DÁIL ÉIREANN

AN BILLE AIRGEADAIS (UIMH. 2), 2026
FINANCE (NO. 2) BILL 2026

LEASUITHE TUARASCÁLA
REPORT AMENDMENTS

[No. 98a of 2026] [23 November, 2026]

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—AN TUARASCÁIL

FINANCE (NO. 2) BILL 2026
—REPORT

Leasuithe
Amendments

1. In page 7, to delete lines 24 and 25, and in page 8, to delete lines 1 and 2 and substitute the following:

"

The first €40,000	0 per cent
The next €30,044	3 per cent
The remainder	8 per cent

".

—Pearse Doherty, Mairéad Farrell.

2. In page 9, between lines 9 and 10, to insert the following:

"Report on indexation of income tax bands, tax credits and universal social charge

4. The Minister for Finance shall, within six months of the passing of this Act, prepare and lay before Dáil Éireann a report on the indexation of the income tax rate bands, personal tax credits and universal social charge rate bands, which the report shall set out—

(a) the extent to which the amendments made by *sections 2* and *3* maintain, increase or reduce the real value of each band and credit concerned, for 2027 and cumulatively since 2022, measured by reference to—

(i) the Consumer Price Index, and

(ii) average weekly earnings,

(b) an estimate of the additional income tax and universal social charge arising in 2027 by reason of those amendments falling short of full indexation by reference to each of the measures referred to in *paragraph (a)*,

(c) the distributional impact, by income decile and household type, of the amendments made by *sections 2* and *3* as compared with full indexation by reference to each of those measures,

(d) the annual cost to the Exchequer of providing by law for the indexation of those

bands and credits by reference to each of those measures, and

(e) the relative distributional effect of indexing personal tax credits as compared with indexing rate bands.".

—Ged Nash.

3. In page 9, to delete lines 13 to 18 and substitute the following:

"(i) in paragraph (a), by the substitution of "€20,000" for "€10,000", and

(ii) in paragraph (b), by the substitution of "€10,000" for "€5,000",

and

(b) in subsection (13)—

(i) by the substitution of "€2,000" for "€1,000", and

(ii) by the substitution of "€4,000" for "€2,000".".

—Pearse Doherty, Mairéad Farrell.

4. In page 12, between lines 14 and 15, to insert the following:

"Irrevocable surrender of option or right

10. The Principal Act is amended by the insertion of the following section after section 790AA:

"790AB (1) Where an individual has—

(a) received, on termination of his or her employment, through redundancy or otherwise (other than retirement), a lump sum which qualifies for relief from income tax under section 201(8) and Schedule 3,

(b) irrevocably surrendered the option or right referred to in clause (c) of the definition, in paragraph 1(1) of Schedule 3, of 'the relevant capital sum in relation to an office or employment', and

(c) transferred his or her entitlements from a scheme or fund described in section 778(1) into a relevant pension arrangement,

then, the amount which has been irrevocably surrendered shall be deducted from the individual's entitlement, on retirement, to a lump sum referred to in section 790AA(1)(b) in respect of that relevant pension arrangement.

(2) In this section, 'relevant pension arrangement' has the same meaning as it has in section 790AA.".".

—An tAire Airgeadais.

5. In page 12, after line 40, to insert the following:

"(2) *Subsection (1)** shall come into operation on such day as the Minister for Finance may by order appoint.".

—An tAire Airgeadais.

[**This is a correct reference if this amendment is accepted]*

6. In page 13, between lines 7 and 8, to insert the following:

"Limit on tax-relieved pension funds

12. The Principal Act is amended—

(a) in section 787O(2), by the substitution of the following paragraph for paragraph (a):

"(a) Subject to paragraph (b), for the purposes of this Chapter and Schedule 23B, the relevant valuation factor in relation to a relevant pension arrangement that is a defined benefit arrangement (in this subsection referred to as the 'pension arrangement') is—

(i) on the specified date, 20, and

(ii) after the specified date—

(I) for the period beginning on the day after the specified date and ending on 31 December 2026, where at the date of the current event relating to the pension arrangement the individual has attained the age included in an entry in column (1) of the Table to Schedule 23B, the figure in column (2) of that Table opposite that entry, or

(II) from 1 January 2027, where at the date of the current event relating to the pension arrangement the individual has attained the age included in an entry in column (1) of the Table to Schedule 23B, the figure in column (3) of that Table opposite that entry,

and, in this Chapter and Schedule 23B, the figure in the said column (2) referred to in subparagraph (ii)(I) or, as the case may be, the figure in the said column (3) referred to in subparagraph (ii)(II) is referred to as the 'relevant age-related factor'.",

(b) in Schedule 23B, by the insertion of the following paragraph after paragraph 2:

"2A (1) Where an individual becomes entitled to receive an occupational supplementary pension before the individual becomes entitled to receive the State pension (contributory), then, for the purposes of Chapter 2C of Part 30 and this Schedule, the annual amount of that occupational supplementary pension shall be treated as a lump sum.

(2) Where an individual becomes entitled to receive an occupational supplementary pension after the individual becomes entitled to receive the State pension (contributory), then, for the purposes of Chapter 2C of Part 30 and this Schedule, the annual amount of that occupational supplementary pension shall be treated as a pension.

(3) This paragraph shall apply to an occupational supplementary pension whether the occupational supplementary pension was paid before or after the coming into operation of this paragraph.

(4) In this paragraph—

'occupational supplementary pension' means a payment under the rules of a pre-existing public services pension scheme (within the meaning of section 5(1) of the Public Service Pensions (Single Scheme and Other Provisions) Act 2012) which is provided for in, and administered and calculated in accordance with, Circular 12/2024 entitled 'Arrangements for Occupational Supplementary Pensions (OSP)' published by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation on 24 July 2024, or such other circular or document as may, from time to time, replace that circular;

'State pension (contributory)' means the State pension (contributory) under Part 2 of the Social Welfare Consolidation Act 2005.",

and

(c) by the substitution of the following Table for the Table to Schedule 23B:

"TABLE

Age (1)	Relevant age-related factor for the period beginning on the day after the specified date and ending on 31 December 2026 (2)	Relevant age-related factor from 1 January 2027 (3)
Up to and including 50	37	25
51	36	25
52	36	25
53	35	24
54	34	24
55	33	23
56	33	23
57	32	23
58	31	22
59	30	22
60	30	21

61	29	21
62	28	20
63	27	20
64	27	19
65	26	19
66	25	18
67	24	18
68	24	17
69	23	17
70 and over	22	16

”.”.

—An tAire Airgeadais.

7. In page 13, between lines 13 and 14, to insert the following:

“Report on domicile levy

13. The Minister for Finance shall, within six months of the passing of this Act, prepare and lay before Dáil Éireann a report on the operation of Part 18C of the Principal Act, which shall set out—

(a) for each year since the domicile levy was introduced, the number of individuals who paid the levy and the amount of levy paid,

(b) an estimate of the number of individuals domiciled in the State whose world-wide income exceeds €1,000,000 and who did not pay the levy, and the principal reasons why they did not do so,

(c) the effect on the yield of the levy of the credit for Irish income tax provided for in that Part,

(d) the effect on the number of individuals liable to the levy of the monetary thresholds in that Part and of the amount of the levy, having regard to changes in prices, incomes and property values since the levy was introduced,

(e) options to strengthen the levy, including—

(i) the revision of those thresholds and of the amount of the levy,

(ii) the modification or removal of the credit for Irish income tax, and

(iii) the reintroduction of citizenship as a connecting factor in addition to domicile,

and

(f) the estimated yield of each option referred to in *paragraph (e)*.”.

—Ged Nash.

8. In page 19, to delete lines 20 to 40, and in page 20, to delete lines 1 to 27.

—Ged Nash.

9. In page 19, to delete lines 21 to 40, and in page 20, to delete lines 1 to 25 and substitute the following:

"16. (1) Section 216A(5) of the Principal Act is amended by the substitution of "€16,000" for "€14,000".".

—Ged Nash.

10. In page 19, line 30, to delete "includes".

—An tAire Airgeadais.

11. In page 20, line 26, to delete "*Subsection (1)(d)*" and substitute "*Subsection (1)**".

—Ged Nash.

*[*This is a reference to a subsection proposed to be inserted by amendment no. 9.]*

12. In page 20, to delete lines 28 to 40, and in page 21, to delete lines 1 to 6.

—Ged Nash.

13. In page 21, between lines 17 and 18, to insert the following:

"Amendment of section 126 of Principal Act (tax treatment of certain benefits payable under Social Welfare Acts)

19. Section 126 of the Principal Act is amended by the insertion of the following subsection after subsection (2B):

"(2C) (a) This subsection shall apply to the increase referred to in Regulation 3(2) of the Social Welfare (Cost of Disability Payment) Regulations 2026 (S.I. No. 566 of 2026) in respect of the amount of a payment specified in Regulation 4 of the said Regulations.

(b) Notwithstanding the tax treatment under any other provision of this Act of a payment referred to in paragraph (a), the increase referred to in paragraph (a) shall be exempt from income tax and shall not be reckoned in computing income for the purposes of the Income Tax Acts.".".

—An tAire Airgeadais.

14. In page 21, between lines 17 and 18, to insert the following:

"Electronic withholding tax

20. (1) The Principal Act is amended—

(a) in Part 18 by the insertion of the following Chapters after section 531:

"CHAPTER 3

eWithholding Tax

Interpretation (Chapter 3)

530AA. In this Chapter—

'API' means an application programming interface made available by the Revenue Commissioners for the purposes of enabling software to communicate electronically with systems maintained by the Revenue Commissioners for the purposes of this Chapter;

'authorised insurer' has the same meaning as it has in section 470;

'compatible software' has the meaning given to it by section 530AB;

'contract of insurance' means a contract between an authorised insurer and a subscriber in respect of insurance referred to in the definition, in section 470(1), of 'relevant contract';

'deduction authorisation' shall be construed in accordance with section 530AI;

'deduction summary' has the meaning given to it by section 530AM;

'designated activity' has the meaning given to it by section 530AD;

'designated withholder' has the meaning given to it by section 530AC;

'eWHT' has the meaning given to it by section 530AB;

'excluded specified person' has the meaning given to it by section 530AF(3);

'exclusion order' means an order issued under section 530AF;

'individualised deduction rate' has the meaning given to it by section 530AM;

'linking documents' has the same meaning as it has in section 886(1);

'member', in relation to a contract of insurance, means a person who is named in the relevant policy of insurance and who has been accepted for insurance by an authorised insurer;

'partnership trade or profession' means a trade or profession carried on by two or more persons in partnership;

'payment notification' has the meaning given to it by section 530AH;

'practitioner' has the same meaning as it has in section 469;

'precedent partner', in relation to a partnership and a partnership trade or profession, has the same meaning as it has in section 1007(1);

'prescribed' means prescribed in regulations made by the Revenue Commissioners under section 530AW;

'professional services' includes—

(a) services of a medical, dental, pharmaceutical, optical, aural or veterinary nature,

(b) services of an architectural, engineering, quantity surveying or surveying nature, and related services,

(c) services of accountancy, auditing or finance and services of financial, economic, marketing, advertising or other consultancies,

(d) services of a solicitor or barrister and other legal services, and

(e) geological services;

'records' has the same meaning as it has in section 886;

'relevant amount', in relation to a relevant payment, means –

(a) where the relevant payment does not include value-added tax, the amount of the relevant payment, and

(b) where the relevant payment includes value-added tax, the amount of the relevant payment exclusive of the value-added tax;

'relevant medical expenses' means expenses incurred in respect of professional services provided by a practitioner, being expenses that are, or may become, the subject of a claim for their reimbursement or discharge in whole or in part under a contract of insurance but not including any such expenses that—

(a) under the terms of the contract of insurance may (except in the case of certain expenses that in the opinion of the authorised insurer concerned are unusually large) be the subject of a claim for their discharge or reimbursement only—

(i) after the expiry of a stated period of 12 months in which the expenses are incurred, and

(ii) to the extent that the aggregate of the expenses and any other expenses incurred in the period referred to in paragraph (i) exceeds a stated amount,

or

(b) are incurred in respect of professional services provided by a practitioner outside the State;

'relevant payment' means a payment made by a designated withholder in respect of a designated activity, whether or not that activity is performed for or provided to the designated withholder making the payment, and, in the case of a payment made by an authorised insurer, includes a payment made—

(a) to a practitioner who provided the professional services to which

the relevant medical expense relates, or

(b) to the employer of a practitioner who provided those professional services, where the services are provided by the practitioner in the practitioner's capacity as an employee rather than on the practitioner's own account,

in discharge of a claim in respect of relevant medical expenses under a contract of insurance, but excludes—

(i) emoluments within the scope of Chapter 4 of Part 42 to which that Chapter applies,

(ii) relevant payments as defined for the purposes of Chapter 2 of this Part,

(iii) payment by a designated withholder to another designated withholder in reimbursement of a relevant payment,

(iv) a payment by a designated withholder to—

(I) another designated withholder being a person whose income is exempt from corporation tax or is disregarded for the purposes of the Tax Acts, or

(II) a body which has been granted an exemption from tax for the purposes of section 207 or 208,

and

(v) a locum cover payment within the meaning of section 986(4A) made on or after 1 November 2023;

'return date' in relation to a return period, means the day that is 23 days from the last day of the return period;

'return period' means a calendar month;

'Revenue officer' means an officer of the Revenue Commissioners;

'specified person' means a person to whom a relevant payment is due to be made but does not include an excluded specified person;

'standard rate' has the same meaning as it has in section 15;

'subscriber', in relation to a contract of insurance, means a person (other than an authorised insurer) who is a party to the contract and in whose name the relevant policy of insurance is registered.

