Main TALC
8 March 2023 at 2.30pm
Hybrid Meeting
Bishops Square & Microsoft Teams
Minutes

1. Minutes of meeting held on 6 December 2022

The minutes had been published following agreement prior to the meeting, in accordance with the TALC Operational Guidelines.

2. Matters arising from meeting on 6 December 2022

It was acknowledged that the various actions arising from the meeting of 6 December 2022 were either sufficiently resolved since the last meeting or have been referred back to the relevant sub-committee for further consideration.

Regarding DAC7, Revenue noted that administrative aspects of DAC7 regarding joint enquiries are best dealt with within the TALC Audit Sub-committee. There was agreement among the group that this was appropriate. Regarding the TALC BEPS DAC7 working group itself, the Chair asked which sub-committee the TALC BEPS DAC7 working group was feeding into and whether minutes were being published or sent to some TALC sub-committee for oversight. It was noted that this group is being chaired by Revenue and the minutes, while not being published, are being fed into TALC BEPS Sub-committee. The group acknowledged that the TALC BEPS DAC7 working group is functioning well and achieving its aim of teasing out issues.

Practitioners expect that TALC BEPS will be recommencing shortly given that the Pillar Two Feedback Statement is due to issue shortly.

3. Revenue update on the Temporary Business Energy Support Scheme (TBESS)

Revenue provided an update on TBESS. Revenue acknowledged that take-up has been low to date. It noted that statistics are published every Thursday. Registrations are at almost 26,000. Claims to the value of €56 million have been approved. Revenue is going to commence a phone campaign for customers with incomplete claims. The scheme has been enhanced following recent Government announcements.

Revenue noted that there are now some useful materials on their website, including a recording of the Webinar held in December and newly produced “How to” videos. These videos, which are less than 5 minutes in length, should assist taxpayers as they demonstrate how to register for the scheme on ROS and how to submit claims.

The recent changes were provided for in Finance Act 2022, subject to Ministerial Order. The scheme has been extended to 30 April 2023 and from 1 March 2023 onward, the €10,000 monthly limit for trade/profession has been increased to €15,000 and the upper limit of €30,000 has been increased to €45,000 per trade/profession where carried on in more than one location.

The remaining changes are subject to State Aid approval, which is being sought but as of yet not received. This includes the extension of the scheme to 31 May 2023, a reduction in the unit cost threshold from 50 percent to 30 percent backdated to 1 September 2022, and from 1 March 2023 a change in amounts payable under the scheme from 40 percent of the increase to 50 percent of increase. The overall time limit for submitting claims has been extended to 31 July 2023.

Revenue explained it is currently operating under the existing provisions of Finance Act 2022. The extension of the scheme means an extension of the pre-claim reference period relating back to 2022. So businesses will need to compile their details for March, April and May. The sweep-back due to the reduction in thresholds will see certain customers who may not have had a basis for a claim now being within the scheme. There will be no need for customers who have already submitted all relevant details to resubmit claims. Instead, once the functionality is activated, the sweepback will pick up impacted customers without the need for further taxpayer input. For customers who have partially saved claims that would now be eligible under the '30 percent gateway', they will have to complete these claims and 'sign and submit' the relevant information. The message is to get the bills together and submit details and the system should perform the calculations once the limits are updated. The calculator on Revenue's website will also be updated to reflect the changes coming in the Spring Finance Bill 2023.

The Chair asked if all changes will be reflected in the Spring Bill and when State Aid approval is expected. Revenue noted that the Spring Bill is expected to reflect these changes and State Aid approval is expected in the next few weeks.

Practitioners queried the scenario where the 50 percent threshold is not met but the 30 percent threshold will be, how will the sweepback work. Revenue noted that if you have bills to 28 February 2023, you can submit claims, but you will be subject to the 50 percent threshold. If you submit a claim in two weeks, then you will get the benefit of the 30 percent threshold. The sweepback will apply where claimants received a payment for some periods but not for others. So full details have been submitted but only a portion of the claims met the thresholds.

Revenue noted its disappointment that one of the bodies represented on TALC had chosen to make public comments regarding the complexity of the scheme rather than taking up its concerns through the TALC forum. The Body in question explained that the comments, which ultimately found their way into the public domain, were collated from member feedback following a request from the Department of Enterprise, Trade & Employment for feedback on the operation of the scheme.

4. Review of Sub-Committee Workplans and Reports

The Chair took it in turn to go through the various subcommittees workplans and information provided in advance of the meeting.

