

Minutes of TALC Sub-Committee on Collection Issues

DATE: 17 June 2025
Via Microsoft Teams

Agenda Item 1: Minutes of meeting held on 17 June 2025 and matters arising therefrom

The minutes of the meeting held on 25 February 2025 were agreed for publication.

A number of matters arising from this meeting were discussed:

- **Form CT1 2025:** Revenue noted the Form CT1 2025 has been available since April. The release date was provided following the February meeting.
- **ROS Agent Notifications - Demands and Final Demands:** Revenue advised that with effect from 30 June 2025, it is expected that notifications will be generated to the ROS inbox of Agents on Monday mornings where a linked client(s) has been issued with a demand (i.e. a Request for Payment) in the previous week or will receive a final demand notice that day. An agent may receive two separate notifications if they have both clients who received initial demands and clients who received final demands.
- **Residential Premises Rental Income Relief (RPRIR) & Tax Clearance:** Revenue confirmed that an individual who was tax compliant as of 31 December 2024 can claim the RPRIR for 2024 where the individual holds a tax clearance certificate when their 2024 income tax return is filed. All other conditions for claiming the relief must also be met. A key consideration from the legislation is that clearance has not been revoked. Revenue will provide for this on an administrative basis with the Tax and Duty Manual to be updated shortly. Landlords filing Form 12s without current tax clearance will see an error message to prompt them to apply for tax clearance prior to filing.
- **AI misdirection of queries in MyEnquiries:** Revenue noted the examples provided relate to Personal Division Self-Assessment taxpayers. The AI direction has heretofore only fully been activated for PAYE queries. Personal Division Self-Assessment Branch have been working on implementing the AI direction and it is hoped to be active over the coming months.
- **Stamp Duty:** Law Society confirmed examples of issues discussed at the February meeting are being compiled and there has been correspondence with Revenue at Main TALC.
- **Form CG50A:** Revenue confirmed internal discussions are ongoing in respect of the queries raised by practitioners at the February meeting.
- **Assessments raised in December:** Practitioners confirmed this matter had been raised at a meeting of the TALC Audit Sub-committee the previous week.

Agenda Item 2: Local Property Tax (LPT)

The LPT payment compliance rate for 2025 is 95%, based on 2.1 million properties. Around 220,000 compliance notices were issued over recent months which has resulted in an increase in compliance. Approximately, 34,000 notices issued to property owners who are registered for income tax and corporation tax and of these, approximately 50% have paid the LPT due.

Revenue reminded agents to confirm with their clients that LPT compliance has been addressed in advance of the filing deadline. The Form 11 includes an automatic warning message that the filing of a return will trigger an LPT surcharge if the LPT obligations have not been met. In the interests of time and during a pressurised period, it is preferable if outstanding LPT is dealt with at an early stage, for example, when engaging with the client about information required to complete the tax return. Revenue reminded there is a specific LPT Agent-Link Notification if an agent needs to engage with Revenue about LPT for a client. The process to Agent-Link for LPT has been made as straightforward as possible, bearing in mind the volume of property transfers on an ongoing basis.

2025 is a revaluation year for LPT. The Finance (Local Property Tax and Other Provisions) (Amendment) Bill 2025 is before the Dáil and is expected to be passed before the Dáil summer break. Revenue indicated communications to property owners regarding revaluing properties will commence from September, following receipt of the decision from local authorities on their Local Adjustment Factor (LAF) by the end of August. Revenue will undertake a substantial amount of work and a comprehensive communications campaign, to ensure property owners are aware of their obligations to revalue their properties on 1 November 2025 and file LPT returns. The valuation on 1 November 2025 will be the valuation for the next 5 years.

Agenda Item 3: Vacant Homes Tax

There is a small case base for VHT, with an initial case base of around 6,000 vacant properties in the first valuation period. This case base subsequently reduced to approximately 3,000 last year. VHT was introduced to change behaviour and free up properties for rental or sale. Revenue confirmed the rate of VHT will be seven times the LPT payable for the period commencing 1 November 2024. In September, communications to property owners to remind them of their obligations will commence.

