Corporation Tax – 2020 Payments and 2019 Returns

This report is the latest in a series of annual papers by Revenue on Corporation Tax ("CT"). The report presents a statistical profile of receipts in 2020 and returns for 2019 for the tax.

2020 Payments

CT is the third largest taxhead, representing 21% of net tax receipts in 2020

Net Receipts

2020	€11,833m
2019	€10,887m
2018	€10,387m

Impact of COVID-19

Small businesses were badly impacted by the pandemic, with CT payments from SMEs down 40% in 2020

With large companies less impacted, and some sectors even benefiting, the level of concentration in the top 10 companies increased to 51%

2019 Returns

167,800 CT Returns
97,500 Positive Profits
73,800 Profits Liable to CT

Trading Income
€195.3bn taxable profits reported in 2019

90% in five sectors

Largest Sectors: Manufacturing, Finance & Insurance, Admin & Support Services, ICT and Wholesale & Retail

Non-Trading Income €10,155bn
Net Dividend Income €6.7bn
Capital Gains €308m

Losses Forward €209.2bn
Down 1% on 2018, 90% of losses over 5 years old

Intangible Assets €46.2bn
Foreign multinationals account for 98%

Research & Development Credit
2019 €626m
2018 €355m

Knowledge Development Box
14 claimants in 2019
2019 €12.2m
2018 €9.3m

Employment

Over 2.4m employments in companies, with combined Income Tax, USC and PRSI payments for these employees of €21.5bn. Foreign multinationals account for 32% of employment and 49% of employment taxes.

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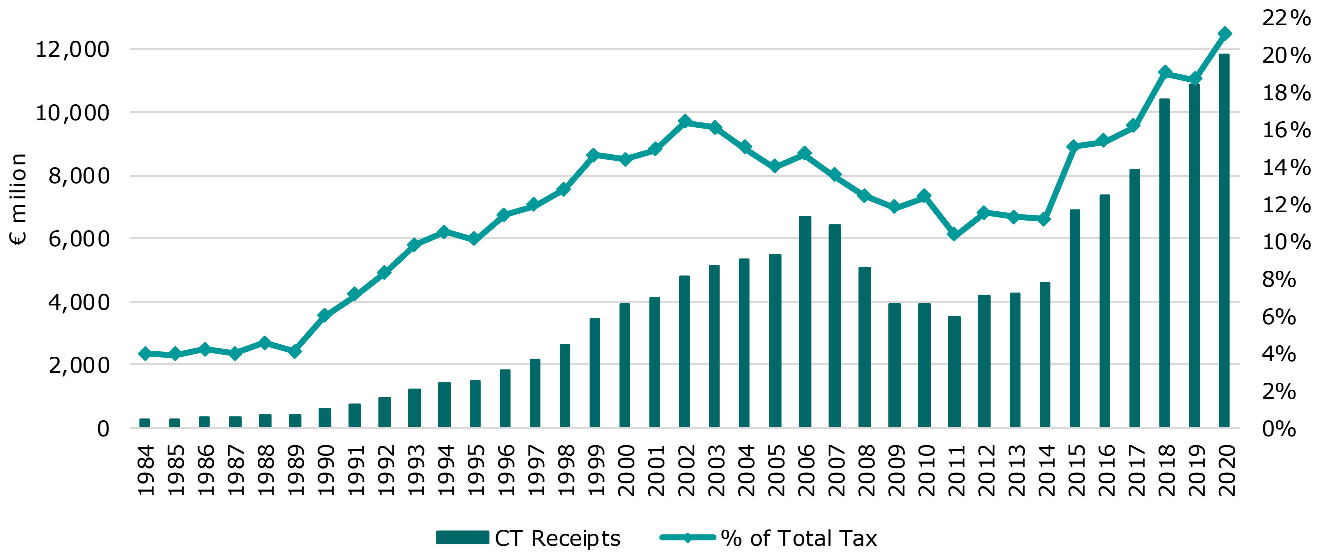
1 Introduction

This report is the latest in a series of annual papers by Revenue on Corporation Tax ("CT").[1] CT is the third largest taxhead, with €11.8 billion in net receipts transferred to the Exchequer in 2020, accounting for 21 per cent of total tax receipts in that year.[2]

Figure 1: Corporation Tax Receipts



Source: Revenue analysis. Note: Based on Exchequer receipts of CT.

CT payments received in 2020 are mainly in respect of accounting periods ended in 2020. The associated Corporation Tax returns for 2020 (the "CT1" return) are not due until nine months after the end of the accounting period, which is in the latter half of 2021 in most cases. However, analysis of returns for 2019 (the most recent year for which returns have been filed at present) provides context for the payments.

Section 2 profiles CT payments in 2020 and changes compared to 2019. In Section 3, returns for 2019 are reviewed to understand the activities of companies and the factors driving CT payments. Section 4 presents data on different company structures. Section 5 reviews employment and payroll data related to companies and Section 6 concludes.

[1] Reports from previous years are published at: https://www.revenue.ie/en/corporate/information-about-revenue/research/research-reports/corporation-tax-and-international.aspx.
[2] Exchequer transfers of CT were reduced by around €120 million in 2020, to fund payments to companies under the COVID Restrictions Support Scheme.

2 Corporation Tax Payments in 2020

2.1 Overview

Net CT receipts in 2020 (i.e., tax paid during the calendar year 2020 regardless of the tax year to which it relates) were €11.8 billion. This exceeded receipts in 2019 by €0.95 billion (8.7 per cent) and the forecast by €1.6 billion (16.2 per cent). Exchequer CT receipts in 2020 were reduced by €121 million to fund payments for the COVID Restrictions Support Scheme ("CRSS"). Table 1 shows net and gross CT receipts by the calendar year in which the payments are received. Shown in the final column are the liabilities by reference to the tax year.

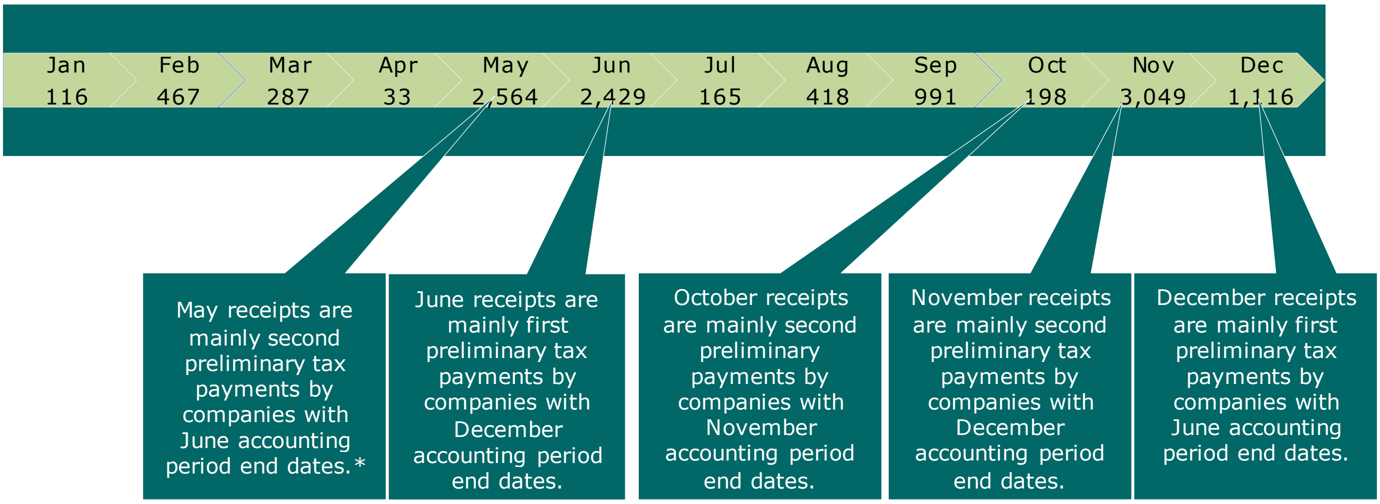
Table 1: Receipts and Liabilities

Year	Gross Receipts €m	Net Receipts €m	Corporation Tax Liability for Tax year €m
2018	11,442	10,387	10,211
2019	12,337	10,887	10,937
2020	13,896	11,833	*

Source: Revenue analysis *Not available until returns have been filed during 2020.

Figure 2 shows the €11.8 billion collected in 2020 by month and explains the factors behind the larger payment months. Dates for preliminary tax (due in the sixth and eleventh months of the accounting year for some large payers) and accounting period end dates are key drivers of the main payment months. Around 55 per cent of taxpaying companies have January to December accounting periods, followed by 13 per cent with July to June and 11 per cent April to March.