Electronic services for purposes of operation of withholding tax by electronic means

530AB. (1) The Revenue Commissioners shall put in place and maintain a facility for the administration and operation of withholding tax in respect of relevant payments by designated withholders to specified persons by electronic means for the purpose of giving effect to this Chapter (in

this Chapter referred to as the 'eWHT facility').

(2) Without prejudice to the generality of subsection (1), the eWHT facility shall provide for any or all of the following:

(a) communication, in such form and manner as may be prescribed, between designated withholders and the Revenue Commissioners through an API through the use by designated withholders of a software program which, on its own or when taken together with one or more than one other software program—

(i) is capable of electronic communication with the Revenue Commissioners through an API,

(ii) enables a person to do anything, in such form and manner as may be prescribed, that the person is required or authorised by or under this Chapter to do by means of compatible software,

(iii) enables information to be provided to, and received from, the Revenue Commissioners, in such form and manner as may be prescribed, for the purposes of this Chapter, and

(iv) complies with such functional, technical, security and other requirements as may be prescribed for the purposes of this Chapter,

(referred to in this Chapter as 'compatible software'),

(b) the provision by designated withholders or specified persons of information to the Revenue Commissioners for the purposes of this Chapter,

(c) the receipt by designated withholders or specified persons of information from the Revenue Commissioners for the purposes of this Chapter,

(d) such other matters relating to the use of compatible software and services available through the eWHT facility as may be prescribed.

(3) For the purposes of providing information to, or receiving information from, the Revenue Commissioners for the purposes of this Chapter—

(a) a designated withholder shall, and

(b) a specified person may, where provided for in this Chapter or in such circumstances as may be prescribed for that purpose,

use compatible software.

Designated withholder

530AC (1) In this Chapter, 'designated withholder' means, subject to subsection (2), a person specified in Schedule 13A.

(2) Where any person specified in Schedule 13A is a body corporate, a reference in this Chapter to 'designated withholder' includes—

(a) any subsidiary (within the meaning of section 7 of the Companies Act 2014) of that body corporate where that subsidiary is resident in the State, and

(b) a company, resident in the State, of which two or more designated withholders are members if the designated withholders—

(i) control the composition of its board of directors,

(ii) hold more than half in nominal value of its equity share capital, or

(iii) hold more than half in nominal value of its shares carrying voting rights (other than voting rights which arise only in specified circumstances).

(3) The Minister for Finance may by regulations amend Schedule 13A for the purposes of this Chapter by adding to, or deleting from, the list of persons specified in Schedule 13A.

(4) Where regulations are proposed to be made under subsection (3), a draft of the regulations shall be laid before Dáil Éireann and the regulations shall not be made until a resolution approving of the draft has been passed by Dáil Éireann.

Designated activity

530AD. (1) In this Chapter, 'designated activity' means an activity referred to in subsection (2) which—

(a) subject to paragraph (b), is performed by a specified person, or

(b) in the case of an activity referred to in subsection (2)(b), is performed by a practitioner in the practitioner's capacity as an employee of the specified person.

(2) The following activities are designated activities for the purposes of this Chapter:

(a) the provision of professional services, whether or not those services are provided to the designated withholder making the relevant payment;

(b) the provision of professional services by a practitioner in respect of relevant medical expenses.

Register of designated withholders

530AE. (1) The Revenue Commissioners shall keep and maintain a register of designated withholders who make, or who wish to make, relevant payments (in this Chapter referred to as 'the register').

(2) A designated withholder who wishes to make relevant payments shall—

(a) apply to the Revenue Commissioners, in such form and manner and

by providing such information, as may be prescribed for the purpose of being registered in the register, and

(b) shall not—

(i) make a relevant payment, or

(ii) submit a payment notification,

unless that designated withholder is so registered.

(3) The register shall contain such particulars in respect of designated withholders as may be prescribed.

(4) A designated withholder who has been registered shall notify the Revenue Commissioners, in such form and manner as may be prescribed, of anything which would require such particulars as have been entered in the register in respect of that designated withholder to be amended.

(5) A designated withholder who has—

(a) never made and intends never to make, or

(b) made but ceases, or no longer intends, to make,

relevant payments, shall notify the Revenue Commissioners, in such form and manner as may be prescribed, accordingly and shall specify the date on which the registration in the register is to be cancelled on that basis.

(6) Where a Revenue officer is satisfied, on the basis of a notification under subsection (4), or otherwise, that—

(a) a designated withholder has never made or, having made has ceased to make, as the case may be, and

(b) it is reasonable to expect the designated withholder will not make,

relevant payments, the Revenue officer shall—

(i) notify the designated withholder, in such form and manner as may be prescribed, accordingly, and

(ii) include in the notification under paragraph (i) information in relation to subsections (7) and (8).

(7) A designated withholder who is notified under subsection (6) may, within a period of 21 days from the date of the notification, make representations, in such form and manner as may be prescribed, to the Revenue Commissioners in respect of that notification for the purposes of satisfying them that—

(a) the designated withholder has made or has not ceased to make, as the case may be, relevant payments, and

(b) it is reasonable to expect that the designated withholder will make relevant payments.

(8) Where a designated withholder—

(a) does not make representations to the Revenue Commissioners in accordance with subsection (7), or

(b) having made such representations, fails to satisfy the Revenue Commissioners as to the matters set out in paragraphs (a) and (b) of that subsection, as the case may be,

the Revenue Commissioners shall cancel the registration concerned and notify the designated withholder accordingly in such form and manner as may be prescribed.

Exclusion orders

530AF. (1) Where, on receipt of an application in that behalf under subsection (4) or where subsection (5) applies, the Revenue Commissioners are satisfied that a specified person—

(a) is not chargeable to income tax or corporation tax in respect of relevant payments, or

(b) is chargeable to income tax or corporation tax in respect of relevant payments where that person—

(i) is resident for the purposes of tax, by virtue of the law in a territory with the government of which arrangements are for the time being in force by virtue of section 826(1), and

(ii) is subject to tax on the relevant payment in a territory with the government of which arrangements are for the time being in force by virtue of section 826(1),

they shall issue an order (in this Chapter referred to as an 'exclusion order') to that person (in this Chapter referred to as an 'excluded specified person') excluding from the application of this Chapter relevant payments made to the person by a designated withholder to whom a copy of the order has been provided in accordance with subsection (3).

(2) An exclusion order shall be in such form and manner as may be prescribed and shall—

(a) specify the excluded specified person,

(b) specify the designated activity to which the relevant payments concerned relate, and

(c) subject to subsections (8), (9) and (10), have effect for the period specified in the order.

(3) An excluded specified person who wishes not to have relevant

payments made to him or her by a designated withholder in respect of the designated activity specified in the order to be subject to this Chapter, shall furnish a copy of the exclusion order to the designated withholder concerned.

(4) Subject to subsection (5), a person may apply, in such form and manner and providing such information and particulars, as may be prescribed, to the Revenue Commissioners for an exclusion order to be issued to him or her.

(5) Where a request is made by a specified person under section 530AP(6) and the Revenue Commissioners are satisfied that the person who made the request was a person who satisfied the requirements of subsection (1) at the time the relevant payment which is the subject of the request was made, the Revenue Commissioners shall issue an exclusion order notwithstanding that the specified person concerned did not make an application in that behalf under subsection (4).

(6) Where a person to whom an exclusion order has been issued ceases to be a person who satisfied the requirements of subsection (1), the person shall as soon as practicable after such cessation, notify the Revenue Commissioners accordingly, in such form and manner as may be prescribed.

(7) The Revenue Commissioners may amend, in such form and manner as may be prescribed, an exclusion order where they are satisfied that there is an error or omission in the exclusion order.

(8) The Revenue Commissioners may renew, in such form and manner as may be prescribed, an exclusion order for such period as may be prescribed on receipt of an application by a specified person in that behalf made in such form and manner as may be prescribed.

(9) An exclusion order shall be cancelled where the Revenue Commissioners are satisfied, either on foot of a notification under subsection (6) or otherwise, that the person to whom it was issued has ceased to be a person who satisfies the requirements of subsection (1) and they shall notify, in such form and manner as may be prescribed, the person concerned accordingly.

(10) The Revenue Commissioners shall prescribe the period for which exclusion orders shall be valid.

Information to be provided by specified persons to designated withholders for the purposes of making relevant payments

530AG. (1) Subject to subsection (2), a specified person shall furnish to a designated withholder—

(a) in the case of a specified person who is resident in the State or who has a permanent establishment or fixed base in the State, details of the specified person's tax reference number (within the meaning of

section 891B), and

(b) in the case of any other specified person, details of—

(i) the specified person's country of residence,

(ii) the specified person's tax reference number (or equivalent) in that country, and

(iii) the specified person's address and contact details.

(2) (a) Where a relevant payment is made in accordance with section 530AS, the precedent partner shall furnish to the designated withholder the tax reference number of the partnership.

(b) For the purposes of paragraph (a), 'tax reference number', in relation to a partnership, means—

(i) the registration number allocated by the Revenue Commissioners in relation to the operation by the partnership of value-added tax or any other tax, or the reference number stated on any return, form or notice issued by the Revenue Commissioners in relation to the partnership, or

(ii) where appropriate, the tax reference number of the partnership in another country or territory.

(3) For the purposes of this section, a designated withholder shall take all reasonable measures to establish that—

(a) the tax reference number furnished by the specified person in accordance with subsection (1)(a) relates to that specified person, or

(b) the tax reference number of the partnership furnished by the precedent partner in accordance with subsection (2)(a) relates to that partnership.

(4) Where a relevant payment is made in accordance with section 530AT, references in this Chapter to the tax reference number of a specified person shall be construed as references to the tax reference number of the partnership.

(5) A designated withholder shall include—

(a) the tax reference number furnished in accordance with subsection (1)(a) or, as the case may be, the tax reference number of the partnership furnished in accordance with subsection (2)(a), or

(b) where paragraph (b) of subsection (1) applies, the country of residence, tax reference number and address and contact details furnished in accordance with that paragraph,

in any payment notification or late payment notification, as the case may be, submitted in accordance with section 530AH.

Submission of payment notification

530AH. (1) Where a specified person has furnished a designated withholder with the information required under section 530AG, the designated withholder shall, on or before making a relevant payment to that person, submit a notification to the Revenue Commissioners, by means of compatible software and in such form and manner as may be prescribed, of the payment (in this Chapter referred to as a 'payment notification').

(2) A payment notification shall contain—

(a) the tax reference number of the specified person or, where section 530AG(2) applies, the tax reference number of the partnership, or, where section 530AG(1)(b) applies, the information referred to in subsection (1)(b) of that section,

(b) the date and amount of the relevant payment, and

(c) such other particulars as may be prescribed relating to the making of a relevant payment.

(3) Where a designated withholder makes a relevant payment but has not submitted a payment notification to the Revenue Commissioners in respect of that payment, the designated withholder shall, as soon as practicable after making the payment, submit a payment notification, in such form and manner as may be prescribed, to the Revenue Commissioners in respect of that payment (in this Chapter referred to as a 'late payment notification').

(4) Where a payment in respect of which a payment notification has been submitted to the Revenue Commissioners is not made, the designated withholder who submitted the notification shall notify the Revenue Commissioners, in such form and manner as may be prescribed, that he or she wishes to cancel the payment notification.

