

INFORMATION BOOKLET ON:

- **WAREHOUSING OF TAX DEBTS ASSOCIATED WITH COVID-19 and**
- **REDUCED INTEREST RATE ON OTHER TAX DEBTS**

This document provides guidance on the Warehousing of Tax Debts which commenced on 2 May 2020. Guidance is also provided on the 3% interest rate provision announced as part of the Government's Jobs Stimulus Package on 23 July 2020.

This document will be updated as required.

Revision history:

| | | |
|---|-------------------|---|
| 1 | 6 August 2020 | |
| 2 | 17 September 2020 | Change of date in Para. 4.16 |
| 3 | 30 September 2020 | PPA agreement date extended to 31 October |
| 4 | 8 October 2020 | Removal of date in Para. 4.16 |
| 5 | 13 October 2020 | Additional Para inserted at 4.10 Subsequent paragraphs re-numbered. Additional Examples added |
| 6 | 22 October 2020 | Addition of Income Tax and TWSS warehousing information Extension date for PPA for Income Tax 2019 |
| 7 | 02 December 2020 | Insertion of 2 new FAQs on Income Tax warehousing |

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1. Introduction

Over the last number of months, Revenue has outlined some key advice and actions it has taken to assist businesses experiencing cashflow and trading difficulties arising from the impacts of COVID-19, including:

- advising businesses to continue to send in tax returns on time, even where payment is not immediately possible;
- suspending all debt enforcement action until further notice;
- suspending interest on late payment of VAT and PAYE (Employer) for both SMEs (automatically) and larger businesses (on request); and
- warehousing of VAT and PAYE (Employer) debts associated with COVID-19.

As part of the July 2020 Jobs Stimulus Package, the Government announced the application of a lower interest rate of approximately 3% per annum for non-COVID-19 related tax debt.

Budget 2021 provides for the extension of the debt warehousing scheme to include certain Income Tax (IT) liabilities. It also extended warehousing to the recovery of any overpayments arising in respect of the Temporary Wage Subsidy Scheme.

2. Purpose of document

This document provides businesses, employers and agents with information and guidance on the operational phase of the 'Warehousing' of COVID-19 related tax debts. The document also provides details of the introduction in the July Jobs Stimulus Package of a reduced interest rate of circa. 3% per annum on non-COVID-19 related tax debts for businesses who enter a payment arrangement to discharge such debt. Additional amendments to Phased Payment Arrangements (PPAs) are also advised.

It is important to note that businesses with COVID-19 related tax debts which are warehoused, or non-COVID liabilities which are included in a Phased Payment Arrangement, qualify for tax clearance, despite having these outstanding debts. Accordingly, businesses with warehoused debts or debts covered by a PPA can obtain a Tax Clearance Certificate and may then:

- participate in the Employment Wage Subsidy Scheme (EWSS);
- participate in the Stay and Spend scheme as a service provider whose customers can avail of tax credits in relation to their expenditure on accommodation, food and non-alcoholic drink;
- qualify for accelerated loss relief; and
- participate in the Covid Restrictions Support Scheme (CRSS).

3. Debt Warehousing

Revenue would normally work closely with businesses to put in place arrangements appropriate to the circumstances and viability of each business in order to secure payment of any debt over a reasonable timeframe. However, Revenue recognises that, in the current circumstances, businesses that have had to close or have been

significantly negatively impacted by the restrictions may not be able to enter into arrangements in the short term to clear any COVID-19 related tax debt. In addition to this tax debt, businesses face the challenge of paying their ongoing tax liabilities as they arise after they reopen; pay their trade and other non-Revenue creditors; complete any necessary restructuring to deal with new trading arrangements in the context of social distancing; build up stock, etc.

In response to these business challenges, the Government has legislated to allow for debt associated with the COVID-19 crisis to be deferred or 'warehoused'. The scheme allows for the deferral of unpaid **VAT** and **PAYE (Employers)** debts arising from the COVID-19 crisis for a period of 12 months after a business resumes trading (in accordance with the Reopening Roadmap) and the application of a lower interest rate of 3% per annum on the repayment of such warehoused tax debts after that date. PAYE (Employer) liabilities include income tax, USC, employer's PRSI and LPT collected by the employer on behalf of a customer which are due to be remitted by employers under the PAYE system.

The period covered by the scheme is the time during which the business was and is unable to trade due to any COVID-19 related restrictions and includes two months after the business re-commences trading.

Budget 2021 also provides for the inclusion in the debt warehousing scheme of the Income Tax liability falling due on 31st October 2020 which comprises of the balancing payment for the 2019 Income Tax year as well as any Preliminary Tax due for the 2020 Income Tax year.

The debt warehousing scheme has also been expanded to include the recovery of any overpayment of the Temporary Wage Subsidy which was paid to employers during the Covid-19 crisis. The scheme allows for the deferral of these unpaid liabilities for a 12-month period and reduced interest charge of 3% on those debts thereafter.

3.1 General Terms of Scheme – VAT and PAYE (Employer)

- All Personal and Business Division VAT and PAYE (Employer) debts from the COVID-19 restricted trading phase plus 2 months can be warehoused.
- In the case of Large Corporates and Medium Enterprises Divisions, debts from the COVID-19 restricted trading phase, plus 2 months, where the business applies for warehousing due to a reduction in trade, may also be considered for inclusion in the scheme.
- The scheme contains 3 distinct Periods;

Period 1 – Restricted trading phase plus 2 months. There will be 0% interest applied to Period 1

Period 2 – Phase commences from end of period 1 for 1-year duration. Interest rate applied is also 0%

Provision has been made in legislation whereby this period may be further extended by Ministerial order, if required, but cannot be extended beyond December 2022.

Period 3 - Phase of indefinite duration commencing at end of Period 2.

3% interest applied to warehoused debt from start of Period 3 to date the debt is discharged. Customers should contact Revenue with their repayment plan for warehoused debt before end of Period 2.

- The qualifying period for each business is determined by the date they resumed trading as set out by the Government Roadmap for Reopening Society and Business.
- All tax returns must be filed, as the benefit of the warehouse scheme is conditional on the business quantifying its tax debt through submission of all outstanding returns.
- Any individual or business that has additional tax liabilities that have not been declared to Revenue in the appropriate tax return, due to error or omission, will not be entitled to benefit from the debt warehousing scheme unless the issues are regularised immediately. Information in relation to making a self-correction and unprompted qualifying disclosure is set out in Chapter 3 of the [Code of Practice Revenue Audit & Other Compliance Interventions](#)
- Current taxes must be maintained for the duration of the warehouse period and for any subsequent arrangement period to guarantee the reduced interest rates of 0% (while in warehouse) and 3% (after the warehouse period ends).
- Tax Clearance will not be affected by businesses availing of the warehoused arrangements.
- Refunds and repayments of tax arising in 'warehoused' COVID-19 periods will be repaid notwithstanding that the businesses will have tax debts under the scheme (i.e. the repayment will not be offset against the warehoused debts). However, a business can choose to offset the repayment against the warehoused debts, or other outstanding debts, if it so wishes.

