

# Statistics on Capital Gains Tax Revised Entrepreneur Relief

May 2024

Information on the operation of this Relief is available on the Revenue website  
<https://www.revenue.ie/en/gains-gifts-and-inheritance/cgt-reliefs/revised-entrepreneur-relief.aspx>

For queries of a statistical nature in relation to the relief, please contact [statistics@revenue.ie](mailto:statistics@revenue.ie)



## Background

Section 597AA of the Taxes Consolidation Act 1997 (inserted by the Finance Act 2015) introduced a revised relief for entrepreneurs disposing of certain business assets. A qualifying business is a business other than the holding of securities or other assets as investments, the holding of development land or the development or letting of land. The relief applies to individuals only.

The relief initially provided for a 20% rate of CGT applicable to chargeable gains on disposals of qualifying business assets on or after 1 January 2016 up to a lifetime limit of €1m. This 20% rate was reduced to 10% by Finance Act 2016 in the case of disposals made on or after 1 January 2017.

## Statistics

The tables on the following pages provide statistical breakdowns of the Exchequer cost and other features of Revised Entrepreneur relief.

**Estimated Exchequer Cost of Revised Entrepreneur Relief by accounting period**

| <b>Year</b> | <b>Amount<br/>€m</b> | <b>Number<br/>of Tax Units</b> |
|-------------|----------------------|--------------------------------|
| 2016        | 20.4                 | 406                            |
| 2017        | 81.8                 | 875                            |
| 2018        | 92.4                 | 875                            |
| 2019        | 93.9                 | 972                            |
| 2020        | 93.2                 | 924                            |
| 2021        | 142.9                | 1,204                          |
| 2022        | 161.7                | 1,335                          |

**Breakdown by Sector (NACE) of the Relief Claimant**

| Sector  | Amount of Claim 2016 |              |                | Amount of Claim 2017 |              |                | Amount of Claim 2018 |              |                |
|---|----------------------|--------------|----------------|----------------------|--------------|----------------|----------------------|--------------|----------------|
|   | Number               | €m           | Cost Amount €m | Number               | Amount €m    | Cost Amount €m | Number               | Amount €m    | Cost Amount €m |
| Agriculture Forestry and Fishing                        | 42                   | 6.1          | 0.8            | 91                   | 15.2         | 3.5            | 105                  | 21.1         | 4.9            |
| Manufacturing   | <10                  | 1.3          | 0.2            | 10                   | 2.3          | 0.5            | 15                   | 3.3          | 0.8            |
| Construction  | 20                   | 5.1          | 0.7            | 52                   | 10.1         | 2.3            | 38                   | 9.0          | 2.1            |
| Wholesale and retail trade                              | 18                   | 3.9          | 0.5            | 59                   | 24.4         | 5.6            | 43                   | 20.1         | 4.6            |
| Transportation and Storage                              | <10                  | 0.3          | 0.0            | 13                   | 0.9          | 0.2            | 18                   | 2.8          | 0.6            |
| Accommodation and food service activities               | 16                   | 5.7          | 0.7            | 30                   | 10.8         | 2.5            | 13                   | 3.5          | 0.8            |
| Information and Communication                           | <10                  | 1.4          | 0.2            | 29                   | 12.5         | 2.9            | 34                   | 13.9         | 3.2            |
| Financial and Insurance Activities                      | 17                   | 10.0         | 1.3            | 26                   | 12.6         | 2.9            | 24                   | 13.2         | 3.0            |
| Real Estate Activities                                  | 46                   | 25.7         | 3.3            | 124                  | 75.6         | 17.4           | 142                  | 80.1         | 18.4           |
| Professional Scientific and Technical Activities        | 64                   | 19.0         | 2.5            | 131                  | 44.1         | 10.1           | 118                  | 53.3         | 12.3           |
| Human health and Social Work activities                 | 22                   | 7.5          | 1.0            | 40                   | 13.6         | 3.1            | 29                   | 13.1         | 3.0            |
| Other Activities and Sectors                            | 19                   | 5.2          | 0.7            | 40                   | 9.2          | 2.1            | 24                   | 8.6          | 2.0            |
| Other including individuals with a "director only" code | 122                  | 65.8         | 8.5            | 230                  | 124.7        | 28.7           | 272                  | 159.6        | 36.7           |
| <b>Total</b>  | <b>386</b>           | <b>156.6</b> | <b>20.4</b>    | <b>875</b>           | <b>355.8</b> | <b>81.8</b>    | <b>875</b>           | <b>401.5</b> | <b>92.4</b>    |