(5) The Revenue Commissioners shall make available to a specified person in respect of whom a payment notification or a late payment notification, as the case may be, has been submitted to them such information relating to the notification as may be prescribed.

(6) Where, after a payment notification or a late payment notification has been submitted to the Revenue Commissioners, the designated withholder becomes aware that the payment notification or late payment notification, as the case may be, contains an error or omission, the designated withholder shall, as soon as practicable after becoming so aware, request, in such form and manner as may be prescribed, that the payment notification or, as the case may be, the late payment notification, be cancelled.

Deduction authorisation

530AI. (1) Where a designated withholder submits a payment notification, the

Revenue Commissioners shall issue to the designated withholder an authorisation, in such form and manner as may be prescribed, specifying the amount, calculated in accordance with section 530AL, which the designated withholder is authorised to deduct from the relevant payment concerned (in this Chapter referred to as a 'deduction authorisation').

(2) A deduction authorisation—

(a) shall—

(i) state the specified person to whom it relates,

(ii) state the relevant payment to which it relates, and

(iii) contain such other information relating to deduction authorisations as may be prescribed,

and

(b) have effect only in respect of the specified person and relevant payment referred to in the authorisation.

(3) The Revenue Commissioners may, where a payment notification is cancelled under section 530AH, or in such other circumstances as may be prescribed, cancel a deduction authorisation.

(4) The Revenue Commissioners shall make available to a specified person in respect of whom a deduction authorisation issued such information relating to the authorisation as may be prescribed.

Obligation on designated withholders to make deduction from relevant payment

530AJ. (1) (a) A designated withholder to whom a deduction authorisation is issued shall, on making the relevant payment to which the deduction authorisation relates, deduct from that payment the amount specified in the deduction authorisation.

(b) The specified person or, where section 530AT applies, the partnership to whom the amount is payable shall allow such deduction on receipt of the residue of the payment.

(c) The designated withholder making the deduction and, if the designated withholder is an authorised insurer, any subscriber or member on whose behalf the designated withholder is making the relevant payment shall be acquitted and discharged of such amount as is represented by the deduction, as if the amount had actually been paid.

(2) Where—

(a) in accordance with subsection (3) or section 530AT, a relevant payment has been made to a practitioner, an employer or, as the case may be, a partnership by an authorised insurer, and

(b) in accordance with subsection (1), the recipient has allowed a deduction of appropriate tax in respect of that payment and a subscriber or member has been acquitted and discharged of so much money as is represented by the deduction,

then, the recipient shall, if any amount in respect of the relevant medical expenses to which the relevant payment relates has been paid by the subscriber or member, pay to the subscriber or member, as the case may be, an amount equal to the amount by which the aggregate of the amount paid by the subscriber or member and the amount of the relevant payment exceeds the relevant medical expenses.

(3) Subject to subsection (1), where, under a contract of insurance, a claim is made to an authorised insurer in respect of relevant medical expenses—

(a) the insurer shall, subject to section 530AT, discharge the claim by making payment to the extent of the amount of the benefit, if any, due under the contract—

(i) to the practitioner who provided the professional services to the subscriber or member concerned to whom the relevant medical expenses relate, or

(ii) to the employer of the practitioner who provided the professional services to the subscriber or member concerned, where the professional services to which the claim relates were provided by the practitioner in the practitioner's capacity as employee rather than on the practitioner's own account,

and

(b) the subscriber or member, as the case may be, shall be acquitted and discharged of such amount as is represented by the payment as if the subscriber or member had made such payment.

Deduction where deduction authorisation not available

530AK. (1) Where—

(a) a deduction authorisation cannot be issued to a designated withholder by reason of a specified person not having furnished to the designated withholder a tax reference number under subsection (1)(a) of section of 530AG or the information referred to in subsection (1)(b) of that section, and

(b) it is not reasonably practicable for the designated withholder to delay making the relevant payment,

then, the designated withholder shall deduct from the relevant payment an amount calculated at the standard rate on the relevant amount.

(2) Where—

(a) by reason of a persistent failure of the API, a designated withholder is unable to submit a payment notification to the Revenue Commissioners, and

(b) it is not reasonably practicable for the designated withholder to delay making the relevant payment to which the payment notification would otherwise relate,

the designated withholder shall deduct from the relevant payment—

(i) in the case of a specified person who is an individual or a partnership, an amount calculated at the standard rate on the relevant amount, or

(ii) in any other case, an amount calculated at the rate of 5 per cent on the relevant amount.

(3) A designated withholder to whom subsection (2) applies shall, as soon as practicable after the failure referred to in that subsection has been rectified, submit the payment notification to the Revenue Commissioners.

(4) A deduction made in accordance with subsection (1) or (2), as the case may be, shall be treated for the purposes of this Chapter as if it were a deduction made in accordance with a deduction authorisation.

(5) A designated withholder shall provide to the Revenue Commissioners such information as may be prescribed in relation to a deduction made in accordance with subsection (1) or (2), as the case may be.

Rates to be applied for purposes of section 530AI

530AL. (1) The amount to be specified in a deduction authorisation shall be the amount that is determined by applying the rate referred to in paragraph (a), (b), (c) or (d), as appropriate, of subsection (2), to the relevant amount.

(2) The rate to be applied by the Revenue Commissioners for the purposes of subsection (1) is—

(a) where the specified person is an individual, the individualised deduction rate for the time being determined by the Revenue Commissioners in accordance with section 530AM,

(b) where the specified person is a body corporate, 5 per cent,

(c) where the specified person is a partnership, the standard rate, or

(d) where the specified person is a person other than a person referred to in any of paragraphs (a) to (c), 5 per cent.

Individualised deduction rate

530AM. (1) Where a payment notification is received by the Revenue Commissioners from a designated withholder in respect of a specified person referred to in section 530AL(2)(a) (in this Chapter referred to

as a 'relevant specified person'), they shall, in respect of the specified person concerned, determine, in such manner as may be prescribed, a rate, expressed as a percentage, such that, when the rate is applied to the relevant payment to which the payment notification relates, the amount which is set out in the deduction authorisation is, as nearly as practicable, equal to the amount which falls to be deducted under this Chapter on account of the income tax and Universal Social Charge liability of the relevant specified person for the year of assessment in respect of the income represented by that payment (in this Chapter referred to as an 'individualised deduction rate').

(2) For the purposes of determining an individualised deduction rate, the Revenue Commissioners shall, at the time of making the determination, have regard to—

(a) the income of the specified person in the year of assessment up to that time,

(b) the tax credits and standard rate cut-off point applicable to the specified person for the year of assessment concerned,

(c) such amounts, if any, that in the year of assessment up to that time have been remitted to the Revenue Commissioners under this Chapter in respect of the specified person for the year of assessment, and

(d) such other matters as may be prescribed for that purpose.

(3) An individualised deduction rate and the date from which it applies shall be notified, in such form and manner as may be prescribed and by means of compatible software, to the designated withholder concerned and shall be accessible to the specified person concerned in such form and manner as may be prescribed.

(4) A specified person may make a request, in such form and manner as may be prescribed, for the Revenue Commissioners to review the individualised deduction rate applicable to the person.

(5) The Revenue Commissioners shall, on receipt of a request in that behalf by a specified person under subsection (4), review the individualised deduction rate applicable to the person and, as appropriate, in accordance with this section, determine a different individualised deduction rate.

(6) Without prejudice to subsection (5), the Revenue Commissioners may review and, as appropriate, in accordance with this section, determine a different individualised deduction rate of their own volition where they become aware, other than by means of a request under subsection (4)—

(a) of additional information relevant to the determination made under subsection (1), or

(b) that there is a change in any information on which the determination of the rate was based.

(7) For the purposes of a review under subsection (5) or (6), as the case may be, the specified person shall provide the Revenue Commissioners with such information as the person considers appropriate or such information as the Revenue Commissioners may reasonably request for the purposes of the review.

(8) In carrying out a review under subsection (5) or (6), as the case may be, the Revenue Commissioners shall consider the information provided by the specified person under subsection (7) and shall decide—

(a) to determine a different individualised deduction rate, or

(b) that the individualised deduction rate is to remain unchanged.

(9) The Revenue Commissioners shall notify, in such form and manner as may be prescribed, the specified person of their decision under subsection (8).

(10) Where the Revenue Commissioners decide to determine a different individualised deduction rate, the notification referred to in subsection (9) shall state that rate and the date from which it has effect.

(11) A specified person may appeal a decision under subsection (8) to the Appeal Commissioners, in accordance with section 949I, within the period of 30 days after the date of the notification under subsection (9).

(12) Subsection (2) shall apply to the determination of a different individualised deduction rate under subsection (8) as it applies to a determination under subsection (1).

(13) None of the following shall affect the validity of a deduction authorisation issued under section 530AI or the requirement that a designated withholder is to comply with a deduction authorisation issued under that section:

(a) the making of a request under subsection (4);

(b) the carrying out of a review under subsection (5) or (6);

(c) the determination of a different individualised deduction rate under subsection (8);

(d) an appeal under subsection (11).

(14) An individualised deduction rate shall not constitute—

(a) an assessment to income tax or Universal Social Charge,

(b) a determination of the amount of income tax or Universal Social Charge payable by the specified person, or

(c) a determination of the profits, gains or income of the specified person for any purpose of the Tax Acts.

Return by designated withholder

530AN. (1) A designated withholder shall, on or before the return date, make a return to the Revenue Commissioners, in such form and manner as may be prescribed, of all relevant payments made by the designated withholder during the return period, specifying in the return the total amount of tax deducted from relevant payments to specified persons for that period and containing such other information as may be prescribed.

(2) At the end of each return period or as soon as practicable thereafter, the Revenue Commissioners shall issue a statement, in such form and manner as may be prescribed, to each designated withholder in respect of that return period (in this Chapter referred to as a 'deduction summary') containing details of all relevant payments and tax deducted in respect of those payments and any other information that may be prescribed.

(3) (a) For the purposes of subsection (1), where the Revenue Commissioners issue a deduction summary to a designated withholder for a return period, the details on that summary shall, for the purposes of the Tax Acts, be deemed to be a return made by the designated withholder to the Revenue Commissioners in respect of the return period and the amount of tax specified on that summary shall be deemed to be the amount specified by the designated withholder of the tax liability of that designated withholder under this Chapter in respect of that return period.

(b) Paragraph (a) does not apply where a designated withholder is required to amend, in such form and manner as may be prescribed, the details on a deduction summary and to submit a return under subsection (1) in accordance with those amended details and so submits the required return.

(4) Where a designated withholder becomes aware that a deduction summary contains an error, the designated withholder shall as soon as practicable amend the deduction summary in such form and manner as may be prescribed.

(5) Where enforcement action for the recovery of an amount specified in a return made or deemed to have been made under this section has been initiated by the Revenue Commissioners, the return shall not be amended under subsection (3), in so far as the amendment would affect that amount, until that action has been completed, unless the Revenue Commissioners otherwise direct.

(6) The amount specified in a return made or deemed to have been made under this section shall be due and payable by the designated

withholder to the Revenue Commissioners.

Payment of amounts withheld by designated withholder

530AO. A designated withholder shall, on or before the return date, pay to the Collector-General the amount due and payable in accordance with section 530AN in respect of the return period concerned.

Deduction review and repayment

530AP. (1) In this section, 'relevant period' means, as the case may be,—

(a) the period beginning on the first day of the year of assessment and ending on the last day of the third month of that year,

(b) the period beginning on the first day of the year of assessment and ending on the last day of the sixth month of that year, or

(c) the period beginning on the first day of the year of assessment and ending on the last day of the ninth month of that year.

(2) A specified person from whose relevant payments amounts have been deducted under this Chapter may request the Revenue Commissioners, in such form as may be prescribed, to carry out a reconciliation in respect of a relevant period.

(3) On receipt of a request under subsection (2), the Revenue Commissioners shall determine, in respect of the relevant period and having regard to the matters set out at paragraphs (a) to (d) of section 530AM(2)—

(a) the amount, if any, to be repaid to the specified person, or

(b) that no amount is repayable.

(4) The Revenue Commissioners shall notify the specified person, in such form and manner as may be prescribed, of a determination made under subsection (3).

(5) Subject to section 960H, the Revenue Commissioners shall repay to the specified person an amount determined under subsection (3)(a).