Non-COVID-19 debts cannot be warehoused but can be managed as part of an overall case solution. The July Jobs Stimulus Package has included a facility whereby customers can select to repay any non-COVID-19 debt by way of a Phased Payment Arrangement and, in doing so, avail of a reduced rate of projected interest on such debts subject to certain terms and conditions. If you have any undeclared liability, you can also avail of this facility provided you self-correct or make a disclosure under the terms of the [Code of Practice Revenue Audit & Other Compliance Interventions](#)

Full details of the reduced interest measure for non-warehoused debts are provided in Section 6.

Correspondence will issue in due course to Business and Personal Division customers to inform them of their inclusion in the warehousing scheme. Letters will issue to customers' ROS inbox for E-enabled customers, and general post for all others.

Liabilities available for warehousing

| Month Business Resumes Trading | Liabilities to be warehoused ("COVID-19 liabilities") | Period 1 (COVID-19 restricted trading phase – 0% interest on COVID-19 liabilities) | Period 2 (Zero Interest Phase – 0% interest on COVID-19 liabilities) | Period 3 (Reduced Interest Phase – 3% interest on COVID-19 liabilities) |
|--------------------------------|---|--|--|---|
| May 2020 | VAT: January – August 2020 PAYE: February - August 2020 | 1 January 2020 (VAT)/1 February 2020 (PAYE) - 31 August 2020 | 1 September 2020 - 31 August 2021 | 1 September 2021 until COVID-19 liabilities are paid in full |
| June 2020 | VAT: January – August 2020 PAYE: February-August 2020 | 1 January 2020 (VAT)/1 February 2020 (PAYE) - 31 August 2020 | 1 September 2020 - 31 August 2021 | 1 September 2021 until COVID-19 liabilities are paid in full |
| July 2020 | VAT: January – October 2020 PAYE: February - October 2020 | 1 January 2020 (VAT)/1 February 2020 (PAYE) - 31 October 2020 | 1 November 2020 - 31 October 2021 | 1 November 2021 until COVID-19 liabilities are paid in full |
| August 2020 | VAT: January – October 2020 PAYE: February - October 2020 | 1 January 2020 (VAT)/1 February 2020 (PAYE) - 31 October 2020 | 1 November 2020 - 31 October 2021 | 1 November 2021 until COVID-19 liabilities are paid in full |
| September 2020 | VAT: January – December 2020 PAYE: February - December 2020 | 1 January 2020 (VAT)/1 February 2020 (PAYE) – 31 December 2020 | 1 January 2021 – 31 December 2021 | 1 January 2022 until COVID-19 liabilities are paid in full |
| October 2020 | VAT: January– December 2020 PAYE: February - December 2020 | 1 January 2020 (VAT)/1 February 2020 (PAYE) – 31 December 2020 | 1 January 2021 – 31 December 2021 | 1 January 2022 until COVID-19 liabilities are paid in full |
| November 2020 | VAT: January 2020– February 2021 PAYE: February 2020 – February 2021 | 1 January 2020 (VAT)/1 February 2020 (PAYE) –28 February 2021 | 1 March 2021 – 28 February 2022 | 1 March 2022 until COVID-19 liabilities are paid in full |
| December 2020 | VAT: January 2020– February 2021 PAYE: February 2020 – February 2021 | 1 January 2020 (VAT)/1 February 2020 (PAYE) –28 February 2021 | 1 March 2021 – 28 February 2022 | 1 March 2022 until COVID-19 liabilities are paid in full |

3.2 General Terms of Scheme – Income Tax

- Income Tax payments which normally fall due on 31st October 2020 can now, subject to certain criteria, avail of the debt warehousing scheme. The Income Tax liabilities affected are the 2019 Income Tax year balancing payment and Preliminary Tax for the 2020 Income Tax year.
- A declaration must be made to Revenue by the Taxpayer that their total income for 2020 is expected to be at least 25% less than total income for 2019.
- Where a taxpayer did not meet 2019 Preliminary tax requirements, the option to warehouse the 2019 Income Tax balance is not available. However, this debt qualifies for the 3% Phased payment arrangement, where the taxpayer applies before the 10th December 2020.
- As with the VAT and PAYE (Employer) debts, the Income Tax Warehousing scheme contains 3 distinct periods, however, they are determined in a different manner;
Period 1 – is a set date 31st October 2020 for customers filing paper returns or 10th December 2020 for customers filing on ROS.
Period 2 – is a period of 1 year commencing immediately at end of Period 1. 0% interest is applied to outstanding debt in Period 2.
Period 3 – Phase of indefinite duration commencing at end of Period 2.
3% interest is applied to warehoused debt from start of Period 3 to date the debt is discharged. Customers should contact Revenue with their repayment plan for warehoused debt before the end of Period 2.
- Provision has been made in legislation to allow for the extension of Period 1 to include the warehousing of Income Tax liabilities for 2021 i.e. Preliminary Tax 2021 and Income Tax 2020, where the taxpayer experiences income reduction of 25% on the 2019 Income Tax liability
- Where the filing of the 2020 Income Tax return shows the taxpayer did not meet the requirement for a 25% reduction in income, the debt will be removed from warehousing, and the due date will revert to 31st October 2020 for both the 2019 and 2020 Income Tax returns and full statutory interest will apply.
- All tax returns must be filed. The benefit of the warehouse scheme is conditional on the business quantifying its tax debt through submission of all outstanding returns.
- Any individual or business that has additional tax liabilities that have not been declared to Revenue in the appropriate tax return, due to error or omission, will not be entitled to benefit from the debt warehousing scheme unless the issues are regularised immediately. Information in relation to making a self-correction and unprompted qualifying disclosure is set out in Chapter 3 of the Code of Practice Revenue Audit & Other Compliance Interventions

- Current taxes must be maintained for the duration of the warehouse period and for any subsequent arrangement period to guarantee the reduced interest rates of 0% (while in warehouse) and 3% (after the warehouse period ends).
- Tax Clearance will not be affected by individuals availing of the warehoused arrangements.
- Refunds and repayments of tax arising in 'warehoused' COVID-19 periods will be repaid notwithstanding that individuals will have tax debts under the scheme (i.e. the repayment will not be offset against the warehoused debts). However, a taxpayer can choose to offset the repayment against the warehoused debts, or other outstanding debts.

