

Minutes of TALC Sub-Committee on Collection Issues

DATE: 2 September 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 17 June 2025 were agreed for publication.

A number of matters arising from this meeting were discussed:

- **Tax refunds to non-assessable spouses:** Revenue had clarified the scenario where tax refunds issue by cheque to non-assessable spouses, as discussed at the June meeting.
- **Stamp Duty:** Law Society collating examples of cases where Revenue has requested certified translations of documents.
- **Final demand letters received after the 7-day timeframe:** CCAB-I gathering details of cases where the receipt of final demand letters has been delayed.
- **VAT Refunds:** ITI to request details of cases where VAT refunds are delayed.
- **Preliminary Tax:** Revenue agreed to check if any edits are required to be made to the note circulated at the June meeting in respect of preliminary tax and interest.
- **Update to TDM on Residential Premises Rental Income Relief (RPRIR):** Revenue agreed to update the RPRIR TDM to reflect tax clearance requirements in due course.

Agenda Item 2: Local Property Tax (LPT)

Revenue provided an update on Local Property Tax (LPT) in relation to the revaluation date of 1 November 2025, confirming communications to 1.5 million property owners regarding revaluing 2.2 million properties will commence from mid-September 2025.

The letters from Revenue will issue over a three-week period and will highlight that property owners will need to do three things: determine the valuation band for their property at 1 November 2025; notify Revenue of the valuation and file a return by 7 November; and confirm the preferred payment arrangement for LPT for 2026. The valuation on 1 November 2025 will be the valuation up to 2030 inclusive. Revenue will use available media as part of its communications campaign on LPT.

The LPT portal is due to be updated for the new revaluation period from mid-September, together with information on the Revenue website relevant to the revaluation. Revenue gave a brief update on the changes to LPT following the enactment of the Finance (Local Property Tax And Other Provisions) (Amendment) Act 2025 in July.

Revenue encouraged agents to engage early with self-assessed clients to ensure LPT is paid before filing the Form 11/CT1 in order to avoid a surcharge and reminded that the LPT Helpline will be extremely busy considering the upcoming revaluation date.

Agenda Item 3: Vacant Homes Tax

Revenue updated on the third chargeable period for Vacant Homes Tax (VHT), which is 1 November 2024 to 31 October 2025, with a pay and file date of 7 November 2025. The rate of VHT for this period is seven times the basic rate of LPT for 2025.

Agenda Item 4: ROS

- **Form CT1 Simplification:** Revenue thanked practitioners for submitting recommendations for potential simplifications for the Form CT1 2026. Revenue circulated written comments to practitioners in advance of the meeting and suggested scheduling an ad hoc meeting at the end of September to discuss potential developments to the Form CT1 2026. Revenue will revert on proposed dates.
- **ROS communications/message board for fixes underway:** Practitioners queried whether Revenue further considered the suggestion to notify fixes that are underway on the Revenue website, perhaps on the ROS sign-in page. This would ensure filers could be aware of issues as they arise. Revenue confirmed this matter was raised with their technical teams. Revenue will update the TALC Sub-committee once the technical teams have considered the suggestion and provided feedback.

Form CT1 - September filing deadline: ITI queried whether any ROS updates are planned in September that would affect the Form CT1, other than the planned ROS downtime on 6 September. Revenue noted that some downtime may be required in the week commencing 15 September if any technical issues arise from the 6 September update. Due to essential maintenance on 27 September, taxpayers and agents will be unable to create or renew a ROS Certificate on that date.

- **ROS Computation – Form 11:** CCAB-I noted feedback from members reporting that unannounced changes to the ROS Computation resulted in error reporting in third-party software packages. Revenue advised it has reached out to third-party software providers of the Form 11 and CT1 about establishing a technical forum involving technical personnel from Revenue and the providers to discuss communications and awareness of developments etc. Practitioners welcomed this proposal and noted a representative from this TALC sub-committee should also attend the technical forum to ensure participants are kept informed of important developments.
- **Return Preparation Facility (RPF):** CCAB-I noted feedback from members reporting that fixes to the RPF resulted in work-in-progress being wiped out. Revenue acknowledged this was an unintended consequence arising from changes made to the Residential Premises Rental Income Relief (RPRIR) calculation. Revenue acknowledged this is an area for improvement and work is ongoing to minimise this occurrence in the future.
- **ROS Statements:** CCAB-I noted feedback from members reporting delays in receiving statements requested through ROS. Revenue confirmed it had investigated the matter and noted delays generating statements were identified in a small number of RCT and VAT cases where a large number of transactions occur in a period and Revenue will endeavour to fix this.
- **Agent lists of initial and final demands:** ITI noted the provision of the lists of initial requests for payment and final demands to agents is a very new feature and queried whether Revenue has any insight yet on the extent to which the lists are being viewed by agents (and whether it is facilitating quicker action on overdue payments). Revenue confirmed analysis of 'read rates' to date show positive engagement by agents with the new notices and emphasised the importance of addressing the compliance issue within the 7 day timeline to avoid escalation. Revenue will continue to monitor the impact on timely payment compliance.