Figure 2: Net Receipts by Month in 2020 (€ million)



Source: Revenue analysis. *Also includes some first preliminary payments for November end companies.

2.2 Impact of COVID-19 on Tax Payments

Tax payments in 2020 (€11.8 billion) are made up of preliminary tax ("PT") payments for 2020 (€10.3 billion) and balances due for earlier years (€1.5 billion). For PT, companies can choose to pay 90 per cent of the estimated tax due for the year or 100 per cent of the tax due for the immediately previous year. It will not be possible to fully assess the impact of the COVID-19 pandemic on tax receipts until after returns for 2020 are filed. However, as PT payments account for the majority of receipts in 2020, the changes in receipts are indicative of the effects of COVID-19 on the corporate tax base.

CT paid in 2020 was up €0.95 billion or 12 per cent on 2019. As Table 2 shows however, the change in CT varied markedly between companies in Revenue's Large Corporates, Medium Enterprises and Business divisions. Most taxpayers in the Business Division are small to medium sized enterprises ("SMEs").

Table 2: Payments in 2020 by Revenue Division

Revenue Division	CT Payments in 2020 €m	+/- 2019 %
Large Corporates	10,322	+18.0%
Medium Enterprises	917	-24.8%
Business	594	-40.0%

Source: Revenue analysis.

This shows clearly that the impact of the pandemic has been significantly greater on smaller businesses. While many large companies, often multinationals, have been less impacted by the effects of COVID-19 (or even benefited from greater demand for pharmaceuticals and certain ICT products), SMEs have suffered the largest reductions in demand for their products and consequently in their profits and tax due. These reductions have occurred despite the COVID support schemes put in place (Box 1) – most of the companies using these schemes are SMEs.

Box 1: Companies Assisted by COVID Support Schemes

Revenue implemented a number of Government initiatives to assist businesses and employers through the COVID-19 pandemic throughout 2020 (and continuing into 2021). These schemes are generally open to companies or taxpayers registered for other taxes (non-corporates). The table below shows the numbers of companies claiming the under the major schemes administered by Revenue and their CT paid in 2020. In most cases, the CT payments are markedly lower than 2019 (for example, companies availing of the TWSS in 2020 paid €535 million in CT compared to €817 million in the previous year).

Scheme	Total Number of Businesses Availing	Of which: Number of Companies	CT Payments by Companies Availing €m
COVID Restrictions Support Scheme (CRSS)	16,600	7,100	38
Temporary Wage Subsidy Scheme (TWSS)	66,600	43,000	535
Employment Wage Subsidy Scheme (EWSS)	39,700	23,800	92
Debt Warehousing	70,000	38,300	101
Acceleration of Corporation Tax loss relief	--	180	--

The impacts of the COVID pandemic, and the diverging effects across different groups of companies, are evident also in the analysis of CT payments by sector, ownership, concentration and other headings discussed in the following Sections.

2.3 Sectors

Figure 3 shows 2020 receipts by sector. The *Information & Communication* sector was the only sector with significant growth in receipts. As in previous years, the sector with the largest payments was *Manufacturing* (24 per cent of net receipts), this sector includes pharmaceuticals.

2.4 Ownership

Tax records do not provide a complete record of the 'nationality' (or country of ownership) of companies operating in Ireland. To address this, Revenue has compiled a marker for companies tax resident in Ireland, distinguishing three categories: Irish owned multinational, foreign owned multinational and non-multinational.[3] This marker has been enhanced with information from external (non-Revenue) sources in 2020. This enhanced marker identifies 14,545 foreign owned multinationals and 2,821 Irish owned multinationals from the 167,769 companies active on Revenue records (filing returns for 2019).

As shown in Figure 3, foreign owned multinationals paid €9,657 billion (82 per cent of net CT receipts), Irish owned multinationals €841 million (7 per cent) and non-multinationals €1.335 billion (11 per cent).

2.5 Concentration

Figure 3 also shows indicators of the degree of concentration of payments. Revenue's Large Corporates Division ("LCD") has responsibility for managing the tax affairs of the largest taxpayers. Net CT receipts from LCD companies in 2020 increased by €1.6 billion (18 per cent) to €10.3 billion. These accounted for 87 per cent of net receipts. Net receipts from non-LCD companies decreased by €631 million compared with 2019.

The share of receipts from LCD or multinationals had been relatively stable in recent years but COVID has caused a reversal of this trend in 2020. In previous years, growth in receipts from non-LCD companies often outpaced that of LCD companies. However, as discussed above, SMEs have been more significantly impacted by the pandemic. This has also altered the share of net receipts from the 10 largest payers, which in 2020 were €5,983 million or 51 per cent of net CT receipts. Table 3 and Table 4 present alternative views of the top 10 over time.

[3] A foreign owned multinational is defined here as a company that is ultimately owned abroad and operates in more than one country. An Irish owned multinational is a company that is ultimately owned in the Republic of Ireland and operates in more than one country.

Figure 3: Net Receipts in 2020

2019
€10.887bn

+€0.95bn
Increase

2020
€11.833bn

Large Corporates Division companies
+€1,576m (+18%)

Other companies
-€631m (-30.0%)

Gross Receipts
€13,896m

less **Repayments**
€2,063m

Net Receipts
€11,833m

Preliminary Tax
€10.3bn

Balances
€1.5bn

Sector	2020	+/- 2019
Manufacturing	2,891	-26
Information & Communication	2,883	1,763
Financial & Insurance Activities	2,155	-322
Wholesale & Retail Trade	1,788	-72
Administrative & Support Services	1,152	-15
Construction	297	-40
Professional, Scientific & Technical Activities	288	-70
Real Estate Activities	112	-39
Other Sectors	92	14
Mining & Quarrying + Utilities	80	-20
Agriculture, Forestry & Fishing	62	16
Accommodation & Food Services	44	-74
Transportation & Storage	-9	-170

Concentration of Payments

Top 10 Companies
€5,983m net receipts
51% of net receipts

Top 100 Companies
€9,380m net receipts
79% of net receipts

Top 10 Groups*
€6,663m net receipts
56% of net receipts

Large Corporates Division Companies
€10,322m net receipts
87% of net receipts

**Individual companies or affiliates that are members of the same corporate entity grouped together.*

Ownership

Non Multinational Companies
€1,335m net receipts
11% of net receipts

Irish Owned Multinationals
€841m net receipts
7% of net receipts

Foreign Owned Multinationals
€9,657m net receipts
82% of net receipts

Source: Revenue analysis.

Table 3: Receipts from Top 10 Companies

Year	Gross Receipts Amount €m	Gross Receipts % of Gross Receipts	Net Receipts Amount €m	Net Receipts % of Net Receipts
2009	1,397	27	1,345	35
2010	1,281	26	1,268	32
2011	1,379	30	1,378	39
2012	1,416	30	1,414	34
2013	1,553	31	1,551	36
2014	1,729	33	1,728	37
2015	2,801	37	2,798	41
2016	2,762	33	2,755	37
2017	3,268	35	3,230	39
2018	4,675	41	4,671	45
2019	4,564	40	4,390	40
2020	6,072	44	5,983	51

Source: Revenue analysis.

Table 4: Receipts from Each Year's Top 10 Payers

€m Net Receipts	Net CT Paid In Year				
Top Ten in Year	**2016**	**2017**	**2018**	**2019**	**2020**
2016	2,755	2,862	3,940	3,556	3,066
2017	2,306	3,230	4,258	3,948	3,242
2018	2,055	2,995	4,671	4,047	3,229
2019	2,407	3,037	4,364	4,390	3,786
2020	2,116	2,726	4,202	4,107	5,983

% Net Receipts	Net CT Paid In Year				
Top Ten in Year	**2016**	**2017**	**2018**	**2019**	**2020**
2016	37	35	38	32	26
2017	31	39	41	36	28
2018	28	36	45	37	28
2019	32	37	42	40	32
2020	28	33	40	37	51

Source: Revenue analysis. Note: Central axis (shaded) matches the % for net receipts in Table 3.

2.6 Number of Companies Paying Tax and Ranges of Payments

Almost 56,000 companies paid net CT in 2020, down 6.5 per cent up on the previous year. The number of gross payers was 59,000, down 5.9 per cent on 2019. Much of these reductions in the number of taxpayers are likely to be due to the impact of COVID-19.

€613 million was paid in 2020 by 17,400 companies that did not pay CT in 2019. This was partly counterbalanced by €342 million paid by 19,500 companies in 2019 that did not pay CT in 2020.

Table 5: Number of Gross and Net Corporation Tax Payers

Year	Number of Gross Payers	Number of Net Payers*
2017	53,277	50,449
2018	58,293	55,369
2019	63,365	59,970
2020	59,603	56,067
2020 Change	**-5.9%**	**-6.5%**

Source: Revenue analysis. * Does not include "refund only" cases.