3.3 General Terms of Scheme – TWSS

- Where Revenue has paid an employer a temporary wage subsidy in relation to a specified employee, and the employer did not pay that employee an additional amount equivalent to the temporary wage subsidy, or the employer was not entitled to receive a subsidy in respect of an employee, the employer is obliged to refund the subsidy.
- The TWSS warehouse scheme is available to employers who are obliged to refund amounts which are deemed to be overpayments of TWSS following a reconciliation undertaken by Revenue.
- Businesses will be notified of any outstanding TWSS liability due to overpayments by way of a Statement of Account for PAYE (EMP) which will be sent to their ROS inbox.
- Warehousing of the TWSS liabilities will mirror the VAT and PREM warehousing periods. Liabilities to TWSS can be warehoused with Period 1 ending at the end of the VAT period plus 2 months following resumption of trading.
- Interest will not be payable during Period 2 of the warehouse period.
- A reduced interest rate of c.3% per annum will apply for Period 3 on warehoused balances outstanding until the debt is discharged.
- Employers whose tax affairs are dealt with in Revenue's Personal Division or Business Division can have their excess TWSS debts warehoused automatically. LCD and MED cases can apply to have their TWSS overpayments warehoused.
- Revenue will be entitled to make enquiries to satisfy itself that a business is unable to repay its excess TWSS payments.
- Current taxes must be maintained for the duration of the warehouse period and for any subsequent arrangement period to guarantee the reduced interest rates of 0% in Periods 1 and 2 and 3% in Period 3. Failure to meet current taxes will result in the warehouse

facility being withdrawn. Full statutory interest will be applied to the outstanding balance from the date of removal from the warehouse.

- Tax Clearance will not be affected by individuals availing of the warehouse arrangements.
- Refunds and repayments of tax arising in ‘warehoused’ COVID-19 periods will be repaid notwithstanding that individuals will have TWSS liabilities under the scheme (i.e. the repayment will not be offset against the warehoused debts). However, a taxpayer can choose to offset the repayment against the warehoused debts, or other outstanding debts, where it so wishes.

4. Frequently Asked Questions on Debt Warehousing

4.1 What is warehousing of tax debt?

Revenue has suspended debt collection for VAT and Employer PAYE liabilities incurred by businesses during the period when their trade was restricted – either stopped completely or significantly reduced – by the impact of COVID-19. Interest will not be charged on this debt during the “COVID-19 Restricted Trading Period” or during the following 12 months. After that, interest will be charged at c. 3% per annum on the “warehoused” tax debt until it is paid. This contrasts with a rate of c. 10% per annum normally charged on such liabilities. Employers who have debt outstanding as a result of overpayments of the Temporary Wage Subsidy scheme can also avail of warehousing of this debt under the same terms and conditions as the VAT and PAYE (EMP) scheme.

In addition, Income Tax liabilities normally due on 31st October 2020 or the extended date of 10 December (i.e. Preliminary Tax 2020 and the Income Tax balance 2019) can also be warehoused for a period of 12 months subject to meeting the reduced income criteria. Interest will not be charged on this debt during this period, and a reduced interest rate of 3% per annum will be applied thereafter until the debt is discharged.

4.2 How can tax debt be warehoused?

Access to the warehouse arrangement for VAT, PAYE (Employer) and TWSS repayments is automatic for all businesses managed by Revenue’s Business Division (turnover <€3m) and Personal Division. Access is available for businesses managed by Revenue’s Large Corporates Division (LCD) and Medium Enterprise Division (MED).

Income Tax can be warehoused by the making of a declaration that income for 2020 is expected to be 25% less than income for 2019. Further details on the making of the declaration will issue in due course.

4.3 What type of tax debt can be warehoused?

The warehousing scheme applies to **VAT and PAYE (Employer), Income Tax and TWSS repayment** debts only. PAYE (Employer) liabilities include Income Tax, Universal Social Charge, employees’ and employer’s PRSI and Local Property Tax due to be remitted by employers under the PAYE system.

4.4 What is the start date for warehoused debt?

Warehoused debt for VAT and PAYE (Employer) commences for periods ending in February 2020. The end of the warehouse period and consequently the returns covered in the warehousing arrangement is determined having regard to the restriction levels in place for each local area and business.

TWSS warehousing applies to overpayments arising on or after 26 March 2020 and mirrors the arrangements for the VAT and PAYE (Employer) warehouse.

The start date for warehousing of Income Tax 2019 and Preliminary Tax 2020 is 31st October 20 with an extended date of 10 December 2020 where the taxpayer files on ROS.

4.5 How do I demonstrate that I qualify for debt warehousing?

Small and Medium Enterprises

Entry to the warehouse for VAT, PAYE (Employer) and TWSS is automatic for Small and Medium Enterprises (SMEs), which includes all cases dealt with in Revenue's Business Division and Personal Division. An SME in this context is a business where annual turnover is less than €3 million.

Other businesses (turnover above €3m) managed by Revenue's Large Corporates Division and Medium Enterprises Division

The business must have been unable to pay VAT, PAYE (Employer) and TWSS liabilities. This may have been because turnover or the volume of customer orders was reduced or that it had another reasonable basis for being unable to pay those liabilities. Revenue will be entitled to make enquiries to satisfy itself that a business is unable to pay or repay any liabilities.

Income Tax

Taxpayers must make a declaration on filing their Form 11 that they have experienced a loss in income of 25% or more on their 2019 Income Tax liability. The 2020 Income Tax return will be assessed to ensure those availing of warehousing were entitled to do so.

Taxpayers wishing to avail of Income Tax warehousing, who have already submitted their 2019 Income Tax return, should contact the Collector-General's helpline on 01-7383663.

4.6 How do I contact Revenue to arrange for tax debt to be warehoused?

Small and Medium Enterprises

Revenue has already commenced "warehousing" the debt for customers dealt with in Revenue's Business Division and Personal Division and will contact these customers to confirm they are covered by the scheme.

Other businesses (turnover above €3m)

For other cases, entry to the scheme is by application either to:

- the Revenue Branch normally dealing with the business's tax affairs (in Revenue's Medium Enterprise Division or Large Corporates Division as appropriate) or
- the Collector General's Division.

If your business has not been contacted by Revenue but wishes to avail of the warehousing scheme, or you wish to confirm that your business is covered by the warehousing scheme, please contact Revenue through myEnquiries or telephone 01 7383663. Please also see [COVID-19 Filing and Paying Information](#).

4.7 Can Revenue refuse to warehouse debt?

It is anticipated that all qualifying businesses who wish to participate in the warehousing scheme and who have filed all up to date tax returns will be facilitated.

To be eligible for the warehousing scheme and to ensure your business remains eligible, you should ensure you file returns for all taxes, including the returns for the VAT and PAYE (Employer) liabilities that you are currently unable to pay.

