

Tax Pulse

An analysis of the latest tax trends, insights, and policy changes impacting Irish businesses, prepared by Fitzgerald Power.

APRIL 2026



Exchequer Returns:

KEY FIGURES – MARCH 2026

KEY FIGURES

- **Total Tax Receipts:** €22.6 billion (up 3.4% on last year)
- **Income Tax:** €8.7 billion (up 1.0% on last year)
- **Corporation Tax:** €2.9 billion (down 3.1% on last year)
- **VAT:** €0.4 billion (up 5.3% on last year)
- **Excise Duty Receipts:** €1.5 billion (up 1.2% on last year)
- **Gross Voted Expenditure:** €26.4 billion (up 6.4% on last year)
- **Exchequer Deficit:** €0.2 billion

Revenue Results for 2025

Headline Results for 2025 – Strong Collections and Compliance Activity

Revenue has released its Headline Results for 2025, confirming another strong year for tax collections and compliance. Total Exchequer receipts reached €106 billion, with a further €34 billion collected on behalf of other Government Departments, Agencies and EU Member States.

Revenue highlighted very high levels of voluntary compliance, with 99% compliance among large and medium cases and 92% across all other taxpayers, supported by extensive use of digital services, over 87 million transactions were processed during the year (such as the 2025 Local Property Tax revaluation campaign and implementation of the Residential Zoned Land Tax).

In addition to strong voluntary compliance, Revenue's enforcement activity played a significant role in overall yield. According to reporting by The Irish Times, Revenue completed over 291,600 audit and compliance interventions, resulting in €734 million in additional tax collected during 2025. This reflects a continued focus on targeted interventions, with further outcomes including the settlement of tax avoidance cases and criminal convictions for tax evasion where required.

Public Spending Context - Revised Estimates 2026

Parliamentary Budget Office (PBO) analysis of the Revised Estimates for Public Services 2026

The Parliamentary Budget Office has published an overview of the Revised Estimates for Public Services 2026, which sets out the Government's spending allocations for 2026 and highlights recent trends in budgeting and appropriations-in-aid (A-in-A). Key points include:

- » Gross government spending for 2026 is estimated at €117.4 billion (excluding amounts not allocated at Vote level), comprising current expenditure of €98.279 billion and capital expenditure of €19.106 billion (with €0.416 billion unallocated at Vote level).
- » The PBO notes that the gap between initial Estimates and final outturn has widened: outturn exceeded initial Estimates by 1.6% on average in 2014–2019, rising to 6.1% on average between 2021 and 2025.
- » Appropriations-in-Aid are expected to offset 15.8% of gross government spending in 2026, compared to over 25% in 2009 — increasing reliance on Exchequer funding where fees and charges do not keep pace with costs.

- » Spending remains concentrated in a small number of Votes; the three largest allocations (excluding the Social Insurance Fund) are Health (€27.35 billion), Social Protection (€14.4 billion) and Education and Youth (€13.46 billion).

VAT Updates

VAT Modernisation & Mandatory eInvoicing

The modernisation of Ireland's VAT system, including the introduction of mandatory eInvoicing and real-time digital reporting, was originally announced as part of Budget 2026, where the Minister for Finance confirmed Ireland's intention to prepare for the EU's VAT in the Digital Age (ViDA) reforms.

Revenue subsequently published "VAT Modernisation: Implementation of eInvoicing in Ireland" in October 2025, outlining the roadmap for transitioning from traditional VAT returns to a fully digital reporting system.

This document highlights a move away from PDF and paper-based invoicing toward structured electronic invoices compliant with European Standard EN16931, marking the most significant overhaul of VAT administration in over 50 years.

These Budget 2026 commitments were further advanced on 10 February 2026, when Revenue confirmed the businesses that fall within Phase One of the rollout of Ireland's VAT Modernisation Programme.

From 1 November 2028, all VAT-registered large corporates, defined as businesses whose tax affairs are managed by Revenue's Large Corporates Division, and which have an establishment or fixed establishment in Ireland must issue structured eInvoices and report a subset of invoice data for domestic B2B transactions.

From the same date, all Irish businesses will be required to be capable of receiving structured eInvoices, regardless of whether they fall within Phase One. Revenue will issue notification letters to in-scope corporates and encourages early planning, including system reviews, software upgrades and internal process changes.

These developments will also prepare Irish

businesses for the wider ViDA rules applying to cross border EU B2B transactions from July 2030.

Irish VAT Grouping Rules – Major Changes to Territorial Scope

Revenue has introduced significant changes to the Irish VAT grouping regime, fundamentally altering how cross-border head office and branch structures are treated for VAT purposes.

