RBK



MIKE SCANLAN TAX SENIOR MANAGER RBK

Budget 2024 – A Window of Opportunity Budget

To balance the needs of our society today, while ensuring the wellbeing of our economy for generations to come."

Minister Michael McGrath



Budget 2024 – Summary of Budgetary package at a glance





New National Savings Funds

The Future Ireland Fund

- 0.8% of GDP to be invested on an annual basis from 2024 to 2035 (2024 figure €4.8bn) €400m initial seed funding from National Reserve Fund
- Target to build fund to €100bn by 2035

The Infrastructure, Climate and Nature Fund

- €2bn per annum over next 7 years 2024 funding to originate from National Reserve Fund
- Breaking the 'stop/start' cycle in terms of funding capital expenditure
- €3bn to be specifically set aside for Climate and Nature component securing carbon targets



Overview



Property and Housing

Supporting Business

Climate and Other







Personal Taxes and Cost of Living



Income Tax Summary





Income Tax Measures – USC / PRSI

New USC Rates

2023	2024
€12,012 @ 0.5%	€12,012 @ 0.5%
€10,908 @ 2%	€13,748 @ 2%
€47,123 @ 4.5%	€44,284 @ 4%
Balance @ 8%	Balance @ 8%

 Note: From 1 October 2024, all PRSI Contribution Rates will increase by 0.1%

- The reduced rate of USC has been maintained for a further 2 years for Medical Card Holders and those over 70 years earning less than €60,000 per annum:
 - The first €12,012 @ 0.5%
 - 2% on balance of income



Impact of changes to Standard Band and Personal Credits

Person	Earnings	Net Increase (estimated)	Net % impact on income (estimated)
Single Person	Earning minimum wage (€23k - €25.7k)	€2,301	11.1%
Single Person	Earning €50,000	€792	2.1%
Married Couple, 2 children, Home Carer	One income, earning €50,000 +	€1,102	2.1%
Married couple	Two Incomes €100,000 +	€1,683	2.1%



Key Personal Non-Tax Measures

- Energy Bill Credit €450 credit to be paid over three instalments between end of year and April 2024
- Recipients of Regular Social Welfare Christmas bonus, payable early December
- Double Child Allowance envisaged for late October and Christmas
- Fuel Allowance Scheme €300 lump sum payment
- Living Alone Allowance €200 extra
- Once-off Double Week 'Cost of Living Support' payable in January
- Once-off €400 payment for those in receipt of Carers Support, Disability Allowance, Blind Pension,
 Invalidity Pension and Domiciliary Care Allowance
- Once-off €400 Working Family Payment



Key Personal Non-Tax Measures – Longer term measures

- Increases in weekly payment rate for jobseekers/ pension / fuel allowances €12 per week
- Childcare cost supports 25% reduction in fees
- Free Schoolbook Scheme extended up to Junior Cycle in Secondary School
- Reduction in University Fees €1,000 reduction





Property and Housing



Housing – Rent Tax Credit

- Introduced Budget 2023
- Tax Credit increased from;
 - €500 to €750 (single)
 - €1,000 to €1,500 (married)
- Extended to parents paying rent for students in 'rent a room' or 'digs' accommodation
 - Retrospective for claims in 2022 and 2023



Housing - Mortgage Interest Tax Relief

- Abolished / phased out completely in 2020
- Temporary one year scheme
- Applies to Homeowners PPR
- Mortgage at 31 December 2022 must be between €80,000 and €500,000
- Tax relief at Standard Rate on increase in mortgage interest paid in 2023 v 2022
- Capped at €1,250 per property
- Must be LPT compliant / file a return to claim relief



Housing - Rented Residential Relief

- New Tax Relief for Landlords subject to certain conditions applies to Residential Rental Income
- Relief at Standard Rate as follows:
 - €3,000 in 2024 (worth €600)
 - €4,000 in 2025 (worth €800)
 - €5,000 in 2026 (worth €1,000)
 - €5,000 in 2027 (worth €1,000)
- Clawback of Relief if Landlord removes <u>any</u> of the rental properties held in Year 1 from the rental market within 4 years
- Tenancies must be registered with RTB / let to a Local Authority
- If property held jointly, relief is divided proportionally



Housing - Help to Buy Scheme

Extended to 31 December 2025

Amended to include Local Authority Schemes



Housing – Vacant Homes Tax ("VHT")

- Introduced in Budget 2023 Tax on long term vacant residential property
- Payable by property owner first return due 7th November 2023
- "Vacant" occupied for less than 30 days in a 12-month period
- Rate of VHT revised to 5 times LPT liability, effective next chargeable period, commencing November 2023