Regarding the TALC Direct/Capital Sub-committee, a workplan was not provided but a detailed list of issues was. The Chair acknowledged that the aim of the subcommittee in the recent year has been to progress items as efficiently as possible which may have been on the agenda for some time. The Chair picked out a number of items of interest to Main TALC, feeding back where certain items are and explaining the extent of progression of various items:

- The basis of taxation on the commutation of a foreign pension which accumulated from contributions out of foreign income is being considered by a subgroup;
- There is a subgroup meeting on 9 March 2023 to discuss the draft TDM on the classification of foreign entities;

- The TDM review process is on the agenda and there is an intention to have a meeting on this shortly;
- The issues relating to CG50 have come off the agenda with specific issues to go to RLS;
- There was a detailed meeting of the TALC Leasing subgroup on 7 March 2023 and this group is progressing the various issues with the proposed draft TDM;
- There is an updated TDM on tips paid by electronic means due to issue shortly;
- Section 845C has come off the agenda following confirmation this is only applicable to financial institutions;
- Several stamp duty issues have been concluded and others progressed substantially.

The Group are satisfied that, although there is no published workplan, the sub-committee is functioning well and progressing issues, which is the overall aim of that committee.

Regarding the TALC BEPS Sub-committee, the Chair noted the importance of this forum in the context of Pillar Two. There is a very tight timeframe to implement the directive. These are fundamentally new rules which must be aligned with the Irish tax system. The Department of Finance intends to become quite active in this sub-committee and will use this forum to progress technical matters arising. The Chair noted that there are two public consultations planned, one toward the end of March and another toward the end of the Summer. The Chair's view is that the TALC BEPS Sub-committee should be well able to tease out the complexities which are sure to arise.

Revenue noted the significant body of work in the Pillar Two space. It hopes to have draft legislation to share in advance of the second round of consultations. The consultations to date will inform the material shared as part of the upcoming consultations. Practitioners will have a key role to ensure the legislation is administered efficiently. The Chair welcomed the Department of Finance involvement, especially given the necessary policy, legislation, and administration overlap. Practitioners acknowledged that a meeting is likely in early April. The Chair noted that Main TALC should maintain active oversight of TALC BEPS given the importance of the efficient implementation of Pillar Two.

Regarding the TALC Audit Sub-Committee, the Chair acknowledged the meeting earlier in the day. The sense is that the subcommittee is working well, and the group agreed. Revenue noted a new practice of inviting rotating representation from operational Divisions to brief the sub-committee on key compliance issues and significant projects. A central focus of the group remains the new Code of Practice for Revenue Compliance Interventions published last year.

Regarding the TALC Collections Sub-Committee, it is acknowledged that this is a very active committee. It seems to be performing its function well. Revenue suggested that the Vacant Homes Tax could be linked with Local Property Tax, and this could be addressed at the sub-committee. Practitioners noted that this is in fact being considered by the sub-committee presently.

Regarding the TALC Indirect Sub-Committee, it was noted that the workplan is principally driven by EU developments, given Revenue participate in the working party groups at EU level. Practitioners noted that the sub-committee is working effectively and is an important and useful forum for engaging on EU developments, including the developments in relation to VAT in the Digital Age (VIDA). The sub-committee meets as frequently as other TALC sub-committees and practitioners noted that the sub-committee addresses issues effectively. It was also acknowledged that due to ongoing developments with the Spring Finance Bill 2023, Finance Act 2022, and the NI Protocol, meeting dates of the sub-committee for 2023 had not yet been agreed. However, the sub-group of TALC Indirect on VAT

Grouping had met on 23 January. The Group agreed to invite a representative from TALC Indirect to update Main TALC on important issues on the sub-committee's agenda.

An invitation to speak at Main TALC may be extended to all sub-committees as a matter of process for Main TALC.

ACTION: Consider asking a representative from each sub-committee to report to the group once a year.

5. Department of Justice review of Sheriff operations

Revenue acknowledged that well over 90 percent of the Sheriffs' function is done on behalf of Revenue. The suspension of enforcement activities as a result of the public health restrictions raised questions about the appropriate structure and function of the Sheriff going forward, in particular considering best international practice.

A review group has been formed by the Minister for Justice and is chaired by Noel Waters, a former Secretary General of the Department of Justice. Bodies represented on the group include the Courts' Service, the Department of Justice, the Department of Housing, the Department of Finance, and the Revenue Commissioners. A targeted consultation has been commenced. It was suggested that the bodies represented on TALC should also be given an opportunity to consult. A special webpage has been launched in relation to the consultation process which includes the terms of reference, minutes, and some other background information on the consultation. The deadline is 5.00pm on Friday, 24 March 2023.