(6) (a) Subject to section 865(4), where an amount has been deducted under this Chapter from a relevant payment, the specified person to whom that relevant payment relates may make an application to the Revenue Commissioners for repayment by them of that amount, on the basis that the person satisfied the requirements of section 530AF(1) at the time the payment was made.

(b) An application under paragraph (a) shall be in such form and manner, and accompanied by such information and other particulars, as may be prescribed for the purposes of satisfying the Revenue Commissioners that the applicant satisfied the requirements of section 530AF(1) at the time the payment was made.

(7) Where an application under subsection (6) is made and the Revenue Commissioners are satisfied that, the applicant satisfied the requirements of section 530AF(1) at the time the payment which is the subject of the application was made to the applicant then, subject to section 960H, the Revenue Commissioners shall repay to the applicant the amount deducted from that payment.

Computation of profits or gains of specified person

530AQ. In computing, for the purposes of Schedule D, the profits or gains arising or accruing to a specified person who receives a relevant payment from which an amount has been deducted in accordance with section 530AJ, the payment shall be treated as being of an amount equal to the aggregate of the net amount received after deduction of the tax and the amount of the tax deducted.

Treatment of deducted amounts

530AR. (1) Where an amount is deducted from a relevant payment in accordance with this Chapter, the specified person to whom the relevant payment is made shall be treated as having paid to the Revenue Commissioners, on the date on which the deduction was made, an amount equal to the amount deducted, on account of that person's liability to, as the case may be—

(a) income tax and Universal Social Charge, or

(b) corporation tax.

(2) The amount referred to in subsection (1) shall be available to be credited against the liability referred to in that subsection in such manner as may be prescribed for that purpose.

(3) Without prejudice to the generality of subsection (2), the Revenue Commissioners may prescribe—

(a) the manner in which amounts referred to in subsection (1) are to be taken into account, for the purposes of Part 41A, in determining the amount of preliminary tax payable by a specified person for a year of assessment, and

(b) such adjustments, if any, as may be necessary to ensure that an amount is not brought into account more than once or omitted from account in determining that preliminary tax.

(4) For the purposes of Part 41A, the amount referred to in subsection (1) which is credited against a specified person's liability to income tax and Universal Social Charge for a year of assessment shall be treated as a payment made by that person on account of that liability for that year.

Interest

530AS. (1) Where an amount required to be paid to the Collector-General under

section 530AO is not paid by the date on which it is due and payable, the amount unpaid shall carry interest from that date until it is paid, for each day or part of a day during which it remains unpaid, at a rate of 0.0219 per cent.

(2) Subsections (3) to (5) of section 1080 shall, with any necessary modifications, apply to interest payable under subsection (1) as they apply in relation to interest payable under section 1080.

Partnerships

530AT. (1) Where a designated activity is performed in the course of a partnership trade or profession, a relevant payment in respect of that activity may, for the purposes of this Chapter, be made in the name of the partnership.

(2) Where a relevant payment is in respect of a designated activity performed in the course of a partnership trade or profession—

(a) the relevant payment shall be treated as having been made to each person who is a partner in the partnership in the proportion in which profits or gains of the partnership trade or profession for the chargeable period involved are to be apportioned amongst the partners, and

(b) any amount deducted from the relevant payment under this Chapter shall be apportioned between the partners in the proportion referred to in paragraph (a).

(3) An apportionment under subsection (2) shall apply for the purposes of sections 530AO and 530AQ.

(4) Where subsection (2) applies, the precedent partner shall provide to each partner such information and details as may be prescribed in relation to—

(a) the relevant payment,

(b) the amount deducted from that payment,

(c) the apportionment of the payment and amount deducted to that partner, and

(d) the basis on which that apportionment was made.

(5) Without prejudice to the duties and obligations of the partners, where the designated withholder is a partnership, anything required to be done by the designated withholder under this Chapter shall be done by the precedent partner.

Books and records

530AU. (1) Without prejudice to any other provision of the Tax Acts, a designated withholder shall retain, or cause to be retained on that person's behalf, such records and linking documents as are necessary for the purposes

of the designated withholder complying with this Chapter.

(2) Records required to be retained shall include books, accounts, documents and data maintained manually or by any electronic, photographic or other process.

(3) Records required to be retained under this section shall be retained for a period of 6 years from the end of the return period to which the records relate and shall be retained—

(a) in written form in an official language of the State, or

(b) subject to section 887(2), by means of any electronic, photographic or other process.

(4) Where a designated withholder is a company and the company—

(a) is wound up, the liquidator, or

(b) is dissolved without the appointment of a liquidator, the last directors, including any person occupying the position of director by whatever name called, of the company,

shall retain the records required to be retained under this section for a period of 5 years from the date on which the company is wound up or dissolved, as the case may be.

(5) A person who fails to retain records in accordance with this section shall be liable to a penalty of €3,000 other than where the person -

(a) had a reasonable excuse for the failure concerned, and

(b) remedied the failure as soon as it was reasonably practicable to do so.

Miscellaneous provisions

530AV. Sections 959Z, 959AA and 959AD shall apply for the purposes of this Chapter, with the following modifications in respect of each of those sections, as appropriate:

(a) a reference to a 'person' or a 'chargeable person' shall be construed as a reference to a 'designated withholder' within the meaning of section 530AA,

(b) a reference to a 'chargeable period' shall be construed as a reference to a 'return period' within the meaning of section 530AA,

(c) a reference to 'tax' shall be construed as including withholding tax,

(d) a reference to 'amount of income, profits or gains, or, as the case may be, chargeable gains' shall be construed as including a reference to relevant payments, and

(e) a reference to a 'return' shall be construed as including a return required under this Chapter.

Regulations

530AW. (1) The Revenue Commissioners may make regulations to provide for any matter referred to in this Chapter as prescribed or to be prescribed.

(2) Without prejudice to any other provision of this Act, regulations under this Chapter may contain such incidental, supplementary and consequential provisions as appear to the Minister for Finance to be necessary or expedient for the purposes of the regulations.

(3) Every regulation made under this Chapter, other than a regulation made under section 530AC(3), shall be laid before Dáil Éireann as soon as may be after it is made and, if a resolution annulling the regulation is passed by Dáil Éireann within the next 21 days on which Dáil Éireann has sat after the regulation is laid before it, the regulation shall be annulled accordingly, but without prejudice to the validity of anything previously done under the regulation.

CHAPTER 3A

Transitional Provision

Transitional provision

530AX. (1) In this section, 'appointed day' means the day, appointed by order under section (2) of the Finance (No. 2) Act 2026 for the coming into operation of section (1) of that Act.

(2) Chapter 1 shall not apply in relation to a relevant payment (within the meaning of Chapter 1) made on or after the appointed day.

(3) Chapter 1 shall continue to apply in relation to—

(a) relevant payments (within the meaning of Chapter 1) made before the appointed day, and

(b) any obligations, rights or entitlements arising out of such payments, including—

(i) the making of returns and the payment of tax,

(ii) the making and determination of claims for repayment,

(iii) the making and determination of assessments, and

(iv) the making and determination of appeals.

(4) Chapter 3 shall apply only in relation to relevant payments (within the meaning of Chapter 3) made on or after the appointed day, and nothing in that Chapter shall be construed as applying to, or affecting the treatment of, any payment to which Chapter 1 continues to apply by virtue of subsection (3).

(5) Where, immediately before the appointed day, a person is an accountable person for the purposes of Chapter 1 in respect of payments to which that Chapter applies, that person shall, in respect of

relevant payments to which Chapter 3 applies and which the person makes on or after the appointed day, be a designated withholder for the purposes of Chapter 3.",

and

(b) by the insertion of the following Schedule after Schedule 13—

'SCHEDULE 13A

Section 530AC

1. A Minister of the Government.

2. A local authority within the meaning of the Local Government Act 2001 (as amended by the Local Government Reform Act 2014).

3. A body established under the Local Government Services (Corporate Bodies) Act 1971.

4. Primary Care Reimbursement Service.

5. The Attorney General.

6. The Comptroller and Auditor General.

7. The Director of Public Prosecutions.

8. The Revenue Commissioners.

9. Public Appointments Service.

10. The Commissioners of Public Works in Ireland.

11. The Clerk of Dáil Éireann.

12. The Legal Aid Board.

13. An education and training board.

14. Teagasc.

15. Údarás na Gaeltachta.

16. The Industrial Development Agency (Ireland).

17. The National Tourism Development Authority.

18. A designated institution of higher education within the meaning of the Higher Education Authority Act 2022 that falls under paragraph (a) of section 53(1) of that Act and that is also a funded body within the meaning of that Act.

19. A voluntary public or joint board hospital to which grants are paid by the Minister for Health in the year 1988-89 or any subsequent year of assessment.

20. An authorised insurer within the meaning of section 470.

21. An Coimisiún Pleanála.
22. daa public limited company.
23. Blood Transfusion Service Board.
24. An Bord Bia.
25. Rásaíocht Con Éireann.
26. Bord Iascaigh Mhara.
27. Bord na Móna plc.
28. Coillte Teoranta.
29. Coras Iompair Éireann.
30. Electricity Supply Board.
31. Housing Finance Agency plc.
32. Irish National Petroleum Corporation Limited.
33. Irish National Stud Company Limited.
34. National Building Agency Limited.
35. National Concert Hall.
36. The Marine Institute.
37. An Post.
38. Raidió Teilifís Éireann.
39. Royal Hospital Kilmainham Company.
40. The Environmental Protection Agency.
41. The Irish Aviation Authority.
42. The National Roads Authority.
43. Temple Bar Cultural Trust Designated Activity Company.
44. Fís Éireann - Screen Ireland.
45. Pobal.
46. The Commissioner of Irish Lights.
47. The Heritage Council.
48. The Higher Education Authority.
49. Horse Racing Ireland.
50. The Pensions Authority.
51. The Commission for Communications Regulation.

52. The Law Reform Commission.

53. National Standards Authority of Ireland.

54. Enterprise Ireland.

55. The Office of the Ombudsman.

56. The Standards in Public Office Commission.

57. The Office of the Information Commissioner.

58. Western Development Commission.

59. Commission for Regulation of Utilities.

60. Údarás Uchtála na hÉireann.

61. National Disability Authority.

62. Aquaculture Licences Appeals Board.

63. Office of the President.

64. Chief State Solicitor.

65. Central Statistics Office.

66. Commission to Inquire into Child Abuse.

67. Digital Hub Development Agency.

68. Citizens Information Board.

69. The Dublin Institute for Advanced Studies.

70. Pre-Hospital Emergency Care Council.

71. Sustainable Energy Ireland - The Sustainable Energy Authority of Ireland.

72. The Health Insurance Authority.

73. Mater and Children's Hospital Development Ltd.

74. The Marine Casualty Investigation Board.

75. National Treasury Management Agency as regards the performance of functions by it conferred on, or delegated to, it by or under Part 2 of the National Treasury Management Agency (Amendment) Act 2000. (State Claims Agency).