Table 6: Ranges of Net Payment Amounts

Payment Amount €	Number of Companies	Total CT Paid €m
1 - 40,000	47,521	318
40,001 - 60,000	2,234	99
60,001 - 80,000	1,209	75
80,001 - 100,000	821	66
100,001 - 200,000	1,823	230
200,001 - 500,000	1,262	351
500,001 - 1,000,000	505	318
1,000,001 - 5,000,000	454	878
5,000,001 - 10,000,000	101	647
Over 10,000,000	137	8,851
Total	**56,067**	**11,833**

Source: Revenue analysis.

Box 2: Country by Country Reporting

Country by Country ("CbC") reporting was developed as part of Action 13 of the OECD/G20 Base Erosion and Profit Shifting ("BEPS") Action Plan. CbC reporting requires certain multinational enterprises ("MNEs") to file a CbC report that provides a breakdown of the amount of revenue, profits, taxes and other indicators of economic activities for each tax jurisdiction in which the MNE group does business.

This box presents data on CbC reports filed in Ireland for 2016 and 2017, aligned to statistics submitted through a harmonised, aggregated process to the OECD for publication. Information for later years is not yet available.

Year	Number of CbC reports*	Number of CbC Sub-groups**	Number of CbC entities***
2016	45	1,068	1,702
2017	56	1,426	1,850

**The number of reports filed in Ireland (i.e., each one represents the top level of a group) but excluding those of surrogate parents; **The number of subgroups associated with the reports filed in Ireland (these can be located in any country); ***The number of companies associated with the groups and sub-groups for the reports filed in Ireland (these can be located in any country).*

Who Needs To File CbC Reports with Revenue

An Irish resident ultimate parent entity of a multinational group with worldwide revenue greater than €750 million in the previous accounting period has to file CbC reports from 1 January 2016. This information is exchanged with other tax authorities through specific automatic tax exchange agreements. Companies are required to make a notification of their obligation to file a report on or before the end of their accounting period. The actual report needs to be filed within 12 months of the end of their accounting period.

Use of CbC reporting data

CbC reports can be used for high level transfer pricing risk assessment, assessing other BEPS related risks and economic or statistical analysis. The data can be used to identify taxpayers and arrangements that pose a potential tax risk (in the areas noted) but cannot generally be used for other purposes. The use of the reports for economic or statistical purposes relates to reports filed in Ireland. Reports filed in other jurisdictions and received in Ireland via Exchange of Information should not be used for economic or statistical analysis by Irish Revenue.

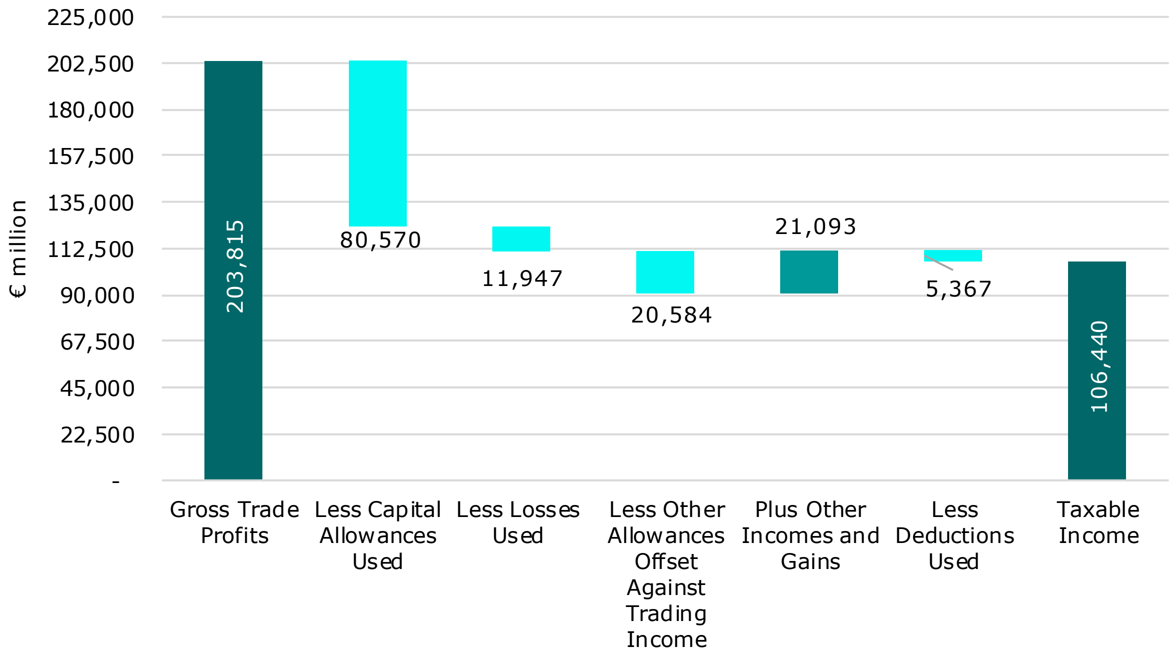
3 Corporation Tax Returns for 2019

As noted in the Introduction, CT1 returns in respect of accounting periods ended in 2019 (i.e., returns for the liability year 2019) were due in late 2020. Analysis of these returns provides context for the payments in 2020 as the returns for 2020, which underpin 2020 receipts (outlined in Section 2) have not yet been filed in most cases.

3.1 Profits

Figure 4 shows the summary, in aggregate for all companies, from gross profits of €203.8 billion declared to taxable income of €106.4 billion in 2019.

Figure 4: Gross Profits to Taxable Income 2019



Source: Revenue analysis. Note: Gross Trade Profits here includes balancing charges and excepted trade profit.

Over €195.3 billion of trading profits taxable at 12.5% was reported by companies in 2019 returns.[4] This is an increase of €12.5 billion on 2018 returns. As Table 7 shows, 90 per cent (€176.6 billion) of trading profits were attributed to five sectors: *Manufacturing*, *Financial & Insurance*, *Information & Communication*, *Wholesale & Retail Trade* and *Administrative & Support*.[5] The remaining 11 sectors accounted for the other 10 per cent. The sector with the largest trading profits, *Manufacturing* (€79.4 billion), recorded a 1 per cent decrease on 2018. Large increases in trading profits were seen in *Information & Communication, Financial & Insurance, Administrative & Support* and *Wholesale & Retail* sectors.

[4] Also included in the €203bn noted in Figure 4 are trading profits taxed at 25% (known as excepted trade profits) and balancing charges.
[5] The administrative & support services sector includes aircraft leasing.

Table 7: Trading Profits by Sector

Sector	Adjusted Profits €m *		Growth	
	2018	2019	€m	%
Manufacturing	80,352.91	79,397.53	-955.38	-1.19%
Information & Communication	24,363.65	26,771.13	2,407.47	9.88%
Financial & Insurance Activities	23,647.47	25,808.85	2,161.38	9.14%
Administrative & Support Services	20,716.78	24,518.35	3,801.57	18.35%
Wholesale & Retail Trade	16,491.99	20,146.64	3,654.65	22.16%
Professional, Scientific & Technical Activities	5,273.93	5,917.17	643.24	12.20%
Transportation & Storage	3,707.23	2,985.59	-721.64	-19.47%
Construction	2,366.87	2,645.59	278.72	11.78%
Mining & Quarrying + Utilities	1,972.95	1,870.52	-102.43	-5.19%
Accommodation & Food Services	1,149.83	1,084.50	-65.33	-5.68%
Agriculture, Forestry & Fishing	608.02	679.17	71.15	11.70%
Real Estate Activities	593.47	505.82	-87.65	-14.77%
Human Health & Social Work Activities	475.71	1,896.05	1,420.34	298.57%
Other Sectors	1,013.77	1,055.32	41.55	4.10%
Total	**182,735**	**195,282**	**12,547.63**	**6.87%**

Source: Revenue analysis. * Adjusted profits are the trading profits of a company after being adjusted to reflect any differing treatment of certain items for accounting purposes compared to tax purposes.

Table 7 analyses trading profits taxed at the standard rate of CT (12.5%). There are a number of other income and profit streams taxed in different ways, some of which are shown in Table 8.

Table 8: Non-Trading Profits and Other Incomes

Year	Net Dividend Income		Non-Trading Income		Capital Gains	
	Number of Companies	Amount of Income €m	Number of Companies	Amount of Income €m	Number of Companies	Amount of Capital Gains €m
2017	477	8,688	21,510	4,409	1,143	228
2018	522	4,451	20,621	9,151	1,208	264
2019	524	6,742	20,087	10,155	1,288	308
2019 Change	**0.0%**	**51.5%**	**-2.6%**	**10.9%**	**6.6%**	**16.5%**

Source: Revenue analysis.

