Corporation Tax – 2022 Payments and 2021 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 2022 and returns for 2021.

2022 Corporation Tax Payments

CT is the second largest tax-head, representing 27.5% of net tax receipts in 2022

Net CT Receipts

2022	€22,645m (+ 48%)
2021	€15,323m (+ 29%)
2020	€11,833m (+ 9%)

Aspects of Growth in 2022

Number of companies paying CT - ↑ 16%
Large corporates - receipts ↑ 51%
SMEs - receipts ↑ 32%

The level of concentration in the Top 10 companies increased to 57% in 2022 from 53% in 2021

2021 Corporation Tax Returns

194,600 CT Returns
113,900 Positive Profits
88,900 Profits Liable to CT

Trading Income
€250.5bn taxable profits reported in 2021

90% in five sectors

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

Non-Trading Income €6.2bn
Net Dividend Income €19.1bn
Capital Gains €1.9bn

Losses Forward €222.5bn
+ 5% y-on-y
89% of losses over 5 years old

Intangible Asset Claims €131.3bn
Foreign multinationals account for 91%

Research & Development Credit
2021 – 1,629 claimants
€753m (+ 14% y-on-y)

Knowledge Development Box
2021 - 14 claimants
€14.2m (-13% y-on-y)

Employment

Over 2.5m employments in companies, with combined Income Tax, USC and PRSI payments of €25.6bn in respect of these. Foreign multinationals account for 33% of employment and 52% of employment taxes of corporate employers.

Revenue
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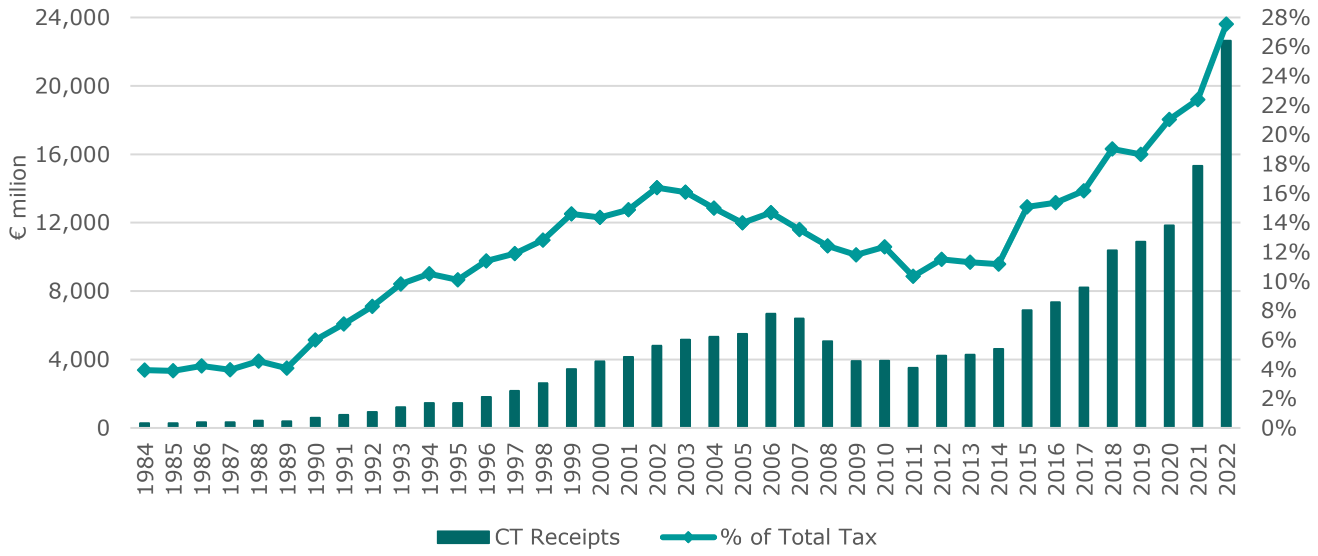
1 Introduction

This report is the latest in a series of annual papers by Revenue on Corporation Tax ("CT").[1] CT is currently the second largest tax head, with €22.6 billion in net receipts transferred to the Exchequer in 2022, equivalent to 27.5 per cent of total tax receipts in that year. CT receipts grew by 47.8 per cent, strongly surpassing growth in general economic activity in Ireland in 2022.

Figure 1: Corporation Tax Receipts



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

CT payments received in 2022 are mainly in respect of accounting periods ended in 2022. The associated CT returns for 2022 (the "CT1" return) are not due until nine months after the end of the accounting period, which is in the latter half of 2023 in most cases. However, analysis of returns for 2021 (the most recent year for which returns have been filed at present) provides context for the two latest years of payments, 2021 and 2022.

Section 2 profiles CT payments in 2022 and changes compared to 2021. In Section 3, returns for 2021 are reviewed to understand the activities of companies and the factors underpinning CT payments. Section 4 presents data on different types of company structures. Section 5 reviews employment and payroll data related to companies. Section 6 concludes and summarises some key points from this report.

[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 Corporation Tax Payments in 2022

2.1 Overview

Table 1 shows net and gross CT receipts by the calendar year in which the payments are received. For example, the row "2022" reflects CT paid in 2022 regardless of the liability years to which these payments related.[2] The final column shows CT paid arising from Revenue compliance interventions (such as audit settlements).

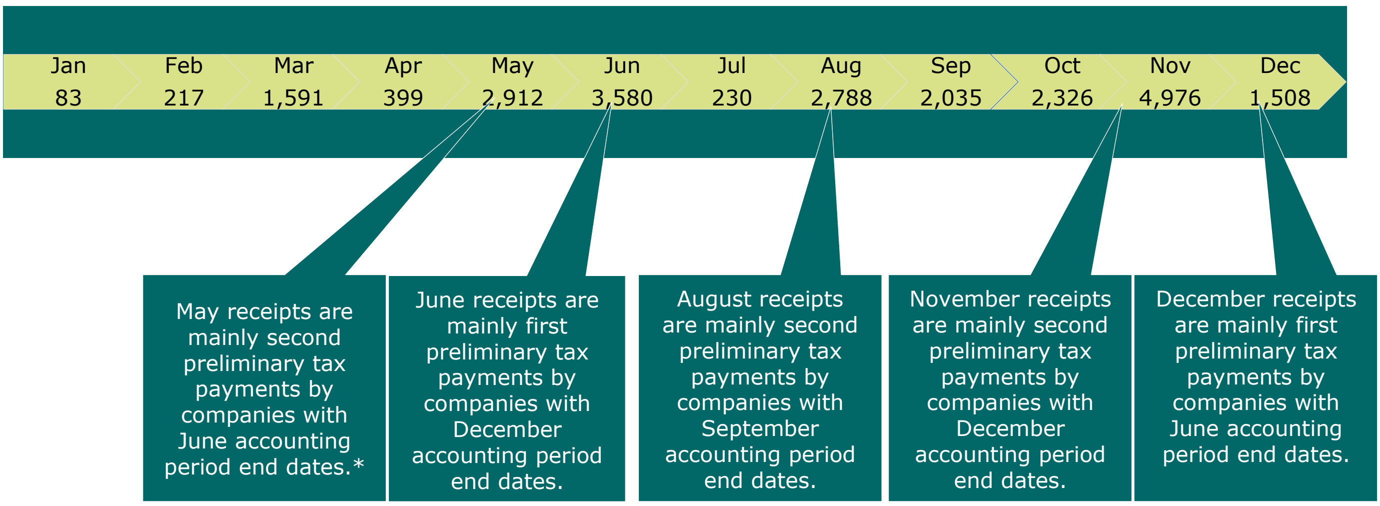
Table 1: Receipts and Liabilities

Year	Gross Receipts €m	Net Receipts €m	Corporation Tax Liability for Tax year €m	Corporation Tax Compliance Yield €m
2020	13,896	11,833	11,754	158
2021	17,517	15,323	15,106	778
2022	24,606	22,645	*	390

Source: Revenue analysis *Not available until returns have been filed during 2023.
Note: The compliance yield shown in the table above relates to yield in the year and not for the tax year.
Gross receipts are generally receipts prior to repayments etc.

Figure 2 shows the €22.6 billion collected in 2022 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. Just under half of corporation tax payments are associated with companies with a January to December accounting period, followed by 18 per cent with July to June and 15 per cent December to November and the remainder associated with other accounting periods.

Figure 2: Net Exchequer Receipts by Month in 2022 (€ million)



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

[2] Exchequer CT receipts in 2022 were reduced by approximately €18 million to fund payments for the COVID Restrictions Support Scheme ("CRSS").