**Breakdown by Sector (NACE) of the Relief Claimant**

| Sector  | Amount of Claim 2019 |              | Cost Amount €m | Amount of Claim 2020 |              | Cost Amount €m | Amount of Claim 2021 |              | Cost Amount €m |
|---|----------------------|--------------|----------------|----------------------|--------------|----------------|----------------------|--------------|----------------|
|   | Number               | Amount €m    |                | Number               | Amount €m    |                | Number               | Amount €m    |                |
| Agriculture Forestry and Fishing                                    | 154                  | 25.3         | 5.8            | 97                   | 14.8         | 3.4            | 119.0                | 28.1         | 6.5            |
| Manufacturing   | 11                   | 2.0          | 0.4            | 16                   | 8.0          | 1.8            | <10                  | 5.5          | 1.3            |
| Construction  | 28                   | 10.3         | 2.4            | 44                   | 17.6         | 4.0            | 45                   | 11.7         | 2.7            |
| Wholesale and retail trade/Repair of motor vehicles and motorcycles | 50                   | 25.5         | 5.9            | 47                   | 22.4         | 5.2            | 57                   | 24.4         | 5.6            |
| Transportation and Storage  | 13                   | 1.3          | 0.3            | 13                   | 5.3          | 1.2            | <10                  | 2.6          | 0.6            |
| Accommodation and food service activities                           | 31                   | 13.3         | 3.1            | 18                   | 7.0          | 1.6            | 21                   | 7.2          | 1.7            |
| Information and Communication                                       | 25                   | 7.6          | 1.7            | 31                   | 14.5         | 3.3            | 39                   | 19.2         | 4.4            |
| Financial and Insurance Activities                                  | 30                   | 16.6         | 3.8            | 18                   | 10.3         | 2.4            | 40                   | 27.7         | 6.4            |
| Real Estate Activities  | 139                  | 89.6         | 20.6           | 150                  | 96.9         | 22.3           | 203                  | 139.1        | 32.0           |
| Professional Scientific and Technical Activities                    | 134                  | 53.6         | 12.3           | 122                  | 44.5         | 10.2           | 153                  | 73.4         | 16.9           |
| Human health and Social Work activities                             | 39                   | 18.4         | 4.2            | 42                   | 17.9         | 4.1            | 62                   | 35.2         | 8.1            |
| Other Activities and Sectors  | 27                   | 10.2         | 2.3            | 21                   | 7.3          | 1.7            | 41                   | 13.8         | 3.2            |
| Other including individuals with a "director only" code             | 291                  | 134.7        | 31.0           | 305                  | 138.4        | 31.8           | 397                  | 233.5        | 53.7           |
| <b>Total</b>  | <b>972</b>           | <b>408.3</b> | <b>93.9</b>    | <b>924</b>           | <b>405.1</b> | <b>93.2</b>    | <b>1,204</b>         | <b>621.4</b> | <b>142.9</b>   |

**Breakdown by Sector (NACE) of the Relief Claimant**

| Sector  | Amount of Claim 2022 |              | Cost Amount<br>€m |
|---|----------------------|--------------|-------------------|
|   | Number               | Amount €m    |                   |
| Agriculture Forestry and Fishing                                    | 149                  | 29.8         | 6.8               |
| Manufacturing   | 18                   | 9.2          | 2.1               |
| Construction  | 43                   | 23.4         | 5.4               |
| Wholesale and retail trade/Repair of motor vehicles and motorcycles | 60                   | 33.3         | 7.7               |
| Transportation and Storage  | 10                   | 5.5          | 1.3               |
| Accommodation and food service activities                           | 43                   | 19.7         | 4.5               |
| Information and Communication                                       | 28                   | 18.8         | 4.3               |
| Financial and Insurance Activities                                  | 46                   | 29.1         | 6.7               |
| Real Estate Activities  | 187                  | 126.4        | 29.1              |
| Professional Scientific and Technical Activities                    | 219                  | 93.9         | 21.6              |
| Human health and Social Work activities                             | 57                   | 28.8         | 6.6               |
| Other Activities and Sectors  | 25                   | 12.8         | 2.9               |
| Other including individuals with a "director only" code             | 450                  | 272.6        | 62.7              |
| <b>Total</b>  | <b>1,335</b>         | <b>703.2</b> | <b>161.7</b>      |

"<10" indicates that there are less than 10 (but more than zero) taxpayers availing of the particular relief in that year; the exact number is not provided due to Revenue's obligation to protect taxpayer confidentiality and Revenue's statistical disclosure protocols.

