Respondents emphasised the need for timely information regarding the operation of the proposed regime, clear implementation guidance and practical support materials. Some respondents also highlighted the value of training and access to testing environments to support system readiness and business preparation.

System design and integration

A second theme related to system design and integration. Respondents indicated that confidence in implementation would depend on the ability to integrate eWHT processes seamlessly into existing accounting, payroll and business management systems. Several respondents highlighted the importance of user-friendly solutions that minimise disruption to existing workflows and business processes.

Implementation timelines

Respondents also highlighted the importance of realistic implementation timelines. Feedback referenced the need for adequate lead-in periods to allow businesses to make system changes, train staff and adapt operational processes. A number of respondents suggested that flexibility during implementation would be important in supporting a smooth transition to the new regime.

Change management

While many respondents expressed confidence in their ability to adapt, some identified potential challenges for smaller businesses and subcontractors, particularly where existing technological capabilities are limited. Concerns were also raised regarding the potential costs associated with system changes and the resources required to implement new processes.

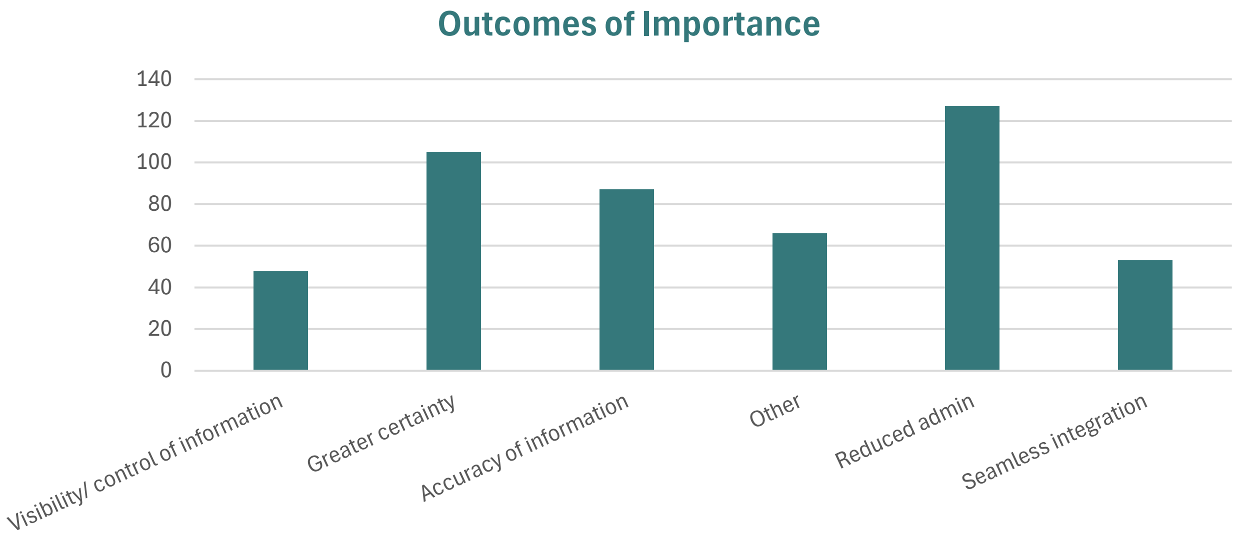
Overall, responses indicate that respondents generally believe that businesses can adapt to a new eWHT regime within a reasonable timeframe. However, confidence was frequently linked to the provision of clear guidance, effective support, realistic implementation timelines and the availability of solutions that can be integrated efficiently into existing business systems.

Question 36. In terms of business management, which outcomes from this new regime are the most important?

Responders were asked, *"in terms of the management of your business, which outcomes from this proposed new model are the most important for you? (Select up to 3)*

- *Reduced administrative workload*
- *Increased accuracy of information submitted to Revenue*
- *Greater certainty in relation to your tax affairs*
- *Better visibility and control of information held by Revenue*
- *Seamless integration of taxation with your business systems*
- *Other"*

The most frequently cited outcomes of importance as stated by the 231 respondents to the survey are as follows.

