

# **COVID-19 Support Schemes**

## **Debt Warehousing**

### **Preliminary Statistics**

(prepared for publication September 2023)

**These statistics are provisional and may be revised**

## Debt Warehousing

Debt Warehousing was announced by Government on 2 May 2020, to provide a vital liquidity support to businesses suffering a downturn due to the COVID-19 pandemic. The Warehousing arrangements initially applied to VAT and PAYE (Employer) liabilities accumulated by businesses associated with the COVID-19 crisis. Debt Warehousing was also available to businesses for Income Tax (IT) 2019, 2020 and 2021 subject to qualifying criteria. In addition, Debt Warehousing was available on balances that were overpaid under the Temporary Wage Subsidy Scheme (TWSS) and the Employment Wage Subsidy Scheme (EWSS) on the same basis as VAT and PAYE (Employer).

Debt Warehousing was automatically available to businesses that are managed by Revenue's Business and Personal Divisions. It was available by agreement to larger businesses managed by Revenue's Large Corporates Division (LCD) and Medium Enterprises Division (MED), where such businesses were adversely impacted by COVID-19.

The extension to the scheme announced in October 2022 means that there is no obligation on businesses to commence repaying their warehoused debt until 1 May 2024. Revenue has commenced directly engaging with businesses to advise them of the options available for repayment and to encourage advanced agreement of tailored phased payment arrangements of the 'parked' liability, over an agreed timeframe. Revenue will continue this engagement for the remainder of 2023 and into 2024. An interest rate of 3% per annum has begun to accrue on warehoused debt from 1 January 2023. This is a significant reduction from the standard interest rates of 8% and 10% per annum that normally apply to late payments of tax.

It remains a key condition of the Debt Warehousing Scheme that current liabilities are filed and paid on time. Where payment difficulties arise, Revenue will work proactively with businesses who engage early to resolve these payment difficulties, and to ensure that businesses retain the benefits of the scheme. Where businesses fail to engage, their warehouse benefits are revoked, and any debt previously 'parked' becomes collectable. A business can be reinstated into the warehouse on agreement with Revenue, where compliance issues are resolved, and current taxes are paid.

The tables on the following pages provide breakdowns of the currently warehoused debt by Revenue Division, economic sector, and range of tax debt. All data reflect the position of the Warehouse as at end August 2023.

**Figure 1. Debt Warehousing: Headline Figures (at end August 2023)**



*\*Includes approx. €290m PRSI; \*\*Includes approx. €6m PRSI.*

**At end August 2023:**

**€1.906 billion of tax debt was warehoused.**

**Over 59,500 businesses** are availing of Debt Warehousing. This includes 1,608 Large Corporates and Medium Enterprises.

**28,900 (49%)** businesses have an outstanding balance of **<€1,000**.  
**39,500 (66%)** businesses have an outstanding balance of **<€5,000**.  
 The bulk of debt - **€1.62 billion** – is warehoused by **5,900** businesses.

**33,600** Debt Warehoused businesses are employers, with **398,500 employments** in total.

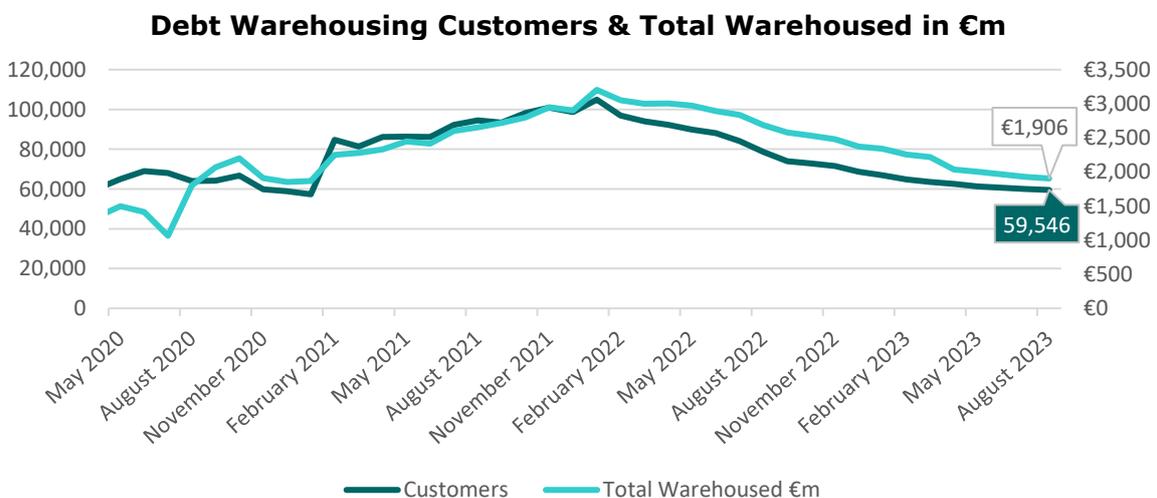
**2,171** businesses have a phased payment arrangement for **€109 million** of warehoused debt.

**11,799** businesses have been **revoked** from the Debt Warehouse, with an outstanding balance of **€310 million**. \*

Nearly **550** businesses were **reinstated** into the Debt Warehouse, with an outstanding balance of **€58 million**

At 31 July **€85 million** of debt previously warehoused by **956 businesses** was determined as uncollectable due to reasons such as liquidation, examinership, bankruptcy and cessation of trading. These businesses have exited the Debt Warehouse.

