Minutes of TALC Sub-Committee on Collection Issues

DATE: 2 June 2026
Via Microsoft Teams

Agenda Item 1: Minutes of meeting held on 10 March 2026 and matters arising therefrom

The minutes of the meeting held on 10 March 2026 were agreed for publication.

A number of matters arising from this meeting were discussed:

- **Form CT1 Simplification**: Revenue provided an update of the recent meeting of the subgroup. Revenue has commenced developments and will revert to the subgroup to demo revisions. The intention is to release updates with the 2027 CT1 return.
- **LONA subgroup:** Revenue has identified the appropriate Revenue division, being the Accountant General's and Strategic Planning Division **(**AGSPD) Compliance Policy team. That team is currently considering purpose of the LONA Subgroup. Practitioners suggested a meeting with the relevant team to outline the issues of concern with the administration of taxes in death cases as the matter has been ongoing for a number of years.
- **ROS – 2024 ROS Form 11 & Employers' PRSA contributions:** Revenue will engage directly with the impacted taxpayers. The guidance in the TDM will be updated and published in the next few weeks for the 2025 Form 11.
- **ROS – 2025 ROS Form 11 & exemption from PRSI for persons aged 66 before 1 January 2024 and/or who have already been awarded the State Pension (Contributory):** The guidance in the TDM will be updated and published in the next few weeks for the 2025 Form 11.
- **Clawback of Residential Premises Rental Income Relief (RPRIR):** Revenue confirmed that where a clawback of RPRIR arises, the taxpayer is to report the clawback of RPRIR via MyEnquiries.
- **RPF print option for VAT, VIES and DWT:** Revenue will update the forms to include the print option. The sub-committee agreed to prioritise development of the RPF print option for the VAT form. Due to the scale of mandatory legislative development there is only sufficient development capacity to consider one form in H2 2026.
- **ROS end-user workshops:** Revenue to arrange a further ROS end-user workshop to review proposed design changes later in the summer.
- **2027 list of outstanding returns:** Revenue will include taxpayer names in 2027 list of outstanding returns sent to agents.
- **Interaction of DMS with directors' bonuses:** Practitioners had report filing 2024 payroll adjustments for bonuses to directors whereby the liability was paid on the same day as the adjustment was processed, yet in all cases a demand letter issued. Revenue requested a specific example of the incident to enable a walk through of the process flow. Revenue also advised that, if a final demand issues and the agent/taxpayer is concerned, to contact Revenue in advance of the seven-day notice so it doesn't proceed to enforcement in case there has been a delay with the processing of the payment.

- **Interaction of DMS with the RCT offset process:** Practitioners requested clarification regarding the interaction of the process and timeline for issuing demands in the DMS with the automated process for offsets of RCT on record. Revenue will provide an update at a later date when it has reviewed the example provided by practitioners.

- **Auto Enrolment:**

The Law Society had queried whether a taxable benefit-in-kind arises where an employer pays the participant contribution shortfall in accordance with Regulation 19 of the Automatic Enrolment Retirement Savings System Regulations 2025 (S.I. NO. 637/2025), and if so, if there is a timeframe for repayment before the taxable benefit-in-kind is deemed to arise.

Revenue had provided a response which was shared with the representative bodies:

Where there is an insufficiency of payments made to the employee such that the employer is unable to make a deduction from emoluments for the purposes of the participant contribution, in those instances, Regulation 19 of the Automatic Enrolment Retirement Savings System Regulations 2025 (S.I. NO. 637/2025) stipulates that the employer is liable to pay that participant contribution.

It was not envisaged that the participant contribution which the employer is obliged to make on behalf of the employee would not be recouped by the employer, as Regulation 20 of the Automatic Enrolment Retirement Savings System Regulations 2025 (S.I. NO. 637/2025) requires the employee to reimburse the employer the amounts paid on their behalf and Regulation 21 of the Automatic Enrolment Retirement Savings System Regulations 2025 (S.I. NO. 637/2025) provides that they are entitled to do so through future emoluments due to the participant. It is not clear how the scenario you have provided would arise.

If you have a specific example, please provide details of same and we can review and provide further instruction where necessary.

Subsequently the Law Society provided Revenue a specific example as follows:

"We have received a query from a client who engages apprentices through Solas. Solas is a 4-year training programme where apprentices time is divided between "on the job" working for the employer and attending courses / training programmes in college.

Salaries for apprentices are run through the company's payroll system in the normal way, however, a value equal to their weekly Solas payment is deducted (as the employees receive this payment directly from Solas). In particular, in year 1 of the programme, apprentices spend significantly more time in college than working for the employer and as a result, the salaries paid by the employer for these periods are low. After various deductions are applied it is not uncommon that a payslip in these circumstances would be in credit.