ACTION POINT

Link to be established between technical forum and TALC sub-committees.

Agenda Item 5: PAYE

- **PAYE Exclusion Order (PEO) online – access for ROS sub-cert user:** The ITI noted feedback from members that only the ROS administrator can access the new PEO application, not sub-cert users, and queried whether it is possible to permit access to sub-cert users and the necessary permissions. Revenue confirmed there is no individual PEO ROS cert available, instead the ROS administrator should be able to grant access to sub-cert users to give permission to access the PEO. Revenue advised the permission must be to an Employer (PAYE / PRSI) registration (i.e. PREM registration).
- **Letters regarding underpaid tax on pensions:** The ITI requested an update on recent activity in relation to Revenue letters relating to tax underpayments on pension income. Revenue confirmed it has commenced the final stage of its 2025 PAYE correspondence campaign to encourage PAYE taxpayers to use myAccount and claim their entitlements. Since 2022, Revenue has written to over 900,000 PAYE taxpayers. To date in 2025, Revenue has issued over 400,000 letters to PAYE taxpayers who, based on information available to Revenue, may have overpaid or underpaid tax in either 2021 or 2022. A further 286,000 letters are issuing to PAYE taxpayers who may have overpaid or underpaid tax in 2023. A press release issued on 1 September covering these updates. Revenue noted the wording in the letters now issuing relating to tax underpayments had been modified based on feedback received.
- **Revenue communication regarding underpaid tax:** CCAB-I noted feedback from members of a delay in Revenue contacting PAYE taxpayers with possible tax underpayments and requested Revenue consider making contact at an earlier stage. Revenue confirmed that PAYE Modernisation has been in place since 2019 and a preliminary statement is made available to all PAYE employees in myAccount from the January of the following year.

Agenda Item 6: Debt Management Services

Adherence to Phased Payment Arrangements (PPAs) agreed for debt in the Debt Warehouse Scheme (DWS) remains high, at 95%. The Debt Management Services (DMS) is operating as normal.

Agenda Item 7: Agent e-Linking

Revenue is developing short 'how to' instructional videos for myAccount and ROS users, to assist taxpayers to understand how to use the new agent e-linking process. An FAQ will also be published by Revenue. Practitioners welcomed these plans noting the importance of taxpayers understanding the e-linking requirements to reduce the risk of delays in linking, that could impact on the timely filing of Forms 11.

Revenue confirmed that agents wishing to link to clients for Pillar Two will do so on ROS via the Pillar Two section (not the 'Manage tax registrations' section that deals with all other tax registrations).

The Law Society had raised concerns at the June meeting regarding agents being able to obtain a link in advance of the Automatic Exchange of Information (AEOI) reporting deadline of 30 June. Law Society are gathering examples to share with Revenue.

Agenda Item 8: Modernisation Programmes

Revenue gave an update on the multi-phase banking and payment modernisation programme being rolled out by the Collector General's Division. A Direct Debit Modernisation project is underway as part of this programme. This involves ceasing Fixed Direct Debit (FDD) payment options and moving to Variable Direct Debit (VDD) to align with industry standards. It also includes the rollout of a new Payments Hub on ROS, live since August, to manage direct debits and bank account details.