CT payments in 2022 (€22.6 billion) are made up of preliminary tax ("PT") payments for 2022 (€20.1 billion) and balances due for earlier years (€2.5 billion). PT payments in 2022 are 48 per cent higher than in 2021 (and twice the preliminary tax payments in 2020). This indicates that, for many companies, profitability increased significantly in 2022. Table 2 shows the change in CT varied between companies in Revenue's Large Corporates, Medium Enterprises and Business divisions with the greatest increases in the payments from Large Corporates Division.

Table 2: Payments in 2022 by Revenue Division

Revenue Division	CT Payments in 2022 €m	+/- 2021 %
Large Corporates	19,560	+ 51.31%
Medium Enterprises	1,677	+ 26.16%
Business	1,409	+ 32.02%

Source: Revenue analysis.
Note: taxpayers in the Business Division are typically micro and small SMEs and taxpayers in the Medium Enterprises Division are typically medium-sized SMEs.

2.2 Sectors

Figure 3 on page 7 shows 2022 receipts by sector. Nearly all sectors showed growth in 2022 over 2021 tax receipts. Some sectors showed significant increases. In particular, the *Manufacturing* sector grew by over 128 per cent. Its growth is responsible for 77 per cent of the €7.3 billion increase in 2022 CT receipts. Manufacturing is a diverse sector, incorporating chemical and pharmaceuticals as well as ICT manufacturing. Receipts from both of these subsectors experienced extremely strong growth in 2022.

2.3 Ownership

As also shown in Figure 3, foreign-owned multinationals paid €19.6 billion (86.5 per cent of net CT receipts), Irish-owned multinationals €928 million (4.1 per cent) and non-multinationals €2.1 billion (9.4 per cent).[3]

2.4 Concentration

Figure 3 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 2022 increased by €6.6 billion (51 per cent) to €19.6 billion. These accounted for 86 per cent of net receipts. Net receipts from non-LCD companies increased by €689 million compared with 2021, a growth of 29 per cent.

The net receipts from the 10 largest payers in 2022 totalled €13,013 million, with their share of CT receipts increasing to 57 per cent, which is a substantial increase in the payments made by these companies. Tables 3 and 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 2022

2021
€15.323bn

+€7.322bn
Increase

2022
€22.645bn

Large Corporates Division companies
+€6,630m (+51%)

Other companies
+€689m (+29%)

Gross Receipts
€24,606m

less **Repayments**
€1,961m

Net Receipts
€22,645m

Preliminary Tax
€20.1bn

Balances
€2.5bn

Sector	2022 €m	+/- 2021 €m	Share of 2022 increase %
Manufacturing	10,078*	5,660	77.3
Information & Communication	4,184	922	12.6
Financial & Insurance Activities	2,698	334	4.6
Wholesale & Retail Trade	2,292	-49	-0.7
Administrative & Support Services	1,199	-86	-1.2
Professional, Scientific & Technical Activities	660	4	0.1
Construction	469	105	1.4
Mining & Quarrying + Utilities	304	127	1.7
Real Estate Activities	204	86	1.2
Transportation & Storage	179	89	1.2
Accommodation & Food Services	150	80	1.1
Other Sectors	129	28	0.4
Agriculture, Forestry & Fishing	98	21	0.3
Total	**22,645**	**7,322**	**100**

**€5,536m chemical and pharma manufacture (+ €2,645m on 2021), €3,788m ICT manufacture (+ €2,855m on 2021), €754m other (+ €160m on 2021). Financial & Insurance Activities include €490m of receipts associated with holding companies (+ €126m on 2021).*

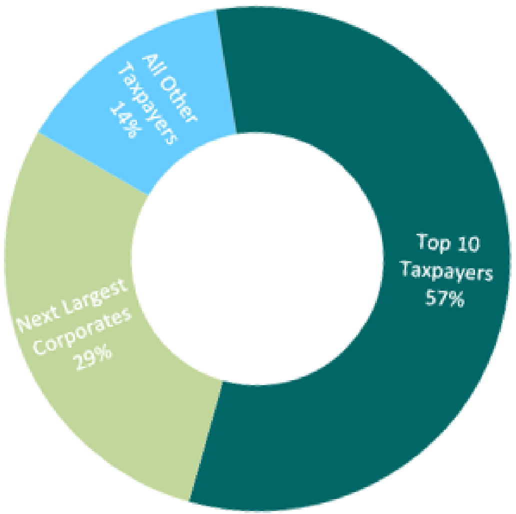
Concentration of Payments

Top 10 Companies
€13,013m net receipts
57% of net receipts

Top 10 Groups*
€13,615m net receipts
60% of net receipts

Top 100 Companies
€17,878m net receipts
79% of net receipts

Large Corporates Division Companies
€19,560m net receipts
86% of net receipts



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

Ownership

Non-Multinational Companies
€2,135m net receipts
9.4% of net receipts

Irish-Owned Multinationals
€928m net receipts
4.1% of net receipts

Foreign-Owned Multinationals
€19,579 net receipts
86.5% of net receipts

Source: Revenue analysis.

Table 3: Receipts from Top 10 Companies

Year	Gross Receipts		Net Receipts	
	Amount €m	% of Gross Receipts	Amount €m	% of Net Receipts
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
2021	8,191	47	8,176	53
2022	13,121	53	13,013	57

Source: Revenue analysis.
Note: Top companies are by reference to payments. Gross receipts are generally receipts prior to repayments etc.

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

€m Net Receipts	Net CT Paid In Year				
Top Ten in Year	2018	2019	2020	2021	2022
2018	4,671	4,047	3,229	6,298	7,557
2019	4,364	4,390	3,786	7,009	8,475
2020	4,202	4,107	5,983	7,292	9,470
2021	3,959	3,834	3,904	8,176	12,213
2022	4,028	3,941	3,915	7,794	13,013

Note: Table is read as follows: the Top 10 in 2018 paid €4,671m in 2018 and this same group of taxpayers paid €7,557m in 2022, the Top 10 in 2022 paid €13,013 in 2022 and this same group of taxpayers paid €4,028m in 2018, etc.

% Net Receipts	Net CT Paid In Year				
Top Ten in Year	2018	2019	2020	2021	2022
2018	45	37	28	41	33
2019	42	40	32	45	37
2020	40	37	51	47	41
2021	38	35	33	53	53
2022	39	36	33	51	57

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

2.5 Number of Companies Paying Tax and Ranges of Payments

Over 77,100 companies paid net CT in 2022, 16.2 per cent up on the previous year. The number of gross payers was 80,800, up 16 per cent on 2021. Table 6 shows the number of companies by range of payment amount.

Table 5: Number of Gross and Net Corporation Tax Payers

Year	Number of Gross Payers	Number of Net Payers*
2020	59,603	56,067
2021	69,651	66,400
2022	80,789	77,136
2022 Change	**16.0%**	**16.2%**

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	63,647	522
40,001 - 60,000	3,608	169
60,001 - 80,000	2,017	133
80,001 - 100,000	1,335	114
100,001 - 200,000	2,873	386
200,001 - 500,000	1,933	578
500,001 - 1,000,000	752	510
1,000,001 - 5,000,000	665	1,362
5,000,001 - 10,000,000	135	919
Over 10,000,000	171	17,951
Total	**77,136**	**22,645**

Source: Revenue analysis.

CT of €833 million was paid in 2022 by 26,000 companies that did not pay CT in 2021. This was partly counterbalanced by €576 million paid by 15,100 companies with positive tax payments in 2021 that did not pay CT in 2022.

Box 1: 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 to 2020, 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
2018	61	1,505	1,749
2019	65	1,646	1,976
2020	63	1,692	2,017

**2016 was a half year of reporting so number of reports lower than later years; **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.