6. Revenue's plans for stakeholder engagement on the implementation of the Enhanced Reporting Requirement for employers

Practitioners asked for clarity as to the implementation of this requirement, beyond the recent survey to get initial views from stakeholders.

Revenue noted that this was discussed at TALC Collections. It is collating results from its recent survey. There were over 3,200 responses from a selection of employers, agents, and software providers. Half of the employers have five or fewer employees receiving the in-scope payments. A significant proportion stated they managed it in house. Many acknowledged the use of software packages. Revenue expects to complete a report on the consultation process in due course. Revenue acknowledged that stakeholders are keen to work with Revenue. Revenue is looking to implement by 1 January 2024.

Practitioners noted that when the survey came out it was understood that this was very much to simply frame the stakeholder consultation that would then follow. Practitioners therefore queried whether a more robust consultation will take place prior to implementation. Revenue noted the recent consultation was to get some initial information only. Revenue now has a baseline and it will work on the issues for the remainder of the year with a view to implementation by 1 January 2024.

Practitioners queried the forum through which the dialogue will take place. There is concern about the level of work taxpayers will need to complete. There are going to be many issues which will need to be worked through and an appropriate forum will be particularly helpful from practitioners' perspective. Revenue wants to ensure it gets a good cross section of views, taking into consideration the breadth of interests impacted by this. It was acknowledged that the implementation will require a separate process. Once it is understood how to best represent the various views, then the appropriate forum can be established.

Practitioners queried if there are any particular themes coming from larger employers. Revenue is not getting any sense that large employers are noting issues peculiar to those organisations.

The Chair queried how this could be best progressed. Practitioners acknowledged how well PMOD stakeholder engagement worked prior to implementation. The difference in how this requirement will impact larger and smaller organisations will need to be considered. Revenue intends to hold some sort of forum to address these issues, similar to PMOD.

Practitioners would be keen for stakeholder engagement as soon as possible. Taxpayers are concerned that the survey was not responded to by many businesses. It was noted that those who were written to in the initial phase did not see this as the appropriate moment to tease out the issues. As such, it may not be representative of views. Practitioners cautioned against making decisions based on this initial survey.

The Chair asked if a separate forum will be established for practitioners. Revenue noted that it has been discussed at TALC Collections. Revenue asked if it would be preferable for Main TALC or TALC Collections to look at this. The Group acknowledged the level of work on the TALC Collections agenda is substantial as is. An ad-hoc group reporting into Main TALC seems like the optimal approach. Practitioners noted that if this is a multi-phase project, then a separate group would assist with the implementation of future phases. Practitioners also acknowledged that the benefits in question are typically 'off-payroll' and that should be considered as part of the process.

The Chair asked if this can be progressed in advance of the June meeting of Main TALC and Revenue agreed to revert on the engagement process. Revenue acknowledged the level of work to be done. Once the consultation is published, this will commence the stakeholder engagement process. Revenue noted there are standing relationships with software providers as part of PMOD and they are engaging with these already. Revenue is keen to get a cross-section of stakeholder engagement, however. It will therefore consider an ad-hoc group to report into Main TALC.

7. New reporting requirements for payment service providers under EU Cross Border Payment Service Provider Reporting. What is the intended scope and status?

Revenue noted that this is being dealt with by the TALC Indirect sub-committee. The scope of Payment Service Providers included in this measure is broadly defined. In terms of dates, it is intended to have test facilities available for PSPs by October 2023, with ROS registration available at that time also. The legislation will be in force in 2024.

8. Joint ITI/CCAB-I IT Priority List 2023 (included in the Appendix)

Practitioners noted that personal taxpayers arguably bear the greatest burden and perhaps have the least support. It was acknowledged that some of the measures on the list are more complex than others. Practitioners feel that overall, the list represents a good balance of measures which will improve compliance both from practitioners' and Revenue's perspectives. The items raised will not be new to TALC. It is hoped that this list will be referred to throughout the year with regular check-ins. Revenue thanked the practitioner bodies for the list and advised that it is reviewing it. It noted that its IT capacity has been very much constrained by mandatory demands such as TBESS, Pillar Two, etc. but will examine the scope to advance the proposals.