Income Tax customers who failed to meet Preliminary Tax requirements for 2019 (insufficient payment on 31 October 2019) are ineligible and cannot avail of Debt Warehousing in respect of the 2019 Income Tax balance. However, those customers are eligible for warehousing of their 2020 Preliminary Tax and can also avail of the reduced rate phased payment arrangement on 2019 Income Tax if they apply before the 10th December 2020.

4.8 What recourse do I have to review?

A business that has been refused access to the warehousing scheme due to non-compliance with tax return filing obligations, may contact Revenue through myEnquiries when all returns have been filed.

4.9 How is it decided that trade has resumed?

Trade is deemed to have resumed following the easing of restrictions for the relevant sector as set out in the Government's *Roadmap for Reopening Society and Business* as provided for in regulations made under sections 5 and 31A of the Health Act 1947, or at a later date on which trade recommences where it is demonstrated that the trade did not recommence before then.

On 15th September 2020, Government published '*Resilience and Recovery 2020 – 2021: Plan for Living with COVID-19*' which outlined a plan for restrictions where Covid levels began to escalate. Where a business is impacted by these restrictions their return to trade date will also be impacted.

4.10 What if a business has re-opened but has had to close again due to the re-imposition of restrictions?

In these circumstances the trade is deemed to be still subject to the restrictions provided for in the regulations under sections 5 and 31A Health Act 1947 until it has re-opened again. This means that VAT and PAYE (Employer) debts for such businesses can continue to be warehoused in respect of the extended restricted period(s).

4.11 What are the Phases of the scheme?

The scheme has three phases or Periods:

- Period 1, the “COVID-19 Restricted Trading Period”;
- Period 2, the “Zero Interest Period”; and
- Period 3, the “Reduced Interest Period”.

These periods are explained in more detail below.

4.12 When does Period 1 begin and end?

Period 1, the “COVID-19 restricted trading phase”, covers the period when the business first experienced cash flow trading difficulties arising from the impact of COVID-19. This is 1 January 2020 for VAT (that is, beginning with the January/February 2020 bi-monthly VAT period) and 1 February 2020 for PAYE (Employer) liabilities (that is, beginning with the February PAYE “income tax month”).

Period 1 ends on the last day of the first full bi-monthly VAT taxable period which commences after the business has resumed trading. This end date applies even if the business is not registered for VAT.

Period 1 for the 2019 Income Tax and 2020 Preliminary Tax years ends on the due date for both returns i.e. 31st October 2020. An extended due date of 10th December 2020 applies for taxpayers who file online through Revenue’s Online Services (ROS).

No interest is charged during Period 1 on the warehoused liabilities arising in that Period.

4.13 When does Period 2 begin and end?

Period 2 is the period of 12 months beginning on the first day after the end of Period 1. No interest is charged during Period 2 on the warehoused liabilities from Period 1.

4.14 When does Period 3 begin and end?

Period 3 begins on the first day after the end of Period 2 and continues until the date on which the COVID-19 deferred liabilities are discharged in full. This is the phase where a reduced interest rate of 3% per annum applies until the warehoused debt has been fully discharged.

4.15 What are the taxpayer obligations once tax debt has been warehoused?

Eligibility for warehousing of tax debts is conditional on the filing of all tax returns and payment of all tax liabilities that fall due while the warehousing scheme is in effect.

Taxes that fall due for current periods during the warehousing agreement must be maintained for the duration of the warehouse period and for any subsequent arrangement period to guarantee the reduced interest rates of 0% (while in warehouse) and 3% (after the warehouse period ends).

4.16 What happens to the warehoused debt if I fall behind on current tax payments and / or filing returns during the period where the warehousing agreement is in place?

Tax payments and filing of returns should be addressed as they fall due during the period where the warehousing agreement is in place.

Where a business is unable to file complete returns due to, for example, the absence of key employees or an agent due to COVID-19 related illness or restrictions, the business should submit returns based on the best estimate of the liability.

If you encounter any payment difficulties during this time, you should contact Revenue at the earliest opportunity. Failure to meet current taxes and returns can result in Revenue removing you from the warehousing scheme.

Please note that the reduced rates of interest (0% in Periods 1 and 2 and 3% per annum in Period 3) only apply to the “warehoused” tax debt. The normal rates of interest (c. 8% per annum for direct taxes such as income tax and corporation tax and 10% per annum for taxes such as VAT and PAYE (Employer) will apply to other unpaid liabilities unless you make or have made an agreement with Revenue to pay these liabilities – see Section 6 below.

4.17 How will I know that my tax debt has been warehoused?

If you have filed returns and have liabilities outstanding, a notification will be sent to your ROS or MyAccount inbox confirming the details of tax debts that have been warehoused.

4.18 Will interest be charged on warehoused tax debt?

Interest will not be charged on any warehoused tax debt during Periods 1 and 2. A rate of 3% per annum interest on this debt applies after this date once you comply with the payment and filing conditions set out at 4.15 above.

4.19 How long do I have to pay any debt that has been warehoused?

The duration of the agreement will be determined based on the individual circumstances involved.

4.20 Will tax clearance be affected by having debts in the warehouse?

Warehousing of tax debt will not impact on tax clearance. If you hold tax clearance prior to entering a warehousing arrangement, then tax clearance will continue while the arrangement remains in place. Any person seeking tax clearance should continue to apply using ROS or MyAccount.

4.21 I am a licenced trader. Will my ability to renew my licence be affected by having debts in the warehouse?

Warehousing of tax debt will not affect your ability to renew your licence.

4.22 What happens if I already have a Phased Payment Arrangement (PPA) with Revenue?

Any PPA that has been in place prior to the introduction of tax debt warehousing is not affected by these measures. These arrangements remain subject to the conditions outlined when they were put in place. However, the amount of interest on any tax that is still outstanding will be reduced – see Section 6 below.

4.23 Can I set up a PPA to discharge the warehoused debt at the zero-interest rate?

Yes, you can make payments any time during the zero-interest rate period. Please see [COVID-19 Filing and Paying Information](#). In addition, it is intended to provide a direct debit facility should you wish to make payments on a regular basis.

4.24 Will warehoused debt be enforced at the end of Period 2 – in what circumstances can it be enforced?

The debt will not be considered for enforcement activity while there is engagement between Revenue and the business concerned.

4.25 I am on monthly Direct Debit for VAT and PAYE (Employer) liabilities and I had stopped making Direct Debit Payments, can I avail of debt warehousing?