These changes were formally announced in Revenue eBrief No. 216/25 and reflect Ireland's alignment with EU case law following the Skandia and Danske Bank decisions.

Under the revised guidance, the territorial scope of Irish VAT groups is now restricted to Irish establishments only. This means that only an Irish head office or an Irish branch may be included in an Irish VAT group.

Foreign branches or foreign head offices of the same legal entity are excluded, ending the long-standing "whole entity" approach previously applied in Ireland.

As a result, certain intra entity transactions that were historically disregarded for VAT purposes may now fall within the scope of Irish VAT.

A key consequence of this change is that services exchanged between an Irish establishment and a foreign head office or branch may now be treated as taxable supplies, potentially giving rise to reverse-charge VAT obligations in Ireland.

This is particularly significant for businesses operating in partially exempt sectors, such as financial services, insurance, and asset management, where any additional VAT incurred may represent a real cost due to limited recovery.

The new rules apply immediately to VAT groups formed on or after 19 November 2025. For VAT groups that were already in place before that date, Revenue has provided a transitional period up to 31 December 2026, during which affected businesses are expected to review and, where necessary, restructure their VAT grouping arrangements.

What This Means for Businesses

Businesses with Irish VAT groups and cross border branch or head office structures should now:

- » Review all intra entity service flows involving Irish and non Irish establishments;
- » Identify services that may now attract Irish VAT under the reverse charge;
- » Assess the impact on VAT recovery and overall cost base; and
- » Begin planning ahead of the 31 December 2026 transition deadline.

Given the potential financial and compliance impact, early analysis and restructuring may be required.

iXBRL Updates

Changes with effect from 1 January 2026

iXBRL is a way of filing a company's financial statements with Revenue so that they are readable by both people and computers.

Instead of sending PDF or paper accounts, the figures and notes in your financial statements are "tagged" with standard labels. This lets Revenue's systems automatically read and analyse the data for your Corporation Tax return.

iXBRL only applies to large companies or companies where the turnover or total assets exceed certain thresholds.

With effect from 1 January 2026 only final, signed financial statements will be accepted for iXBRL filing. Companies without an exemption must have final signed accounts ready within 12 months of the year end.

Tax Appeal Commissions ("TAC") - Determinations

232TACD2025 – Help to Buy Relief Denied Due to Excessive Property Valuation

Issue: Whether the Appellant qualified for Help to Buy (HTB) relief for a self-build property where the mortgage letter of offer listed a property valuation above the €500,000 threshold.

Appellant's Position: The Appellant argued that the valuation in the mortgage offer (€575,000) was incorrect and submitted a revised valuation (€485,000) supported by a bank letter stating the original valuation was erroneous.

Revenue's Position: Revenue maintained that the HTB scheme requires the valuation at the time of the mortgage offer to be €500,000 or less. They stated that subsequent valuations are not relevant under the legislation.

Outcome: Appeal unsuccessful.

Determination: The Commissioner found that the HTB legislation clearly defines the "approved valuation" as the one in place at the time the loan is entered into. Since the mortgage offer listed €575,000, the property exceeded the qualifying threshold. The Commissioner upheld Revenue's decision and dismissed the appeal.

TACD2025 – Income Tax Repayment Denied Due to Late Claim

Issue: Whether the Appellant was entitled to a repayment of €15,632.64 in income tax for 2013, despite filing the return in 2024.

Appellant's Position: The Appellant argued that he only became aware of the overpayment in 2023 when Revenue extracted funds from his account and that he filed the return promptly thereafter.

Revenue's Position: Revenue stated that the claim was outside the statutory four-year time limit under section 865(4) of the TCA 1997 and therefore could not be repaid.

Outcome: Appeal unsuccessful.

Determination: The Commissioner found that the legislation imposes a strict four-year limit for repayment claims. Since the 2013 return was filed in 2024, the claim was statute-barred. The appeal was dismissed.

01TACD2026 – Termination Payment

Issue: Whether a €130,000 termination payment qualified for exemption from income tax under section 201(2)(a) TCA 1997 (payments made due to an employee's injury or disability).

Appellant's Position: The payment was made

because the Appellant had long term illness and could no longer perform his duties. Therefore, the payment should qualify for the disability related tax exemption.

Revenue's Position: The payment was not made because of disability but as part of a settlement agreement that included the withdrawal of a claim the Appellant had taken against his employer. Therefore, it did not meet the statutory test for exemption.

Outcome: The appeal was dismissed.