It appears that, in the absence of any specific exemption contained in legislation, any payment by the employer on behalf of the employee pursuant to regulation 19 of the Automatic Enrolment Retirement Savings System Regulations 2025 (the "**AE Regulations**"), may constitute a benefit provided by the employer and therefore may give rise to a benefit-in-kind chargeable to tax under section 118 of the Taxes Consolidation Act, 1997. Whilst it is acknowledged that regulation 20 of the AE Regulations requires the employee to reimburse the employer for any employee contributions paid by the employer pursuant to regulation 19 of the AE Regulations, there is no timeframe for repayment and therefore, it is unclear when any such benefit-in-kind would be deemed to arise."

As the relevant Revenue representative was unavailable to attend the meeting the matter will be held over until the next meeting.

- **Tax registration for appointees and executors (TR4):** Revenue to issue guidance.

ACTION POINT

Revenue to consider arranging a meeting of the LONA Subgroup.

Revenue and practitioners will arrange a further ROS end-user workshop to review proposed design changes arising from feedback from the initial workshop.

Practitioners to provide example to Revenue of interaction of DMS with directors' bonuses.

Revenue to provide update on interaction of DMS with the offset process. (Response issued 18/08/2026

Revenue to consider the Auto Enrolment issue contained in the example provided. (Response issued 18/06/2026)

Agenda Item 2: Local Property Tax (LPT) & Vacant Homes Tax (VHT)

Revenue provided an update on LPT returns filed in respect of the 2026-2030 valuation period. Between March & April this year Revenue issued over 110,000 compliance notices automatically to property owners with outstanding balances for LPT with an active PAYE income. By mid-May over 60,000 payment methods had been arranged by those in receipt of the compliance notices. For anyone who fails to respond there is the application of the mandatory deduction at source mechanism from salary or pension, which has commenced.

Payment compliance for LPT has now reached over 95 percent for 2026. There remain over 200,000 taxpayers with payment arrangements in place where LPT returns remain outstanding for 2026-2030. Revenue has issued over 20,000 compliance notices to property owners who are registered for income tax/corporation tax with approximately half of that cohort responding. Practitioners were reminded that, where LPT returns remain outstanding for taxpayers that are subject to income tax, capital gains tax or corporation tax, such non-compliance is subject to surcharges on filing those other returns, subject to caps, under section 38 Local Property Tax Act 2012. It may also give rise to interest charges and impact on tax clearance.

Revenue noted that the deadline for Vacant Homes Tax is 7 November 2026 and letters will issue in September 2026. The is currently a very small case base which applies to homes that are occupied for less than 30 days in the year ending 31 October 2026. Some analysis is being conducted to identify vacancy across the national property portfolio.

Agenda Item 3: ROS

Manage Tax Registrations

Agents report difficulty de-registering clients for Corporation Tax via ROS. The process links back to the Agent Link Notification page to upload a link notification letter to link the agent to the taxpayer.

Revenue confirmed that following the implementation of the new registration application the system currently requests a document to be uploaded by the practitioner confirming taxpayer consent to the de-registration. Revenue is working to remove this requirement. For now, Revenue advise that agents upload the taxpayer's letter of consent to enable the de-registration.

ROS Access on 23 March deadline

Revenue confirmed that ROS was unavailable on 23 March between 6pm and 7pm due to unscheduled downtime required to fix an urgent issue. Revenue is aware that 23 March is a significant date due to the filing of Forms CT1 for approx. 2,500 companies with an accounting period ended 30 June. Revenue noted that 80 percent of those taxpayers had filed before 6pm on the date in question, with 120 filing their returns during the downtime and the remainder filing later that evening. While it was unavoidable, Revenue acknowledged it was not ideal and it will make every effort going forward to avoid downtime on significant dates.

MyEnquiries

Practitioners had queried the extent to which AI is routing queries in MyEnquiries in ROS. Revenue confirmed that it has taken a staggered approach. It has been introduced for the business taxes (income tax, corporation tax, capital acquisitions tax and stamp duties) before being rolled out to other tax heads following a review.

Practitioners had requested an update on practitioner uptake of the 'priority email address' feature on MyEnquiries. Revenue indicated that approx. 25 percent of taxpayers in ROS have taken up a priority email address. However, it noted that the statistics include taxpayers that don't have an agent, and those that have only one email address. Revenue requested that practitioners remind their members that the 'priority email address' facility is available and may be of use to them.

RFTS

When using the Revenue File Transfer Service (RFTS), practitioners have advised that the RFTS data disappears after a set period. Therefore, a record of what was submitted and the submitter is not retained on the system. We understand from Revenue that the data becomes unavailable after 30 days for data protection reasons. However, is it possible to retain information on the submission and the sender (even if the underlying data cannot be retained)? This would assist in keeping track of communication with Revenue when practitioners use the RFTS.

Revenue will revert with an update on this matter.