Housing - Residential Zoned Land Tax

- Announced in Budget 2022
- Payment date deferred for 1 year to facilitate further engagement and to allow local authorities to prepare maps setting out areas impacted by tax



Supporting Businesses





Enterprise Tax Measures

OECD – Pillar Two

- Finance Bill to legislate for 15% minimum effective tax rate
 - Larger companies €750m turnover

Territoriality / Participation Exemption

- Finance Bill 2024
- Participation Exemption for foreign sourced dividends
- First step in reducing administration burden

Commitment to review complex interest deductibility rules



Indigenous Business - Package of Wide Ranging Measures

1. R&D Tax Credit

For 2024 spend:

- Increase in credit from 25% to 30%
- Cash flow benefit to smaller R&D projects
 - o First €50,000 (was €25,000) now payable in first year



Indigenous Business - Package of Wide Ranging Measures

2. EIIS

- Tax relief up to 40% of investment in certain companies
- Previously;
 - €250,000 investment limit / 4 year holding or
 - €500,000 investment limit / elect for 7 year holding
- Now;
 - €500,000 investment limit / 4 year holding
- Further review early 2024 focus on further simplification



Indigenous Business - Package of Wide Ranging Measures

3. KEEP

- CGT not Income Tax payable on exercise of KEEP share options detailed eligibility criteria
- Commencing some key 2022 provisions (post EU approval)
 - Extended to 31 December 2025
 - Company limit increased to €6m

4. Film Tax Credit

- Corporation tax credit at 32%
- Current cap on qualifying spend from €70m to €125m
- Subject to State Aid approval



Indigenous Business - CGT

1. New Targeted CGT Relief

- Angel investors to innovative SME start ups
- Reduced CGT rate on qualifying investment
 - o 16% if direct
 - 18% if through a partnership
- Applies to gains up to twice value of investment
- €3m lifetime limit / 3 year investment period
- Minimum €10,000 investment comprising 5% 49% of Ordinary Share Capital
- Certification process to be carried out by Enterprise Ireland



Indigenous Business - CGT

2. Retirement Relief

With effect from 1 January 2025;

- > Restricted relief from 70 onwards (previously 66)
- > €10m cap on transfers to child

	Current Rules		1 January 2025 Onwards	
Qualifying Disposals	AGE	RELIEF	AGE	RELIEF
Child	55 – 65	unrestricted	55 – 69	€10m cap
	66 onwards	€3m cap	70 onwards	€3m cap *
Third Party	55 – 65	€750k limit	55 – 69	€750k limit
	66 onwards	€500k limit	70 onwards	€500k limit

^{*} To be confirmed on publication of Finance Bill 2023.



Indigenous Business - CGT

3. Entrepreneur Relief

- 10% tax rate on first €1m qualifying gains
- Results of Cost Benefit Analysis published
- Commitment to refocus relief and enhance for;
 - Innovative start-ups and
 - Ensure contributes to job creation



Farming

Accelerated Capital Allowances – Farm Safety Equipment

- Extended to 31 December 2026
- Allows for capital allowances of 50% per annum on eligible equipment

Consanguinity Relief

- Extended to 31 December 2028
- Relief that can reduce Stamp Duty applicable to intra-familial transfers of farmland

from 7.5% to 1%



Farming

Young Trained Farmers and Succession Farm Partnerships

- Lifetime aggregate limits being increased from €70,000 to €100,000
- Relates to individuals availing of the below reliefs:
 - Stock Relief for young trained farmers
 - Relief for succession farm partnerships
 - Stamp Duty relief

Stock Relief – Registered Farm Partnerships

• Increase to maximum amount of stock relief that can be claimed from €15,000 to €20,000

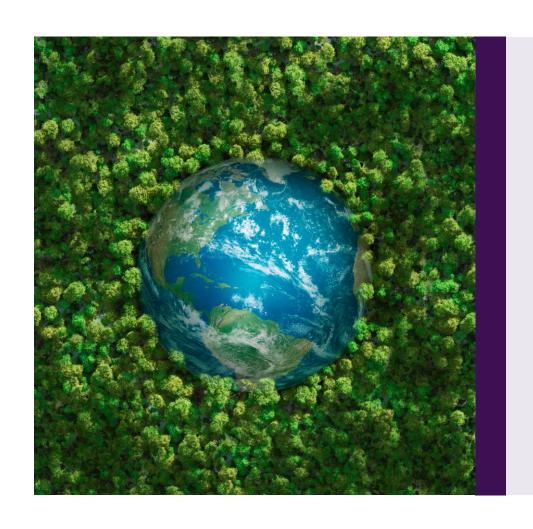


Farming

Farmland Leasing Income Tax Exemption

- The Income Tax exemption for the leasing of farm land to be changed in the Finance Bill.
- Tax relief will only now be available to a land owner after holding the land for seven years.