Determination: The TAC held that the documentation showed the payment was linked principally to settlement of a claim rather than inability to work due to disability. The exemption under section 201(2)(a) did not apply.

Revenue E-Briefs

e-Brief 034/26: Pay and File Extension 2026

Revenue has announced an extension to the 2026 ROS Pay & File deadline for self assessed Income Tax taxpayers and individuals liable to Capital Acquisitions Tax (CAT). Where the **2025 Form 11** and both the **Income Tax balance for 2025** and **Preliminary Tax for 2026** are filed and paid through ROS, the due date is extended to **18 November 2026**. The same extended deadline applies to CAT returns and payments for beneficiaries with valuation dates falling in the year ended 31 August 2026. Revenue has emphasised that **both filing and payment must be completed via ROS** for the extension to apply; otherwise, the standard deadline of **31 October 2026** remains in force.

While the extension is welcome it should be noted that early filing does not trigger earlier payment; taxpayers can still pay by the standard deadline, avoiding last-minute penalties while ensuring accurate tax calculation.

e-Brief 020/26: Pay and File Extension 2026

Revenue has updated its guidance on the income tax exemption for profits arising from the microgeneration of electricity at an individual's sole or main residence. The Tax and Duty Manual confirms that **up to €400 per year** in profits from

exporting surplus renewable electricity to the grid is exempt from Income Tax, USC and PRSI for the years **2024–2028**, following the extension introduced by Finance Act 2025. Any profits earned **in excess of €400 annually** must be declared and taxed in the normal manner.

e-Brief 230/25: Revenue Updates on Review of Opinions and Confirmations

Revenue has issued an eBrief highlighting important updates to Tax and Duty Manual Part 37-00-41, which deals with the continued validity of Revenue-issued opinions and confirmations.

The updated guidance clarifies that taxpayers who wish to continue relying on opinions or confirmations issued between 1 January 2020 and 31 December 2020 must apply for their renewal or extension on or before 31 March 2026.

The revised manual also consolidates earlier guidance, including a new table summarising the treatment of opinions issued between 2012 and 2019, and removes outdated appendices.

Revenue's policy is that an opinion or confirmation can be relied upon for an extended period, its maximum validity is five years, unless a shorter period is explicitly specified.

Opinions may also cease to be valid sooner if underlying facts change, legislation is amended, or Revenue decides to review its position.

These changes serve as a timely reminder to audit any existing Revenue opinions and ensure renewal applications are made within the prescribed deadlines to avoid inadvertently losing the protection those opinions provide.

e-Brief No. 028/26: Accelerated Capital Allowances Extended to 31 December 2030

Revenue has published eBrief No. 028/26, confirming important updates to two Tax and Duty Manuals dealing with accelerated capital allowances. These changes arise from measures in Finance Act 2025 and provide enhanced certainty for businesses investing in energy-efficient equipment and gas-powered vehicle technology.

1. Accelerated Wear & Tear Allowances for Gas Powered Vehicles and Refuelling Equipment

Revenue has updated TDM Part 09 02 06 to reflect the extension of accelerated allowances to 31 December 2030. Qualifying expenditure includes:

- » Gas powered vehicles, including hydrogen vehicles (as updated under earlier Finance Acts);
- » Qualifying refuelling equipment, used for business purposes.

Businesses can continue to claim a 100% wear-and-tear allowance in the year the equipment or vehicle is first put into use, provided the asset meets the statutory definitions and is used wholly for the trade.

Ordinary passenger cars remain excluded, but taxis, hackneys, and short-term rental vehicles may qualify.

2. Accelerated Capital Allowances for Energy-Efficient Equipment

Revenue has also updated TDM Part 09 02 04, confirming that accelerated capital allowances are similarly extended to 31 December 2030. Under this scheme:

- » Businesses may claim 100% of qualifying capital expenditure in the year the energy efficient equipment is first used;
- » Equipment must appear on the SEAI Triple E Register and meet the efficiency criteria set in Schedule 4A TCA 1997;
- » From 1 January 2022, equipment operating directly on fossil fuels (other than electricity generated from such fuels) no longer qualifies.

What This Means for Businesses

The extension of these schemes to 2030 provides long term planning certainty for companies considering investment in:

- » Alternative fuel or hydrogen powered fleet vehicles;
- » Refuelling infrastructure;
- » Energy efficient machinery, manufacturing equipment, ICT, and renewable energy technologies.

These incentives continue to provide an immediate deduction benefit compared to standard capital allowances spread over eight years, improving cash flow for investment in sustainability and decarbonisation.

If you would like assistance determining whether planned capital expenditure qualifies for accelerated allowances, or assessing eligibility under the SEAI product register, we would be happy to review it with you.