Yes. As stated at 4.5 and 4.6 above, you are automatically eligible for warehousing if your tax affairs are dealt with by Revenue's Business Division or Personal Division, and you can apply for warehousing if your tax affairs are dealt with in Medium Enterprises Division or Large Corporates Division. You should remain on the monthly direct debit scheme and resume making monthly payments at the start of Period 2. You should continue to submit your monthly returns for PAYE (Employer) liabilities as normal. For further detail on the monthly direct debit scheme, please refer to the information on www.revenue.ie which can be accessed [here](#).

4.26 I was on monthly Direct Debit for Preliminary Income Tax liabilities and I had stopped making Direct Debit Payments, can I avail of debt warehousing?

Yes. Any shortfall in 2020 Preliminary Income Tax can be warehoused. Your 2019 Income Tax balancing payment can also be warehoused where you have met the preliminary tax requirements for 2019.

4.27 Will any overpayments or claims be offset against warehoused debt?

Refunds and repayments of tax which arise, in relation to the COVID-19 periods as outlined above, will be paid notwithstanding that the businesses will have tax debts covered by the scheme (i.e. Revenue will not automatically offset the repayment against the warehoused debts). However, a business can choose to offset the repayment against the warehoused debts if it wishes.

4.28 Can a couple who are jointly assessed for income tax purposes avail of warehousing where one spouse or civil partner is self-employed and the other has PAYE income?

Under joint assessment, the assessable spouse or civil partner is charged to tax on the combined total income of the assessable and non-assessable spouse/civil partner. To be eligible for warehousing of preliminary tax for 2020 and the balance of income tax for 2019, the couple's combined total income for 2020, returned by the assessable spouse/civil partner, should be estimated to be less than 75% of the couple's combined total income for 2019. However, for a couple subject to joint assessment, where one spouse/civil partner is self-employed and the other is a PAYE employee, Revenue will treat the assessable spouse/civil partner as eligible to avail of debt warehousing if the income of the self-employed spouse/civil partner for 2020 is estimated to be less than 75% of that spouse's/civil partner's income for 2019.

4.29 Can a landlord warehouse income tax liability if a tenant is unable to pay rent due to COVID-19?

If a landlord's tenant/s is/are unable to pay all or part of the rent due under a tenancy, as a result of the impact on their income of Covid-19 restrictions, and as a consequence the landlord estimates her/his total income for 2020 will be less than 75% of her/his total income for 2019, the landlord can avail of debt warehousing for income tax.

5 Examples of Debt Warehousing

Example 1

Mary runs a Hotel which was closed between 15 March 15th and 29 June. The hotel is registered for PAYE (Employer) which should be filed and returned monthly and Bi-monthly VAT. The last return submitted and paid was January 2020 PAYE (Employer) and Nov/Dec 2019 VAT. Her business is dealt with by Revenue's Business Division. Although Level 5 restrictions have been announced for a 6-week period commencing midnight 21 October, Mary has decided to remain open as an essential service.

In order to avail of debt warehousing, she must file all returns which are outstanding, i.e.

- Feb, Mar, April, May, June and July PAYE (Employer) returns and
- Jan/Feb, Mar/Apr, May/June VAT returns.

As a Business Division case, she is pre-approved for warehousing and no action will be taken on the non-payment of the returns once filed.

Mary returned to trade on 29 June and so all PAYE (Employer) debts from February 2020 to June 2020 plus 2 months and all VAT debts from Jan 2020 to June 2020 plus 2 months will be warehoused i.e.

- All Feb to Aug 2020 PAYE (Employer) returns inclusive and
- Jan/Feb, Mar/Apr, May/June, July/Aug 2020 VAT returns.

Mary's next payment is due Oct 2020 for Sept PAYE (Employer).

Warehouse Periods and Rates:

Period 1: Feb 2020 to 31/08/2020: 0%

Period 2: 01/09/2020 to 31/08/2021: 0%

Period 3: 01/09/2021 until the warehoused debt is fully paid: 3%

Example 2

John is a self-employed small retailer in Donegal with no staff. He was unable to meet his VAT liabilities for 2020 to date. He has filed all his bi-monthly returns. His business is dealt with by Business Division. Like most businesses, he ceased trading due to COVID-19 in March and returned in Phase 2 on 8th June. What happens now?

As a Business Division case, John's COVID-19 related debt has been automatically warehoused. As he returned to trade in June 2020, his VAT returns from Jan - Jun (end of bi-monthly period) plus 2 months can be warehoused i.e. Jan/Feb VAT, Mar/Apr VAT, May/June VAT, Jul/Aug 2020 VAT.

John's next payment is due in Nov 2020 for Sept/Oct VAT

Warehouse Periods and Rates:

Period 1: Feb 2020 to 31/08/2020: 0%

Period 2: 01/09/2020 to 31/08/2021: 0%

Period 3: 01/09/2021 until the warehoused debt is fully paid: 3%

Example 2a

Donegal was placed under Level 3 restrictions in September, but John was able to continue to trade. However, when Level 4 restrictions were announced with effect from midnight 15th October, John had no option but to close his premises. John will not be able to re-open until 10 November and even then, it will only be if Level 4 restrictions are lifted by Government. On 10 October Government announced further Level 5 restrictions for the entire country for a 6-week period commencing midnight 21st October.

As shown in example 2, John has been able to warehouse his VAT returns up to and including August 2020. As John has had to close again, his return to trading date will now be 1 December, assuming Level 5 restrictions are lifted are that date. John will be able to warehouse his VAT returns to December 2020 (end of bi-monthly period) plus 2 months i.e. Jan/Feb VAT, Mar/Apr VAT, May/June VAT, Jul/Aug VAT, Sept/Oct VAT, Nov/Dec 2020 VAT and Jan/Feb 2021 VAT.

Warehouse Periods and Rates:

Period 1: Feb 2020 to 28/02/2021: 0%

Period 2: 01/03/2021 to 28/02/2022: 0%

Period 3: 01/03/2022 until the warehoused debt is fully paid: 3%

Example 2b

John is due to file his Income Tax return for 2019 and Preliminary Tax 2020 on 31st October 2020. John's agent normally pays and files on-line for John, and so John has an extension date for filing and paying his IT returns of 10th December 2020. John is concerned, as the loss of income resulting from the closures this year has meant that he is unlikely to be able to pay his liabilities. John paid 100% of his 2018 Income Tax liability in preliminary tax, however 2019 was a good year and so his balancing payment is expected to be quite large. John is satisfied his income for 2020 will be only be around 60% of last years (2019) income.

John will be required to declare that his income in 2020 will be 25% less than the income earned in 2019, when submitting his 2019 Income Tax return and 2020 preliminary tax declaration. As John met his preliminary tax requirements for 2019, he will be entitled to warehouse the balance of his 2019 Income Tax return and his preliminary tax due for 2020.