76. Personal Injuries Resolution Board.

77. The National Council for Curriculum and Assessment.

78. The State Examinations Commission.

79. National Treatment Purchase Fund Board.

80. The Mental Health Commission.

81. Health Products Regulatory Authority.

82. Oifig Choimisinéir na dTeangacha Oifigiúla.

83. The Health Service Executive.

84. Commission for Public Service Appointments.

85. National Council for Special Education.

86. National Library of Ireland.

87. An Education Support Centre established under section 37 of the Education Act 1998.

88. The Road Safety Authority.

89. Grangegorman Development Agency.

90. Commission for Railway Regulation.

91. The Teaching Council.

92. EirGrid.

93. Irish Auditing and Accounting Supervisory Authority.

94. The Health Information and Quality Authority.

95. Teilifís na Gaeilge.

96. Food Safety Authority of Ireland.

97. Sea-Fisheries Protection Authority.

98. National Economic and Social Development Office.

99. National Transport Authority.

100. The Medical Council.

101. Irish Bank Resolution Corporation Limited.

102. Central Bank of Ireland.

103. Office of the Financial Services and Pensions Ombudsman.

104. Inland Fisheries Ireland.

105. An tSeirbhís um Athbhreithniú Creidmheasa.

106. Health and Safety Authority.

107. Irish Takeover Panel.

108. The Pharmaceutical Society of Ireland.

109. Ombudsman for Children.

110. Health and Social Care Professional Council.

111. Qualifications and Quality Assurance Authority of Ireland.

112. Nursing and Midwifery Board of Ireland.

113. Fiosrú - Oifig an Ombudsman Póilíneachta.

114. Credit Union Restructuring Board.

115. Child and Family Agency.

116. An tSeirbhís Oideachais Leanúnaigh agus Scileanna (SOLAS).

117. A regional assembly established by an order made under section 43(1) of the Local Government Act 1991.

118. Irish Human Rights and Equality Commission.

119. Competition and Consumer Protection Commission.

120. Regulator of the National Lottery.

121. Shannon Group plc.

122. Charities Regulatory Authority.

123. An tÚdarás Póilíneachta agus Sábháilteachta Pobail.

124. Educational Research Centre.

125. Sport Ireland.

126. A company to which section 7 of the Harbours Act 1996 applies.

127. Data Protection Commission.

128. A Director of Authorised Intervention under the Institutional Burials Act 2022.

129. An Coimisiún Toghcháin.

130. Approved Housing Bodies Regulatory Authority.

131. The Land Development Agency.

132. Uisce Éireann.

133. Royal Irish Academy.

134. Irish Air Navigation Service.

135. Tailte Éireann.

136. Coimisiún na Meán.

137. Maritime Area Regulatory Authority.

138. An Rialálaí Agraibhia.

139. An Ghníomhaireacht um Fhoréigean Baile, Gnéasach agus Inscnebhunaithe.

140. Taighde Éireann.

141. Judicial Appointments Commission.

142. Comhlacht Formhaoirsithe Seachtrach Óglaigh na hÉireann.

143. Gambling Regulatory Authority of Ireland.

144. Oifig an Scrúdaitheora Neamhspleách um Reachtaíocht Slándála.

145. The Assisted Human Reproduction Regulatory Authority.

146. An tÚdarás Náisiúnta um Uathrollú Coigiltis Scoir.

147. The Tribunal for Asylum and Returns Appeals.

148. Office of the Chief Inspector of Asylum Border Procedures.".

(2) *Subsection (1)* shall come into operation on such day or days as the Minister for Finance may appoint by order or orders, either generally or with reference to any particular purpose or provisions, and different days may be so appointed for different purposes or different provisions.".

—An tAire Airgeadais.

15. In page 34, to delete lines 7 and 8 and substitute the following:

" " 'clinical trial', subject to subsection (1D), has the meaning assigned to it by Article 2(2) of the Clinical Trials Regulation;

'clinical trial activities' has the meaning assigned to it by subsection (1E)(a);

'Clinical Trials Regulation' means Regulation (EU) No. 536/2014 of the European Parliament and of the Council of 16 April 2014 on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC, as amended from time to time;

'emoluments' has the same meaning as it has in section 983;

'employee' has the same meaning as it has in section 983;

'marketing authorisation' means, in relation to clinical trial activities, an authorisation which—

(a) is granted by—

(i) the European Commission in accordance with Regulation (EC) No. 726/2004 of the European Parliament and of the Council of 31 March 2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency, as amended from time to time,

(ii) the Health Products Regulatory Authority in accordance with the Medicinal Products (Control of Placing on the Market) Regulations 2007 (S.I. No. 540 of 2007), or

(iii) a body having authority under the laws of another jurisdiction to

grant such an authorisation,

in respect of the medicinal product for which the clinical trial activities were conducted, and

(b) authorises the placing on the market of the medicinal product referred to in paragraph (a) in the State or another jurisdiction in respect of the therapeutic indication that is the subject of the clinical trial concerned;

'medicinal product' has the same meaning as it has in the Irish Medicines Board Act 1995;

'public registry' means a primary or partner registry of, or a data provider to, the International Clinical Trials Registry Platform of the World Health Organisation that facilitates public access to information about a clinical trial;",".

—An tAire Airgeadais.

16. In page 34, line 17, to delete "the following subsection" and substitute "the following subsections".

—An tAire Airgeadais.

17. In page 35, line 1, to delete "paragraph (a)(ii).","" and substitute the following:

"paragraph (a)(ii).

(1D) For the purposes of the definition, in subsection (1)(a), of 'clinical trial', the reference in Article 2(2) of the Clinical Trials Regulation to 'the Member State concerned' shall be construed as a reference to the jurisdiction or jurisdictions in which the clinical trial is being conducted.

(1E) (a) For the purposes of this section and section 766C, activities which are undertaken as part of a clinical trial that is registered on a public registry (in this section referred to as 'clinical trial activities') and which are—

(i) systematic, investigative or experimental activities in a field of science or technology, and

(ii) described in one or more of paragraphs (i) to (iii) of the definition, in subsection (1)(a), of 'research and development activities',

shall, for the period specified in paragraph (b), be treated as activities that satisfy the requirements of paragraphs (I) and (II) of the definition, in subsection (1)(a), of 'research and development activities'.

(b) The period referred to in paragraph (a) shall be the period that—

(i) commences on the date¬ on which the application is made for registration of the clinical trial on a public registry, provided that the clinical trial is so registered pursuant to that application, and

(ii) ends on the earlier of—

(I) the date on which the clinical trial ends, or

(II) the date on which a marketing authorisation is granted in any jurisdiction.

(c) Where a company makes a claim in accordance with section 766C(9) in respect of expenditure incurred by it wholly and exclusively in the carrying on by it of research and development activities, in a relevant Member State, that are clinical trial activities, the company shall notify the Revenue Commissioners, in such form and manner as the Revenue Commissioners may specify, that the claim has been made in respect of such clinical trial activities.",".

—An tAire Airgeadais.

18. In page 36, to delete lines 27 to 29 and substitute the following:

" 'contribution' means, in relation to an individual investment account, any amount of money paid into the account for the purposes of—

(a) the acquisition of eligible investments to be held in the account, or

(b) the operation of the account;".

—An tAire Airgeadais.

19. In page 37, to delete lines 11 and 12.

—An tAire Airgeadais.

20. In page 37, line 13, to delete "(c)" and substitute "(b)".

—An tAire Airgeadais.

21. In page 37, line 15, to delete "(d)" and substitute "(c)".

—An tAire Airgeadais.

22. In page 37, line 18, to delete "(e)" and substitute "(d)".

—An tAire Airgeadais.

23. In page 37, line 20, to delete "(f)" and substitute "(e)".

—An tAire Airgeadais.

24. In page 37, line 23, to delete "(g)" and substitute "(f)".

—An tAire Airgeadais.

25. In page 39, line 11, after "State" to insert "for tax purposes".

—An tAire Airgeadais.

26. In page 44, to delete lines 6 to 9 and substitute the following:

"(10) In the case of an individual investment account to which subsection (8) applies, section 747P shall apply to income, profits, gains and losses arising up to and including the prescribed date.".

—An tAire Airgeadais.

27. In page 46, to delete lines 15 to 41, and in page 47, to delete lines 1 to 6 and substitute the following:

"(2) An individual investment account that is provided and operated by a qualifying account provider under subsection (1) shall only be established under the following terms and conditions:

(a) the account shall be opened on the request, and held in the sole name, of a qualifying individual, who shall, subject to Chapter 4, at any given time hold only one such account,

(b) on opening the account with, or on a transfer in accordance with Chapter 4 to, the qualifying account provider, the qualifying individual shall make a declaration in accordance with section 747O,

(c) contributions to the account, without regard to any amounts withdrawn from the account, in a year of assessment shall not exceed the contribution limit,

(d) contributions to the account shall be used by the qualifying account provider only for the purposes of acquiring eligible investments or discharging any fees, costs or charges reasonably and necessarily incurred by the qualifying account provider in operating the account,

(e) eligible investments in the account shall be acquired only using amounts referred to in subparagraphs (ii) to (v) of paragraph (f) held in the account,

(f) assets held in the account shall consist solely of—

(i) one or more than one eligible investment acquired in accordance with paragraph (e),

(ii) amounts constituting any income, profits and gains that arise in respect of an eligible investment held in the account,

(iii) amounts arising from disposing of, or otherwise liquidating, an eligible investment held in the account,

(iv) contributions made to the account that have not yet been applied by the qualifying account provider for a purpose referred to in paragraph (d), and

(v) such other amounts as may be specified in regulations made under section 747AA for the purposes of this Part,

(g) assets held in the account shall be managed by the qualifying account provider and beneficially owned by the qualifying individual,

(h) no interest shall be paid, credited, or otherwise allowed to accrue in respect of any cash balance standing to the credit of the account, and

(i) subject to section 747W(6)(b)(i), an eligible investment held in the account shall not be withdrawn *in specie* from the account and a withdrawal from the account shall only be by way of a withdrawal of money.".

—An tAire Airgeadais.

28. In page 47, between lines 6 and 7, to insert the following:

"(g) the qualifying account provider shall, before the account is opened and at least once in each year of assessment thereafter, furnish to the qualifying individual, in such standardised form as may be prescribed in regulations made under section 747AA, a statement of all fees, charges and costs that are, or will be, deducted from or charged in respect of the account or the eligible investments held in it, whether by the qualifying account provider or by any other person, expressed both as an amount in euro and as a percentage of the value of the account, together with an illustration of the cumulative effect of those fees, charges and costs on the value of the account over periods of 10 years and 20 years.".

—Ged Nash.

29. In page 47, between lines 9 and 10, to insert the following:

"(4) Where a qualifying individual requests the closure of an individual investment account held in his or her name, the qualifying account provider with whom the account is held shall, without undue delay

following the request—

(a) dispose of, or otherwise liquidate, all of the eligible investments held in the account, and

(b) pay to the qualifying individual concerned—

(i) the proceeds of such disposal or liquidation, and

(ii) any cash balance standing to the credit of the account,

reduced by—

(I) any fees, costs or charges reasonably and necessarily incurred by the qualifying account provider in disposing of, or otherwise liquidating, the eligible investments, and

(II) any amount deducted or otherwise applied in respect of the account under section 747S.".

—An tAire Airgeadais.

30. In page 47, line 10, to delete "(4)" and substitute "(5)".

—An tAire Airgeadais.

31. In page 47, to delete lines 12 and 13 and substitute the following:

"(a) the qualifying individual shall not, during that same year of assessment, request a qualifying account provider to open another individual investment account to be held in his or her name, and".

—An tAire Airgeadais.

32. In page 49, line 32, to delete "applicable".

—An tAire Airgeadais.

33. In page 50, line 8, to delete "subsection (3)" and substitute "subsection (4)".

—An tAire Airgeadais.

34. In page 50, line 9, to delete "section 747L(2)(e)" and substitute "section 747L(2)(f)".

—An tAire Airgeadais.

35. In page 50, to delete lines 15 to 19 and substitute the following:

"(2) Where a qualifying account provider becomes aware that an ineligible investment is being held in an individual investment account, the qualifying account provider shall—

(a) without undue delay following becoming so aware, dispose of, or

otherwise remove, the ineligible investment from the account, and

(b) not later than 30 days after the date of such disposal or removal, give notice in writing to the qualifying individual who holds the account.

(3) A notice under subsection (2)(b) shall—

(a) be given in such form and manner as may be prescribed in regulations made under section 747AA, and

(b) state—

(i) a description of the ineligible investment,

(ii) the date on which the ineligible investment was acquired,

(iii) the cost of acquisition of the ineligible investment,

(iv) the date on which, and the manner in which, the ineligible investment was disposed of or otherwise removed from the account,

(v) the amount of any proceeds arising from the disposal or removal referred to in subparagraph (iv),

(vi) the amount of any income, profits, gains or losses arising in respect of the ineligible investment during the time it is deemed not to have been held in the account by virtue of subsection (5) and the date on which such income, profits, gains or losses arose, and

(vii) such other information as may be specified in regulations made under section 747AA.".

—An tAire Airgeadais.

36. In page 50, line 20, to delete "(3)" and substitute "(4)".

—An tAire Airgeadais.

37. In page 50, line 24, to delete "subsection (2)" and substitute "subsection (2)(a)".

—An tAire Airgeadais.

38. In page 50, line 26, to delete "(4)" and substitute "(5)".

—An tAire Airgeadais.

39. In page 50, line 29, to delete "subsection (5)" and substitute "subsection (6)".

—An tAire Airgeadais.

40. In page 50, line 34, to delete "section 747P(1)" and substitute "section 747P".

—An tAire Airgeadais.

41. In page 50, line 35, to delete "(5) Subsection (4)" and substitute "(6) Subsection (5)".

—An tAire Airgeadais.

42. In page 50, line 38, to delete "subsection (4)" and substitute "subsection (5)".

—An tAire Airgeadais.