Existing Direct Debit arrangements for Preliminary Income tax have been migrated to the new Payments Hub, with correspondence issued to taxpayers with their new Direct Debit mandate numbers. As taxpayers roll off their annual VAT filing period, Revenue will cease FDD for VAT, and traders can transition to VDD with a bi-monthly VAT filing frequency. About 11,000 taxpayers are impacted by the removal of FDD for annual VAT filers. Small businesses with VAT liabilities below certain thresholds may qualify for simplified VAT filing arrangements and can contact Revenue via MyEnquiries to request a reduced filing and paying arrangement where they meet the qualifying criteria. Practitioners raised the importance of being cognisant of the extent of the change for certain traders (and their agents) and issues that may arise as they adapt to the new requirements.

Information on simplified VAT filing arrangements is available on Revenue's [Reduced filing and payment frequency for VAT](#) webpage and in Appendix 1 of the [Agents guide to CGs Division](#). From September onwards, the monthly ROS inbox notice to agents for clients moving off FDD will now also include a reference to the availability of simplified VAT filing arrangements.

Phase 2 of the modernisation programme is commencing and will continue until June/July 2026. As part of Phase 2, ROS RDI and Single Debit Instruction (SDI) will be redesigned. Further taxes with a Direct Debit payment option such as Non-Resident Landlord Withholding Tax (NLWT), LPT and VHT will be integrated into the Payments Hub from January 2026.

Agenda Item 9: Stamp Duty

The Law Society noted their members experienced multiple failures when attempting to file stamp duty returns via ROS outside of standard office hours. Revenue confirmed this matter is under investigation and the technical teams are looking into it as a priority issue.

At the last meeting, Revenue provided data on the average turnaround time for e-stamping number applications for (i) Stamp Duty registrations received for the last 12 months and (ii) Foreign Company TRN requests for the last 12 months. The Law Society queried whether the Foreign Company TRN requests are a sub-set of "Stamp Duty registrations". Revenue confirmed "Stamp Duty Registrations" are for customers who have an existing PPSN and wish to complete a stamp duty transaction but are not yet registered for stamp duty, while "Foreign Company TRN" requests are for companies who do not have a registration number at all and need to be set up with a new number and registered for Stamp Duty.

ACTION POINTS

Revenue to investigate issues filing stamp duty returns via ROS outside of standard office hours.

Agenda Item 10: Form CG50A

The Law Society requested data on the average turnaround times for eCG50A applications and requested whether any update from RLS was available in relation to the issues raised in previous meetings relating to the difficulties for practitioners in the case of simultaneous signing and closing of a transaction where the closing date in the draft contract slips by a number of days; and the requirement that a solicitor provide an unqualified undertaking that signed copies of the contract will be submitted within a period of 2 weeks.

Revenue noted it has thoroughly reviewed the queries raised at the TALC Collections Sub-committee concerning CG50A procedures, specifically addressing discrepancies between the date of disposal on the CG50A form and the final signed contract, as well as the wording of solicitor undertakings. Following a detailed internal examination involving relevant divisions and subject matter experts, Revenue has concluded that the TDM governing CG50A will not be amended to generally accommodate differences in dates or to provide a broader scope for solicitor undertakings.

This decision is underpinned by several key considerations. Firstly, Revenue emphasises the critical importance of legal accuracy and responsibility, noting that CG50A forms and associated contracts are legal documents requiring precision. Introducing a blanket leniency for date discrepancies could inadvertently undermine the necessary exactitude of these transactions. Secondly, there are significant operational concerns; a general provision for "exceptional situations" regarding date variances, would likely lead to a substantial increase in contacts, placing additional strain on Revenue's resources and potentially impacting service standards and existing timelines. Thirdly, the internal review indicated that instances of date discrepancies between the CG50A and the final signed contract are infrequent, and current procedures, which require the submission of an amended CG50A when necessary, are generally effective. Finally, maintaining clear operational requirements within the TDM is deemed crucial for ensuring consistency and certainty for practitioners.

While Revenue remains open to considering truly exceptional and unforeseeable circumstances on a case-by-case basis, the TDM will not be amended to provide a general accommodation.

Revenue confirmed that average times for eCG50A applications are immediate in 60-70% of cases and between 2-3 days in the remainder of cases.