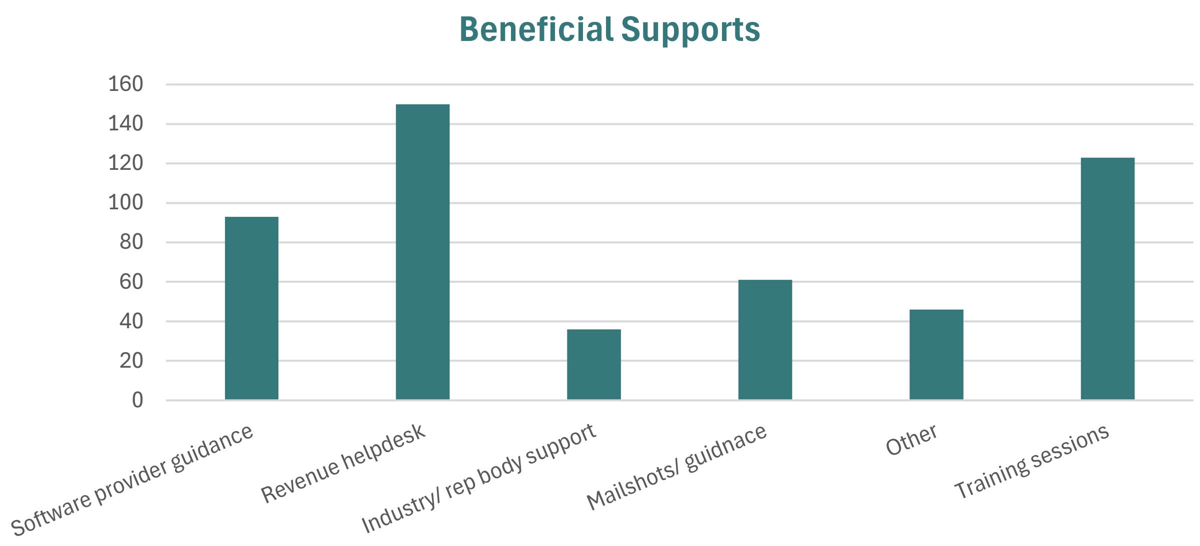


Question 37. What supports from Revenue would be of most benefit in transitioning to the new regime?

"Responders were asked, what supports from Revenue would be of most benefit to you in transitioning to the new model? (Select up to 3)

- *Training or awareness sessions*
- *Helpdesk or dedicated Revenue contact*
- *Industry/professional body support*
- *Clear guidance for software providers and a testing environment*
- *Mailshots and guidance on the Revenue website*
- *Other"*

The most frequently cited outcomes of importance as stated by the 231 respondents to the survey are as follows..



Question 38. Other views on the proposed eWHT system

All responders were asked, *"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?"*

Responses to this question highlighted a number of recurring themes relating to the design, implementation and operation of a potential eWHT regime. Respondents frequently emphasised the importance of ensuring that any future system is proportionate, simple to operate and capable of being integrated effectively within existing business processes.

Administrative burden and implementation cost

The most frequently raised theme related to administrative burden and implementation costs. Respondents expressed concerns regarding the potential compliance burden associated with the proposed regime, including the costs of system changes, software development and process redesign. Some respondents also highlighted the importance of avoiding duplication with existing reporting obligations, particularly DAC7, and minimising unnecessary complexity for businesses.

Implementation and support

A second recurring theme related to implementation and support. Respondents emphasised the importance of clear guidance, targeted training and ongoing engagement throughout the implementation process. Suggestions included the provision of FAQs, webinars, practical guidance materials, helpdesk support, testing environments and phased implementation arrangements to support businesses in preparing for the new regime. Respondents also highlighted the importance of adequate resourcing and support from Revenue during any transition period.

Cashflow impacts and withholding rates

Cashflow impacts and withholding rates were also frequently referenced. Respondents reiterated concerns regarding the impact of withholding on working capital and highlighted the importance of timely offsets, refunds and credits. Some respondents supported the retention of the current 0% RCT rate, while others suggested that withholding rates should more closely reflect taxpayers' actual liabilities. The importance of transparency and visibility regarding withholding positions and Personalised Deduction Rates was also highlighted.

System design and integration

A further theme related to system design and integration. Respondents emphasised the importance of seamless integration with existing software and business processes, the continued availability of manual options where appropriate and the use of automation and real-time data flows to reduce administrative effort. Some respondents also highlighted the value of pre-filled returns and improved digital services.

Policy considerations

Respondents also raised broader observations regarding the overall policy approach. Some expressed a preference for retaining the existing withholding tax regimes without significant expansion or modernisation, including the continued availability of the current 0% RCT rate.

