

Local Jobs Alliance Submission

Michael McGrath TD
Minister for Finance
Department of Finance
Merrion Street
Dublin 2

10 November 2023

Enhanced Reporting & the Revenue Commissioners

Dear Minister,

The Local Jobs Alliance (LJA) is an alliance comprising of trade and representative groups whose members are in the retail, hospitality, and service sectors predominantly operating as SMEs. Collectively the businesses represented by the LJA employ over 300,000 people nationally.

LJA members have only latterly been advised of new reporting requirements which are being introduced by the Revenue Commissioners with effect from 1 January 2024, concerning employee expenses and related payments.

This new Enhanced Reporting regime has been introduced with a complete lack of consultation with business groups representing SMEs and as a consequence represents a new and penal imposition on businesses at a time when significant additional costs are being piled on businesses. We are all adamant that there has been no prior consultation with our membership organisations in advance of the significant new burden being imposed on our members. Any consultation that has taken place seems to have been confined to payroll software providers and agents, but there has been no engagement with business representative bodies.

The era of Revenue (or any Government entity for that matter) foisting new obligations on businesses without proper engagement with representative bodies, should be a thing of the past. The lack of consultation with employer bodies has created a turnaround time for the introduction of this significant new measure which is just too tight – the businesses that we represent will not be in a position to apply these new measures from 1 January 2024.

What is being proposed is a significant departure from current reporting requirements and is being foisted on employers without any adequate business case or regulatory impact assessment having been carried out. The PAYE reporting modernisation process was a success precisely because of proper detailed consultation.

This new measure, if it is to succeed, needs to have a similar in depth consultative process, rather than a narrow technical consultation by Revenue. The implications of this measure for businesses will create significant additional costs and reporting obligations in circumstances where it is not obvious that the measures proposed will achieve the public policy objective that they are presumably aimed at addressing. No compliant business will have any objection to measures aimed at controlling or ceasing unlawful practices - all that we require is that the measures being introduced to secure compliance are properly targeted and introduced with proper consultation and engagement with the entities that will be obliged to comply with new measures.

Members of the LJA conferred with staff of your Department and the Revenue on October 2nd. This was a most unsatisfactory engagement, with Revenue staff suggesting that the “on or before” requirement was consistent with existing legislative requirements for employers. This is not so.

At this stage and in light of the deeply unsatisfactory response that we have received from the Revenue Commissioners on the matter to date, we are calling on you, as the Minister with political responsibility for the Revenue Commissioners, to request a deferral of the new Enhanced Reporting Requirements until such time as there has been proper and meaningful engagement (to include the establishment of a legitimate business case and a regulatory and fiscal impact assessment) with business organisations whose members will bear the brunt of these new requirements when introduced.

We would welcome an urgent meeting with you to discuss this matter.

Yours sincerely,



On behalf of all members of the Local Jobs Alliance:

Vincent Jennings – Convenience Stores and Newsagents Association

Tara Buckley – RGDATA

Neil Mc Donnell – ISME

Tim Fenn – Irish Hotels Federation

Donal O'Keefe – Licensed Vintners Association

Padraig Cribben - Vintners' Federation of Ireland

Adrian Cummins – Restaurants Association of Ireland