Climate and Other Measures



Climate & Other Measures

- Extension of Accelerated Capital Allowances of;
 - ✓ Energy efficient equipment
 - ✓ Listed on SEAI website
- Income Tax Exemption on Sale of Residual Electricity
 - √ €400 per year
 - ✓ Relief from Income Tax, USC, PRSI
- Extension of VRT Relief for Battery Electric Vehicles
 - ✓ Further 2 years to 2025
 - ✓ Value up to €50,000



Climate and Environmental Issues

Carbon / Excise Tax

- Carbon tax increase €7.50
- Revenue raised will fund:
 - A socially progressive national retrofitting programme
 - Encourage and support farmers in the green transition
- Deferral of fuel excise increases
 - Due on 31st October
 - Increases to occur in two equal instalments
 - o 1 April 2024
 - o 1 August 2024

Tobacco and Alcohol

- Increase in excise duty by 75 cents on pack of 20 (Now €16.70)
- E-cigarettes / Vaping Products
 - Domestic Tax to be introduced in Budget 2025



Climate and Environmental Issues

BIK on Electric Vehicles

- BIK Exemption applied for vehicle valued at €50k
 - ✓ Tapering effect on vehicle value was introduced in Budget 2023
 - ✓ Suspension of tapering for 2 years, taxable value to be reduced as follows:

Market Value	Year
€35,000	2023, 2024, 2025
€20,000	2026
€10,000	2027

- ✓ Extension of temporary universal relief of €10,000 for 1 year
- ✓ E.g. BIK Market value relief of €45,000 in 2024 (i.e. €35,000 + €10,000)

VAT Measures

- Decrease in Farmers "Flat-rate" compensation rate to 4.8% from 1 January 2024 (down from the current 5% rate)
- Extension of 9% rate on gas and electricity to 31 October 2024 (extended from 31 October 2023)
- Application of zero rate of VAT on audio books and e-books from 1 January 2024 to align with treatment of printed books
- Application of zero rate for supply and installation of solar panels on schools from 1 January 2024 (since 1 May 2023, this was limited to installations on private dwellings)
- Charities VAT compensation scheme available "pot" for repayment doubling to €10m for 2024
- Increase in VAT Registration thresholds to €40,000 for services and €80,000 for goods from January 2024 (up from €37,500 and €75,000)
- Public Consultation process re modernising of invoicing and reporting systems



Capital Taxes

Capital Acquisitions Tax

- No changes to headline rates / thresholds as part of Budget 2024
- Foster children entitled to Group B Threshold

Donation of Heritage Assets

- Tax credit equal to 80% of the market value of the item
- Aggregate annual limit for approved donations now increased to €8m (previous cap of €6m)





What's Next?



Simplification – Business Tax

Tax Reliefs / Schemes

- By nature, complex / difficult to access
- Compounded by EU State Aid / International rules

Revenue to establish dedicated Tax Administration Liaison Committee (TALC) Group to:

- Ensure SMEs know entitlement and can access
- Identify opportunities to simplify / modernise administration
- Recommendations to be published during 2024

Public consultation on digitalisation / modernisation of VAT invoicing and reporting

Public consultation on share based remuneration



Sporting Reliefs and Philanthropy

Sporting Reliefs for Approved Sporting Bodies

- Qualifying sporting bodies and projects reliefs for donations to same
- Corporates deductibility as an expense
- Individuals approved body can claim a refund
- Commitment to review current reliefs in terms of promoting capital investment
- Outcome of review to be published in 2024

Philanthropy

Further review of tax measures to encourage and support



Payroll Changes 2024

In 2024 there will be a number of changes to be considered when processing your payroll.

- 1. Revenue are introducing enhanced reporting requirements from 1st January 2024 employers will be required to electronically notify Revenue of the following tax free payments or benefits made to an employee/directors:
 - The remote working daily allowance of up to €3.20 per day
 - The payment of travel and subsistence expenses
 - Small benefits covered by the small benefit exemption
- 2. Social welfare are introducing auto-enrolment for pension in latter end of 2024.



Conclusion

We face challenges for sure, but we face them from a position of strength, and we face them together.

Minister Michael McGrath





Thank you









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