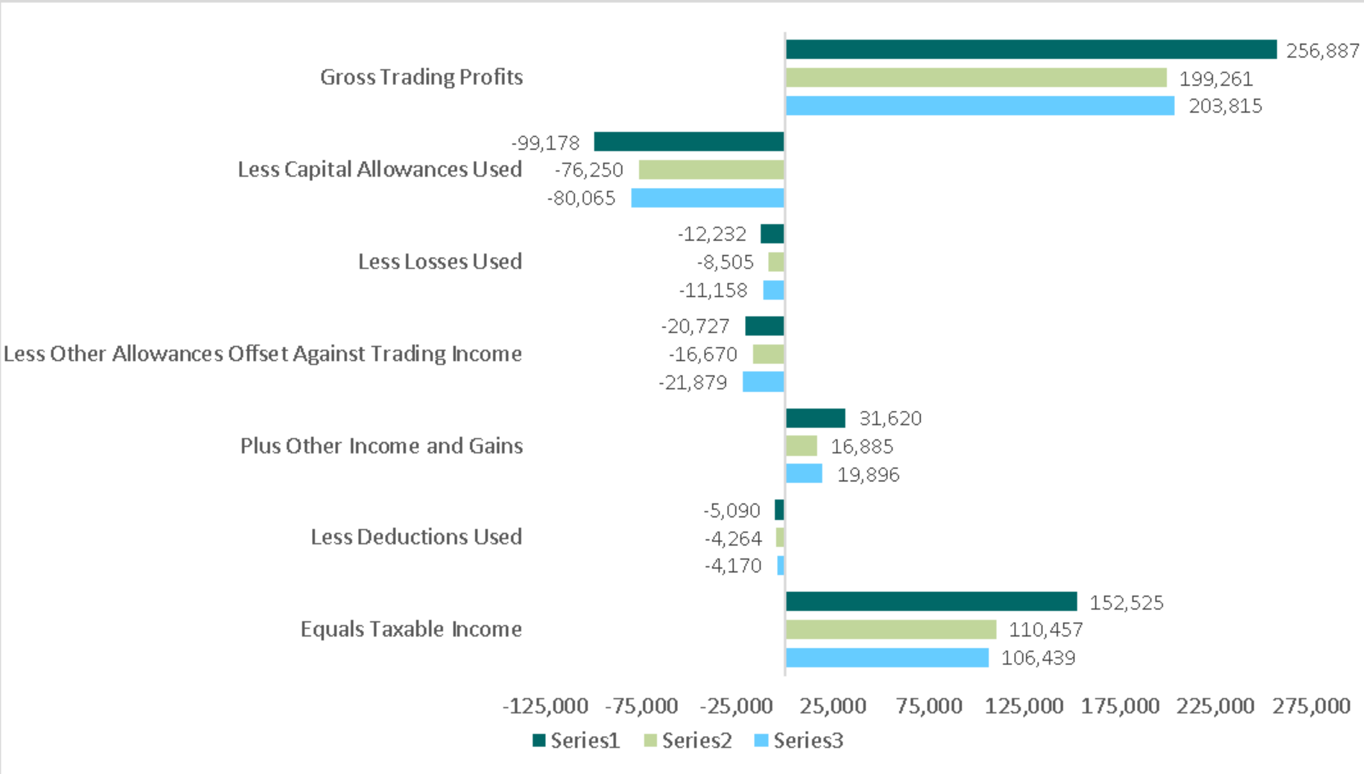
3 Corporation Tax Returns for 2021

As noted in the Introduction, CT1 returns in respect of accounting periods ended in 2021 (i.e., returns for the liability year 2021) were mainly due in late 2022. Analysis of these returns provides context for the payments in 2022 as the returns for 2022, which underpin 2022 receipts (outlined in Section 2), have not yet been filed in most cases. The 2021 returns also provide important context for 2021 receipts, which grew by 29 per cent year-on-year.

3.1 Profits

Figure 4 shows the summary, in aggregate for all companies, from gross trading profits of €256.9 billion declared to taxable income of €152.5 billion in 2021. The two previous years are included for comparison purposes.

Figure 4: Gross Trading Profits and Income to Taxable Income (€ million)



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

Almost €257 billion of trading profits was reported by companies in 2021 returns.[4] This is a large increase of €57.6 billion on 2020 returns and is mainly due to increased profitability experienced by large multinational companies.

As Table 7 shows, 90 per cent (€225 billion) of trading profits were attributed to five sectors: *Manufacturing*, *Information & Communication*, *Financial & Insurance*, *Wholesale & Retail Trade*

[4] Also included in the €257 bn noted in Figure 4 are trading profits taxed at 25% (known as excepted trade profits) and balancing charges. Balancing charges relate to activity in a previous accounting period.

and *Administrative & Support*.[5] The remaining 9 sectors accounted for the other 10 per cent. The sector with the largest trading profits, *Manufacturing* (€105 billion), recorded a 41 per cent increase on 2020.

Table 7: Trading Profits by Sector

Sector	Adjusted Profits €m *		Growth	
	2020	2021	€m	%
Manufacturing	74,414.26	105,224.25	30,809.99	41.40%
Information & Communication	33,038.10	40,057.64	7,019.54	21.25%
Wholesale & Retail Trade	22,173.99	26,701.33	4,527.34	20.42%
Financial & Insurance Activities	20,827.47	27,261.69	6,434.22	30.89%
Administrative & Support Services	24,234.55	25,735.18	1,500.63	6.19%
Professional, Scientific & Technical Activities	7,221.65	10,386.73	3,165.08	43.83%
Construction	2,919.18	3,365.54	446.36	15.29%
Mining & Quarrying + Utilities	2,157.57	2,926.96	769.39	35.66%
Transportation & Storage	2,159.27	2,699.34	540.07	25.01%
Human Health & Social Work Activities	1,405.59	2,066.43	660.84	47.02%
Accommodation & Food Services	604.13	1,252.63	648.50	107.34%
Agriculture, Forestry & Fishing	813.32	1,000.70	187.38	23.04%
Real Estate Activities	327.78	577.19	249.40	76.09%
Other Sectors	915.34	1,240.61	325.27	35.54%
Total	**193,212**	**250,496**	**57,284.04**	**29.65%**

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. This does not include balancing charges, which relate to activity in a previous accounting period, or excepted trade profits.

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 Foreign 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
2019	524	6,742	20,087	10,155	1,288	812
2020	564	5,259	20,421	7,123	1,228	1,243
2021	638	19,128	20,289	6,219	1,750	1,894
2021 Growth	**13.1%**	**264%**	**-0.7%**	**-12.7%**	**42.5%**	**52.5%**

Source: Revenue analysis.
Note: the income streams in Table 8 are also included in Figure 4 under Other Income and Gains.

Net foreign dividend income increased by €13.9 billion in 2021. This income was not significant from a tax point of view as these dividends often do not give rise to significant tax in Ireland, due to offsets of double taxation relief and the additional foreign tax credit.

[5] The administrative & support services sector includes aircraft leasing.

Non-trading taxable income of companies is taxed at the higher rate of 25%. Non-trading taxable income decreased slightly by €905 million between 2020 and 2021. The main reason for this was a decrease in non-trading foreign income from a small number of large companies.

Companies 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.[6] There was an increase in Capital Gains on 2021 tax returns compared to 2020.

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.[7] The following Sections set out a view of the most significant and high profile of these: Losses, Capital Allowances (both tangible and intangible), 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, excluding losses forward reported by excepted trades, from earlier accounting periods into 2021 accounting periods increased by €10.6 billion (from €211.9 billion in 2020 to €222.5 billion). Under 60,700 companies claimed losses on their 2021 tax returns. Of these, 43,600 also claimed losses forward in 2020 (i.e., carrying losses for multiple years). Around 28,000 companies used losses, including current year losses but excluding losses carried into 2021 from later years, in 2021 totalling €12.2 billion, at a cost to the Exchequer of €1.5 billion.

Of companies with losses in 2020, over 15,100 did not carry losses into their 2021 returns, likely indicating in many cases that earlier losses had been fully utilised as a result of trading profits for these companies. The CT liability of these companies was €348 million for 2021.

It is important to note that losses forward include claims for unused capital allowances (for tangible assets).

[6] It should be noted capital gains are taxed at 33% but for technical reasons the gains are re-grossed and taxed at 12.5% on the underlying system. This has no impact on the tax calculation. The amount shown in Table 8 is the amount actually taxed at 33%.

[7] Available at: https://www.revenue.ie/en/corporate/information-about-revenue/statistics/income-distributions/ct-calculation.aspx. Figures for 2021 will be published at this link once data are finalised.