Two of the items on the list are already in hand. In relation to Item 6, from June, a facility will be available to enable taxpayers to apply a bank account to multiple tax heads for payments and refunds. In relation to Item 8, there is an ongoing review of the Tax Clearance process which will address, *inter alia*, the proposed change.

The Chair also suggested another simplification discussion for the June meeting, like that in the prior year. The group agreed that this was a good suggestion. The resolution of issues regarding PPSNs, and Stamp Duty was acknowledged by the group. Practitioners also noted that a letter has gone to the Department of Finance regarding simplification of CGT payment dates.

9. AOB

i. Spring Finance Bill

Revenue does not have a definitive date for publication. It should be published soon. Practitioners acknowledged the Minister's press release the day before the meeting.

ii. Department of Finance Business Tax Stakeholder Forum

The Chair noted all parties to Main TALC will be represented. The Chair queried the interaction between that forum and Main TALC, if any.

Practitioners felt it would operate largely independently of TALC. It is expected that it will involve broader policy issues than just Pillar Two. The Business Tax Stakeholder Forum is a policy update forum.

The Chair queried whether there is a process for implementation of a Territorial System of Taxation. Practitioners hope this will be considered and noted that this issue arises again and again. It is hoped this can be discussed at the forum as part of the updates required for Pillar Two. Revenue advised that this is very much an issue of tax policy rather than administration.

iii. Revenue Centenary and Declan Rigney's retirement

The Chair acknowledged the commemorations and wished Declan all the best in retirement.

The group welcomed Mairéad McGuinness to Main TALC as Revenue co-ordinator.

The next meeting is planned for Tuesday, 27 June 2023.

Attendance:

ITI	Revenue	CCAB-I	Law Society
Anne Gunnel Mary Healy Laura Lynch David Fennell Pat Mahon	Brian Boyle Eugene Creighton Declan Rigney Joe Howley Geraldine McEvoy Mairead McGuinness Davena Lyons	Enda Faughnan (Chair) Brian Purcell Paul Dillon Gearóid O'Sullivan (Secretary) Gráinne McDermott Peter Vale (Apologies)	Caroline Devlin James Somerville Rachel Hession Sonya Manzor Aidan Fahy

Appendix

Main TALC - 8 March 2023

List of Priorities for IT Developments

At the meeting of Main TALC on 6 December 2022, the Committee discussed the outcome of the Main TALC Special Purpose Meeting (SPM) on pre-population and sharing of data on the Form 11 tax return, which took place on 19 October.

Practitioners outlined their concerns about the serious constraints on resources to progress IT developments sought by practitioners, due to Revenue's commitments to IT developments required to comply with changes in the international framework over the coming years. Considering these constraints, ITI and CCAB-I outlined five priority IT developments the professional bodies wish progressed to support the work of their members in assisting taxpayers to comply with their tax obligations.

As the precise nature and timing of the delivery of IT developments to comply with commitments arising under Pillar Two and DAC7 are not yet clear, Revenue invited practitioners to specify in writing their priorities for IT developments, so that Revenue could consider these requests for development should resources become available.

We have outlined 11 priorities for IT developments, as below. Our primary focus is on measures to support the filing of income tax returns, as we believe this would deliver the most benefit in reducing the cost of compliance for taxpayers.

The first five priorities reflect the requests we outlined at Main TALC in December as these developments are of paramount importance. We have included additional explanations on these items where we consider it helpful and where informed by the discussions at the Main TALC SPM last October.

It was evident from the discussions at the Main TALC SPM that a number of the suggestions we made cannot be progressed at this time. This is due primarily to Revenue's wish to dovetail with international developments (for example, in sharing data from third party returns) or limitations in information or the timing of its availability (for example, using data held by the Residential Tenancies Board (RTB)). We have excluded these suggestions from our priorities below on the basis that the suggestions cannot be considered at this time.

Measuring Progress on the Delivery of IT Priorities for Practitioners

It would be important to review, at intervals, the progress made on the priorities identified below. Some of the priorities require less IT development work to deliver and we consider should be implemented in 2023. Other developments would require more intensive work to deliver.

We would suggest that at the December 2023 meeting of Main TALC, the Committee should review what progress has been made on the listed priorities and what items could be scheduled for development in 2024. We would propose to revisit the list again at Main TALC at the end of 2024 to take stock of progress made on the priorities identified.

As a matter of principle, we would seek a commitment from Revenue to fully explore how the data it receives from tax returns and other sources can be shared with the taxpayer to whom it relates, to minimise compliance costs. This should assist in progressing the sharing of further data when opportunities become available.