Others suggested that Revenue should maximise the use of existing data sources, including information reported under DAC7, before introducing additional withholding obligations.

Finally, respondents highlighted the importance of ensuring that any future regime operates consistently with wider domestic and international frameworks. Feedback referenced the need to minimise fragmentation with European reporting requirements, maintain competitiveness and avoid creating unnecessary barriers to entry or participation for businesses operating across multiple jurisdictions.

Overall, responses to this question reinforced themes that emerged throughout the consultation, including the importance of simplicity, proportionality, administrative efficiency, effective implementation support and the need to manage cashflow impacts and compliance costs. Respondents consistently indicated that the success of any future eWHT regime would depend not only on its policy design but also on the practicality of its implementation and operation.

Appendix I

eWHT public consultation – Feedback Questions

Personal information

1. Please give your full name.
2. Please give your contact email address.
3. State the name of the organisation you represent (if applicable).
4. Who are you:
    - Business
    - Tax professional
    - Government department/agency
    - Business association
    - Representative body
    - Public Representative
    - Other – please specify
5. Are you making a submission in relation to the proposals for a:
    - Designated Withholder (DW)
    - Specified Person (SP)
    - Both DW & SP (for tax professionals, representative bodies, RCT middle principals)

    (This option dictates the DW/SP question flow.)
6. Please tick the sectors that apply to you:
    - Construction
    - Forestry
    - Meat processing
    - Professional services
    - Platform economy
    - Other – please specify

Feelings about the proposed change

7. After reading about the proposed new eWHT system, how would you describe your overall reaction?
    - Very positive – I strongly support the proposed direction
    - Somewhat positive – I think it's a good idea overall
    - Neutral / undecided – I need to know more before forming a view
    - Somewhat negative – I have some concerns about aspects of the proposal
    - Very negative – I do not support the proposed direction
8. What aspects of the proposed model appeal most to you, and why?
9. What concerns or reservations do you have about the proposed approach?
10. 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?
11. 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?

Withholding Taxes and Business systems

Current model for DWs

12. Please indicate if you currently operate:
    - Professional Services Withholding Tax (PSWT)
    - Relevant Contracts Tax (RCT)
13. From the perspective of a DW, how does the current application of PSWT and/or RCT impact on your business operations?
14. 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.
15. From the perspective of a DW, what are your views on the application of RCT and/or PSWT, as the case may be?
16. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?

Proposed model for DWs

17. 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?
18. In your view, what opportunities could embedding eWHT within natural business systems create for your business or the wider industry?
19. What challenges do you think your business might face in adopting this embedded within natural systems approach?
20. What is the estimated number of payments that you make to SPs each month?
21. Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?
22. Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?

Current model for SPs

23. Please indicate if you currently receive payments which are subject to deduction of:
    - Professional Services Withholding Tax (PSWT)
    - Relevant Contracts Tax (RCT)
24. Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?
25. From the perspective of a SP, what are your views on the application of RCT and/or PSWT, as the case may be?
26. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?
27. 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?

Proposed model for SPs

28. 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?

29. 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?
30. Do you think this proposed new model, including the PDR will have a positive effect on your end of year Income Tax return filing and preliminary tax payment obligations?
31. The accuracy of PDR is improved by the regular reporting by you to Revenue of your
14. income and business expenses. How likely are you to report your income and expenses to improve the accuracy of your PDR?

Readiness and Change (All)

32. What changes do you expect to have to implement in your business in order to be ready for the proposed eWHT model?
33. What benefits do you expect the proposed new model to have on your business processes, costs and delivery of your business services?
34. What would you consider a reasonable timeframe for your business to adapt to the proposed new system?
35. How confident are you that your business could adapt to the proposed new system within a reasonable timeframe?
36. In terms of the management of your business, which outcomes from this proposed new model are the most important for you? (Select up to 3)

- Reduced administrative workload
- Increased accuracy of information submitted to Revenue
- Greater certainty in relation to your tax affairs
- Better visibility and control of information held by Revenue
- Seamless integration of taxation with your business systems
- Other: _______

37. What supports from Revenue would be of most benefit to you in transitioning to the new model? (Select up to 3)

- Training or awareness sessions
- Helpdesk or dedicated Revenue contact
- Industry/professional body support
- Clear guidance for software providers and a testing environment
- Mailshots and guidance on the Revenue website
- Other: _______

38. 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?