Net foreign dividend income increased by €2.3 billion in 2019. This was not significant from a tax point of view as these dividends often do not give rise to tax in Ireland, due to offsets of double taxation relief and additional foreign tax credit.

Non-trading taxable income of companies is taxed at the higher rate of 25%. Non-trading taxable income increased by over 1 billion between 2018 and 2019.

Companies, like private individuals and sole traders, are required to pay tax in respect of gains made on the disposal of assets. The tax charged on companies' capital gains is equivalent to 33% of the value of the gain. There was a small increase in the number of companies that reported capital gains on their CT1 return for 2019 and a moderate increase in the amount of taxable gains of around €44 million.

As with individual Income taxpayers, companies can use net credits, deductions and reliefs against their profits to reduce taxable income or CT payable. The full detail of this calculation is published on Revenue's website.[6] The following Sections set out a view of the most significant and high profile of these: losses, capital allowances, Research & Development credit and the Knowledge Development Box.

3.2 Trading Losses

Where a company has losses or, subject to certain rules, carries forward losses from a previous accounting period, these can be used to offset against its CT liability in a variety of ways. These include being set against current year profits, surrendered to group companies, offset against a prior year's profits or carried forward.

While a company must record losses *claimed* on their CT1 returns, trading losses can only be *used* if there is an appropriate CT liability to offset.

Figure 5 shows the claimed and used amounts for losses carried forward and current year losses. The amount of losses carried forward from earlier accounting periods into 2019 accounting periods decreased by €1.8 billion (from €211 billion in 2018 to €209.2 billion).

Over 54,400 companies claimed losses on their 2019 tax returns. Of these, 40,500 also claimed losses forward in 2018 (i.e., carrying losses for multiple years). About 11,800 companies did not carry any losses forward into 2018 from earlier years but carried losses forward into 2019 either as a result of new losses or capital allowances created in 2018.

Around 25,000 companies used losses in 2019 totalling €11.9 billion, at a cost to the Exchequer of €1.5 billion.

Of companies with losses in 2018, over 16,200 did not carry losses into their 2019 returns, likely indicating that earlier losses had been fully utilised as a result of trading profits for these companies. The CT liability of these companies was €176 million for 2019.

It is important to note that losses forward include claims for unused capital allowances. This is discussed further in Section 3.3.

It is expected that usage of losses the in coming years will be affected by the COVID-19 crisis. Enhanced support for businesses affected by COVID introduced in the July 2020 Stimulus package including a measure to allow companies an early claim of up to 50 per cent of their 2020 losses against their 2019 tax returns. As at end February 2021, 210 claims were filed amounting to €469 million of losses, with an associated €60 million tax cost.

[6] Available at: https://www.revenue.ie/en/corporate/information-about-revenue/statistics/income-distributions/ct-calculation.aspx. Figures for 2019 will be published at this link once data are finalised.

Figure 5: Losses on 2019 Tax Returns

Losses Forward Claimed by Sector

	€ bn
Financial & Insurance	100.5
Administration & Support Services	45.5
Information & Communications	13.6
Manufacturing	11.1
Transport & Storage	9.0
Wholesale & Retail Trade	8.9
Construction	8.2
All Other Sectors	12.4

Losses carried forward decreased by €1.84bn (0.9%). Financial & Insurance decreased by €8bn (7%) and construction by €1.6bn (16%). The only substantial increases were in Administration & Support Services at €5bn (12%), mainly attributed to the aviation sector, and Information & Communication by €1.2bn (9.6%).

Around €35bn of losses brought forward were claims by companies in liquidation or otherwise unlikely to ever use these losses. The bulk were recorded by companies in the financial sector.

93% of the losses forward were by companies that had been claiming losses forward for 5 years or more.

Losses Forward €209,162m

Excepted Trade Losses Forward €8,466m

Current Year Losses €9,332m

Losses Forward €11,158m

Current Year Losses €789m

Carry Forward into 2020 €215,012m

Claimed

Used

Current Year Losses Claimed by Sector

	€m	+/-2018
Information & Communications	1,637	344
Financial & Insurance	1,281	-402
Administration & Support Services	1,250	-163
Manufacturing	1,121	-762
Wholesale & Retail Trade	1,096	151
Construction	590	118
Transport & Storage	89	-370
All Other Sectors	2,267	126

Losses Forward Used by Sector

	€m	+/-2018
Administration & Support Services	5,082	196
Financial and Insurance Activities	2,375	-1,327
Manufacturing	1,172	-28
Information & Communications	624	179
Wholesale & Retail Trade	565	-226
Construction	481	-187
Transport & Storage	89	-123
All Other Sectors	771	-373

Losses forward include unused capital allowances. Around €50bn of losses forward may be capital allowances – see Section 3.3.

Source: Revenue analysis.

3.3 Capital Allowances

Companies are entitled to capital allowances in respect of certain expenditure and these can be set against profits. Figure 6 summarises the available data on capital allowances.[7]

The tangible component of capital allowances (plant & machinery) increased by €4.9 billion. The value of claims in respect of intangible assets increased by €844 million in 2019.[8]

It is important to note that the €209 billion total losses forward (Section 3.2) includes claims for unused capital allowances from earlier years. After the first year of claim, any losses and capital allowances carried forward are combined in tax returns data. Therefore, it is not possible to separately identify capital allowances and losses in the carry forward at aggregate level.

As Table 9 shows, companies claiming intangible asset capital allowances are important CT payers, these companies account for around 35 per cent of total payments in 2019 and 47 per cent in 2020. Further, the growth of CT payments for this group of companies is higher than the overall growth rate or that for multinational companies alone. As the changes introduced to the regime from 11 October 2017 take further effect, it is expected that these payments will grow somewhat over the coming years. From information on the 2019 CT1s, the additional gross CT receipts associated with the restrictions introduced amounts to approximately €48 million.

Table 9: Tax Payments of Companies Claiming Intangible Asset Capital Allowances

CT Tax Payments	2019	2020	% Growth
Claimants of Intangible Capital Allowances	3,764	5,641	49.9%
All Companies	10,887	11,833	8.7%
Multinationals Only	9,148	10,498	14.8%

Source: Revenue analysis.

[7] It should be noted that these figures represent the aggregate of claims on the return, as distinct from the amount utilised to reduce tax due.
[8] In the case of intangible assets, the allowance is restricted such that it can only reduce trading income generated from the use of intangible assets, with any excess carried forward. Income not related to the use of the intangible assets is still taxable.

Figure 6: Capital Allowances on 2019 Tax Returns

	Amount Claimed €m	+/- 2018	Number Using
Plant & Machinery	38,580	4,927	65,500
Intangible Assets	46,208	844	472
Industrial Buildings	594	18	2,867
Other	235	13	6,801

€25,242m claimed by foreign owned multinationals

€45,211m claimed by foreign owned multinationals

80 less claimants than 2018. However, there were 175 new claimants in 2019, that did not make a claim in 2018, amounting to €3.3bn.

In respect of expenditure on specified intangible assets on or after 11 October 2017, the aggregate amount of capital allowances, plus any deductions for interest on borrowings in respect of specified intangible assets, may not exceed 80% of trading income of the relevant trade for the accounting period. The total value of claims in respect of intangible assets increased by €844m in 2019. There was a gross cash flow gain of €48m from the restriction in 2019.

Capital Allowances Claimed by Sector

	Plant & Machinery €m	Intangible Assets €m	Industrial Buildings €m	Other €m
Administrative & Support Services	22,142	779	2	27
Information & Communication	6,513	4,475	3	24
Manufacturing	3,001	36,780	365	18
Financial & Insurance	1,937	215	1	16
Wholesale & Retail Trade	1,489	2,097	36	64
Transportation & Storage	522	1	93	5
Construction	471	0	4	8
All Other Sectors	2,505	1,861	90	72

Claimant Basis

	€m	%
Accounts-based Pre-FA 2017 assets	33,377	72.2%
Accounts-based Post-FA 2017 assets	2,402	5.2%
Fixed rate Pre-FA 2017 assets	8,782	19.0%
Fixed rate Post-FA 2017 assets	1,639	3.6%
Other	8.6	0.0%

Note: "FA 2017" refers to Finance Act 2017 changes (effective from 11 October 2017).

Source: Revenue analysis.

3.4 Research & Development

The Research & Development ("R&D") tax credit provides relief for qualifying expenditure on certain research activities. Table 10 shows a €271 million increase (57 per cent) in the cost to the Exchequer of the R&D credit in 2019 returns. The number of companies increased from 1,303 to 1,601. The repayable element of the credit accounted for almost a third of the cost, although this varies year to year.[9]

Table 10: Research & Development Tax Credit

Year	Number of Companies	Cost €m	*Of which, Repayable Credit Cost €m*
2017	1,505	448	*152*
2018	1,303	355	*109*
2019	1,601	626	*200*

Source: Revenue analysis.