Agenda Item 11: AOB

SAYE – TDM – Share Schemes Manual – Chapter 12

The Law Society raised a concern that there appears to be an inadvertent error in the cross-referencing in section 12.11.1 "Employee's Filing Requirements" in Chapter 12. Section 12.11.1 states: *"If an employee exercises an option under an SAYE scheme less than 3 years after they were granted as a result of one of the circumstances listed in 12.8 above."* Practitioners noted it appears this should refer to paragraph 12.8.9, in line with section 519A (3) TCA 1997 which provides that income tax shall not be chargeable on the exercise of an option when it is an approved scheme, except for those scenarios which are carved out under subsection (4). Practitioners noted this clarification would also be consistent with the Revenue SAYE guidance from 2017.

Revenue Legislation Services (RLS) provided the following written response: *Section 519A(3) TCA 1997 provides for an income tax exemption when an individual realises a gain upon the exercise of a SAYE option. This exemption is subject to the provisions of s.519A(4) which states that the exemption will not apply if the option is exercised within 3 years of being granted and has become exercisable for one of the circumstances outlined in para. 22 of Schedule 12A. These circumstances are the following:*

- (a) a person gaining control of the company (a take-over) following a general offer to acquire the whole of one or more classes of the company's shares,*
- (b) the amalgamation or reconstruction of the company under a scheme sanctioned by the court under section 453 of the Companies Act, 2014,*
- (c) a person becoming bound or entitled to acquire shares in the company under section 457 of the Companies Act 2014,*
- (d) a resolution being passed for the winding up of the company,*

- (e) *the sale out of the group of the company for which the option holder worked, or*
- (f) *the sale out of the group of the business or part of a business in which the option holder worked.*

We note your recommendation to update the current cross-reference in the SAYE manual. However, the proposed link to paragraph 12.8.9 would only refer to the exercise of options in the event of a reconstruction or amalgamation of a company as per (b) above. The team with responsibility over the TDM will consider this point and update the guidance accordingly if considered relevant.

Restricted Shares – Change of Trustee/Nominee holder

The Law Society raised a query regarding the restricted share regime under section 128D TCA 1997, where the tax charge on shares awarded to employees which meet certain conditions is abated by 10% for each full year of restriction, up to a max 60% where restrictions are in place for more than 5 years. Section 128D(3)(a) TCA states that for shares to be ‘restricted shares’ there must be (emphasis added) “...a restriction on the freedom of the director or employee by whom the shares are held to assign, charge, pledge as security for a loan or other debt, transfer, or otherwise dispose of the shares for a period...” Section 128D(3)(c) provides a carve out from the restriction contained in Section 128D (3)(a) on the freedom of the director or employee to assign, charge, pledge as security the relevant shares in the restricted period. These carve outs are limited to the death of the employee and in the case of certain corporate re-organisations. One of the conditions for restricted shares is that the shares must be held “in a trust established by the employer for the benefit of employees and directors, or held under such other arrangements as the Revenue Commissioners may allow”.

Practitioners queried, as a practical matter, the consequences for the employee where an individual trustee/nominee holder dies or, in the case or in the case of a corporate service provider, it stops offering its services as a trustee or leaves the market. Practitioners noted they would expect that as the trustee/nominee holder only holds the legal interest in the relevant shares, a change of the trustee/nominee holder during the period of restriction would not trigger a clawback of the payroll liability for employees/directors. As the legislation appears to be somewhat ambiguous on this point, it would be helpful if Revenue could clarify in guidance that a change in the trustee/nominee holder of the shares in circumstances outside the control of the relevant employee/director would not trigger a clawback of tax for that employee/director.

RLS provided the following written response: *Section 128D provides for the tax treatment of shares acquired by directors and employees (other than shares acquired under an approved profit-sharing scheme) where there is a restriction on the disposal of the shares for a specified period.*

Subject to certain conditions, the individual can avail of an abatement ranging from 10% to 60% of the amount chargeable to income tax on the acquisition of these shares. The rate of abatement depends on the number of years for which the restriction on the disposal of the shares is in place. For shares to be considered “restricted shares” for the purpose of this section, all the conditions of section 128D(3) must be met. That is —

- a) *There must be a bona fide written agreement in place - s128D(3)(b)*
- b) *This agreement restricts the freedom of the director or employee to assign, charge, pledge as security for a loan, transfer or otherwise dispose of the shares for at least one year (“the specified period”) – s128D(3)(a)*
- c) *During the specified period, shares “cannot be assigned, charged, pledged as security for a loan or other debt, transferred, or otherwise disposed of in any circumstances” – s128D(3)(c). The only exception to this restriction is in the case of death of the employee/director and company reorganisation scenarios where the employee/director has agreed to accept an offer or if the event affects all shares of the same class – s128D(3)(c)(i) and (ii)*
- d) *The scheme must be operated via a “trust” or other arrangement approved by Revenue which will be set up by the employer for the benefit of their employees or directors — s128D(3)(d)*

All and each of these conditions must be met for the shares to be “restricted shares” on date of acquisition and all throughout the specified period.

