

1. Who are you:

Individual/Business

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

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

3. Please tick the sectors that apply to you:

Construction

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

Somewhat negative - I have some concerns about aspects of the proposal

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

Potentially easing some of the burden by only having one rate of RCT.

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

It mentions nothing about Overseas principals using overseas subcontractors, who currently have to go through a convoluted repayment process involving both Governments.

7. The proposed eWHT model seeks to expand withholding tax to payments to service providers where a suitable withholder exists. How do you feel generally about this type of expansion?

If it reduces fraud and/or instances of non payment, it is good.

8. In relation to PSWT specifically, this currently applies to payments made by state and semi-state bodies for certain services. Do you have a view on

how it is targeted and if the types of payments it applies to should be reviewed?

I have no view.

9. Please indicate if you currently operate:

Relevant Contracts Tax (RCT)

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

Yes - we (UK company) use UK subcontractors, but still have to apply RCT and then our subcontractors have to claim it back. This is incredibly onerous.

11. If you are a Platform Operator, does your organisation have any experience of applying taxes to transactions, for services operating on your platform, in other jurisdictions? If yes, please provide information of the jurisdiction and details of the tax.

No

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

For domestic supply, great. For international companies, terrible.

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

It currently seems to work similar to CIS in the UK.

14. The proposal aims to embed eWHT processes directly into accounting, payroll, or other business management systems. How beneficial do you think this would be for your business?

Not at all - we don't have any base in Ireland and our UK software wouldn't be able to do it.

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

N/a

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

We can't do it, without spending on separate software just for our contracts in Ireland.

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

2 or 3, when we have a contract in Ireland. 0 at other times.

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

Yes - RedSky.

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

In the UK, yes. In Ireland, no.

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

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

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

From the perspective of our UK subcontractors working for us (UK company) the process of getting the withheld RCT back under the double taxation agreement between UK and Ireland is onerous and longwinded.

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

It currently seems to work similar to CIS in the UK.

24. Where you are an SP operating as a corporate/partnership or other entity, do the current rates that apply to PSWT and RCT reflect your actual liability on the income received?

25. The proposal aims to embed taxation directly into how you get paid by the DW. How beneficial do you think this would be for your business?

N/a

26. Where you are an SP operating as an individual worker, the proposal aims to implement personalised deduction rates (PDR), which means you will pay tax on your income as you go, similar to how employees are taxed under PAYE. What impact do you think PDR will have on your cashflow and financial management?

If this is 0% for overseas subcontractors who are not subject to Irish income tax, that would be good.

27. Do you think this new regime, including the PDR will have a positive effect on your end of year Income Tax return filing and preliminary tax payment obligations?

28. The accuracy of PDR is improved by the regular reporting by you to Revenue of your income and business expenses. How likely are you to report your income and expenses to improve the accuracy of your PDR?

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

Unsure - no wording refers to overseas companies and overseas subcontractors.

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

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

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

33. In terms of the management of your business, which outcomes from this new regime are the most important for you? (Select a maximum of 3)

Reduced administrative workload

Greater certainty in relation to your tax affairs

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

Training or awareness sessions

Helpdesk or dedicated Revenue contact

35. Is there anything else you'd like to share about how the proposed eWHT system could best meet the needs of your business or sector?