Agenda Item 4: ROS

- **Form CT1 – Suggestions for Simplification:** ITI and CCAB-I submitted lists to Revenue with recommendations for potential simplifications for the Form CT1 2026. Revenue thanked practitioners for their contributions and confirmed the feedback will be considered as Revenue enters its next planning cycle. Developments from Budget 2026 and Finance Bill 2025 may impact simplification plans. Practitioners noted complexities in the CT1 for associated companies and the R&D Tax Credit panels. Practitioners welcomed Revenue's recent list of common errors identified in R&D Tax Credit claims, which was issued to assist claimants and their agents make valid claims within the statutory timeframe. Anecdotal feedback from Revenue divisions on the error rate would suggest there is a need to improve the R&D panels to aid compliance. Practitioners also highlighted that reinstatement of the prior explanatory memorandum for the CT1 is a common request from members. Revenue acknowledged the importance of the Sub-committee to progress discussions on this topic and agreed to consider a request from practitioners to establish a dedicated working group to consider the simplifications proposed for the CT1, once Revenue has fully reviewed the suggestions. In the medium-term, practitioners considered a simplified Form CT1 would be merited considering the current Form CT1 is a 'one size fits all' approach to all corporates regardless of the size or complexity of their business activities. CCAB-I requested clearer guidance on completing the section regarding QFCs.
- **ROS Form 11 - Residential Premises Rental Income Relief (RPRIR):** ITI had noted issues with the ROS apportionment of RPRIR for properties with shared ownership in jointly assessed cases and requested an update on progressing a fix. Revenue confirmed a ROS release on 21 June would address the matter. Once the fix is released, any impacted returns which require corrections will be reviewed by Revenue and affected taxpayers contacted. Considering incorrect Notices of Assessments issued following the March RPRIR fix, practitioners sought assurance that the same issue would not arise following the June fix. Revenue confirmed steps have been taken to avoid a recurrence of the issue that arose in March.
- **ROS Form 11 - AVC Certificate:** ITI queried whether AVC Certs need to be submitted upfront for Form 11 filers (e.g. via MyEnquiries when filing the return). ITI understood that as self-assessed taxpayers, Form 11 filers only need to provide such supporting information if requested to do so by Revenue. However, queries are arising on the topic and the language on the Revenue website on supplying AVC Certs. is not clear in differentiating the requirements for Form 12 versus Form 11 filers. Revenue confirmed self-assessed filers do not need to provide AVC Certs upfront when filing a Form 11 and are only required to do so if requested by Revenue. The website language will be reviewed.
- **The Pay & File extended payment date announcement and opening of the payment date:** ITI requested that the ROS extended Pay & File date be confirmed earlier in the year and synchronised with the opening of the extended payment date on ROS. This would support early filing of income tax returns. Revenue noted practitioners' comments have been taken onboard for next year and the extended payment date on ROS is generally synchronised with the announcement.
- **Form F50A - PSWT claim for an interim refund:** CCAB-I noted feedback from members reporting delays approving Form F50A offset requests resulting in taxpayers incurring interest charges on late payment of tax. Revenue confirmed these requests will be marked as high priority in their systems and will be worked on as a matter of priority.

ACTION POINTS

Revenue to consider potential simplifications for the Form CT1 2026 and engage on plans at the next meeting.

Agenda Item 5: PAYE

ITI highlighted instances where tax refunds have issued to non-assessable spouses by cheque, despite the individual having their own bank account details on Revenue's record. In these cases, the agents acting for the taxpayers were not agents in possession of a PAYE A2 Authorisation (should the reason for this occurrence be the change in practice regarding the payment of refunds to certain PAYE agents). Revenue noted, in general, if the non-assessable spouse is a Form 12 filer the bank details may need to be updated, but a refund should issue to the bank account on record.

Practitioners can provide practical example where this has occurred. Revenue further noted that this issue may arise in Form 11 cases due to current programming. If there is an agent on record for a PAYE taxpayer, a cheque will issue for GDPR reasons given the difficulties in confirming whether the bank account belongs to the agent or individual PAYE taxpayer. Revenue noted the process will be reviewed next year once PAYE A2 Authorisation has been removed.