The value of R&D expenditure for 2019, against which tax relief is claimed, was €2.5 billion in the year. This only includes R&D where the expenditure is liable for the tax credit. Other forms of R&D may be undertaken that are not eligible for the tax credit. The companies using R&D relief paid €4.2 billion of net CT receipts (an amount that would clearly be higher were the credit not used to reduce liabilities).

Most of this expenditure occurred in a relatively small number of sectors. Of the €2.5 billion expenditure, €1.9 billion was by foreign owned multinational companies. R&D credit expenditure by Irish owned multinationals was €223 million, non-multinationals the remaining €329 million.

3.5 Knowledge Development Box

The Knowledge Development Box ("KDB") was introduced in the Finance Act 2015 for accounting periods commencing on or after 1 January 2016. While the R&D credit is a support for creation of new intellectual property ("IP") or other research, the KDB provides for a reduced rate of CT (6.25%) payable on profits arising from qualifying IP assets.[10]

Table 11: Knowledge Development Box

Year	Number of Claimants	Cost €m
2016	12	9.4
2017	16	12.2
2018	<10*	9.3
2019	14	12.2

Source: Revenue analysis. *Less than 10 claimants, the exact number is not shown to protect taxpayer confidentiality.

[9] Sections 766 and 766A of the Taxes Consolidation Act ("TCA") 1997 provide that the tax credit in respect of qualifying expenditure on R&D must be used initially to reduce the CT liability of the company for the accounting period in which the relevant expenditure is incurred. Any unused amount may be carried forward and used to reduce the CT of following accounting periods. Where an excess remains, instead of carrying forward that excess, a company may claim to use it to reduce the CT of the preceding accounting period. If any excess still remains it may still be carried forward and used to reduce the CT of succeeding accounting periods. In the event that there is insufficient CT liability in the current year, the company may claim to have the amount of the excess paid to them by Revenue in 3 instalments over 33 months from the end of the accounting period in which the expenditure was incurred.

[10] The KDB is available only to companies that carry out R&D within the meaning of Section 766 TCA.

A claimant company has a period of up to 24 months to make a claim for KDB relief. It is anticipated that more companies will use the 24 month time frame available. As such, more claims in respect of the year ended 31 December 2019 are likely to be made by September 2021.

3.6 Taxable Income, Paying Tax and the Effective Rate

For 167,800 2019 CT1 returns filed, 70,300 reported no trading or non-trading profits. Of the 97,500 with positive profits, a further 23,700 were not liable to CT due to the various reliefs and allowances available to companies, leaving 73,800 liable to the tax.

Figure 7: Number of Companies Liable to Tax 2019

Source: Revenue analysis. Note: Profits here includes either trading or non-trading.

As noted earlier, companies face three rates of tax: trading income (taxed at 12.5%), passive income (25%) and capital gains (33%). While it is not possible to provide the amounts of *tax collected* under each rate (due to the manner in which the tax assessment calculation operates), Table 12 provides the *taxable income* returned at each rate.

Table 12: Taxable Income by Tax Rate

Year	Trading Income €m	Non-Trading Income €m	Capital Gains €m
	12.50%	25%	33%
2017	75,246	4,409	228
2018	86,898	9,151	264
2019	96,284	10,155	308

Source: Revenue analysis.

As certain reliefs can be offset against profits taxable at the higher rate before offsetting them against income taxable at the 12.5% rate, the bulk of CT paid was attributed to trading income in all years.

Table 13 shows the average effective tax rate of various categories of companies. The effective tax rate for 2019 is calculated at 10.3% for all companies. This rate has been largely stable over the last few years. The average effective rate of foreign owned companies is higher than for domestic companies.

Table 13: Effective Rates of Tax

	Effective Rate %
All Companies	10.3
Foreign Owned Multinationals	11.1
United States Owned Multinationals	11.5
Irish Owned Multinationals	8.0
Non-Multinationals	8.3
Top 10 Companies	11.0
Top 100 Companies	10.3
LCD Companies	10.4

Source: Revenue analysis.

The effective rate of tax can be higher or lower than the statutory tax rate. Various tax reliefs, credits and deductions can lead to effective rates that are lower than the statutory rate. The 25% tax rate on non-trading income can lead to a company's overall effective tax rate being in excess of the statutory 12.5% tax rate. Approximately half of the top 100 companies had non-trading income taxable at 25%.

The effective tax rate is calculated by Revenue as tax due in proportion to taxable income.[11] Were it calculated instead with taxable income plus addback for double taxation and R&D credits, the rate is 13.4%, reflecting foreign taxation of income earned abroad. Calculating the rate on net trade profits plus dividends and other income generates a rate of 9.3%. However, this 9.3% does not reflect the fact that tax is paid in other jurisdictions on foreign income.

[11] As outlined in the Department of Finance technical paper by Coffey and Levey (2014).

4 Other Company Structures and Returns

4.1 Close Companies and Surcharges

A 'close company' is a company that is under the control of 5 or fewer participators (together with their associates), or any number of participators (and their associates) who are directors. A participator is, broadly speaking, any person with a share or interest in the capital or income of the company.

A surcharge at the rate of 20% is imposed on the undistributed estate and investment income (broadly, interest and rental income) of close companies, where it is not distributed within 18 months of the end of the accounting period to which it relates. Close companies that are service companies are also liable to a 15% surcharge on 50 per cent of their undistributed trading income. Table 14 shows the estimated number of close company returns and the associated CT liability, alongside the close company surcharge amounts for each year. Also shown are the number of companies liable to the service company surcharge and the amount due.

Table 14: Close Company and Service Company Surcharge

	2017	2018	2019
Number of Close Company Corporation Tax returns	131,675	134,473	135,136
Corporation Tax Liability	€805m	€849m	€1,233m
Number of Companies returning Close Company Surcharge	4,575	4,562	4,895
Amount of Surcharge returned	€26.9m	€27.7m	€31.2m
Number of Companies returning Service Company Surcharge	2,453	2,602	2,896
Amount of Surcharge returned	€14.4m	€15.4m	€18.0m

Source: Revenue analysis.

4.2 Section 110 Companies and Aircraft Leasing

A Section 110 company is an Irish resident special purpose vehicle that holds and/or manages "qualifying assets".[12] Table 15 shows the CT receipts from these companies. Table 16 shows Section 110 notifications and registrations ceased.

Table 15: Gross and Net Receipts of Section 110 Companies

Year	Gross Receipts		Net Receipts	
	Amount €m	% of Gross Receipts	Amount €m	% of Net Receipts
2018	93	0.8%	87	0.8%
2019	77	0.7%	62	0.6%
2020	73	0.6%	65	0.6%

Source: Revenue analysis. Note: s110 companies identified as companies managed in the relevant LCD Branch.

[12] A company must meet certain conditions, one of which is to notify Revenue of its status as a qualifying company Finance Act 2016 made certain changes to the taxation of qualifying companies, within the meaning of section 110 TCA 1997.

Table 16: Section 110 Companies Notifications Received and Registrations Ceased

Year	Number of Notifications received	Number of Registrations Ceased
2018	477	<10*
2019	535	<10*
2020	362	0

Source: Revenue analysis. *Less than 10 claimants, the exact number is not shown to protect taxpayer confidentiality.

Table 17 shows the net and gross CT receipts from aircraft leasing companies

Table 17: Gross and Net Receipts of Aircraft Leasing Companies

Year	Gross Receipts		Net Receipts	
	Amount €m	% of Gross Receipts	Amount €m	% of Net Receipts
2018	63.5	0.6%	54.3	0.5%
2019	146.9	1.3%	142.7	1.3%
2020	121.4	0.9%	105.5	0.9%

Source: Revenue analysis. Note: Aircraft leasing companies identified as companies in NACE code 7735 on Revenue records.

4.3 Irish Real Estate Fund Regime

Section 23 Finance Act 2016 introduced, and Section 18 Finance Act 2017 amended, the Irish Real Estate Fund ("IREF") regime, which takes effect for accounting periods commencing on or after 1 January 2017. IREFs do not pay CT, but pay an IREF withholding tax. Table 18 shows the information from IREF returns due since 31 July 2019.