Figure 5: Losses on 2021 Tax Returns

Losses Forward Claimed by Sector

	€ bn	+/-2020
Financial & Insurance	99.3	1.6
Administration & Support	55.2	7.6
Information & Communications	15.2	1.0
Manufacturing	11.1	-0.9
Wholesale & Retail Trade	10.3	0.2
Transport & Storage	9.1	0.1
Construction	8.3	0.1
All Other Sectors	14.0	0.8

Losses Forward Claimed by Revenue Division of Company

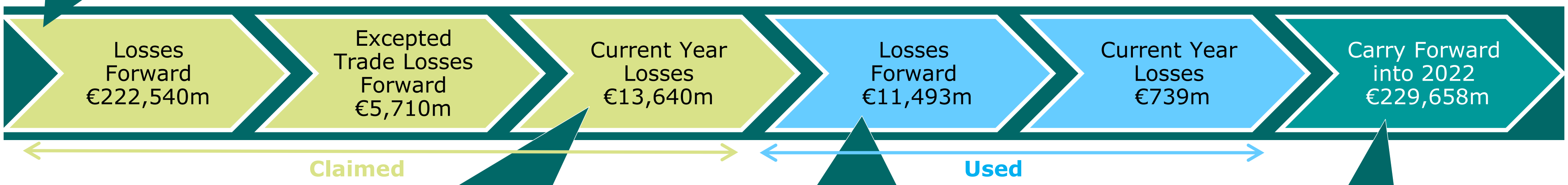
	€ bn
Business	17.6
Medium Enterprises	25.9
Personal	0.0
Large Corporates	179.0

Losses Forward Claimed by Loss Amount

	€ bn
€1-€1m	4.9
€1m-€10m	14.3
€10m-€20m	13.3
€20m-€50m	20.0
€50m-€100m	13.2
€100m-€1bn	45.9
€1bn+	110.9

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.

89% of the losses forward were by companies that had been claiming losses forward for 5 years or more.



Current Year Losses Claimed by Sector

	€m	+/-2020
Administration & Support Services	2,452	853
Information & Communications	1,974	133
Transport & Storage	1,754	1,017
Financial & Insurance	1,753	-1,989
Wholesale & Retail Trade	1,282	46
Manufacturing	1,328	-430
Construction	765	8
All Other Sectors	2,332	-173

Losses Forward Used by Sector

	€m	+/-2020
Administration & Support Services	4,073	997
Financial and Insurance Activities	2,652	1,332
Manufacturing	1,230	-105
Information & Communications	849	327
Wholesale & Retail Trade	772	207
Construction	680	106
Transport & Storage	68	-244
All Other Sectors	1,169	367

Losses forward include unused capital allowances for tangible assets. At least a quarter of losses forward are likely to be capital allowances.

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 on page 16 summarises the available data on capital allowances.[8]

The tangible component of capital allowances (plant & machinery) decreased by €8.9 billion, driven by a drop in claims for *Manufacturing*. The €229.7 billion total losses forward (Section 3.2) includes claims for unused capital allowances for tangible assets from earlier years. After the first year of claim, any losses and capital allowances (plant & machinery and industrial buildings only) 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. It should be noted that unused intangible asset capital allowances[9] are carried forward into later years as capital allowances and not losses.

Capital allowances for intangible assets are ring-fenced against trading income from the relevant trade. In addition, the quantum of available allowances may be further restricted by the application of an 80% cap. Where the cap applies, the aggregate amount of capital allowances for specified intangible assets, plus any deductions for related interest, for an accounting period is restricted to a limit of 80% of trading income (before deduction of such allowances and interest) of the relevant trade for that period. Where it is not possible to utilise all the capital allowances otherwise available for an accounting period due to either insufficiency of relevant trading income or because of the application of the 80% cap, the excess allowances will be carried forward and added to any allowances which are available for offset against trading income of the relevant trade for the next accounting period, and so on for each succeeding accounting period.

The value of amounts available to claim (before any restrictions) in respect of intangible assets increased by €37 billion to €131 billion in 2021. Most of this increase in intangible claims is attributable to a small number of large companies, who also claimed in 2020 (Table 9). The amount of capital allowances in respect of intangible assets reported as unused on 2020 returns by companies and carried forward (including amounts carried forward from earlier periods) into the 2021 returns is €54 billion. This is approximately 41 per cent of the overall amounts available to claim in respect of intangible assets on the 2021 returns. The equivalent amount reported as unused on the 2021 returns and available for carry forward into the 2022 returns is €61 billion.

[8] 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.
[9] For the purposes of this document, references to "intangible asset capital allowances" are to capital allowances in respect of specified intangible assets, as defined in section 291A(1) TCA 1997.

Table 9: Profile of Intangible Asset Capital Allowances Claims

	Amount of Claim € billion		
	2019	**2020**	**2021**
Claims by companies who claimed in all three years	45.7	67.5	82.9
Claims by companies who claimed in 2020 and 2021 but not 2019	N/A	26	42.9
Claims by companies who claimed in 2021 only	N/A	N/A	5.4
Total Claims in the Year *	**46.2**	**94.2**	**131.3**

*€746m was claimed by companies in 2020 who did not make a claim in 2021. A negligible amount was claimed by companies who claimed in both 2019 and 2021 but not 2020.

As Table 9 shows, companies claiming intangible asset capital allowances are important CT payers. They account for approximately 60 per cent of growth in 2022 CT receipts. The growth of CT payments for this group of companies in 2022 is marginally higher than the overall growth rate for multinational companies alone. It should be noted that not all CT paid by companies with intangible capital allowances arises from profit generated through intangible assets.

Table 10: Tax Payments of Companies Claiming Intangible Asset Capital Allowances

CT Payments				
CT Tax Payments by	**2020 €m**	**2021 €m**	**2022 €m**	**Growth in 2022 %**
Claimants of Intangible Capital Allowances in 2021	6,137	8,565	12,981	51.54%
All Companies	11,833	15,323	22,645	47.78%
Multi-Nationals	10,498	13,690	20,507	49.80%

Source: Revenue analysis.

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. As these changes take further effect, it is expected that CT payments arising from companies with intangibles will continue to affect Corporation Tax receipts positively over the coming years. From information on the 2021 CT1s, the additional gross CT receipts associated with the restrictions introduced amount to approximately €600 million.

Figure 6: Capital Allowances Claimed on 2021 Tax Returns

	Amount Claimed €m	+/- 2020	Number of returns Using
Plant & Machinery	40,961	-8,906	78,200
Intangible Assets	131,324	37,087	752
Industrial Buildings	718	74	3,270
Other	232	26	8,316

€29,918m claimed by foreign-owned multinationals

€118,858m claimed by foreign-owned multinationals

58 more claimants than 2020. However, there were 101 claimants in 2020 that did not make a claim in 2021, amounting to €746m. There were 159 new claimants in 2021 amounting to €5.4bn.

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. There was a gross cash flow gain in the region of €600 million from the restriction in 2021.

Capital Allowances Claimed by Sector

	Plant & Machinery €m	Intangible Assets €m	Industrial Buildings €m	Other €m
Administrative & Support Services	21,438	5,839	2	23
Information & Communication	6,621	17,132	3	23
Financial & Insurance	3,847	3,132	1	13
Manufacturing	3,461	66,159	438	24
Wholesale & Retail Trade	1,691	21,173	46	26
Transportation & Storage	552	374	104	12
Construction	435	0	4	9
All Other Sectors	2,916	17,514	120	103

Claimant Basis

	€m	%
Accounts-based Pre-FA 2017 assets	58,532	44.6%
Accounts-based Post-FA 2017 assets	33,475	25.5%
Fixed rate Pre-FA 2017 assets	13,145	10.0%
Fixed rate Post-FA 2017 assets	26,172	19.9%

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

Source: Revenue analysis.

Note: the numbers shown above relate to the number of returns and not the number of companies, which is shown in Table 10. The amount claimed in respect of intangible assets shown above includes unused amounts from earlier years.

3.4 Research & Development

The Research & Development ("R&D") tax credit provides relief for qualifying expenditure on certain research activities. Table 11 shows a €95 million increase in the cost to the Exchequer of the R&D credit in 2021 returns. The cost is now at its highest level since the credit was introduced in 2004. The number of companies increased marginally from 1,616 to 1,629. The repayable element of the credit accounted for less than half of the cost, although this varies from year to year.[10]

Table 11: Research & Development Tax Credit

Year	Number of Companies	Cost €m	Of which, Repayable Credit Cost €m
2019	1,601	626	200
2020	1,616	658	256
2021	1,629	753	339

Source: Revenue analysis.

The value of R&D expenditure for 2021, against which tax relief is claimed, was €3.5 billion in the year. This only includes R&D where the expenditure is eligible for the tax credit. Most of this expenditure occurred in a relatively small number of sectors. Other forms of R&D may be undertaken that are not eligible for the tax credit. The companies using R&D relief paid €7.1 billion of net CT receipts (an amount that would be higher were the credit not used to reduce liabilities). Of the €3.5 billion expenditure, €2.9 billion was by foreign-owned multinational companies. R&D credit expenditure by Irish-owned multinationals was €242 million, non-multinationals accounting for the remaining €299 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.[11]

Table 12: Knowledge Development Box

Year	Number of Claimants	Cost €m
2017	16	12.2
2018	15	10.3
2019	20	13.7
2020	17	16.3
2021	14	14.2

Source: Revenue analysis.