Upcoming Tax Deadlines: April 2026 to June 2026

As we approach the end of the year, it is essential to stay on top of upcoming filing and payment dates. Below is a summary of critical tax deadlines from December 2025 through February 2026.

April 2026	
14	Dividend Withholding Tax: Return and payment for distributions made in March 2026.
23	Corporation Tax: Filing of the corporation tax return (Form CT1), and balance of the corporation tax payments, for companies with a financial year ended on 31 July 2025.
23	Corporation Tax: Payment of preliminary tax for companies with a financial year ending on 31 May 2026.
23	Corporation Tax: Payment of first instalments of preliminary tax for companies (not “small” companies) with a financial year ending on 31 October 2026.
23	iXBRL: Filing of the iXBRL tagged financial statements for companies with a financial year ended on 30 April 2025.
23	Relevant Contracts Tax: Monthly return and payment for March 2026.
23	Professional Services Withholding Tax: F30 monthly return and payment for March 2026.
23	Payroll Taxes (PAYE, PRSI, & USC): Monthly return and payment for March 2026.
30	Form 46G: Filing of the third-party payments return (Form 46G) for companies with a financial year ended on 31 July 2025.
30	Close Company Surcharge: Last date for the payment of dividends by close companies for the period ended on 31 October 2024 to avoid the section 440 and 441 surcharges.
30	R&D Tax Credit: Claim in respect of R&D expenditure incurred in an accounting period ended on 30 April 2025.

May 2026	
14	Dividend Withholding Tax: Return and payment for distributions made in April 2026.
23	Corporation Tax: Filing of the corporation tax return (Form CT1), and balance of the corporation tax payments, for companies with a financial year ended on 30 August 2025.
23	Corporation Tax: Payment of preliminary tax for companies with a financial year ending on 30 June 2026.
23	Corporation Tax: Payment of first instalments of preliminary tax for companies (not “small” companies) with a financial year ending on 30 November 2026.
23	iXBRL: Filing of the iXBRL tagged financial statements for companies with a financial year ended on 31 May 2025.
23	Relevant Contracts Tax: Monthly return and payment for April 2026.
23	Professional Services Withholding Tax: F30 monthly return and payment for April 2026.
23	Payroll Taxes (PAYE, PRSI, & USC): Monthly return and payment for April 2026.
23	VAT: Bi-monthly VAT 3 return and payment for the period March –April 2026 together with the Return of Trading Details where the VAT accounting period ends between 1 March and 30 April.
31	Form 46G: Filing of the third-party payments return (Form 46G) for companies with a financial year ended on 30 August 2025.

31	Close Company Surcharge: Last date for the payment of dividends by close companies for the period ended on 30 November 2024 to avoid the section 440 and 441 surcharges.
31	R&D Tax Credit: Claim in respect of R&D expenditure incurred in an accounting period ended on 31 May 2025.
31	Capital Allowances: Claim in respect of expenditure incurred on specified intangible assets in an accounting period ended on 31 May 2025.

June 2026	
14	Dividend Withholding Tax: Return and payment for distributions made in May 2026.
23	Corporation Tax: Filing of the corporation tax return (Form CT1), and balance of the corporation tax payments, for companies with a financial year ended on 30 September 2025.
23	Corporation Tax: Payment of preliminary tax for companies with a financial year ending on 30 July 2026.
23	Corporation Tax: Payment of first instalments of preliminary tax for companies (not “small” companies) with a financial year ending on 31 December 2026.
23	iXBRL: Filing of the iXBRL tagged financial statements for companies with a financial year ended on 30 June 2025.
23	Relevant Contracts Tax: Monthly return and payment for May 2026.
23	Professional Services Withholding Tax: F30 monthly return and payment for May 2026.
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31	R&D Tax Credit: Claim in respect of R&D expenditure incurred in an accounting period ended on 30 June 2025.
31	Capital Allowances: Claim in respect of expenditure incurred on specified intangible assets in an accounting period ended on 30 June 2025.

At Fitzgerald Power, we partner with ambitious, fast-growing businesses to help them scale with confidence. Growing a company is complex, it takes vision, agility, and the right financial guidance. That's where we step in.

We provide clear, tailored tax solutions for you and your business. Every case is approached with a fresh perspective, ensuring strategies that strengthen your business and support growth.

We turn complex numbers into practical insights you can act on, delivering timely, reliable advice. Our expert team develops strategic plans to improve efficiency, minimise costs, and unlock opportunities.

Speak with our tax experts today and see how we can help your business thrive.

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