IT Period 1: Initial warehouse period will end on the filing date 10/12/2020

IT Period 2: 11/12/2020 to 10/12/2021 0% interest

IT Period 3: 11/12/2021 until warehoused debt is fully paid 3%

Example 3

Paul's construction business is dealt with in Medium Enterprises Division. The business was seriously impacted by the COVID-19 closures in April and May. He contacted the Division and provided evidence of a downturn in business as a result of the closure. He has both monthly PAYE (Employer) and Bi-monthly VAT. The business re-opened on 18 May. Although Level 5 restrictions were announced at national level to take effect from midnight 21st October 2020, the construction industry is allowed to remain open. Accordingly, Paul's company has remained unaffected by the new restrictions and continues to trade.

As Paul provided satisfactory evidence to Medium Enterprises Division of a reduction in turnover, the business was approved for Debt Warehousing.

Business re-opened on 18 May, hence PAYE (Employer) returns from Feb to June (end of VAT bi-monthly period) plus 2 months have been warehoused, along with VAT returns from Jan to June (end of VAT bi-monthly period) plus an additional 2 months i.e.

- February, March, April, May, June, July and August 2020 PAYE (Employer) and
- Jan/Feb VAT, Mar/Apr VAT, May/June VAT, and Jul/Aug 2020 VAT.

The next payment is due in October 2020 for the September PAYE (Employer)

Warehouse Periods and Rates:

Period 1: Feb 2020 to 31/08/2020: 0%

Period 2: 01/09/2020 to 31/08/2021: 0%

Period 3: 01/09/2021 until the warehoused debt is fully paid: 3%

Example 3a

Paul's company availed of the Temporary Wage Subsidy Scheme. If, following reconciliation by Revenue of the subsidy paid, an overpayment to the company is identified, the company will be notified. As Paul's company qualified for warehousing, he will not be asked to pay, but will have the option to do so.

The TWSS overpayment can be warehoused along with the VAT and PAYE (Employer) taxes and will be subject to interest at the same rates and due dates as those taxes.

Warehouse Periods and Rates:

Period 1: Feb 2020 to 31/08/2020: 0%

Period 2: 01/09/2020 to 31/08/2021: 0%

Period 3: 01/09/2021 until the warehoused debt is fully paid: 3%

Example 4

Angela is a sole trader, running a bar and restaurant in West Cork. Angela submits bi-monthly VAT returns, and monthly PAYE (EMP). The bar and restaurant closed in March 2020 and re-opened under the roadmap on 29 June. The business traded throughout July, August and September. Level 3 restrictions were implemented at midnight on 6 October, and Angela had to close her business again as she could not cater for take-away, delivery, nor did she have the capacity for outdoor dining. The Level 3 restrictions were expected to be in place for 3 weeks ending 27th October, however, the entire country was moved to Level 5 restrictions with effect from midnight 21 October for an expected period of 6-weeks.

Originally the business re-opened on 29 June so PAYE (Employer) returns from February to June (end of VAT bi-monthly period) plus 2 months had been warehoused, along with VAT returns from Jan to June (end of VAT bi-monthly period) plus an additional 2 months i.e.

- February, March, April, May, June, July and August PAYE (Employer) and
- Jan/Feb VAT, Mar/Apr VAT, May/June VAT, and Jul/Aug VAT.

The customer's next payment had been due in October 2020 for September PAYE (Employer). However, due to the Level 3 restrictions, the business has been forced to close again, and so her resumption date moves to the ending of restrictions.

Where those restrictions had ended as expected, in October 2020, Angela would have been able to warehouse returns due up to October 2020 plus 2 months. Angela could therefore also have warehoused the additional returns;

- September, October, November and December 2020 PAYE (Employer) returns
- Sept/Oct 2020, Nov/Dec 2020 VAT

The raising of restriction levels to Level 5 has resulted in even further returns being available for warehousing. As Level 5 is due to end in December 2020, Angela can warehouse up to the end of the bi-monthly VAT period plus 2 months i.e. February 2021. Angela can therefore warehouse the additional returns:

- September, October, November and December 2020, January 2021 and February 2021 PAYE (Employer) returns
- Sept/Oct 2020, Nov/Dec 2020 and Jan/Feb 2021 VAT

Warehouse Periods and Rates:

Period 1: Feb 2020 to 28/02/2021: 0%

Period 2: 01/03/2021 to 28/02/2022: 0%

Period 3: 01/03/2022 until the warehoused debt is fully paid: 3%

Example 4a

Angela is also due to file her 2019 income tax return and preliminary tax for 2020. However, when Angela completed her 2019 return, she realised she had underestimated her liability for the year, and so had underpaid her 2019 preliminary tax in October last year. Business has been badly affected by the restrictions in 2020, and costs have increased significantly in trying to keep the business 'Covid-compliant'. As a result, Angela is confident her income for 2020 will be, at a minimum, 25% down on last year. Angela submits paper-based tax returns as she is not an e-enabled customer.

When making her Income Tax 2019 return and preliminary tax declaration for 2020, Angela should also declare that her 2020 income is expected to be reduced by 25% or more on 2019 income. As Angela did not meet her Preliminary tax requirements for 2019, she will be unable to warehouse her outstanding balance on the 2019 Income Tax return. However, her preliminary tax for 2020 can be warehoused. As Angela submits paper-based returns, the relevant dates for warehousing of her Income Tax liabilities are:

IT Period 1: Initial warehouse period will end on the filing date - 31/10/2020

IT Period 2: 01/11/2020 to 31/10/2021 0% interest

IT Period 3: 01/11/2021 until warehoused debt is fully paid 3%

Although Angela is unable to warehouse her 2019 Income Tax, she can still avail of a 3% reduced interest Phased Payment Arrangement (PPA) on that liability, where she submits her return and applies in advance of the 10th December 2020 deadline.

Example 5

Sue is a sole trader and runs a bar/restaurant in Offaly. Sue submits bi-monthly VAT returns, and monthly PAYE (EMP). The bar closed on 15 March 2020 and only re-opened under the Government Roadmap on 29 June. The business traded throughout July but was subject to localised lockdown on 7 August. The business resumed to trade again on 22 August when restrictions were lifted. However, national Level 3 restrictions were implemented at midnight on 6 October, and Sue had to once again close her business. The Level 3 restrictions were expected to be in place for 3 weeks, however restrictions were further extended by the move to Level 5 restrictions on midnight 21st October.

Originally the business re-opened on 29 June so PAYE (Employer) returns from February to June (end of VAT bi-monthly period) plus 2 months had been warehoused, along with VAT returns from Jan to June (end of VAT bi-monthly period) plus an additional 2 months i.e.

