

Consideration due after time of disposal

Part 19-02-19

This document should be read in conjunction with section 563 of the Taxes Consolidation Act 1997

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Executive summary

Section 563 of the Taxes Consolidation Act 1997 (“TCA 1997”) provides that the computation of a chargeable gain for both capital gains tax and corporation tax purposes is to be made without taking into account any discount for the postponement of payment, and without regard to any risk that any part of the payment may prove to be irrecoverable or to the right to receive any part of the payment being conditional.

19.1 Consideration becoming irrecoverable

The gain or loss on disposal should be computed without any discount for the postponement of payment, or for any risk that part of the consideration may turn out to be irrecoverable. If any of the consideration does in fact become irrecoverable, the computation should be adjusted accordingly, and any necessary repayment or discharge made.

Note: This manual is currently subject to review and may not reflect up-to-date position. Most recent version.