Requested Priority IT developments to Support Compliance

1. **Prioritise an IT development to MyEnquiries to address an ongoing difficulty with the delivery of Revenue-initiated queries**

   There is an ongoing issue where Revenue-initiated queries on MyEnquiries are not sent to the appropriate staff member in a practice or are sent to staff who are absent. This means that queries may be overlooked or cannot be dealt with promptly.

   At the TALC MyEnquiries Sub-group, Revenue noted that it had identified a possible solution to this issue through the use of a designated email address for receipt of Revenue-initiated queries, which could be accessed by practice staff with permissions to access that email address.

   However, the Sub-group has been informed that due to IT resourcing constraints, this development cannot be delivered in the first half of this year and it remains uncertain whether it can be implemented in 2023. Effective communication through MyEnquiries is critical. An IT development to resolve this communication difficultly should be prioritised for release in 2023.

2. **Allow tax agents to view a list of overdue tax liabilities for their clients**

   There is a facility on ROS for tax agents to view a list of outstanding tax returns for taxpayers to whom they are agent-linked. This is very useful in helping to ensure clients remain up to date with their tax return filing obligations and any outstanding returns can be identified quickly. A similar facility should be introduced for overdue tax liabilities where the tax agent is agent-linked for the tax-head or for the purposes of a Phased Payment Arrangement.

   This is particularly important given tax agents are not copied on payment demands sent to taxpayers and Revenue has returned to its standard debt collection process, including referral to enforcement. In addition, timely payment of current taxes is a key condition for retaining access to the benefits of the Debt Warehousing Scheme.

As part of this, it would also be useful for tax agents to be notified where an issue has arisen with the processing of a tax payment. Under the current system, tax agents are unaware when an issue arises with the processing of tax payments. Therefore, tax agents are then unaware that the payment of tax has become late.

3. Create a database for Tax and Duty Manuals (TDMs), like that maintained by HMRC

HMRC maintain a database of Tax Manuals that is more user-friendly than the Revenue suite of TDMs. Users can search the HMRC database, view more cross-references between manuals and where a manual has been amended, the specific amendments are highlighted. We would request similar functionality for Revenue's TDMs.

A Sub-group of the Direct/Capital Taxes Sub-committee has discussed improving the process around updating TDMs. For example, allowing continued access to TDMs while they are being updated with an appropriate warning message that the TDM is under review and a standardised approach to detailing updates to a TDM e.g., a revision sheet of the relevant amendments. Feedback from the Sub-group should help inform the important features and functionality in developing a TDM database.

4. Include a field on the tax return to allow a taxpayer to make a negligible value claim (under section 538 TCA 1997)

In contrast to most other claims in the Taxes Consolidation Act (TCA), a claim must be submitted separately to make a negligible value claim under Section 538 TCA 1997. Furthermore, Revenue has noted to the ITI that under the legislation, the Inspector must be satisfied that the value of an asset has become negligible before a loss is allowed.

Therefore, a taxpayer cannot treat an asset as having negligible value without the Inspector being satisfied of the loss. This approach is not consistent with self-assessment and the tax return should be updated during 2023 to enable a claim to be made on the return.

5. Share data from tax returns about a taxpayer's acquisition of capital assets with the taxpayer to whom the data relates and their income tax agent

At the Main TALC SPM, we raised how data Revenue receives from Stamp Duty returns, eProbate, LPT etc. about a taxpayer's acquisition of assets could be leveraged to support the preparation of the Form 11 income tax return. For example, in assisting the tax agent to correctly:

a. Declare the acquisition of an asset on the tax return in the year of acquisition.
b. Identify a potential income stream to be declared on current or future tax returns.

c. Calculate a taxable gain/loss and CGT due on a future disposal of the asset e.g., through access to information on the cost and year of acquisition.

There should be a location on ROS where a taxpayer and their appointed income tax agent can view the information Revenue holds on record in relation to the taxpayer's acquisition of capital assets, where this information would be relevant to completion of the income tax return. This ROS record should be updated as the information becomes available to Revenue.

Tax agents could then review the information on record when preparing their clients' Form 11 tax returns, determine what is relevant for the current return or a future return and raise any relevant queries with clients. Any inaccuracies in the information Revenue holds could also be identified at an earlier stage and corrected before an error may trigger a compliance intervention.