- February, March, April, May, June, July and August 2020 PAYE (Employer) and
- Jan/Feb VAT, Mar/Apr VAT, May/June VAT, and Jul/Aug 2020 VAT.

However, when the local Level 3 restrictions forced the business to close again in August, her resumption date moved to the ending of localised restrictions which was also in August 2020. This allowed Sue to warehouse the additional returns;

- September and October 2020 PAYE (Employer) return and
- Sept/Oct 2020 VAT

The ending of the national Level 5 restrictions will determine what further returns Sue will be able to warehouse. Where those restrictions end, as expected, in December 2020, Sue will be able to warehouse additional returns due up to December 2020 plus 2 months which includes

- September, October, November and December 2020, Jan 2021 and Feb 2021 PAYE (Employer) returns
- Sept/Oct 2020, Nov/Dec 2020, and Jan/Feb 2021 VAT

Example 5a

Having complied with Preliminary tax rules for 2019, Sue is now due to file her 2019 Income Tax return and preliminary tax for 2020. Sue had renovated her premises in late 2019, extending substantially, so she was able host a much larger cohort of customers than in previous years. As a result, although this year has been a difficult trading period, Sue is expecting her 2020 income to be in excess of 2019. Can Sue avail of Income Tax warehousing?

As Sue will be unable to declare an income fall in excess of 25% in 2020, she will be unable to warehouse her liabilities. If Sue does make such a declaration, and subsequently her 2020 Income Tax return confirms that she did not suffer an income reduction, the liability for 2019 becomes due immediately, with an effective due date of 31st October 2020. Interest will be applied at the full statutory rate of 8% per annum. In addition, Sue will not have met Preliminary tax requirements for 2020 and so her 2020 Income Tax liability will become due from 31st October 2020 rather than 31st October 2021.

6 Reduced Interest Rate – Non-COVID-19 Debt

As part of the July 2020 Jobs Stimulus Package, the Government announced a reduced interest rate of 3% per annum to apply to tax debts that cannot be warehoused, i.e. older liabilities and debts not associated with COVID-19. The 3% rate represents a significant reduction from standard interest rates on late payment of taxes of 8% and 10% per annum.

The reduced rate is available across all tax types and to agreements that are already in place as well as new agreements made on or before the end of October.

This reduced interest rate measure is available to taxpayers with undeclared liability from tax periods that pre-date the COVID-19 phase, provided this liability is declared by 31 October 2020 under a self-correction or voluntary disclosure as provided for in Chapter 3 of the [Code of Practice Revenue Audit & Other Compliance Interventions](#).

To avail of this measure, taxpayers must agree a phased payment arrangement with Revenue **before 31 October 2020**. The reduced rate is applicable from 1 August 2020 or from the date of the agreement, whichever is later.

Taxpayers who are unable to warehouse 2019 Income Tax liabilities as they did not meet 2019 preliminary tax rules, may apply for a phased payment arrangement to discharge this liability and will be afforded the concessional rate of 3% on projected interest over the lifetime of the PPA. To avail of this measure, taxpayers must agree the phased payment arrangement with Revenue by 10 December 2020.

6.1 General Terms of Scheme

- The scheme is applicable to a Phased Payment Arrangement for any debt which cannot be warehoused under the terms of the Debt Warehousing Scheme.
- The scheme encompasses all tax-heads and customers from all Divisions. The online phased payment facility available through ROS caters for the six main business taxheads i.e. VAT, PAYE (Employer) taxes, IT, CT, CGT and RCT.
- Phased payment arrangements must be agreed before 31 October 2020 to avail of the reduced interest, or 10th December 2020 where seeking an arrangement to pay 2019 Income Tax.
- The 3% rate is to be applied to projected interest for the lifetime of the payment arrangement.
- Full accrued interest will be applied to 1 August 2020 for existing arrangements or up to the date of PPA agreement for new arrangements.
- Debts currently at enforcement may be included in the scheme, however, this will be dependent on the status of the current enforcement. Further contact with Revenue caseworkers will be required to determine eligibility of any such debt for the scheme.

- Amendments have been made to simplify the on-line application and PPA process allowing for:
 - Application without requirement to supply a full suite of supporting documentation
 - Increased repayment term of up to 60 months
 - Ability to defer payments for up to 12 months
- An individual or business with non-Covid tax debts will not qualify for a tax clearance certificate unless they have agreed a phased payment arrangement to pay those liabilities. Absence of tax clearance will preclude a business from availing of the Employment Wage Subsidy Scheme, the Stay and Spend Scheme, accelerated loss relief and other measures.

6.2 Why is this provision being introduced?

This provision is being introduced to provide vital liquidity support to struggling businesses and sole traders that have historic unpaid tax debts. By applying a lower interest rate of approximately 3% per annum, the cost of paying their unpaid tax debts is significantly reduced.

6.3 What is the current rate of interest of late payment of taxes?

Currently, statutory interest is charged at a rate of 0.0274% per day (approximately 10% per annum) on late payment of PAYE (Employer) taxes, VAT and other indirect taxes while late payment of income tax, corporation tax and capital gains tax attracts interest at a rate of 0.0219% per day (approximately 8% per annum). There is a rate of 11.75% per annum on late payments of Relevant Tax on Share Options; debts for that tax are also eligible for the scheme.

6.4 Who can avail of this reduced interest rate?

All taxpayers that have declared but unpaid tax debts can avail of this reduced interest rate provided they enter into an agreement with Revenue to pay these debts on or before 31 October 2020, or 10 December 2020 for arrangements to discharge 2019 Income Tax.

Declared tax debts under any tax head are eligible and the tax debts can relate to any period.

6.5 What steps must be taken to enter into an agreement with Revenue / how do you apply for this reduced interest rate?

Taxpayers should apply online via ROS for a Phased Payment Arrangement (PPA).

6.6 I already have an existing Phased Payment Arrangement with Revenue. Can I avail of this reduced 3% per annum interest rate?

Yes. If you have an existing Phased Payment Arrangement with Revenue, your Arrangement will be reviewed automatically, and you will be able to avail of the reduced interest rate of approximately 3% per annum on the balance of tax that remains outstanding from 1 August 2020. Revenue will be in contact with you shortly in this regard.

6.7 Are there any declared debts that are not eligible for the reduced 3% interest rate?

Yes. In certain circumstances where payment of the debt has been pursued by way of enforcement proceedings taken by or on behalf of Revenue, it will not be possible to enter into an agreement with Revenue and avail of the reduced interest rate. These circumstances include where:

- There is a court mandated payment plan in place;
- Enforcement of a Court Order is ongoing / being pursued;
- Court proceedings are ongoing.

For further information, contact the Collector-General's Division through myEnquiries or telephone 01 7383663.