[10] Of relevance to 2021, 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. Instead of carrying forward the unused amount, 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.

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

A claimant company has up to 24 months to make a claim for KDB relief. As such, more claims in respect of the year ended 31 December 2021 are likely to be made by September 2023.

3.6 Taxable Income, Paying Tax and the Effective Rate

For 194,600 2021 CT1 returns filed, 80,700 reported no trading or non-trading profits. Of the 113,900 with positive profits, a further 25,100 were not liable to CT due to the various reliefs and allowances available to companies, leaving 88,900 liable to the tax.

Figure 7: Number of Companies Liable to Tax 2021

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 13 provides the *taxable income* (or gain) returned at each rate.

Table 13: Taxable Income by Tax Rate

Year	Trading Income 12.5%	Non-Trading Income 25%	Capital Gains 33%
2018	86,898	9,151	696
2019	96,284	10,155	812
2020	103,335	7,123	1,243
2021	146,286	6,219	1,894

Source: Revenue analysis. Note: From 2021 onwards, the gains associated with section 627 disposals are included in the Capital Gains figure above. These amount to €109.6m gains mainly at 33% by 147 companies.

It should be noted that certain reliefs can be offset against profits taxable at the higher rate before offsetting them against income taxable at the 12.5% rate.

Table 14 shows the average effective tax rate of various categories of companies. The effective tax rate for 2021 is calculated at 10% 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 Irish owned multi-national companies.

Table 14: Effective Rates of Tax

	Effective Rate %
All Companies	10.0
Foreign-Owned Multinationals	10.2
Irish-Owned Multinationals	6.9
Non-Multinationals	10.5
Top 10 Companies	10.1
Top 100 Companies	10.0
LCD Companies	10.1

Source: Revenue analysis. Top companies are by reference to taxable income.

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 and does not use the effective tax rate reported in financial accounts.[12] Were it calculated instead with taxable income plus addback for double taxation and R&D credits, the rate is 12.7%, reflecting foreign taxation of income earned abroad. Calculating the rate on net trade profits plus dividends and other income generates a rate of 8.6%. However, this 8.6% does not reflect the fact that tax is paid in other jurisdictions on foreign income.

[12] 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 15 shows the 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 15: Close Company and Service Company Surcharge

	2019	2020	2021
Number of Close Company Corporation Tax returns	135,136	140,723	143,161
Corporation Tax Liability	€1,233m	€916m	€1,180m
Number of Companies returning Close Company Surcharge	4,895	5,378	5,613
Amount of Surcharge returned	€31.2m	€37.3m	€39.1m
Number of Companies returning Service Company Surcharge	2,896	3,285	3,510
Amount of Surcharge returned	€18.0m	€21.4m	€23.2m

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".[13] Table 16 shows the CT receipts from these companies along with employment tax and VAT receipts. A number of aircraft leasing companies are also classified as section 110 companies and are included in Table 16. Table 17 shows Section 110 notifications and registrations ceased.

[13] 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: Gross and Net Receipts of Section 110 Companies

Year	Number of Companies*	Gross CT Receipts €m	% of Gross Receipts	Net CT Receipts €m	% of Net Receipts	Employment Taxes €m	VAT Receipts €m
2020	1,622	73	0.6%	65	0.6%	7.0	-4.6
2021	1,722	103	0.6%	75	0.5%	7.7	5.9
2022	2,050	98	0.4%	84	0.4%	8.9	-1.2

Source: Revenue analysis.
Note: *The number of Corporation Taxpayers in the year. Companies with no liability are not included in the numbers shown in the table above.
Employment taxes is the sum of Income Tax, USC, Employer PRSI and Employee PRSI.

Table 17: Section 110 Companies Notifications Received and Registrations Ceased

Year	Number of Notifications Received	Number of tax Registrations Ceased**
2020	363	<10*
2021	588	<10*
2022	391	<10*

Source: Revenue analysis.
*Less than 10 claimants, the exact number is not shown to protect taxpayer confidentiality.
** This figure indicates the number of Section 110 companies who submitted a Section 110 notification in the reference period that have since submitted a Form S.110W Withdrawal Notification, and/or dissolved, and/or ceased their tax registration.

Table 18 shows the net and gross CT receipts alongside employment tax and VAT receipts from aircraft leasing companies.

Table 18: Gross and Net Receipts of Aircraft Leasing Companies

Year	Number of Companies*	Gross CT Receipts €m	% of Gross Receipts	Net CT Receipts €m	% of Net Receipts	Employment Taxes €m	VAT Receipts €m
2020	515	121.4	0.9%	105.5	0.9%	281.6	-49.9
2021	420	61.5	0.4%	46.0	0.3%	299.7	-54.4
2022**	569	78.1	0.3%	49.6	0.2%	306.2	-82.7

Source: Revenue analysis.
Note: *The number of Corporation Taxpayers in the year. Companies with no liability are not included in the numbers shown in the table above.
** Prior to 2022, aircraft leasing companies who were also Section 110 companies were excluded from this table. For 2022 and future years, they are included. The change in definition has resulted in a slight increase in net CT receipts as presented here; excluding Section 110 aircraft leasing companies, net receipts growth in 2022 would be broadly flat.
Employment taxes is the sum of Income Tax, USC, Employer PRSI and Employee PRSI.

4.3 Irish Real Estate Fund Regime

Section 23 Finance Act 2016 introduced, and Section 18 Finance Act 2017 and Section 30 Finance Act 2019 subsequently 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 (WHT). Table 19 shows the information derived from the 'Form IREF' returns (details regarding the value of IREF Assets and IREF WHT receipts) and information derived from the 'Form 1 IREF' (the amount of IREF income tax deducted under Schedule D Case IV).

Table 19: IREF Assets, IREF WHT & IREF Income Tax

IREF Asset Description	Accounting Periods Ending 1st January – 31st December 2018^	Accounting Periods Ending 1st January – 31st December 2019	Accounting Periods Ending 1st January – 31st December 2020	Accounting Periods Ending 1st January – 31st December 2021
	€m	€m	€m	€m
Residential - Dublin	2,024	3,094	3,453	5,523
Residential - Rest Leinster	21	141	310	363
Residential - Ulster	0	0	7	13
Residential - Munster	0	190	161	352
Residential - Connacht	90	38	75	89
Retail	1,019	3,154	3,501	3,194
Commercial	4,596	7,688	9,137	10,172
Mixed-use	40	203	404	575
Development land	491	881	892	1,258
Other	311	1,954	1,379	1,916
Shares in a REIT	106	152	151	170
Other shares	253	671	467	380
Specified Mortgages	82	143	42	25
Units in an IREF	90	108	313	603
Total	9,123	18,417	20,293	24,634
IREF Taxable Amount*	236	369	621	311
Number of Returns received	87	180	204	222

Amount of IREF Withholding Tax Deducted				
Year	**2019**	**2020**	**2021****	**2022**
€ m	28.2	65.8	36.8	31.7

Amount of Income Tax Deducted Under Schedule D Case IV				
Year	**2019**	**2020**	**2021**	**2022**
€ m	6.3	16.5	12.1	N/Av

Source: Revenue analysis.

Notes: *IREF taxable amount is before exemptions. IREF WHT does not apply to distributions made to Irish investors or exempt investors.
** FY2020 was the first period an IREF had an obligation to file a return regardless of having a taxable event or not, a measure introduced by FA 2019.
Some IREFs reported the COVID-19 pandemic impacted the value of investment property, and realised/unrealised losses were recorded in the Financial Statements.
^Data revised for FY 2018 due to amended IREF returns on foot of Revenue compliance interventions.

A total of 222 IREF WHT Annual Returns were received for the 2021 period. A factor in the increase in the number of returns filed in financial years 2020 and 2021 relative to earlier years is an amendment in Finance Act 2019. Prior to that amendment, IREFs were only required to file a return if they had an IREF Taxable Event in the year but following the amendment, every IREF is required to submit a return regarding the financial year 2020 (and thereafter) regardless of whether it had an IREF Taxable Event in the year of assessment. The increase in returns filed in financial year 2019 relative to financial year 2018 is not affected by the amended legislation; this increase reflects increased taxable events in the relevant period triggering an obligation to file a return. The IREF filing deadlines regarding the financial year 2021, were 30 January 2022 and 30 July 2022.