43. In page 51, line 13, after "State" to insert "for tax purposes".

—An tAire Airgeadais.

44. In page 52, to delete lines 3 to 15 and substitute the following:

"Individual investment accounts: exclusion from charge to tax

747P. (1) Notwithstanding anything in the Acts—

(a) income, profits or gains arising in respect of an individual investment account held by a qualifying individual shall not be chargeable to tax other than to the extent that a charge to tax arises under section 747Q or 747R, as the case may be, and

(b) no loss shall be treated as accruing on the disposal of any eligible investment held in an individual investment account by a qualifying individual.

(2) Without prejudice to the generality of subsection (1)(a), gains arising in respect of an individual investment account held by a qualifying individual shall not be chargeable gains for the purposes of the Capital Gains Tax Acts.

(3) In so far as any income, profits or gains, which are not chargeable to tax by virtue of subsection (1)(a), are to be regarded as income of an individual for a year of assessment, such income shall not be reckoned in computing total income for the purposes of the Tax Acts.".

—An tAire Airgeadais.

45. In page 56, after line 44, to insert the following:

"(9) (a) Subject to subsection (11), where, on the last day of a relevant month (in this subsection referred to as the 'calculation date'), there is an outstanding excess amount in relation to an individual investment account operated by a qualifying account provider, whether or not that amount arose from a contribution accepted by that provider, the qualifying account provider shall, without undue

delay and in any event not later than 30 days after the calculation date, remove from the account an amount (in this section referred to as the 'removal amount') equal to the lesser of—

(i) the outstanding excess amount in relation to the account, determined as at the calculation date and as reduced by the aggregate of any amounts withdrawn from the account after the calculation date and before the removal is made, or

(ii) the aggregate of the cash balance standing to the credit of the account and the market value of the eligible investments held in the account on the day on which the removal is made.

(b) For the purposes of paragraph (a), the qualifying account provider—

(i) may apply any cash balance standing to the credit of the account and may dispose of, or otherwise liquidate, such of the eligible investments held in the account as is necessary to realise the removal amount, and

(ii) shall pay the amount applied or realised under subparagraph (i) to the qualifying individual reduced by any fees, costs or charges reasonably and necessarily incurred by the qualifying account provider in disposing of, or otherwise liquidating, the eligible investments.

(10) A qualifying account provider that removes an amount from an individual investment account in accordance with subsection (9) shall, without undue delay after the removal, notify the qualifying individual in writing, in such manner as may be prescribed in regulations made under section 747AA, of—

(a) the removal amount,

(b) the date of the removal,

(c) details of any fees, costs or charges deducted under subsection (9)(b)(ii), and

(d) such other information as may be specified in regulations made under section 747AA.

(11) Subsection (9) shall not apply to an individual investment account—

(a) during the period beginning on the transition date (within the meaning of Chapter 4) and ending on the transfer date in relation to the account, or

(b) where, before the removal is made, the account has been closed or has ceased to be an individual investment account.

(12) An amount removed from an individual investment account in accordance with subsection (9), before the deduction of any fees, costs

or charges referred to in paragraph (b)(ii) of that subsection, shall be treated, for the purposes of subsection (6), as an amount withdrawn from the account.".

—An tAire Airgeadais.

46. In page 60, between lines 10 and 11, to insert the following:

"(c) the total amount of fees, charges and costs deducted from, or charged in respect of, the account or the eligible investments held in it during the year of assessment, whether by the qualifying account provider or by any other person, expressed both as an amount in euro and as a percentage of the average investment account value of the account,".

—Ged Nash.

47. In page 64, line 19, to delete "applicable".

—An tAire Airgeadais.

48. In page 68, line 11, to delete "section 747P(1)" and substitute "section 747P".

—An tAire Airgeadais.

49. In page 69, line 40, to delete "(o) and (p)" and substitute "(p) and (r)".

—An tAire Airgeadais.

50. In page 71, line 9, to delete "section 747L(2)(e)(v)" and substitute "section 747L(2)(f)(v)".

—An tAire Airgeadais.

51. In page 71, line 14, to delete "section 747L(4)" and substitute "section 747L(5)".

—An tAire Airgeadais.

52. In page 71, between lines 19 and 20, to insert the following:

"(o) as to the form and manner in which, and the information to be included in, a notice to a qualifying individual under section 747N(2)(b),".

—An tAire Airgeadais.

53. In page 71, line 20, to delete "(o)" and substitute "(p)".

—An tAire Airgeadais.

54. In page 71, between lines 37 and 38, to insert the following:

"(q) as to the form and manner in which, and the information to be included in, a notice to a qualifying individual under section 747R(10),".

—An tAire Airgeadais.

55. In page 71, line 38, to delete "(p)" and substitute "(r)".

—An tAire Airgeadais.

56. In page 71, line 41, to delete "(q)" and substitute "(s)".

—An tAire Airgeadais.

57. In page 72, line 1, to delete "(r)" and substitute "(t)".

—An tAire Airgeadais.

58. In page 72, line 6, to delete "(s)" and substitute "(u)".

—An tAire Airgeadais.

59. In page 72, line 10, to delete "(t)" and substitute "(v)".

—An tAire Airgeadais.

60. In page 72, between lines 25 and 26, to insert the following:

"Report on fees and charges applied to individual investment accounts

28. The Minister for Finance shall, within twelve months of the passing of this Act, following consultation with the Central Bank of Ireland, prepare and lay before Dáil Éireann a report on the fees, charges and costs applied to individual investment accounts (within the meaning of Part 27A of the Principal Act), which the report shall set out—

(a) the range and average of the total annual fees, charges and costs, expressed as a percentage of account value, applied by qualifying account providers,

(b) the effect of those fees, charges and costs on the net return to qualifying individuals, as compared with the value of the tax treatment provided for by that Part,

(c) a comparison with the fees, charges and costs applicable to personal retirement savings accounts, other pension products and the automatic enrolment retirement savings system, and

(d) the feasibility of making registration as a qualifying account provider conditional on—

(i) a maximum level of total annual fees, charges and costs, or

(ii) the provision of a low-cost default investment option.".

—Ged Nash.

61. In page 87, between lines 24 and 25, to insert the following:

"Amendment of section 481 of Principal Act

31. Section 481 of the Principal Act is amended by the insertion of the following new paragraph after subsection (2)(a):

"(b) A certificate given by the Minister under paragraph (a) shall be subject to the following conditions:

(i) the recipient or a qualifying company shall ensure that it will provide the same employment rights and conditions for fixed-term workers as for comparable permanent workers, and comply fully with the Protection of Employees (Fixed-Term Work) Act 2003;

(ii) the qualifying company shall acknowledge its employment relationship with any employee employed on the qualifying film, and recognise all previous service of such employees to the qualifying company or its subsidiaries or previous film productions, even if such employees are employed by a designated activity company it has established for the purposes of producing the film;

(iii) the Minister shall, in consultation with the Minister for Culture, Communications and Sport, the Minister for Enterprise, Tourism and Employment, and Revenue Commissioners, establish a framework and an independent body to ensure that employment and reemployment of film crew and trainees is done in a fair and transparent manner, which fully acknowledges all employment rights and recognises all previous service of employees and trainees on film productions and for producer companies that benefited from Section 481 tax credit.".".

—Richard Boyd Barrett.

62. In page 87, between lines 24 and 25, to insert the following:

"Report on introduction of a wealth tax

31. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the potential impacts and benefits of introducing a flat marginal tax at a rate of 2 per cent on the net wealth of individuals with assets worth over €5,000,000, the distributional impact and the potential uses of the revenue raised.".

—Cian O'Callaghan.

63. In page 87, between lines 24 and 25, to insert the following:

"Distribution analysis of the investment scheme

31. The Minister shall, within three months of the passing of this Act, prepare and lay before Dáil Éireann a report setting out ways to alter the design of the scheme to avoid the situation where the majority of the cost of the scheme in terms of tax foregone goes to the wealthiest 10 per cent of households as set out in the Department of Finance economic impact assessment.".

—Pearse Doherty, Mairéad Farrell.

64. In page 87, between lines 26 and 27, to insert the following:

"Amendment of section 481 of Principal Act

31. Section 481 of the Principal Act is amended by the insertion of the following new subsection after subsection (2G):

"(2H) (a) In this subsection—

'relevant contract' means any contract of engagement, contract for services, or agreement executed directly or indirectly with a relevant worker for the provision of creative services, scriptwriting, directing, design, performance, technical, craft, or logistical production services in relation to a qualifying film;

'relevant worker' means an author, performer, or creator as recognized under the European Union (Copyright and Related Rights in the Digital Single Market) Regulations 2021 (S.I. No. 567 of 2021), or any person engaged directly or indirectly by a producer company, a qualifying company, or any associated Designated Activity Company (DAC) to provide personal labour, technical skill, or craft services for the production or co-production of a qualifying film;

'relevant representative organisations' means trade unions, guilds, or other professional bodies representing authors, creators, or performers in the audiovisual sector within the State, including any organisation which is a party to a collective agreement referenced in subparagraph (iii) of paragraph (b).

(b) The Minister shall withhold the issuing of a certificate under subsection (2) until the producer company or qualifying company provides verifiable undertakings that:

(i) all relevant contracts executed with relevant workers explicitly recognize the right to appropriate and proportionate

remuneration for the worldwide, multi-platform exploitation of their work as mandated by the European Union (Copyright and Related Rights in the Digital Single Market) Regulations 2021;

(ii) no relevant contract shall require or permit an absolute uncompensated waiver, a permanent buyout, or any temporary, partial, or extended licensing framework that purports to grant unlimited exploitation rights for a flat fee or fixed term, without providing for separate, distinct, and escalating downstream residual revenue streams, repeat fees, and royalty structures originating from all forms of exploitation, including but not limited to digital streaming, video-on-demand (VOD), advertising-supported video services, theatrical release, television broadcast and syndication;

(iii) a qualifying company or associated Designated Activity Company (DAC) shall ensure that the terms and conditions of engagement in all relevant contracts are no less favourable than the mandatory minimum remuneration, residual structures, and exploitation thresholds established under:

(I) a collective agreement concluded with a recognised trade union or industry guild within the State; or

(II) the prevailing collective agreement or standard industry baseline recognised for equivalent engagements operating on, or including, the island of Ireland;

whichever is determined by the Minister to establish the higher overall standard of remuneration, residuals, and worker protections;

(iv) where no collective agreement is in force under subparagraph (iii), the qualifying company or associated Designated Activity Company (DAC) shall ensure that all relevant contracts incorporate terms providing no less favourable remuneration, residual tiers, and transparent reporting structures than the standard baseline agreements referenced in subparagraph (iii) as determined by the Minister;

(v) notwithstanding subparagraphs (iii) and (iv), every relevant contract executed with a relevant worker must strictly comply with the transparency, contract adjustment, and appropriate remuneration obligations mandated by the European Union (Copyright and Related Rights in the Digital Single Market) Regulations 2021; and

(vi) no relevant contract, collective agreement, or accompanying agreement shall contain any provision which purports to exclude, limit, or waive any right or protection conferred by subparagraph (v), or by the Regulations of 2021 referenced

therein.

(c) For the avoidance of doubt, and in recognition of the primacy of European Union law:

(i) the collective agreements referenced in paragraph (b) shall apply strictly within the exemptions provided under the Competition (Amendment) Act 2017, or where a relevant worker is a solo self-employed person whose conditions of engagement fall within the scope of the European Commission Guidelines on the application of Union competition law to collective agreements regarding solo self-employed persons (2022/C 374/02); and

(ii) the incorporation of terms from, or compliance with, such collective agreements shall not constitute unlawful price-setting or a breach of section 4 of the Competition Act 2002.

(d) In determining compliance under this subsection, and in alignment with the Supreme Court decision in Revenue Commissioners v. Karshan (Midlands) Ltd IESC 43, the qualifying company or associated Designated Activity Company (DAC) shall treat relevant workers engaged for physical performance or on-set services as employees at the point of production for tax and statutory purposes, and the classification of a relevant worker as an employee at the point of production shall be without prejudice to their statutory right to separate, proportionate remuneration for the downstream intellectual property exploitation of their work under the Regulations of 2021, provided that, where a relevant worker operates through a registered corporate entity or personal service company (the 'intermediary entity'):

(i) the requirement to treat the individual as an employee under this subsection shall be deemed satisfied if the intermediary entity is a validly registered corporate body inside the State, or a recognised corporate body on, or including, the island of Ireland, and maintains continuous, verified tax compliance, including the provision of a current Tax Clearance Certificate or satisfactory verification under the Relevant Contracts Tax (RCT) system, and

(ii) in strict accordance with Recital 72 of Directive (EU) 2019/790, the use of such an intermediary entity shall be without prejudice to the individual relevant worker's personal, non-assignable right to separate, proportionate remuneration for the downstream intellectual property exploitation of their work under the Regulations of 2021.