Table 18: Irish Real Estate Funds 2017, 2018 and 2019

IREF Asset Description	For Accounting Periods Ending 1 July – 31 December 2017	For Accounting Periods Ending 1 January – 31 December 2018	For Accounting Periods Ending 1 January – 31 December 2019
	€m	€m	€m
Residential - Dublin	732	1,882	3,094
Residential – Rest Leinster	52	21	141
Residential - Ulster	2	0	0
Residential - Munster	34	0	190
Residential - Connacht	15	90	38
Retail	2,078	1,447	3,154
Commercial	3,837	2,887	7,688
Mixed-use	56	40	203
Development land	617	550	881
Other	236	54	1,954
Shares in a REIT	269.45	106	152
Other shares	0	253	671
Specified Mortgages	0	82	143
Units in an IREF	0	91	108
Total	**7,929**	**7,501**	**18,417**
Amount of IREF taxable event	623	905	368
Number of Returns received	52	87	179

Year	Amount of IREF WHT Deducted		
	2018	2019	2020
€m	8.3	24.2	65.7

Source: Revenue analysis. Note: IREF taxable event including distributions and redemption payments deriving from certain income and gains.

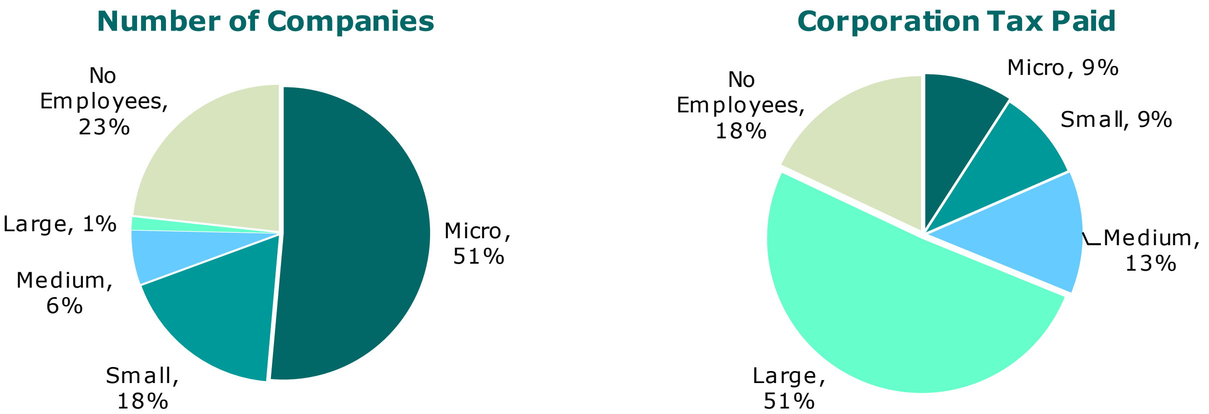
5 Employment and Payroll

As well as CT, companies contribute to the Exchequer as employers by collecting and paying over payroll taxes.

Employer returns to Revenue are on an *employment* rather than *employee* basis. An employee may have more than one employment (e.g., changing employment during the year or having a second job). Employments are a mix of part-time and full-time and also include as employees those who are in receipt of occupational pensions.

Figure 8 shows the number of companies and CT payments, both categorised by number of employments. While the majority (51 per cent) were micro companies, large companies accounted for over half of CT receipts. Companies with "no employees" may be affiliates within a larger corporate group, for example where one company pays the CT and another records the employments for the group.

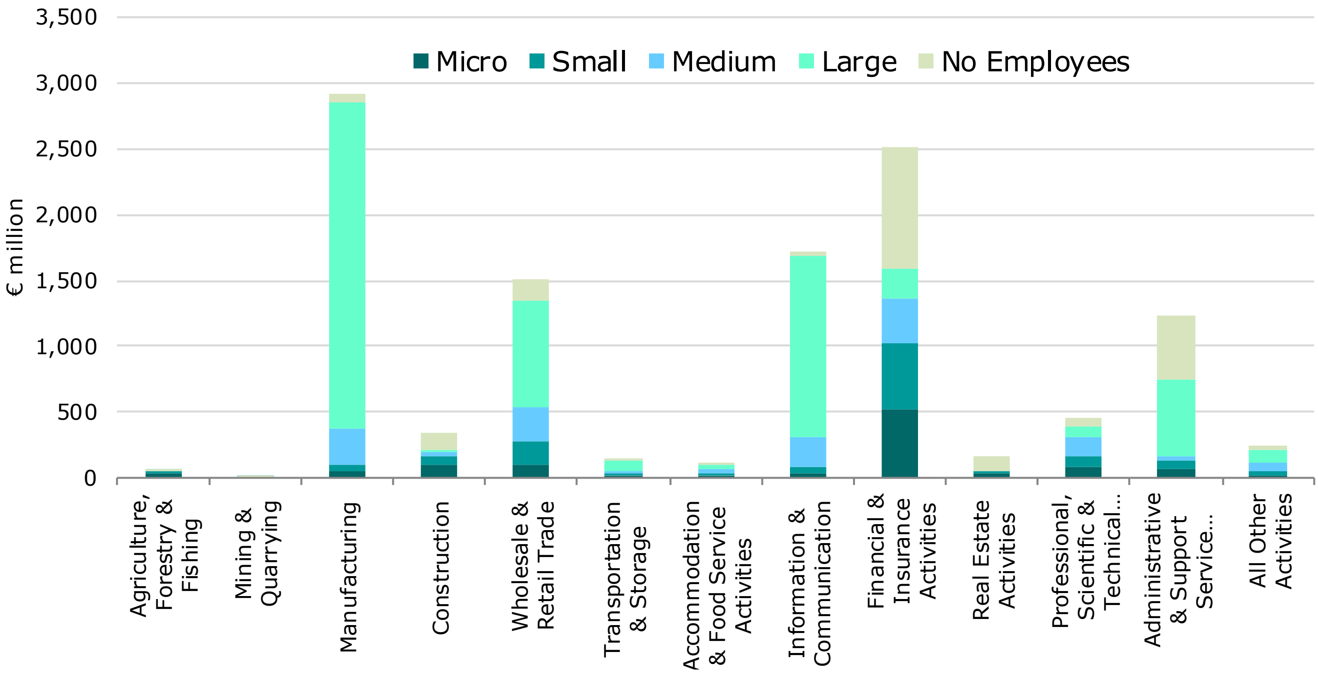
Figure 8: Number of Companies and Corporation Tax by Company Size 2019



Source: Revenue analysis. Note: 'Micro' refers to companies with between 1 and 10 employments, 'Small' 11 and 50 employments, 'Medium' 51 to 250, and 'Large' over 250 employments.

Figure 9 shows the CT payments by sector broken down by the size of the company (based on number of employees). The majority of payments of CT, particularly across the largest sectors, were made by companies with significant employment.

Figure 9: Corporation Tax by Company Size 2019



Source: Revenue analysis. Note: 'Micro' refers to companies with between 1 and 10 employments, 'Small' 11 and 50 employments, 'Medium' 51 and 25, and 'Large' over 250 employments.

Table 19 breaks down the value of PAYE, USC, PRSI remitted by companies as employers (on behalf of employees) and employment income (paid to employees) in 2019 by ranges of gross CT liability.[13] The VAT paid over by companies is also shown. The first panel displays data in respect of all companies, the following panels show the same for all multinationals, foreign owned multinationals, Irish owned multinationals and non-multinational companies respectively. Table 20 shows the same information by sector of the company.

There were over 2.4 million employments in companies. Just under half (approximately 1 million) were employed in multinational companies, while the majority of the balance were employed by non-multinationals. The combined Income Tax, USC and PRSI payments for these employees were €21.5 billion (€13.4 billion for multinationals' employees). Average earnings (and consequently average tax payments) were highest among employees of foreign owned multinationals.

Foreign owned multinationals had 767,000 employments in 2019 on Revenue records. Revenue data show 439,000 employments in *Manufacturing*, *Administrative & Support*, *Information & Communication* and *Financial Services* sectors, which are likely to be the traditional FDI sector (with export oriented activities and IDA support). The remaining 328,000, of which the largest share was 161,000 in *Wholesale & Retail Trade*, are most likely foreign owned multinationals operating in Ireland to serve the domestic market.

[13] Non-CT registered employers are not included in the following analysis.