In addition to a 20% IREF WHT on distributions, the Finance Act 2019 introduced a charge to income tax at the rate of 20% at the level of the IREF to counter the use of excessive debt and other payments to reduce distributable profits. The three anti-avoidance measures introduced in 2019 included (i) a debt cap, to limit excessive leveraging and resulting interest, (ii) a property financing cost ratio, to limit excessive interest rates, and (iii) a “wholly and exclusively” test to limit excessive expenses. The measures were introduced by Financial Resolution on Budget night, 8 October 2019. The payments/amounts exceeding the caps are deemed to be the income of the IREF and are charged to tax under Schedule D Case IV. For the first period (i.e. 9 October 2019 to 31 December 2019), income tax of €6.3 million was paid; for the 2020 year of assessment, income tax of €16.5 million was paid; and for the 2021 year of assessment, income tax of €12.1 million was paid by the IREFs (see Table 19).

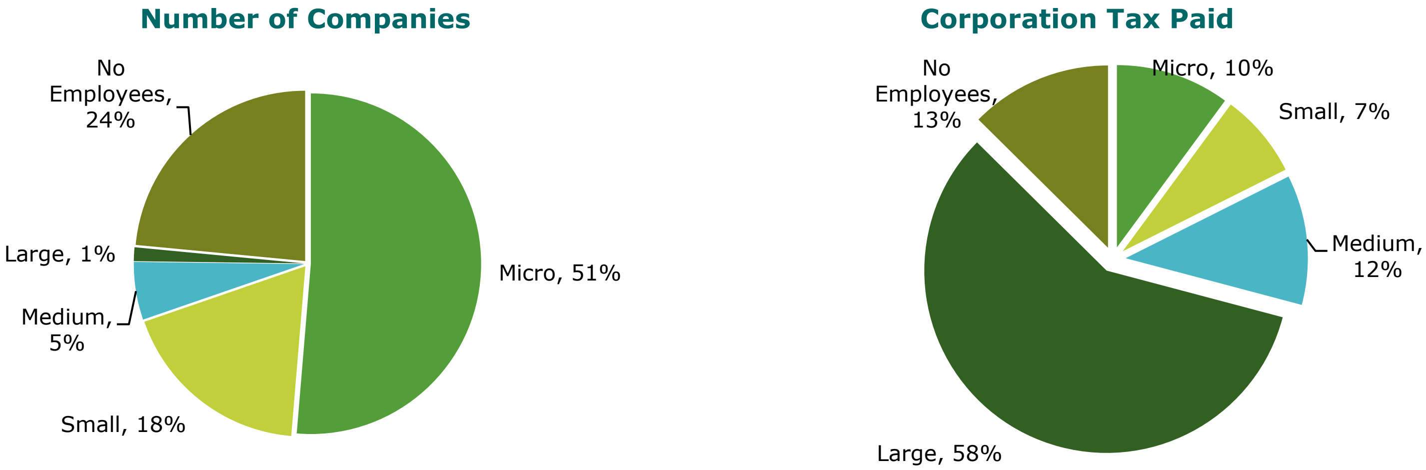
5 Employment and Payroll

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 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 (1 per cent) accounted for over half of CT receipts. Companies with "no employees" may be affiliates within a larger corporate group, for example where one company records the employments for the group.

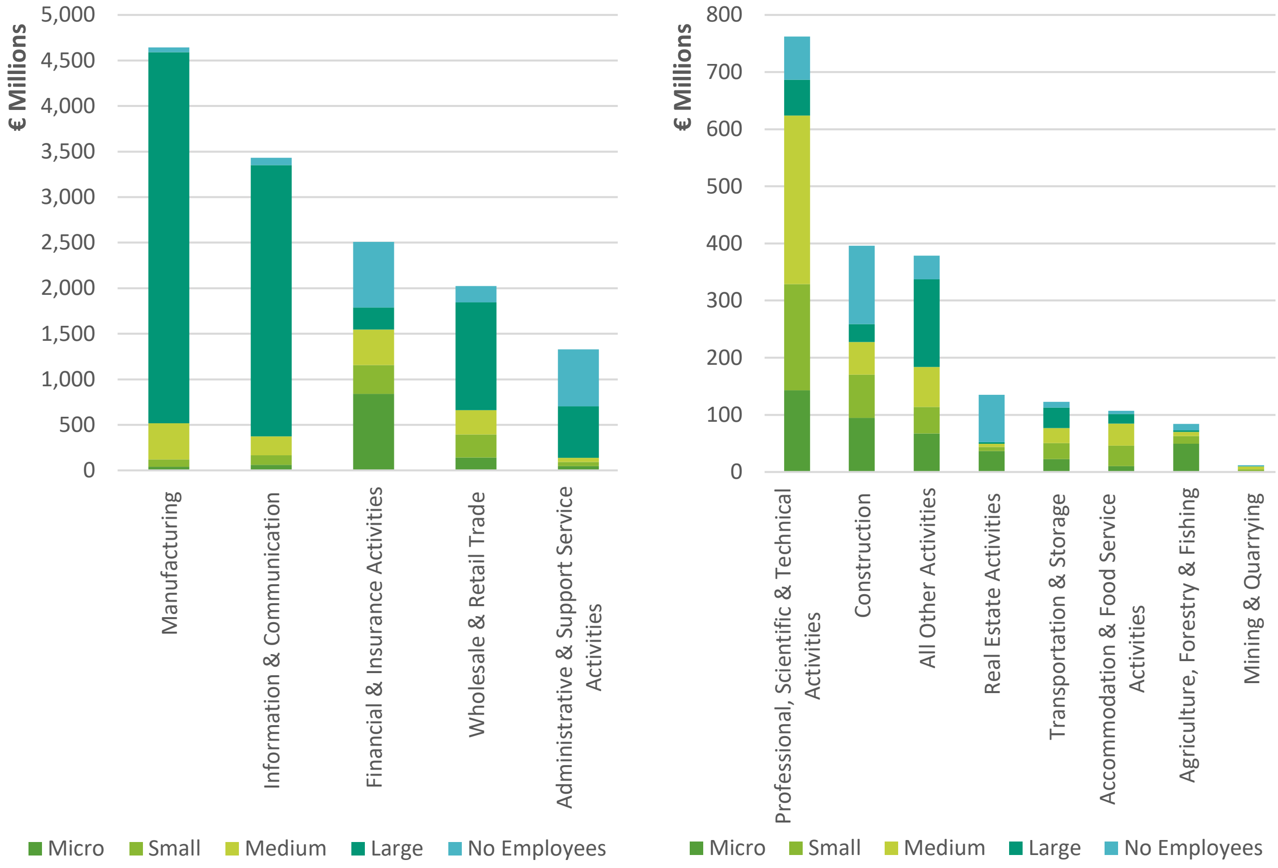
Figure 8: Number of Companies and Corporation Tax by Company Size 2021



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 2021



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

Table 20 breaks down the value of PAYE, USC, PRSI and employment income (paid to employees) in 2021 by ranges of gross CT liability.[14] 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 foreign-owned multinationals, Irish-owned multinationals and non-multinational companies respectively. Table 21 shows the same information by sector of the company.

There were around 2.5 million employments in companies in 2021. Approximately 1.1 million of these were in multinational companies, while the majority of the balance were in non-multinationals. The combined Income Tax, USC and PRSI payments for all companies were €25.6 billion (€16.5 billion for multinationals). Average earnings (and consequently average tax payments) were highest among employments of foreign-owned multinationals.

[14] Non-CT registered employers are not included in the following analysis. As such, the totals should not be interpreted as referring to the whole of the Irish labour market. For example, Income Tax-registered businesses who are also employers are excluded from the analysis.

Foreign-owned multinationals had over 850,000 employments in 2021 on Revenue records. Revenue data show 490,600 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 360,400, of which the largest share was 174,800 in *Wholesale & Retail Trade*, are most likely foreign-owned multinationals operating in Ireland to serve the domestic market.