The hypothetical scenario would seem to indicate that, if the event takes place during the specified period, a disposal of shares may take place as a result of a circumstance that is not a company reorganisation or death of the employee or director to which the provisions of s128D(c)(i) and (ii) apply. The legislation is clear that these are the only two circumstances where shares can be “assigned”,

“transferred or otherwise disposed of” during the specified period and continue to be “restricted shares” for the purpose of s. 128D.

Should the shares cease to be “restricted shares” during the specified period, the general provisions of the Act in respect of the collection and recovery of tax on emoluments, including share-based remuneration, may apply. In the application of the legislation, consideration is always given to the full facts and circumstances of each case. Any queries in relation to specific cases can be submitted to the [Revenue Technical Service](#) for further consideration.

Tax registrations for pre-commencement periods and section 110s

ITI provided a note to Revenue outlining issues with TR2 tax registration applications requiring the current date or date of incorporation, notwithstanding that a section 110 business may not yet have commenced. Revenue’s Financial Services Investment Funds Branch confirmed no change in practice has been introduced and they would consider updating the registration date to match commencement date. Revenue noted specific cases would help them understand the issue further.

Commercial debit cards not accepted from 1 September

Revenue reminded that commercial debit cards are no longer accepted for payment of tax since 1 September 2025. This follows on from Revenue ceasing to accept commercial credit cards from October 2023.

Upcoming ROS Agent-Notification – expiry of eTax Clearance

Revenue confirmed work is underway to develop an automatic reminder to agents in advance of the expiry dates for eTax Clearance Certificates for their clients. Revenue confirmed the reminder will be available at the end of November to notify agents and taxpayers 30 days in advance of the expiry date of a 4-year eTax Clearance Certificate. The notification to agents will be in the form of a list of clients that have tax clearance expiring within 30 days and will be marked as priority in the ROS inbox.

Directors’ Voted Salaries

CCAB-I raised a query regarding the administration burden in relation to director’s voted salaries paid within six months of the year end and its interaction with the Form 11. Revenue noted this matter was appropriate to the TALC Direct/Capital Taxes Sub-committee.

LONA Subgroup

Revenue confirmed a meeting of the LONA subgroup will be convened to deal with ongoing queries.

Cyber Security

Revenue noted that it has become aware of a pattern where bad actors are obtaining access to agent/advisor devices. Revenue requested that practitioners be made aware of this pattern and reminded to remain vigilant and security conscious, particularly, as we move into peak filing periods for corporation tax and income tax.

The pattern that has been highlighted recently is that bad actors acting as potential clients are gaining access to agent devices by sending PDF attachments to agents as part of the client onboarding process. These attachments are then opened on agent devices that then provide malware access to the agents’ devices and data.

Revenue reminded that it is the agents’ responsibility to maintain an adequate and effective security and control framework in respect of the use of ROS digital certificates and sub-certificates. Paragraph 16 of Revenue’s Manual ‘Guidelines for Agents or Advisors Acting on Behalf of Taxpayers’ provides clear requirements in this regard.

If any agent experiences, or suspect that they have experienced, a security breach event, they should contact Revenue. It is important to engage with Revenue as early as possible so that access to Revenue’s system can be revoked while the security breach event is resolved

Stamp Duty Helpline hours extended

Revenue confirmed the Stamp Duty Helpline hours have been extended to align with Revenue’s other phone line operating hours. The Stamp Duty Helpline will be open Monday to Friday between 9.30am and 1pm.

The meeting concluded.

In attendance:

Revenue

Alan Greaney
Diarmuid Farrelly
Katie Clair
Paul Brady
Aoife Donohue
Aisling Ní Mhaoileoin
Geraldine Hegarty
Maureen Marray

Law Society

Deirdre Barnicle
Cian O'Rourke

CCAB-I

Gráinne McDermott
Gerry Higgins
Carla Manning

ITI

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