Table 19: Employment by Liability Amount 2019

All Companies

CT Liability €	Company returns Number	Total CT Liable €m	Employment Number	Earnings €m	Income Tax €m	USC €m	Employer PRSI €m	VAT €m
Negative or Nil	97,744	-485	645,604	16,851	3,034	583	2,061	1,717
1-20,000	54,709	250	521,046	10,713	1,645	323	1,261	2,412
20,000-40,000	6,098	172	162,121	3,810	627	124	487	878
40,000-60,000	2,499	122	97,014	2,270	366	73	299	535
60,000-80,000	1,373	95	70,384	1,685	275	55	224	297
80,000-100,000	847	76	64,971	1,381	224	44	182	251
100,000-200,000	1,966	277	162,116	4,411	754	150	574	702
200,000-500,000	1,315	413	177,832	5,053	941	182	675	719
500,000-1,000,000	481	329	88,066	2,966	561	110	413	440
1,000,000-5,000,000	486	1,024	160,689	5,800	1,139	224	800	1,171
5,000,000-8,000,000	90	569	60,250	1,213	271	49	125	114
8,000,000+	161	8,096	156,499	6,633	1,503	294	802	469
Total	**167,769**	**10,939**	**2,366,592**	**62,787**	**11,340**	**2,210**	**7,902**	**9,705**

Foreign Owned Multinationals Only

CT Liability €	Company returns Number	Total CT Liable €m	Employment Number	Earnings €m	Income Tax €m	USC €m	Employer PRSI €m	VAT €m
Negative or Nil	7,912	-217	130,632	5,334	1,108	215	723	655
1-20,000	3,403	14	69,629	2,205	446	87	300	455
20,000-40,000	567	17	28,039	1,112	227	45	155	205
40,000-60,000	321	16	20,350	714	145	29	100	225
60,000-80,000	243	17	13,217	429	81	16	60	120
80,000-100,000	191	17	26,244	602	103	20	81	79
100,000-200,000	544	79	55,851	1,841	349	69	258	203
200,000-500,000	572	183	104,902	3,075	613	118	403	456
500,000-1,000,000	265	183	57,049	2,111	415	81	294	333
1,000,000-5,000,000	343	747	110,030	4,277	873	171	592	1,071
5,000,000-8,000,000	60	380	55,301	1,013	231	41	100	-26
8,000,000+	124	7,051	95,436	4,702	1,097	217	620	297
Total	**14,545**	**8,487**	**766,680**	**27,416**	**5,688**	**1,109**	**3,686**	**4,073**

Irish Owned Multinationals Only

CT Liability €	Company returns Number	Total CT Liable €m	Employment Number	Earnings €m	Income Tax €m	USC €m	Employer PRSI €m	VAT €m
Negative or Nil	1,933	-26	64,264	2,815	578	110	365	-124
1-20,000	413	1	19,018	690	126	26	92	29
20,000-40,000	75	2	7,093	234	47	9	28	151
40,000-60,000	39	2	4,566	133	24	5	19	2
60,000-80,000	27	2	4,289	163	24	5	23	12
80,000-100,000	24	2	818	29	6	1	4	4
100,000-200,000	88	13	26,451	819	133	27	90	27
200,000-500,000	101	34	19,293	558	94	19	78	46
500,000-1,000,000	43	29	11,454	345	61	12	48	43
1,000,000-5,000,000	41	84	17,337	622	110	22	89	117
5,000,000-8,000,000	14	89	3,029	170	34	6	23	142
8,000,000+	23	746	58,682	1,777	370	70	161	165
Total	**2,821**	**978**	**236,294**	**8,355**	**1,609**	**312**	**1,019**	**613**

Non-Multinational Companies Only

CT Liability €	Company returns Number	Total CT Liable €m	Employment Number	Earnings €m	Income Tax €m	USC €m	Employer PRSI €m	VAT €m
Negative or Nil	87,899	-242	450,708	8,702	1,348	259	974	1,185
1-20,000	50,893	235	432,399	7,819	1,072	209	869	1,929
20,000-40,000	5,456	153	126,989	2,464	352	70	304	521
40,000-60,000	2,139	104	72,098	1,423	198	40	180	308
60,000-80,000	1,103	76	52,878	1,093	170	34	141	165
80,000-100,000	632	57	37,909	750	115	23	97	168
100,000-200,000	1,334	185	79,814	1,751	273	54	226	472
200,000-500,000	642	196	53,637	1,420	234	46	194	217
500,000-1,000,000	173	117	19,563	510	85	17	70	65
1,000,000-5,000,000	102	194	33,322	901	156	31	119	-18
5,000,000-8,000,000	16	101	1,920	30	6	1	2	-2
8,000,000+	14	299	2,381	155	35	7	21	7
Total	**150,403**	**1,474**	**1,363,618**	**27,016**	**4,043**	**790**	**3,197**	**5,018**

Source: Revenue analysis.

Table 20: Employment by Sector 2019

All Companies

Sector	Company returns Number	Total CT Liable €m	Employment Number	Earnings €m	Income Tax €m	USC €m	Employer PRSI €m	VAT €m
Manufacturing	9,768	2,863	262,967	10,074	1,781	363	1,388	235
Financial & Insurance	19,214	2,513	231,830	7,123	1,654	308	821	-64
Information & Communication	12,229	1,623	144,485	7,226	1,705	320	924	547
Wholesale & Retail Trade	25,781	1,400	471,664	11,104	1,768	353	1,419	5,051
Administrative & Support	10,895	1,212	255,813	4,679	778	155	619	554
Prof., Scientific & Technical	22,717	318	157,257	6,024	1,295	242	729	1,140
Transportation & Storage	4,867	150	103,699	3,184	483	98	367	183
Mining, Quarrying & Utilities	292	8	5,466	206	36	7	29	-14
Construction	22,276	334	148,496	4,115	650	124	523	53
Accommodation & Food	8,599	107	292,062	3,010	243	55	364	795
Real Estate Activities	9,541	158	27,432	740	151	29	90	695
Agriculture, Forestry & Fishing	6,222	58	33,932	591	74	15	66	-21
Other Sectors	15,368	194	231,489	4,710	722	142	563	551
Total	**167,769**	**10,939**	**2,366,592**	**62,787**	**11,340**	**2,210**	**7,902**	**9,705**

Foreign Multinational Companies Only

Sector	Company returns Number	Total CT Liable €m	Employment Number	Earnings €m	Income Tax €m	USC €m	Employer PRSI €m	VAT €m
Manufacturing	1,020	2,629	130,037	6,294	1,216	247	886	194
Financial & Insurance	4,339	1,823	142,632	4,207	1,014	190	495	-30
Information & Communication	1,061	1,619	85,588	5,179	1,284	243	682	307
Wholesale & Retail Trade	1,605	1,025	161,083	4,828	890	177	659	2,919
Administrative & Support	2,631	1,055	80,550	1,903	335	67	268	200
Prof., Scientific & Technical	1,226	137	44,055	1,980	449	85	272	135
Transportation & Storage	274	24	17,880	664	118	24	96	1
Mining, Quarrying & Utilities	20	4	1,192	73	15	3	11	-30
Construction	796	36	13,802	522	97	18	74	12
Accommodation & Food	228	24	45,341	535	48	11	71	95
Real Estate Activities	627	32	8,812	299	68	13	41	113
Agriculture, Forestry & Fishing	134	5	2,195	56	8	2	8	-4
Other Sectors	584	75	33,513	876	144	28	124	163
Total	**14,545**	**8,487**	**766,680**	**27,416**	**5,688**	**1,109**	**3,686**	**4,073**

Irish Owned Multinationals Only

Sector	Company returns	Total CT Liable	Employment	Earnings	Income Tax	USC	Employer PRSI	VAT
	Number	€m	Number	€m	€m	€m	€m	€m
Manufacturing	269	53	26,924	1,019	174	36	145	-106
Financial & Insurance	1,007	463	66,374	2,062	440	80	229	-166
Information & Communication	125	2	7,421	248	48	9	35	23
Wholesale & Retail Trade	409	177	36,166	1,091	191	39	150	372
Administrative & Support	328	68	6,354	344	94	19	39	-9
Prof., Scientific & Technical	227	61	19,454	941	207	40	130	215
Transportation & Storage	53	68	35,815	1,283	199	39	119	21
Mining, Quarrying & Utilities	0	0	0	0	0	0	0	0
Construction	153	21	9,912	430	83	15	62	20
Accommodation & Food	19	3	3,160	47	6	1	6	32
Real Estate Activities	113	4	426	20	5	1	2	6
Agriculture, Forestry & Fishing	19	1	1,680	36	5	1	5	3
Other Sectors	99	57	22,608	833	157	31	95	200
Total	**2,821**	**978**	**236,294**	**8,355**	**1,609**	**312**	**1,019**	**613**

Non- Multinationals Only

Sector	Company returns	Total CT Liable	Employment	Earnings	Income Tax	USC	Employer PRSI	VAT
	Number	€m	Number	€m	€m	€m	€m	€m
Manufacturing	8,479	181	106,006	2,760	391	80	357	147
Financial & Insurance	13,868	227	22,824	854	199	38	97	132
Information & Communication	11,043	2	51,476	1,799	374	68	207	217
Wholesale & Retail Trade	23,767	198	274,415	5,185	686	138	610	1,760
Administrative & Support	7,936	90	168,909	2,433	348	68	312	362
Prof., Scientific & Technical	21,264	120	93,748	3,103	638	116	327	790
Transportation & Storage	4,540	58	50,004	1,237	166	34	152	161
Mining, Quarrying & Utilities	265	3	4,264	132	20	4	18	16
Construction	21,327	277	124,782	3,164	470	91	387	21
Accommodation & Food	8,352	80	243,561	2,428	189	43	287	668
Real Estate Activities	8,801	123	18,194	421	79	15	46	577
Agriculture, Forestry & Fishing	6,069	53	30,057	499	61	12	52	-20
Other Sectors	14,692	62	175,378	3,001	421	83	344	188
Total	**150,403**	**1,474**	**1,363,618**	**27,016**	**4,043**	**790**	**3,197**	**5,018**