Table 20: Employment by CT Liability Amount 2021
All Companies

CT Liability €	Companies returns Number	Total CT Liable €m	Employments Number	Earnings €m	Income Tax €m	USC €m	Employee PRSI €m	Employer PRSI €m	VAT €m
Negative or Nil	109,111	-830	679,578	19,374	3,821	713	695	1,694	977
1-20,000	64,904	326	544,197	11,657	2,009	380	408	952	2,771
20,000-40,000	8,521	240	193,923	4,387	758	144	158	409	632
40,000-60,000	3,471	169	146,894	2,735	483	88	91	234	515
60,000-80,000	1,841	128	81,845	2,035	378	72	73	196	396
80,000-100,000	1,094	98	51,047	1,248	222	42	45	121	243
100,000-200,000	2,603	366	182,913	4,715	847	161	174	466	936
200,000-500,000	1,663	520	211,688	5,995	1,198	225	215	567	1,524
500,000-1,000,000	609	424	125,021	3,583	662	126	135	369	605
1,000,000-5,000,000	565	1,213	159,621	5,625	1,194	227	207	546	873
5,000,000-8,000,000	77	486	23,746	919	195	38	34	94	458
8,000,000+	188	11,966	168,481	8,819	2,161	420	330	805	1,379
Total	**194,647**	**15,106**	**2,568,954**	**71,093**	**13,928**	**2,637**	**2,564**	**6,452**	**11,310**

Foreign-Owned Multinationals Only

CT Liability €	Companies returns Number	Total CT Liable €m	Employments Number	Earnings €m	Income Tax €m	USC €m	Employee PRSI €m	Employer PRSI €m	VAT €m
Negative or Nil	9,958	-414	170,931	7,103	1,596	303	267	698	-252
1-20,000	4,264	16	83,308	2,748	581	113	100	273	1,364
20,000-40,000	620	18	24,656	1,055	237	46	40	108	159
40,000-60,000	369	18	52,136	989	211	38	29	73	153
60,000-80,000	297	21	19,907	741	160	31	27	74	170
80,000-100,000	183	16	11,689	402	83	16	15	41	93
100,000-200,000	576	83	52,496	1,860	366	70	71	192	410
200,000-500,000	655	213	116,078	3,593	766	144	129	336	1,023
500,000-1,000,000	304	211	70,217	2,143	412	78	82	223	367
1,000,000-5,000,000	380	853	120,351	4,444	958	182	164	431	699
5,000,000-8,000,000	58	368	17,581	686	150	30	26	70	353
8,000,000+	159	11,260	111,546	7,373	1,852	362	286	695	1,032
Total	**17,823**	**12,663**	**850,896**	**33,135**	**7,374**	**1,413**	**1,236**	**3,216**	**5,571**

Irish-Owned Multinationals Only

CT Liability €	Companies returns Number	Total CT Liable €m	Employments Number	Earnings €m	Income Tax €m	USC €m	Employee PRSI €m	Employer PRSI €m	VAT €m
Negative or Nil	1,728	-74	88,479	3,460	662	123	117	320	64
1-20,000	480	2	26,773	1,111	234	46	38	93	15
20,000-40,000	87	2	13,409	569	114	22	22	60	-78
40,000-60,000	45	2	3,171	96	16	3	4	10	-8
60,000-80,000	39	3	2,020	91	22	4	4	8	6
80,000-100,000	37	3	2,066	86	19	4	3	8	15
100,000-200,000	112	16	12,894	411	74	14	15	42	18
200,000-500,000	116	36	17,598	543	112	21	19	50	121
500,000-1,000,000	67	48	18,750	636	116	22	24	65	3
1,000,000-5,000,000	62	134	18,751	550	111	22	21	56	-4
5,000,000-8,000,000	N/A*	39	5,006	167	29	6	6	17	89
8,000,000+	N/A*	567	56,206	1,402	298	55	42	105	344
Total	**2,799**	**778**	**265,123**	**9,120**	**1,809**	**342**	**314**	**835**	**584**

Non-Multinational Companies Only

CT Liability €	Companies returns Number	Total CT Liable €m	Employments Number	Earnings €m	Income Tax €m	USC €m	Employee PRSI €m	Employer PRSI €m	VAT €m
Negative or Nil	97,425	-341	420,168	8,811	1,562	286	311	677	1,165
1-20,000	60,160	309	434,116	7,798	1,194	221	270	585	1,392
20,000-40,000	7,814	220	155,858	2,764	407	76	96	241	552
40,000-60,000	3,057	149	91,587	1,651	255	48	58	151	370
60,000-80,000	1,505	104	59,918	1,203	196	37	43	114	220
80,000-100,000	874	78	37,292	760	120	23	27	71	135
100,000-200,000	1,915	267	117,523	2,445	407	77	87	231	508
200,000-500,000	892	271	78,012	1,860	320	61	68	180	380
500,000-1,000,000	238	165	36,054	805	133	25	29	81	234
1,000,000-5,000,000	123	227	20,519	631	125	24	22	58	178
5,000,000-8,000,000	N/A*	79	1,159	66	16	3	3	7	16
8,000,000+	N/A*	139	729	44	10	2	2	5	3
Total	**174,025**	**1,666**	**1,452,935**	**28,837**	**4,745**	**882**	**1,014**	**2,402**	**5,154**

*The number of cases is not provided for these ranges to protect taxpayer confidentiality due to the small number of cases involved.

Table 21: Employment by Sector 2021

All Companies

Sector	Companies returns	Total CT Liable	Employments	Earnings	Income Tax	USC	Employee PRSI	Employer PRSI	VAT
	Number	€m	Number	€m	€m	€m	€m	€m	€m
Manufacturing	11,149	4,380	286,894	11,345	2,151	426	433	1,127	931
Financial & Insurance Activities	22,374	2,528	245,166	8,204	1,985	365	267	677	30
Information & Communication	13,909	3,295	162,556	9,285	2,362	442	360	820	200
Wholesale & Retail Trade	28,906	1,915	516,397	12,343	2,127	410	436	1,152	6,832
Administrative & Support Services	12,217	1,304	282,398	5,222	936	176	190	507	591
Professional, Scientific & Technical Activities	27,043	558	173,189	7,172	1,641	304	275	597	1,112
Transportation & Storage	5,348	122	109,285	3,121	463	90	106	283	279
Mining & Quarrying + Utilities	331	12	5,175	200	36	7	8	21	-26
Construction	26,505	392	175,852	4,898	846	155	185	442	40
Accommodation & Food Services	10,296	109	296,113	2,542	249	47	75	237	338
Real Estate Activities	10,636	134	28,212	754	156	29	26	65	288
Agriculture, Forestry & Fishing	7,607	84	41,004	734	100	20	25	59	-40
Other Sectors	18,326	275	246,713	5,274	875	165	179	467	735
Total	**194,647**	**15,106**	**2,568,954**	**71,093**	**13,928**	**2,637**	**2,564**	**6,452**	**11,310**

Foreign Multinational Companies Only

Sector	Companies returns	Total CT Liable	Employments	Earnings	Income Tax	USC	Employee PRSI	Employer PRSI	VAT
	Number	€m	Number	€m	€m	€m	€m	€m	€m
Manufacturing	1,138	4,159	140,174	7,303	1,505	301	282	741	954
Financial & Insurance Activities	5,287	1,926	149,291	5,044	1,265	235	167	431	126
Information & Communication	1,338	3,316	93,494	6,696	1,797	339	264	613	-314
Wholesale & Retail Trade	1,893	1,382	174,820	5,508	1,089	212	202	552	4,162
Administrative & Support Services	3,295	1,216	107,542	2,511	471	89	93	260	228
Professional, Scientific & Technical Activities	1,547	390	44,950	2,540	630	120	99	250	94
Transportation & Storage	305	49	19,393	672	115	22	25	70	6
Mining & Quarrying + Utilities	24	5	1,164	77	16	3	3	8	-38
Construction	1,018	49	17,643	727	149	27	28	76	22
Accommodation & Food Services	301	12	42,405	446	49	9	14	46	61
Real Estate Activities	737	24	7,834	267	60	11	10	27	101
Agriculture, Forestry & Fishing	164	4	3,056	117	22	5	4	12	-20
Other Sectors	776	130	49,130	1,230	206	39	45	130	190
Total	**17,823**	**12,663**	**850,896**	**33,135**	**7,374**	**1,413**	**1,236**	**3,216**	**5,571**

Irish-Owned Multinationals Only

Sector	Companies returns	Total CT Liable	Employments	Earnings	Income Tax	USC	Employee PRSI	Employer PRSI	VAT
	Number	€m	Number	€m	€m	€m	€m	€m	€m
Manufacturing	283	59	34,586	1,223	221	44	47	125	-176
Financial & Insurance Activities	1,031	333	71,150	2,111	465	82	61	161	-158
Information & Communication	166	-2	5,284	301	73	14	12	31	26
Wholesale & Retail Trade	326	204	41,998	1,285	237	46	47	132	481
Administrative & Support Services	125	22	16,780	495	124	24	19	41	10
Professional, Scientific & Technical Activities	283	61	22,035	1,006	219	42	39	103	97
Transportation & Storage	57	8	38,252	1,322	196	38	41	113	20
Mining & Quarrying + Utilities	0	0	0	0	0	0	0	0	0
Construction	176	24	10,876	473	97	18	18	50	-17
Accommodation & Food Services	42	1	7,025	75	8	2	2	8	4
Real Estate Activities	176	7	1,038	37	8	2	1	3	5
Agriculture, Forestry & Fishing	21	0	1,858	43	6	1	2	5	4
Other Sectors	113	60	14,241	750	156	30	24	63	287
Total	**2,799**	**778**	**265,123**	**9,120**	**1,809**	**342**	**314**	**835**	**584**