*\*A further 29,236 businesses were removed that currently have no balances outstanding for warehouse periods.*



### Debt Warehousing Table 1: Revenue Division

Revenue Division	Taxpayers	Tax Debt €m
Business	55,337	1,188
Personal	2,570	19
Medium Enterprises	1,535	584
Large Corporates Division	73	109
Large Cases - High Wealth Individuals	31	6
<b>Total</b>	<b>59,546</b>	<b>1,906</b>

*Note: taxpayers in the Business Division are typically micro and small SMEs; taxpayers in the Medium Enterprises Division are typically medium-sized SMEs; taxpayers in the Personal Division have only PAYE income or are trusts, charities etc.; taxpayers in the Large Corporates Division are the State's largest businesses; taxpayers in the Large Cases-High Wealth Individuals Division are the State's wealthiest individuals.*

### Debt Warehousing Table 2: Economic Sector

Sector of Business	Taxpayers		Tax Debt	
		%	€m	%
Agriculture, forestry, and fishing	3,142	5	18	1
Manufacturing	3,194	5	113	6
Construction	9,419	16	231	12
Wholesale and retail trade	8,910	15	392	21
Transportation and Storage	2,413	4	73	4
Accommodation and food service	5,954	10	299	16
Information and Communication	2,330	4	155	8
Financial and Insurance Activities	736	1	30	2
Real estate activities	2,174	4	54	3
Professional, scientific, and technical activities	6,967	12	229	12
Administrative and support service activities	2,476	4	144	8
Education	1,955	3	17	1
Human health and Social Work activities	2,495	4	51	3
Arts, entertainment and recreation	1,592	3	30	2
All other sectors	5,789	10	69	4
<b>Total</b>	<b>59,546</b>	<b>100</b>	<b>1,906</b>	<b>100</b>

### Debt Warehousing Table 3: Tax Debt Ranges

Tax Debt Range	Taxpayers		Tax Debt		Employers		Employment	
		%	€m	%		%		%
<€100	19,853	33	0	0.0	10,909	33	105,377	26
€101 to €1,000	9,053	15	4	0.2	3,956	12	25,787	7
€1,001 to €5,000	10,623	18	27	1.4	5,088	15	35,066	9
€5,001 to €50,000	14,147	24	254	13.3	8,748	26	72,837	18
>€50,000	5,870	10	1,620	85.0	4,856	15	159,390	40
<b>Total</b>	<b>59,546</b>	<b>100</b>	<b>1,906</b>	<b>100</b>	<b>33,557</b>	<b>100</b>	<b>398,457</b>	<b>100</b>

*Note: employer and employment figures refer to the monthly position in August 2023.*

**Debt Warehousing Table 4: Taxpayers by Sector and Tax Debt Range**

Taxpayer Share by Tax Debt Range (%)								
	Agriculture, forestry, and fishing	Manufacturing	Construction	Wholesale and retail trade	Transportation and Storage	Accommodation and food service	Information and Communication	Financial and Insurance Activities
<€100	49	32	34	29	33	22	33	42
€101 to €1,000	23	14	16	14	15	13	11	12
€1,001 to €5,000	15	17	19	17	18	17	17	14
€5,001 to €50,000	11	25	23	27	25	32	24	22
>€50,000	2	13	8	12	10	17	15	10
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

Taxpayer Share by Tax Debt Range (%)								
	Real estate activities	Professional, scientific, and technical activities	Administrative and support service activities	Education	Human health and Social Work activities	Arts, entertainment, and recreation	All other sectors	Tax Debt Total
<€100	40	34	28	44	43	31	35	33
€101 to €1,000	13	11	15	22	16	17	21	15
€1,001 to €5,000	18	17	19	17	17	23	21	18
€5,001 to €50,000	21	28	25	14	17	22	19	24
>€50,000	8	12	12	3	7	7	4	10
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

**Debt Warehousing Table 5: Tax Debt by Sector and Tax Debt Range**

Tax Debt Share by Tax Debt Range (%)								
	Agriculture, forestry, and fishing	Manufacturing	Construction	Wholesale and retail trade	Transportation and Storage	Accommodation and food service	Information and Communication	Financial and Insurance Activities
<€100	0	0	0	0	0	0	0	0
€101 to €1,000	2	0	0	0	0	0	0	0
€1,001 to €5,000	6	1	2	1	2	1	1	1
€5,001 to €50,000	30	13	17	12	15	12	7	11
>€50,000	62	86	81	87	84	87	92	88
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

Tax Debt Share by Tax Debt Range (%)								
	Real estate activities	Professional, scientific, and technical activities	Administrative and support service activities	Education	Human health and Social Work activities	Arts, entertainment, and recreation	All other sectors	Tax Debt Total
<€100	0	0	0	0	0	0	0	0
€101 to €1,000	0	0	0	1	0	0	1	0
€1,001 to €5,000	2	1	1	5	2	3	4	1
€5,001 to €50,000	15	16	8	24	15	20	26	13
>€50,000	83	83	91	70	83	77	69	85
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

## Further Information

Information on the operation of the COVID-19 support schemes is available on [www.revenue.ie](http://www.revenue.ie).

Queries of a statistical nature in relation to the Schemes can be sent to [statistics@revenue.ie](mailto:statistics@revenue.ie). Media queries should be directed to [revpress@revenue.ie](mailto:revpress@revenue.ie) in the first instance.

Statistical updates on COVID-19 support schemes were published on a weekly basis throughout the pandemic [here](#).