6.8 What happens if I have undeclared liabilities?

Any individual or business that has additional tax liabilities that have not been declared to Revenue in the appropriate tax return, due to error or omission, will not be entitled to benefit from the 3% reduced interest rate in relation to those additional liabilities unless the issues are regularised by 31 October 2020. Information in relation to making a self-correction and unprompted qualifying disclosure is set out in Chapter 3 of the [Code of Practice Revenue Audit & Other Compliance Interventions](#)

6.9 From what date will the reduced 3% interest rate apply?

The reduced interest rate will apply from 1 August 2020 where an agreement for payment of the declared tax debts has already been reached or the date of an agreement in the case of new phased payment arrangements.

6.10 How will interest be applied to my PPA?

For Current PPAs

- From 1 August 2020, projected interest will be recalculated at a rate of 3% on the remainder of the debt over the remaining repayment term
- Accrued interest remains charged at full rate of 8% or 10% as applicable up to 1 August 2020.

This change will be made retrospectively in September 2020

New PPAs

- For PPAs agreed before 31 October 2020 in respect of debt that does not qualify for warehousing
- Accrued interest will be calculated from due date to the date of agreement at full rate (10% or 8% as applicable)
- 3% on projected interest over the repayment term.

Examples

- 1. ABCD Limited has outstanding Revenue debt and cannot obtain tax clearance. The company wishes to address the outstanding tax liability and avail of the interest rate reduction announced in the July Jobs Stimulus package. The company requires a Phased Payment Arrangement (PPA) to discharge outstanding PAYE (Employer) debt for the annual period ended 31st December 2019 as well as VAT Sept/Oct 2019 and VAT Nov/Dec 2019. Due to expected reduced trading, the company is seeking to repay the debt over a prolonged period.**

The company can avail of a PPA to discharge their existing non-COVID-19 debt. However, they must agree the PPA before 31 October 2020 to avail of the reduced interest rate charges. The PPA can be repaid over a 5-year period. The annual PAYE (Employer) return was due on the 14th January 2020. The Sept/Oct 2019 VAT was due on 19th November and the Nov/Dec 2019 VAT was due on the 19th January 2020. Final Payment under the terms of the PPA agreement is due on 25th September 2025.

| Tax-Head | Due Date | PPA agreed date | Accrued Interest (10%) charge dates | Projected Interest (3%) charge dates |
|------------------------|------------------|-----------------|-------------------------------------|--------------------------------------|
| Annual PAYE (Employer) | 14 January 2020 | 25 Sept 2020 | 15 January – 25 Sept 2020 | 26 Sept 2020 – 25 Sept 2025 |
| Sept/Oct 2019 VAT | 19 November 2019 | 25 Sept 2020 | 20 November 2019 – 25 Sept 2020 | 26 Sept 2020 – 25 Sept 2025 |
| Nov/Dec 2019 VAT | 19 January 2020 | 25 Sept 2020 | 20 January 2020 – 25 Sept 2020 | 26 Sept 2020 – 25 Sept 2025 |

- 2. DCBA Enterprises Ltd entered into a PPA on 10 December 2019 for July/August 2019 VAT which fell due for payment on 19 September 2019 and Sept/Oct 2019 VAT which fell due for payment on 19 November 2019. The company were to make repayments over a 2-year term with final payment due on 10 December 2021. How will the entity be affected by the July Jobs Stimulus Package?**

Under the initial Phased Payment Arrangement agreed in December 2019, the interest charges applied were as follows:

- Accrued interest 20 Sept 2019 to 10 Dec 2019 on Jul/Aug 2019 VAT @ 10% rate
- Accrued Interest 20 Nov 2019 to 10 Dec 2019 on Sept/Oct VAT 2019 @ 10% rate
- Projected interest from 11 Dec 2019 to 10 Dec 2021 @ 10% rate

The interest charges associated with the PPA as a result of changes in the July Jobs Stimulus Package would be calculated as follows:

- Accrued Interest 20 Sept 2019 to 1 Aug 2020 on Jul/Aug VAT @ 10% rate
- Accrued Interest 20 Nov 2019 to 1 Aug 2020 on Sept/Oct VAT @ 10% rate
- Projected interest from 1 August 2020 to 10 December 2021 on remaining balance outstanding @3% rate.

This would result in significant savings in interest charges to DCBA Enterprises Ltd.

3. ABC and XYZ Partnership ceased to trade between March and June 29th due to COVID-19 restrictions. The Partnership have the following debts outstanding: IT 2018, PAYE (Employer) November 2019, January 2020, February 2020, March 2020, April 2020, May 2020, June 2020 and VAT Nov/Dec 2019, Jan/Feb 20, Mar/April 20. Return for May/June VAT was Nil. The Partnership now wish to address their compliance record by availing of the various schemes announced by Government.

The Partnership has debt which must be addressed under separate schemes. Debt which is COVID-19 related can be warehoused under the Debt Warehousing Scheme announced by Government. Non-COVID-19 debt encapsulates all the other tax debt which the company has accumulated that does not qualify under the warehousing scheme.

As the Partnership resumed trading at the end of June 2020, COVID-19 debt includes all VAT returns between January and August 2020 and all PAYE (Employer) returns between February and August 2020. All such liabilities can be warehoused, and no formal repayment scheme is required until the end of Period 2 in August 2021.

Non-COVID-19 debt can be included in a Phased Payment Arrangement. By entering an arrangement before 31 October 2020, the Partnership will be able to avail of reduced interest rate on balances outstanding over the lifetime of the arrangement.

| Debt | Tax-head | Period | Warehouse (0% Periods 1 & 2 3% Period 3) | Status | Available for 3% Interest PPA before 31 October 2020? |
|-----------------------------|-----------------|------------|--|----------------------|---|
| COVID-19 related | VAT | Jan/Feb 20 | Yes | On-File | No |
| | | Mar/Apr 20 | Yes | On-File | No |
| | | May/Jun 20 | Yes – but n/a | On-File – Nil return | No |
| | | Jul/Aug 20 | Yes | On-File | No |
| | PAYE (Employer) | Feb 20 | Yes | On-File | No |
| | | Mar 20 | Yes | On-File | No |
| | | Apr 20 | Yes | On-File | No |
| | | May 20 | Yes | On-File | No |
| | | Jun 20 | Yes | On-File | No |
| | | Jul 20 | Yes | On-File | No |
| | | Aug 20 | Yes | Awaiting return | No |
| Non-COVID-19 related | VAT | Nov/Dec 19 | No | On-file | Yes |
| | PAYE (Employer) | Nov 19 | No | With Sheriff | Refer to CG to query |
| | | Jan 20 | No | On-file | Yes |
| | IT | 2018 | No | With Sheriff | Refer to CG to query |