ACTION POINT

Revenue to revert regarding its policy regarding retention of certain information for practitioners using the RFTS. (Detail provided on 26/06/2026)

Agenda Item 4: PAYE

Processing Form 12 in the first half of the year

Practitioners received feedback of backlogs on processing Form 12 returns (including eForm 12) and members receiving indications from the Helpline of volume-related delays in processing. Following a request for an update on processing times for 2025 Form 12 income tax returns in the first half of 2026, Revenue confirmed it will provide detailed results once the first half of 2026 is completed.

As of 30 May 2026, almost 1.1 million PAYE returns for 2025 were filed, with over 700,000 filed in January alone. The majority of electronic Form 12 returns auto process. Of those that did not auto process over 50 percent have been dealt with in under 20 days.

By 30 May 2026 Revenue had refunded over €800 million in overpaid PAYE to almost 850,000 taxpayers. Revenue will collect circa €20 million in underpaid PAYE for 2025 from circa 122,000 PAYE taxpayers via the tax credit system over the following four-year period.

Revenue will commence the preliminary end-of-year campaign for the tax year 2024 in the next few weeks and will issue letters to approx. 300,000 PAYE taxpayers.

Agenda Item 5: Debt Management Services

Demands for payment of interest
Practitioners requested clarification from Revenue as to whether the list of initial and final demands issuing to agents include interest on previous late payments of tax or solely demands for tax i.e. are interest demands a separate process and is there a means to notify agents of these demands at an early stage?

Revenue outlined the process of interest demands. Initially an interest warning issues with the first late payment of tax. If there is a second late payment of tax that interest is calculated and an interest demand is issued. The interest warning and the interest demand are a separate process from the initial and final demand, and are not included in notifications issuing to agents. However if the interest demand is unpaid it progresses to a final demand at which stage it is included in the overall final tax demand notified to the agent.

Revenue noted the positive impact of interest warnings resulting in no further late payments.

Timing of offsets of RCT refunds

Addressed under Agenda Item 1 Matters Arising.

Agenda Item 6: Modernisation Programmes

Direct Debit Modernisation
Revenue provided an update on the transition of annual VAT filers to bi-monthly filing under the VAT Variable Direct Debit programme. Of the 10,500 VAT taxpayers impacted, most have now transitioned, with 700 remaining to have their final Annual VAT Return submission for the VAT period May-June 2026. Revenue reported positive timely compliance with the new filing schedule. Revenue acknowledged the efforts of practitioners assisting taxpayers in the transition from annual filing to bi-monthly filing.

Revenue noted that the number of taxpayers applying for simplified VAT filing arrangements (quarterly or bi-annually) is very low.

Banking Modernisation

Revenue informed the meeting that the new Payments Hub has been live since August 2025. Currently there are five taxes that can be managed through the hub: VAT, Employers' income tax, preliminary income tax, Vacant Homes Tax and non-resident landlords' withholding tax. Revenue intends migrating other direct debit payments to the payments hub in the future, as will ROS debit instructions (RDIs).

Revenue recommends that taxpayers use variable direct debits (VDD) in preference to RDIsas it ensures that the right amount of tax is always collected at the right time and minimises risk of late payment. It notes however that VDD will only collect current and future payments, therefore the Single Debit Instruction (SDI) payment option should be used for any liabilities pertaining to periods preceding the current period.

Agenda Item 7: AOB

VAT refunds under review

When VAT refunds are selected for review by Revenue they are not available for offset or refund until the review is completed. Sometimes this can take weeks or months to complete, causing cashflow problems and undue hardship for businesses. Practitioners requested that Revenue considers making the VAT refund available for offset thereby easing some of the cashflow problems.

Revenue requested further information regarding the extent of delays in the process. Practitioners confirmed that delays in the review process are common.

Revenue will consider the matter with its operational areas, but notes that where a VAT refund that was under review was used for offset against another tax liability and it subsequently transpires the VAT refund is not due, issues of underpayment of tax and interest on the late payment of tax could arise.

Systems security awareness

Revenue asked that practitioners remind their members to be vigilant as regards their systems security controls particularly as we approach the summer holiday season, with staff possibly covering roles of others as bad actors may take this as an opportunity.

Collector General

The new Collector General, Deirdre Quaid, took up duty in April 2026 and may be available for an introduction to the sub-committee when we next meet.

<u>Next meeting</u>

The next meeting is to be held on Tuesday, 1 September 2026.

ACTION POINT
Revenue to consider the feasibility of making VAT refunds under review available for offset during the review process.

In attendance:

Chartered Accountants Ireland
Gerry Higgins (Chair)
Gráinne McDermott (Minutes Coordinator)

ITI
Paul Wallace
Mary Healy
Lorraine Sheegar

Law Society
Deirdre Barnicle
Cian O'Rourke

Revenue
Geraldine Hegarty
Alan Greaney
Diarmuid Farrelly
Katie Clair
Aisling Ní Mhaoileoin
Maureen Marray

Apologies
Carla Manning
Jane Gaveda
Davena Lyons
Paul Brady