At the Main TALC SPM, Revenue considered that locating such information on ROS rather than on the ROS Form 11 would be the preferred option. We would agree with this approach. It would also ensure the information is accessible to tax agents who do not prepare returns using ROS but use commercial tax-preparation packages.

We have focused on sharing data related to the Form 11 income tax return, as discussed at the Main TALC SPM, as we believe this would deliver the greatest benefit in supporting tax compliance. However, a similar facility for taxpayers filing a corporation tax return (Form CT1) would also be worthwhile.

6. Simplify the process for updating bank account details for tax refunds

Currently, taxpayers must separately enter on ROS their bank account(s) details to be used for tax payments and for tax refunds, often across multiple tax heads. If a taxpayer wishes to nominate the same bank account for both tax payments and refunds it should be possible to implement this choice through a simple mechanism such as the selection of a "tick box" or similar option on ROS. This would reduce the time spent in entering the same bank details several times.

It would also help to reduce the number of instances where the payment of a tax refund is delayed, simply because the taxpayer's bank account details for tax refunds have not been provided.

7. Allow tax agents to access the weekly Customs & Excise Reports which are needed to complete postponed accounting entries on VAT returns

Tax agents do not have access to the Customs & Excise (C&E) Weekly Reports for imports which have information needed to complete postponed accounting entries on the Forms VAT3 and VAT Return of Trading Details. Based on discussions at the TALC Collections Sub-committee, an IT development had been planned for Quarter 3, 2022 but this was subsequently deferred.

At other fora, Revenue has advised that it is noticing inaccuracies in the entries for postponed accounting on VAT returns. This is directly related to issues for tax agents in obtaining the information needed to prepare these entries. Therefore, the required IT updates to permit tax agents access to the weekly C&E Reports should be made in 2023 without further delay.

8. Issue automatic reminders in advance of the expiry dates for Tax Clearance Certificates and for PAYE Agent Authorisations

Tax Clearance Certificates (TCC) are generally valid for 1 year or for 4 years. Taxpayers and their agents receive a notification from Revenue when a TCC has expired. However, it would be better if a notification was issued in advance of the expiry date to give sufficient time to renew the TCC, if required, and avoid the potential cash-flow impact and correspondence involved in reinstating expired clearance.

Tax agents could be advised of an upcoming expiry date in advance thorough notification via their TAIN i.e., so that a list of TCCs that will expire shortly could be generated. This would be preferable to issuing notifications to the ROS Inbox due to the volume of notifications that may be issued.

In January 2021, Revenue introduced a 4-year validity period for PAYE Agent Authorisations (Forms PAYE A1 and A2) on a prospective basis. We understand Revenue is considering updates to its internal systems so that Revenue staff can be made aware of expiring authorisations.

As part of this IT build, we would request that tax agents with PAYE Agent Authorisations should receive reminder notifications in advance of the dates of their expiry to help ensure authorisations are renewed in a timely manner, if required. We propose that the reminders would be notified via the agent's TAIN.

9. Expand the activities agents can conduct on MyAccount for taxpayer with PAYE income

It is currently not possible for a tax agent to set up an instruction (RDI) to pay a tax liability for a PAYE taxpayer filing an income tax return, or to set up a payment of tax on the exercise of share options through the Return of Tax on Share Options (RTSO). These functions should be added to ROS.

10. Progress Revenue's current plans on pre-population

At the Main TALC SPM, Revenue advised that it intends to progress a number of further pre-population initiatives, for example, pre-population of tax on the exercise of share options potentially on the 2023 Form 11 and pre-population of data from the Employment Investment Incentive Scheme (EIIS). We would encourage a continued emphasis by Revenue on pre-population of returns wherever possible.

Revenue also noted its interest in including CGT payments on the Form 11 that are derived from the CG50 application process. The CG50A requires the vendor's PPSN so it should be possible to populate CGT payments to the taxpayer's record with Revenue where CGT is paid. It would also be worth exploring a mechanism for crediting tax deducted and remitted by the purchaser, with the CG50B, to the vendor's ROS record.

11. EIIS Relief for Qualifying Investment Funds

Finance Act 2021 extended EIIS relief to include Qualifying Investment Funds. However, ROS was not updated to accommodate differences between Qualifying Investment Funds and Designated Investment Funds. This includes instances where a Qualifying Investment Fund makes both non-qualifying investments as well as qualifying EIIS investments. There is a concern among practitioners that this could lead to significant difficulties when it comes to filing returns. As such, an IT upgrade to facilitate the Finance Act 2021 updates is needed.