(e) For the purposes of paragraph (b), the Minister shall evaluate and designate which baseline collective agreement or standard industry

framework establishes the higher overall protective standard for the relevant category of worker, and may establish an advisory panel comprising representatives of recognized industry guilds, trade unions, and administrative bodies to assist in making such determinations.

(f) Continuous, verified compliance with the provisions of this subsection and the Regulations of 2021 is a condition for the retention of a certificate issued under subsection (2).

(g) Where the Minister or the Revenue Commissioners identify a failure to comply with the provisions of this subsection or the Regulations of 2021, the Minister shall issue a written notice to the producer company or qualifying company specifying the nature of the breach, and the company shall have a period of 14 days from the date of the notice to remedy the failure or make representations.

(h) Following the expiration of the notice period provided under paragraph (g):

(i) where the breach is determined to be an isolated or administrative failure affecting an individual contract, the Minister may partially withhold the certification, or the Revenue Commissioners may withhold an equivalent proportion of the relief due under this section, until such time as the breach is remedied; or

(ii) where the breach is determined to be a serious, systematic, or repeated failure to comply, or where a company fails to remedy an isolated breach within the specified timeframe, the Minister shall revoke the certificate issued under subsection (2) and the Revenue Commissioners shall move to claw back any relief already claimed or paid under this section for the qualifying film.

(i) Where a certificate is revoked under subparagraph (ii) of paragraph (h), both the qualifying company and the producer company shall be disqualified from claiming or receiving relief under this section for a minimum period of 36 months from the date of the revocation, or until such time as the Minister is satisfied, having consulted the relevant representative organisations of authors and performers, that the breach has been remedied, whichever is the earlier.”.”.

—Richard Boyd Barrett.

65. In page 102, between lines 22 and 23, to insert the following:

"Report on employment outcomes in qualifying companies in receipt of Section 481 tax credit

36. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on establishment of an independent overseeing entity to ensure quality employment and training in the film and audiovisual sector, including the following—

(a) to ensure transparency and fairness in employment and training outcomes for film crew, including recruitment and reemployment of film production crew across different films produced by qualifying company in receipt of section 481 film tax credit and recognition of service of film crew and trainees;

(b) to ensure fair and equitable renumeration for performers, writers, composers, artists and other film workers, and in particular, to ensure the elimination of contracts that require or permit an absolute uncompensated waiver, a permanent buyout, or any temporary, partial, or extended licensing framework that purports to grant unlimited exploitation rights for a flat fee or fixed term, without providing for separate, distinct, and escalating downstream residual revenue streams, repeat fees, and royalty structures originating from all forms of exploitation, including but not limited to digital streaming, video-on-demand (VOD), advertising-supported video services, theatrical release, television broadcast and syndication.".

—Richard Boyd Barrett.

66. In page 106, between lines 10 and 11, to insert the following:

"(3) The Finance Act 1999 is further amended with effect as on and from 1 January 2027—

(a) by the substitution of the following schedule for Schedule 2:

"SCHEDULE 2

RATES OF MINERAL OIL TAX

With effect as on and from:	Light Oil:		Heavy Oil:						Liquefied Petroleum Gas:		Vehicle gas: Rate per megawatt hour at gross calorific value
	Rates per 1,000 litres		Rates per 1,000 litres						Rates per 1,000 litres		
	Petrol	Aviation gasoline	Used as a propellant	Used for air navigation	Used for private pleasure navigation	Kerosene used other than as a propellant	Fuel oil	Other heavy oil	Used as a propellant	Other liquefied petroleum gas	
10 March 2022	€474.11	€474.11	€413.51	€413.51	€413.51	€84.84	€118.01	€120.55	€118.27	€54.68	€9.36
1 April 2022	€465.98	€465.98	€405.38	€405.38	€405.38	€84.84	€118.01	€120.55	€118.27	€54.68	€9.36
1 May 2022	€465.98	€465.98	€405.38	€405.38	€405.38	€103.83	€141.12	€111.14	€130.52	€66.93	€9.36

12 October 2022	€483.34	€483.34	€425.45	€425.45	€425.45	€103.83	€141.12	€111.14	€130.52	€66.93	€9.36
1 May 2023	€483.34	€483.34	€425.45	€425.45	€425.45	€122.83	€164.23	€131.47	€142.76	€79.17	€9.36
1 June 2023	€532.12	€532.12	€466.10	€466.10	€466.10	€122.83	€164.23	€140.28	€142.76	€79.17	€9.36
1 September 2023	€589.03	€589.03	€506.75	€506.75	€506.75	€122.83	€164.23	€149.09	€142.76	€79.17	€9.36
11 October 2023	€606.39	€606.39	€526.83	€526.83	€526.83	€122.83	€164.23	€149.09	€142.76	€79.17	€9.36
1 April 2024	€638.91	€638.91	€551.22	€551.22	€551.22	€122.83	€164.23	€163.96	€142.76	€79.17	€9.36
1 May 2024	€638.91	€638.91	€551.22	€551.22	€551.22	€141.82	€187.34	€184.30	€155.01	€91.42	€10.13
1 August 2024	€671.43	€671.43	€575.61	€575.61	€575.61	€141.82	€187.34	€199.17	€155.01	€91.42	€10.13
9 October 2024	€688.78	€688.78	€595.68	€595.68	€595.68	€141.82	€187.34	€199.17	€155.01	€91.42	€10.13
1 May 2025	€688.78	€688.78	€595.68	€595.68	€595.68	€160.81	€210.45	€219.50	€167.25	€103.66	€11.48
8 October 2025	€706.14	€706.14	€615.76	€615.76	€615.76	€160.81	€210.45	€219.50	€167.25	€103.66	€11.48
25 March 2026	€584.18	€584.18	€453.15	€453.15	€453.15	€160.81	€210.45	€193.06	€167.25	€103.66	€11.48
15 April 2026	€502.88	€502.88	€371.85	€371.85	€371.85	€160.81	€210.45	€172.14	€167.25	€103.66	€11.48
1 January 2027	€421.58	€502.88	€290.55	€371.85	€371.85	€0.00	€210.45	€21.00	€167.25	€103.66	€11.48
1 July 2027	€421.58	€502.88	€290.55	€371.85	€371.85	€0.00	€210.45	€21.00	€167.25	€103.66	€11.48

and

(b) by the substitution of the following schedule for Schedule 2A:

"SCHEDULE 2A

CARBON CHARGE

With effect as on and from:	Light Oil:		Heavy Oil:						Liquefied Petroleum Gas:		Vehicle gas: Rate per megawatt hour at gross calorific value
	Rates per 1,000 litres		Rates per 1,000 litres						Rates per 1,000 litres		
	Petrol	Aviation gasoline	Used as a propellant	Used for air navigation	Used for private pleasure navigation	Kerosene used other than as a propellant	Fuel oil	Other heavy oil	Used as a propellant	Other liquefied petroleum gas	
1 May 2021	€77.52	€77.52	€89.66	€89.66	€89.66	€84.84	€103.23	€90.81	€54.68	€54.68	€6.06
13 October 2021	€94.87	€94.87	€109.74	€109.74	€109.74	€84.84	€103.23	€90.81	€54.68	€54.68	€6.06
1 May 2022	€94.87	€94.87	€109.74	€109.74	€109.74	€103.83	€126.34	€111.14	€66.93	€66.93	€7.41
12 October 2022	€112.23	€112.23	€129.81	€129.81	€129.81	€103.83	€126.34	€111.14	€66.93	€66.93	€7.41
1 May 2023	€112.23	€112.23	€129.81	€129.81	€129.81	€122.83	€149.45	€131.47	€79.17	€79.17	€8.77
11 October 2023	€129.59	€129.59	€149.89	€149.89	€149.89	€122.83	€149.45	€131.47	€79.17	€79.17	€8.77
1 May 2024	€129.59	€129.59	€149.89	€149.89	€149.89	€141.82	€172.56	€151.81	€91.42	€91.42	€10.13
9 October 2024	€146.94	€146.94	€169.96	€169.96	€169.96	€141.82	€172.56	€151.81	€91.42	€91.42	€10.13
1 May 2025	€146.94	€146.94	€169.96	€169.96	€169.96	€160.81	€195.67	€172.14	€103.66	€103.66	€11.48
8 October 2025	€164.30	€164.30	€190.04	€190.04	€190.04	€160.81	€195.67	€172.14	€103.66	€103.66	€11.48
14 October 2026	€164.30	€164.30	€190.04	€190.04	€190.04	€122.83	€195.67	€172.14	€103.66	€103.66	€11.48
1 January 2027	€164.30	€164.30	€190.04	€190.04	€190.04	€0.00	€195.67	€21.00	€103.66	€103.66	€11.48

".

—Pearse Doherty, Mairéad Farrell.

67. In page 107, to delete lines 1 to 4.

—Pearse Doherty, Mairéad Farrell.

68. In page 107, after line 38, to insert the following:

"Report on e-liquid products tax and retail sale of e-liquid products

44. The Minister for Finance shall, within six months of the passing of this Act, following consultation with the Revenue Commissioners and the Minister for Health, prepare and lay before Dáil Éireann a report which shall set out—

(a) the yield of e-liquid products tax since its introduction, and the number of persons registered for the purposes of that tax,

(b) the number and value of seizures of e-liquid products in respect of which e-liquid products tax had not been paid,

(c) the number of premises licensed for the retail sale of nicotine inhaling products under the Public Health (Tobacco Products and Nicotine Inhaling Products) Act 2023, by local authority area,

(d) the extent to which the Revenue Commissioners, the Criminal Assets Bureau and An Garda Síochána have identified the retail sale of e-liquid products as a means of money laundering, tax evasion or the supply of illicit products, and

(e) the feasibility of requiring a person carrying on the business of the retail sale of e-liquid products to register with the Revenue Commissioners, or to hold a current tax clearance certificate, as a condition of carrying on that business.".

—Ged Nash.

69. In page 110, to delete lines 30 to 34, and in page 111, to delete lines 1 to 41.

—Pearse Doherty, Mairéad Farrell.

70. In page 120, between lines 22 and 23, to insert the following:

"Zero rating of certain non-oral medicines

58. (1) Paragraph 11 of Schedule 2 to the Principal Act is amended by the insertion of the following subparagraph after subparagraph (1):

"(1A) Without prejudice to subparagraph (1), the supply of medicine of a kind used for human non-oral consumption and containing an active substance that is an agonist of the glucagon-like peptide-1 receptor, whether or not that substance also acts as an agonist of any other receptor.".

(2) This section shall come into operation on 1 January 2027.".

—Ged Nash.

71. In 120, between lines 22 and 23, to insert the following:

"Report on VAT tax break for developers

58. The Minister shall, within one month of the passing of this Act, prepare and lay before Dáil Éireann a report on the impact of providing hundreds of millions of euros in VAT tax breaks to developers for apartments, many of which were already under construction.".

—Pearse Doherty, Mairéad Farrell.

72. In page 130, between lines 17 and 18, to insert the following:

"Report on levy on certain financial institutions

64. The Minister for Finance shall, within six months of the passing of this Act, prepare and lay before Dáil Éireann a report on the stamp duty charged under section 126AB of the Stamp Duties Consolidation Act 1999, which shall set out—

(a) the yield of that duty for each of the years 2024 to 2026 and its estimated yield for 2027,

(b) the additional yield that would arise for 2027 from an increase in the rate of that duty, including by reference to rates of 0.112 per cent, 0.15 per cent and 0.2 per cent of the assessable amount,

(c) the profits after tax of the persons liable to that duty for each of the years 2022 to 2025, and

(d) options for extending that duty beyond 2027 and for reforming the basis on which it is charged, including by reference to the profits of the persons liable to it.".

—Ged Nash.

73. In page 130, between lines 17 and 18, to insert the following:

"Report on banking levy

64. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the potential revenue yield and economic impacts of increasing the banking levy to offset the benefit derived by banks from the use of historic losses arising from the financial crisis to reduce corporation tax liabilities while remaining profitable.".

—Cian O'Callaghan.