ACTION POINTS

ITI to provide further examples where tax refunds issue by cheque to non-assessable spouses.

Agenda Item 6: Debt Management Services

Revenue confirmed operations continue as normal for Debt Management Services. There is 96% adherence rate for Phased Payment Arrangements (PPA) in the Debt Warehousing Scheme.

Agenda Item 7: Agent e-Linking

CCAB-I raised member feedback of issues with the new agent e-linking process including links working for some tax heads but not others and taxpayers being required to complete 'inquiry' rather than just 'accept' or 'reject' the link. Revenue requested further feedback identifying tax heads etc. The Law Society also raised concerns with agents obtaining a link in advance of the AEOI reporting deadline of 30 June. If Revenue does not receive the information on time, it cannot exchange the information with other jurisdictions within the required timeframe. The firm filing the AEOI return may not be the compliance agent. In addition, AEOI returns do not include or permit access to taxpayer bank account information and are therefore low risk. Therefore, it was queried whether such returns could be excluded from the e-linking requirement. Revenue noted that no specific returns are excluded but Revenue will review examples of the issue raised, if the Law Society provides more information. CCAB-I requested the development of a 'how to' video that could be made available to taxpayers on the e-linking process. Practitioners considered that increased awareness of the requirement will be important in the lead up to the Pay & File deadline, to ensure timely filing of returns for new clients. Revenue will consider the request for additional and targeted communications for certain cohorts or taxheads.

ACTION POINTS

CCAB-I and Law Society to provide further details to Revenue in respect of the new agent e-linking process.

Revenue to consider release of 'how to' videos. Practitioners to highlight information resources made available.

Agenda Item 8: Modernisation Programmes

Revenue gave a presentation on Banking Modernisation. As part of Revenue's Direct Debit Modernisation project, the Fixed Direct Debit (FDD) payment option is being discontinued to be replaced by Variable Direct Debit (VDD) to align with industry standards.

The current focus in the project is ceasing FDD for VAT and transitioning affected taxpayers to VDD as they roll off their annual VAT filing period. In May, Revenue commenced communications to FDD customers for VAT confirming these arrangements will cease for annual filers at end of their accounting period. VDD will go live in August for VAT customers.

Practitioners raised concerns with Revenue about the additional workload for agents and additional administration for small businesses in complying with a bi-monthly filing schedule. Practitioners requested Revenue adopt a pragmatic approach to exceptional cases where small businesses moving from an annual to a bi-monthly filing basis experience difficulty with the transition. Practitioners noted that what may seem to Revenue to be a small number of impacted taxpayers or agents, is still a sizeable compliance burden for that business or agent.

Revenue considered that pragmatism is generally adopted in appropriate cases. In addition, the simplified VAT filing arrangements remain available to small businesses that meet the eligibility criteria. Revenue agreed to include a confirmation of the availability of simplified VAT filing arrangements in future communications to relevant taxpayers. However, Revenue noted that simplified filing is not envisaged for VAT Modernisation (VMod). Therefore, it is expected this arrangement will be ceased at a future date.

CCAB-I expressed concern about the cumulative impact of changes in Revenue practices placing an increasing burden on businesses and agents, despite objections and issues raised at TALC on the measures. Revenue acknowledged that TALC is a very valuable forum and thanked practitioners for their feedback. Revenue carefully considers feedback raised. However, it may not always be possible to accede to the requests from the professional bodies.

Further developments are beginning in July as part of the wider banking modernisation project. These include a new Payment Hub on ROS to manage bank account details and Direct Debit mandates; a new Payment Activity screen to provide the status of payments (i.e., pending, processed, unpaid etc.) and a transition to VDD for preliminary income tax paid by Direct Debit. Further developments will be rolled out in 2026 and 2027.

Agenda Item 9: Stamp Duty

The Law Society requested data on the average turnaround time for e-stamping number applications. In addition, Revenue Guidance confirms applications for stamp duty numbers for non-resident companies may be made by email to stampduty@revenue.ie, however, agents are being directed by Revenue staff to use MyEnquiries for this application which has resulted in longer turnaround times for the processing of stamp duty numbers and the activation of PPS numbers.