Non-Multinationals Only

Sector	Companies returns	Total CT Liable	Employments	Earnings	Income Tax	USC	Employee PRSI	Employer PRSI	VAT
	Number	€m	Number	€m	€m	€m	€m	€m	€m
Manufacturing	9,728	162	112,134	2,820	425	82	104	261	153
Financial & Insurance Activities	16,056	269	24,725	1,049	255	48	38	84	61
Information & Communication	12,405	-20	63,778	2,288	492	89	85	176	488
Wholesale & Retail Trade	26,687	329	299,579	5,550	801	153	186	469	2,190
Administrative & Support Services	8,797	65	158,076	2,216	342	63	78	206	353
Professional, Scientific & Technical Activities	25,213	107	106,204	3,626	792	142	137	244	921
Transportation & Storage	4,986	64	51,640	1,127	152	30	40	100	253
Mining & Quarrying + Utilities	300	6	3,999	123	19	4	5	12	12
Construction	25,311	319	147,333	3,698	601	110	138	316	36
Accommodation & Food Services	9,953	96	246,683	2,021	193	36	58	183	273
Real Estate Activities	9,723	103	19,340	450	88	16	15	34	182
Agriculture, Forestry & Fishing	7,422	80	36,090	575	72	14	19	42	-25
Other Sectors	17,444	85	183,354	3,294	513	96	110	275	258
Total	**174,025**	**1,666**	**1,452,935**	**28,837**	**4,745**	**882**	**1,014**	**2,402**	**5,154**

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 26.5 per cent of employments among companies and 27.1 per cent of associated Income Tax, USC and PRSI. Non-CT liable foreign-owned multinationals accounted for 20.1 per cent of total foreign multinational employments and 21.6 per cent of associated Income Tax, USC and PRSI payments for foreign multinational companies.

Table shows CT receipts and the employment, earnings, other tax and PRSI information for the top 100 companies and the top 100 groups. Unlike Table 20 and 21, Table 22 refers to the employment and tax position of these companies in 2022.

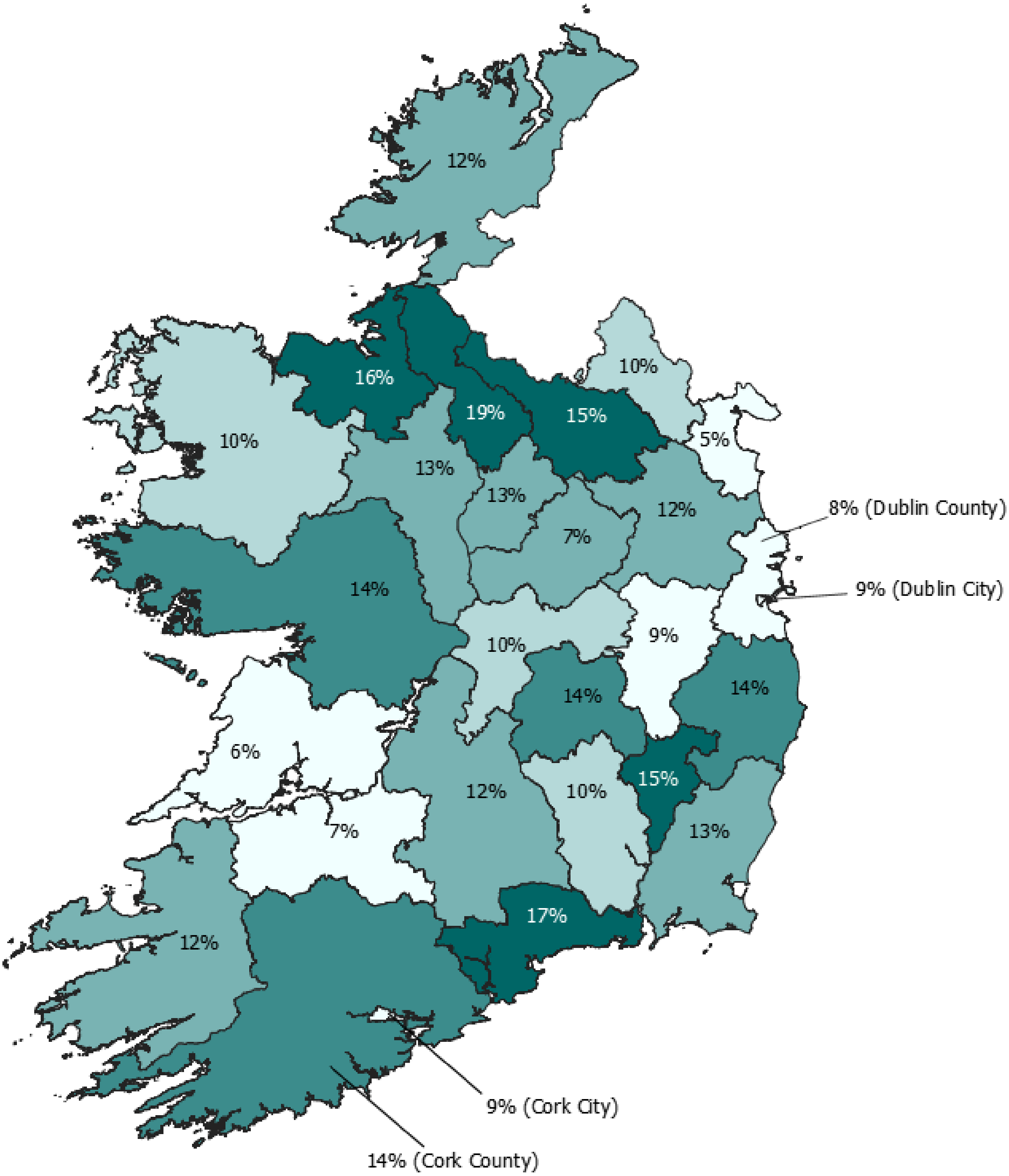
Table 22: Receipts from Top Groups and Companies 2022

Companies	Net CT Liable	Employment	PAYE Earnings	Income Tax	USC	PRSI	VAT €m
	€m	Number	€m	€m	€m	€m	€m
Top 10 Companies	13,013	26,300	2,623	729	144	340	72
Top 10 Groups	13,615	41,900	3,799	1,018	202	491	-49 *
Top 100 Companies	17,878	105,900	6,924	1,697	337	916	505
Top 100 Groups	17,527	194,600	11,274	2,635	523	1,519	1,841

Source: Revenue analysis. *Refunds for groups were significant in the year. PRSI includes Employer and Employee.

Figure 10 shows the growth rates in employments by county between 2020 and 2021. Overall, there was a noticeable increase (+9.9 per cent), reflecting the recovery in the economy and labour market in the aftermath of the COVID-19 pandemic.

Figure 10: Employment Growth by County 2021



Source: Revenue analysis.

6 Conclusion

In summary, the 2021 CT returns, which coincide with CT payment growth of 29 per cent that year, showed extremely strong trading profits growth. This reflects the composition of the CT tax base, with many large corporates, particularly in the export-facing ICT and pharmaceutical sectors, performing strongly. The use of capital allowances in these sectors also increased in 2021, but the scale of profit growth was such that very strong tax receipts were also recorded. Looking at other aspects of the CT tax base in 2021, there was an increase in the number of companies with a positive CT liability compared to the previous year as well as an increase in the numbers using carried forward losses, both of which also reflect a return to profitability in 2021 for many companies.

There were over 2.5 million employments in companies which filed a 2021 CT1 return. The combined employment taxes were €25.6 billion. Foreign multinationals accounted for 33% of employment and 52% of employment taxes of corporate employers. As in previous years, average earnings (and consequently average tax payments) were highest in foreign-owned multinationals.

The 2021 CT returns provide context for the CT payments in 2022. Net CT receipts in 2022 increased by €7.3 billion (48 per cent) to €22.6 billion, with the manufacturing sector responsible for over 77 per cent of the increase. The concentration of Corporation Tax receipts has further intensified with the top ten companies responsible for 57 per cent of CT receipts in 2022. The CT payments from companies with intangible assets has increased by just over half to almost €13 billion in 2022, demonstrating the importance of this sector to the Exchequer.

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.