74. In page 130, between lines 17 and 18, to insert the following:

"Report on banking levy

64. The Minister shall, within six months of the passing of this Act, prepare and lay before Dáil Éireann a report on the banking levy and, in particular, the effective rate of the levy relative to the net interest income and operating profits of in-scope credit institutions in each of the years since its introduction. Additionally, it shall refer to the Government's decision to ignore senior legal advice on ensuring banks contributed to the Defective Concrete Block scheme.".

—Pearse Doherty, Mairéad Farrell.

75. In page 210, to delete lines 24 to 39, to delete page 211, and in page 212, to delete lines 1 to 16.

—Ged Nash.

76. In page 210, to delete lines 28 to 39, and in page 211, to delete lines 1 to 35.

—Ged Nash.

77. In page 216, between lines 15 and 16, to insert the following:

(4) The Minister shall no later than 6 months after the enactment of this Act, prepare and lay before both Houses of the Oireachtas a report on the areas excluded from the Derelict Property Tax.".

—Thomas Gould.

78. In page 216, between lines 15 and 16, to insert the following:

"(4) The Minister shall no later than 12 months after the enactment of this Act, and every 24 months thereafter, prepare and lay a report before both Houses of the Oireachtas on the operation of the criteria defined in this section and shall consider any proposed amendments to same.".

—Thomas Gould.

79. In page 222, between lines 3 and 4, to insert the following:

"(10) The local authority shall issue notification to Revenue of the completion of remediation works if the confirming officer believes the property now fulfils the definition of a 'vacant home' as established in the Act of 2022.".

—Thomas Gould.

80. In page 226, between lines 33 and 34, to insert the following:

"(5) The Minister shall, prior to the first charge period of the Derelict

Property Tax—

(i) publish a register of all outstanding levies on sites as applied under the Derelict Sites Act 1990,

(ii) publish a report on the action to be taken to collect all outstanding levy amounts.

(6) The Minister shall, following the passing of this Act by both Houses of the Oireachtas, produce a report outlining the potential to apply the levy at an earlier date.

(7) The Minister shall, 12 months after the first chargeable period, lay before both Houses of the Oireachtas a report outlining the use of moneys collected under this provision and consideration of ringfencing the funding to address dereliction.".

—Thomas Gould.

81. In page 227, between lines 6 and 7, to insert the following:

"(3) The Minister shall, no later than 12 months after the first chargeable period of the Derelict Property Tax, prepare and lay before both Houses of the Oireachtas a report on the potential to incrementally increase the charge on a property annually whereby it remains a chargeable site.".

—Thomas Gould.

82. In page 242, after line 42, to insert the following:

"Exemption for certain relevant property acquired by local authority

653CQA. (1) In this section—

'acquisition date', in relation to a relevant property, means the date on which the relevant property vested in, or was acquired by, a local authority by means of a relevant acquisition;

'relevant acquisition' means the acquisition by a local authority of a property—

(a) compulsorily, under section 14 of the Derelict Sites Act 1990 or under any other enactment conferring on a local authority a power to acquire land compulsorily, or

(b) by agreement, where, at the time of the acquisition, the property was included on a preliminary register or a final register;

'specified period', in relation to a relevant property, means the period of 5 years beginning on the acquisition date, together with any extension of that period under subsection (5).

(2) This section applies to a relevant property where—

(a) the liable person in relation to the relevant property is a local authority,

(b) the relevant property was acquired by that local authority by means of a relevant acquisition, and

(c) the chief executive of that local authority has, not later than 12 months after the acquisition date, certified in writing that the local authority intends, within the specified period—

(i) to carry out, or cause to be carried out, remediation works in respect of the relevant property, or

(ii) to dispose of the relevant property for the purpose of its remediation, redevelopment or use.

(3) Notwithstanding section 653CA, where this section applies, on the making of a claim by the local authority, derelict property tax shall not be due and payable in respect of the relevant property in relation to any liability date falling within the specified period.

(4) A claim referred to in subsection (3) shall be made in the annual return, in respect of the relevant property, relating to the liability date in respect of which the claim is being made, and shall be accompanied by a copy of the certificate referred to in subsection (2)(c).

(5) Where the chief executive of a local authority certifies in writing that the carrying out of remediation works in respect of a relevant property to which this section applies has been delayed by reason of—

(a) a pending application by the local authority for funding to a Minister of the Government or to a body established by or under statute, or

(b) the structural condition or complexity of the relevant property, including its being a protected structure within the meaning of the Act of 2000 or the Act of 2024, as the case may be,

the Minister for Housing, Local Government and Heritage may, on the application of the local authority, extend the specified period by a further period not exceeding 3 years.

(6) This section shall cease to apply to a relevant property from the date on which the relevant property is disposed of by the local authority to a person other than a local authority.

(7) This section shall not apply unless a return referred to in section 653CC is delivered to the Revenue Commissioners in accordance with that section in respect of the relevant property for each liability date to which a claim under subsection (3) relates.”.”.

—Ged Nash.

83. In page 249, between lines 20 and 21, to insert the following:

"Credit for derelict sites levy

653CVA. (1) This section applies where—

(a) a property is a relevant property on the liability date in a year, and

(b) the liable person in relation to that relevant property has paid derelict sites levy, in respect of the relevant property or the land on which it is situated, for the local financial year immediately preceding that liability date.

(2) Where this section applies, the liable person referred to in subsection (1)(b) shall be entitled to a credit against the derelict property tax payable by that person in respect of the relevant property in the year referred to in subsection (1)(a), of an amount equal to the lesser of—

(a) the amount of derelict sites levy referred to in subsection (1)(b) that has actually been paid by that person, and

(b) the amount of derelict property tax that would, but for this section, be payable by that person in respect of the relevant property for that year.

(3) Where a person is entitled to a credit under this section, no part of that credit shall be repaid to the person, carried forward for set-off against derelict property tax payable in respect of any subsequent liability date, or carried back for set-off against derelict property tax payable for any earlier year.

(4) Where derelict sites levy by reference to which a credit has been allowed under this section is subsequently repaid or remitted, in whole or in part, the amount of the credit allowed by reference to the levy so repaid or remitted shall be treated as never having been allowed, and—

(a) an assessment or amended assessment may be made under section 653CH to give effect to this subsection, and

(b) any derelict property tax that becomes payable as a result of this subsection shall be payable together with interest calculated under section 653CI, from the date on which the derelict property tax would originally have been payable but for the credit.

(5) A claim for a credit under this section shall be made in a derelict property tax return required under section 653CC.

(6) In this section, 'local financial year' has the same meaning as it has in the Local Government Act 2001.".

—Ged Nash.

84. In page 251, to delete lines 2 to 9 and substitute the following:

"(9) Where any relevant property becomes the property of the State in accordance with this section, such land shall, upon so becoming the property of the State, vest in the relevant local authority.

(10) The Registrar of Titles shall cause the relevant local authority to be registered as the owner of the land under the Registration of Title Act 1964.".

—Thomas Gould.

85. In page 251, between lines 9 to 10, to insert the following:

"(11) The Minister shall, no later than 12 months after the enactment of the Act, lay before both Houses of the Oireachtas a report examining the implementation of the Act and the engagement of liable persons, including reference to individual properties that have been found liable but whereby no liable person has engaged and the action taken by the Minister, Revenue Commissioners or local authority in this respect.".

—Thomas Gould.

86. In page 253, between lines 33 and 34, to insert the following:

"Report on derelict property tax and local authorities

80. (1) The Minister for Finance shall, following consultation with the Minister for Housing, Local Government and Heritage, prepare and lay before Dáil Éireann, within six months of the passing of this Act, a report on derelict property tax under Part 22C of the Principal Act.

(2) The report shall set out—

(a) the options for providing to each local authority, whether through the Local Government Fund or otherwise, an amount equal to the derelict property tax, interest and penalties collected in respect of relevant properties situated in its functional area,

(b) an estimate of the costs to be incurred by local authorities in performing their functions under that Part, including the inspection of properties, the preparation and publication of preliminary and final registers and the determination of appeals and of applications for confirmation of completion of remediation works, and the means by which those costs are to be met,

(c) the amount of derelict sites levy charged and collected by each local authority in each of the years 2020 to 2025, and the Government's intentions in relation to that levy following the commencement of that Part,

(d) the application of derelict property tax to relevant properties owned by local authorities, including properties acquired compulsorily, and its effect on the capacity of local authorities to remediate such properties,

(e) an analysis of the differences between the meaning of 'derelict property' in section 653BQ of the Principal Act and the meaning of 'derelict site' in section 3 of the Derelict Sites Act 1990, the properties and land likely to fall within one meaning but not the other, and the steps proposed to align them,

(f) the extent to which a property may be liable to both derelict sites levy and derelict property tax in respect of the same period, and the Government's proposals to prevent such double liability, and

(g) whether property that becomes the property of the State under section 653CX of the Principal Act should instead vest in the local authority in whose functional area it is situated.".

—Ged Nash.

87. In page 253, after line 38, to insert the following:

"Report on number of properties covered

81. The Minister shall, within three months of the passing of this Act, prepare and lay before Dáil Éireann a report on the projected number of properties that are currently included on derelict site registers that would not be included under the new derelict property tax either as a geographical criterion or the definition of dereliction.".

—Pearse Doherty, Mairéad Farrell.

88. In page 253, after line 38, to insert the following:

"Report on resourcing of local authorities

81. The Minister shall, within three months of the passing of this Act, prepare and lay before Dáil Éireann a report on the resourcing of local authorities in order to ensure the derelict property tax is administered effectively and to compensate for any loss of income as a result of the non-payment of the derelict site levy.".

—Pearse Doherty, Mairéad Farrell.

89. In page 253, after line 38, to insert the following:

"Report on taxation of bailed-out banks

81. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the amount of tax revenue lost as a result of bailed-out banks facing no restriction on their ability to off-set corporation taxes using historic losses related to the crash, making specific reference to the number of years the bailed-out

banks will be able to avoid tax into the future as a result of these deferred tax assets.".

—Pearse Doherty, Mairéad Farrell.

90. In page 253, after line 38, to insert the following:

"Report on taxation of vulture funds

81. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the amount of tax revenue lost by the decision to not apply an entity level tax to vulture funds as was recommend by officials in the Department of Finance.".

—Pearse Doherty, Mairéad Farrell.

91. In page 253, after line 38, to insert the following:

"Report on taxation of windfall profits of energy companies

81. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the amount of tax revenue lost by the decision to not apply a 75 per cent tax on the windfall profits of energy companies including electricity generators.".

—Pearse Doherty, Mairéad Farrell.

92. In page 253, after line 38, to insert the following:

"Report on an annual tax and audit gap analysis

81. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report the potential for the government to mandate Revenue to produce an annual report on both the tax and audit gap.".

—Pearse Doherty, Mairéad Farrell.

93. In page 253, after line 38, to insert the following:

"Report on non-domiciled tax status

81. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the use of non-domiciled status by wealthy individuals to avoid paying taxes on their global incomes and the action required implement the recommendation Welfare and Taxation Commission.".

—Pearse Doherty, Mairéad Farrell.

94. In page 254, between lines 3 and 4, to insert the following:

"Report on State-backed savings account for affordable housing

82. The Minister shall, within 3 months of the passing of this Act, prepare and lay before Dáil Éireann a report on the viability of establishing a State-backed, tax-exempt savings account, where the deposits would be used to finance the construction of affordable housing and the infrastructure needed to accelerate housing delivery, the projected level of deposits and the number of homes that could be delivered through such an account.".

—Cian O'Callaghan.

95. In page 254, between lines 3 and 4, to insert the following:

"Report on broadening and diversification of tax base

82. (1) The Minister for Finance shall, within six months of the passing of this Act, prepare and lay before Dáil Éireann a report setting out an analysis by the Department of Finance of each recommendation of the Commission on Taxation and Welfare, contained in its report entitled 'Foundations for the Future' published in September 2022, that relates to the broadening or diversification of the tax base.

(2) The report shall set out, in respect of each recommendation referred to in subsection (1)—

(a) whether the recommendation has been implemented in whole, in part or not at all and, where it has not been implemented in full, the reasons for that,

(b) an estimate of the yield that would arise from the implementation of the recommendation in full,

(c) an assessment of the distributional impact of the recommendation, and

(d) the Government's intentions in respect of the recommendation.

(3) The report shall also set out an assessment of the sustainability of the tax base having regard to the proportion of tax receipts accounted for by corporation tax paid by a small number of companies.".

—Ged Nash.