Revenue provided data on average turnaround times for processing e-stamping numbers for the last 12 months. 96% of the 6,000 applications made were closed within 6 days. Of the 2,100 foreign company e-stamping number applications, 86% were closed within 6 days. Revenue confirmed the preferred method of contacting Revenue is via MyEnquiries and where ROS or myAccount is not available, the contact details are available on Revenue's website. Practitioners noted this appears to be a change in approach to the process for making such applications which has not been communicated to practitioners.

The Law Society queried whether Revenue would consider a more pragmatic approach to the requirement for certified translations of documents. Revenue requested further detail of these cases as they have identified only one case on record.

ACTION POINTS

Law Society to provide examples of cases where Revenue requested certified translations of documents.

Agenda Item 10: Form CG50A

The Law Society requested data on the average turnaround time for eCG50A applications. Revenue agreed to provide this data at the next meeting.

ACTION POINTS

Revenue to provide data on the average turnaround time for eCG50A applications.

Agenda Item 11: AOB

Reminder on Preliminary Tax for IT/CT

Revenue reminded of the importance of timely payment of preliminary tax and the balancing amount for income tax and corporation tax and of the preliminary tax rules. Revenue does not issue warning letters in relation to the late payment of income tax or corporation tax. If the tax is paid late, interest is due and payable, and a charge may issue.

For income tax, this process starts in February of the following year. Therefore, for the income tax year 2024 this process will start in February 2026 and in respect of the income tax year 2023, this began in February 2025. Once the corporation tax return has been filed and the related tax paid in full, an interest charge can be raised if the tax has been paid late. Given that companies have differing year ends, this process is undertaken all year round.

Form R185 Certificate of Income Tax Deducted

CCAB-I queried whether Revenue intends to provide a digital version of the Form R185 Certificate of Income Tax Deducted. Revenue noted there has been a decrease in the use of this form as a result of the Non-Resident Landlord Withholding Tax system going live. It is not intended to make the Form R185 an online form in the short term, given current competing demands for IT developments, but Revenue will review the current form and website for NLWT.

Cross border hybrid working guidance

CCAB-I requested Revenue include examples in the guidance of the tax implications for employers and employees of cross border hybrid working arrangements. Revenue noted this matter was being added to the TALC Direct/Capital Taxes Sub-committee for consideration.

'Completed' queries on MyEnquiries

ITI requested whether Revenue could clarify the instructions to staff on the use of the completed marker on MyEnquiries, as in some instances it appeared queries were marked 'completed' but no response had issued to the agent. Revenue noted staff are instructed to mark a query as 'completed' once it has been answered or if an action has been completed that does not warrant a reply.

Final demand letters received after the 7-day timeframe

CCAB-I noted letters for final demands are being received too late for agents or taxpayers to deal with a payment before it goes to the Sheriff. Revenue noted once agents begin to receive information on initial and final demands from 30 June this may help to address the difficulties. Revenue invited specifics of the cases and confirmed they are not aware of delays printing or posting.

ACTION POINTS

CCAB-I to provide details of cases of delays receiving final demand letters.

VAT Refunds

ITI noted feedback from members of delays in receiving VAT refunds. Revenue requested further details of the cases where delays are experienced.

ACTION POINTS

ITI to provide details of cases where VAT refunds are delayed.

Commercial Debit Cards

Commercial debit cards will no longer be accepted for payment of tax from 1 September 2025. This follows on from Revenue ceasing to accept commercial credit cards from October 2023.

The meeting concluded.

In attendance:

Revenue

Alan Greaney
Diarmuid Farrelly
Katie Clair
Paul Brady
James Fagan
Aisling Ní Mhaoileoin
Rory McMahon

Apologies: Geraldine Hegarty
 Maureen Marray
 Dan Oosthuizen

Law Society:

Deirdre Barnicle
Cian O'Rourke

CCAB-I

Grainne McDermott
Gerry Higgins
Carla Manning
Aileen Carroll

ITI

Stephen Gahan (Chair)
Paul Wallace
Mary Healy
Lorraine Sheegar (Minutes Coordinator)

Apologies: Sophie Ellis