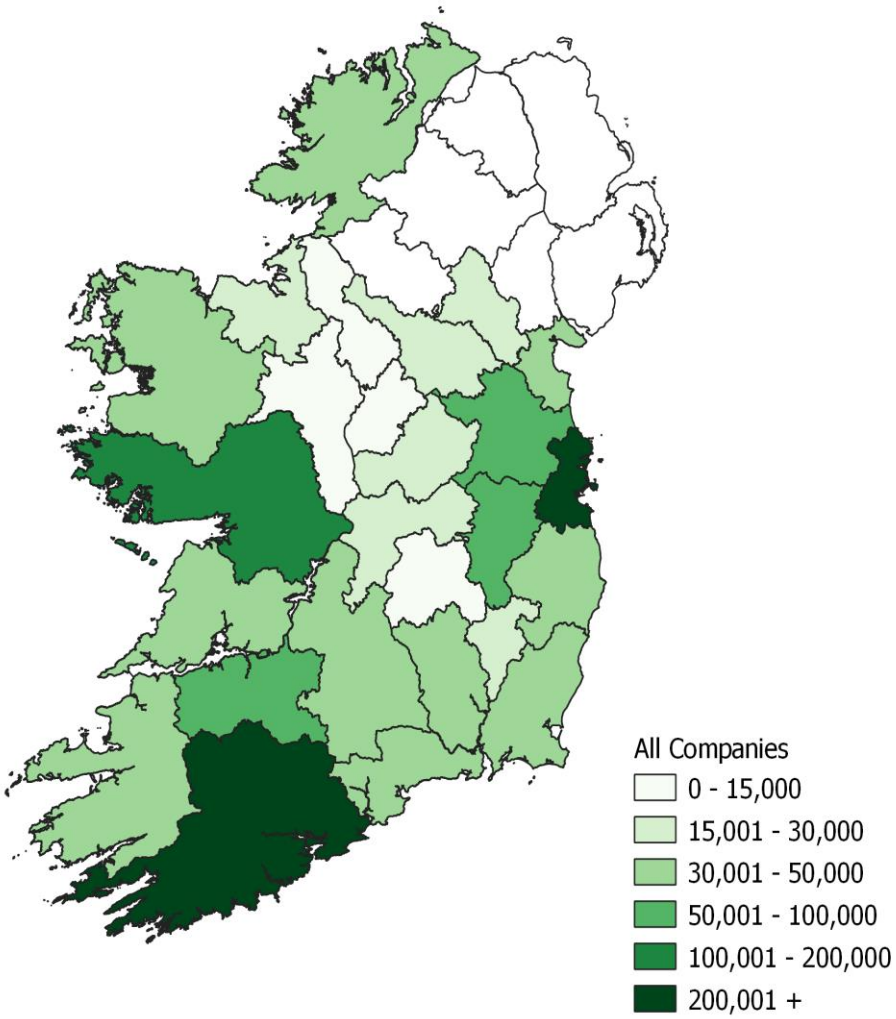
Source: Revenue analysis.

Companies which were not CT liable (for example, because they had not made a profit in a given year) were significant employers. Of the totals as shown in Table 19, CT non-liable companies were responsible for 27.3 per cent of employments among companies and 26.5 per cent of associated Income Tax, USC and PRSI. Non-CT liable foreign owned multinationals accounted for only 17 per cent of total foreign multinational employments and 19.5 per cent of associated Income Tax, USC and PRSI payments for foreign multinational companies.

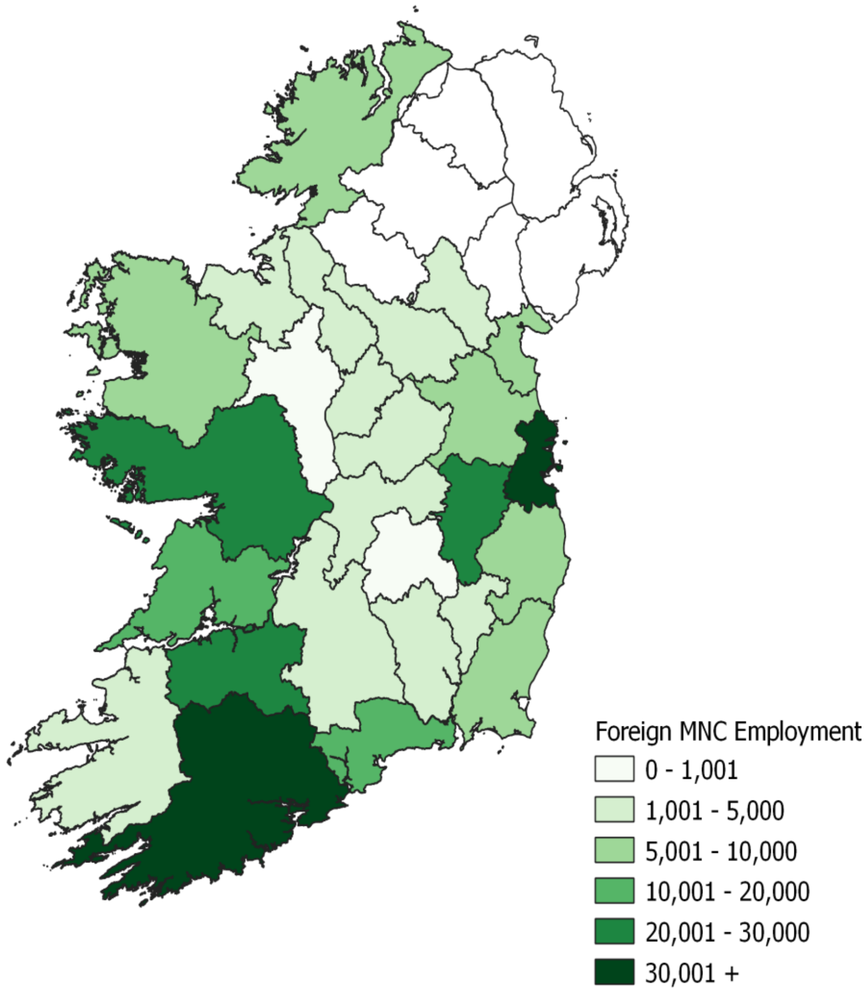
Figure 10 shows the growth rates of employments, overall and for foreign multinational companies, by county between 2018 and 2019.

Figure 10: Employment Level by County 2019

All Companies



Foreign Owned Multinationals Only



Source: Revenue analysis.

6 Conclusion

This report summarises the trends in CT payments in 2020, returns for 2019 and employment by companies. Revenue strives to make more information available to policy makers and other interested stakeholders. The following are the main points to note from the report.

Net CT in 2020 increased by €0.95 billion to €11.8 billion. This increase over 2019 was mainly due to increases in the payments from large companies and the *Information & Communications* sector. *Manufacturing* remains the largest CT paying sector.

Net CT receipts from LCD companies in 2020 increased by €1.6 billion (18 per cent) to €10.3 billion. These accounted for 87 per cent of net receipts. Net receipts from non-LCD companies decreased by €631 million compared with 2019. Foreign owned multinationals were responsible for 82 per cent of CT liability and 48 per cent employment taxes, while employing around 32 per cent of company employees. The share of receipts from LCD or multinationals had been relatively stable in recent years but COVID has caused a reversal of this trend in 2020. SMEs have been more significantly impacted by the pandemic, the initial indications of which are shown in the impact on their preliminary tax payments in 2020. This has also altered the share of receipts from the 10 largest payers, up to 51 per cent due to the COVID impact.

Information from CT1 returns indicate a significant increase in trading profits €12.5 billion or 6.9 per cent) in 2019. R&D credit claims increased substantially in 2019, 1,303 claimants in 2018 increasing to 1,601 in 2019, with a corresponding increase in the cost €355 million in 2018 to €626 million in 2019. Intangible assets claimed in 2019 increased by approximately €440m, mainly associated with foreign owned multinational companies.

Further detail from CT payments and tax returns is published on the Statistics pages of the Revenue website at: https://www.revenue.ie/en/corporate/information-about-revenue/statistics/index.aspx.