**Revised Entrepreneur Relief by amount of gain**

| Range of Revised Entrepreneur Relief Claimed | 2016            |              | 2017            |              | 2018            |              |
|--|-----------------|--------------|-----------------|--------------|-----------------|--------------|
|  | Number of Cases | Amount €m    | Number of Cases | Amount €m    | Number of Cases | Amount €m    |
| 1 - 20,000                                   | 48              | 0.5          | 65              | 0.7          | 78              | 0.8          |
| 20,001 - 40,000                              | 34              | 1.0          | 82              | 2.5          | 83              | 2.4          |
| 40,001 - 60,000                              | 27              | 1.4          | 68              | 3.4          | 57              | 2.9          |
| 60,001 - 80,000                              | 20              | 1.4          | 42              | 3.0          | 48              | 3.3          |
| 80,001 - 100,000                             | 24              | 2.2          | 38              | 3.5          | 25              | 2.3          |
| 100,001 - 200,000                            | 53              | 8.4          | 136             | 20.4         | 91              | 13.2         |
| 200,001 - 500,000                            | 78              | 25.7         | 152             | 48.7         | 153             | 50.5         |
| 500,001 - 999,999                            | 43              | 31.3         | 139             | 107.5        | 143             | 110.8        |
| 1,000,000 or Over                            | 79              | 84.8         | 153             | 166.2        | 197             | 215.3        |
| <b>All</b>                                   | <b>406</b>      | <b>156.6</b> | <b>875</b>      | <b>355.8</b> | <b>875</b>      | <b>401.5</b> |

| Range of Revised Entrepreneur Relief Claimed | 2019            |              | 2020            |              | 2021            |              |
|--|-----------------|--------------|-----------------|--------------|-----------------|--------------|
|  | Number of Cases | Amount €m    | Number of Cases | Amount €m    | Number of Cases | Amount €m    |
| 1 - 20,000                                   | 116             | 1.3          | 87              | 0.8          | 120             | 1.1          |
| 20,001 - 40,000                              | 87              | 2.6          | 70              | 2.0          | 47              | 1.4          |
| 40,001 - 60,000                              | 70              | 3.4          | 59              | 3.0          | 61              | 3.1          |
| 60,001 - 80,000                              | 36              | 2.6          | 44              | 3.1          | 42              | 3.0          |
| 80,001 - 100,000                             | 46              | 4.1          | 44              | 3.9          | 47              | 4.3          |
| 100,001 - 200,000                            | 133             | 19.6         | 133             | 19.4         | 143             | 21.2         |
| 200,001 - 500,000                            | 149             | 48.1         | 174             | 57.5         | 221             | 74.0         |
| 500,001 - 999,999                            | 146             | 114.3        | 130             | 102.1        | 225             | 170.4        |
| 1,000,000 or Over                            | 189             | 212.3        | 183             | 213.3        | 298             | 343.0        |
| <b>All</b>                                   | <b>972</b>      | <b>408.3</b> | <b>924</b>      | <b>405.1</b> | <b>1,204</b>    | <b>621.4</b> |

**Revised Entrepreneur Relief by amount of gain**

| Range of Revised Entrepreneur Relief Claimed | 2022            |              |
|--|-----------------|--------------|
|  | Number of Cases | Amount €m    |
| 1 - 20,000                                   | 95              | 0.9          |
| 20,001 - 40,000                              | 77              | 2.3          |
| 40,001 - 60,000                              | 55              | 2.7          |
| 60,001 - 80,000                              | 55              | 3.8          |
| 80,001 - 100,000                             | 35              | 3.2          |
| 100,001 - 200,000                            | 173             | 25.8         |
| 200,001 - 500,000                            | 256             | 81.9         |
| 500,001 - 999,999                            | 206             | 155.7        |
| 1,000,000 or Over                            | 383             | 426.9        |
| <b>All</b>                                   | <b>1,335</b>    | <b>703.2</b> |



### Description of Assets and Aggregate Consideration for Taxpayers who claimed Revised Entrepreneur Relief

A breakdown of the disposal consideration associated with *all* assets reported by claimants of the relief is as shown below. Due to the format of the tax returns it is not possible to show the assets in respect of section 597AA *only*. Therefore, the table below indicates all asset disposals from 2016 to 2022 by the claimants.

| Description of Assets                      | Aggregate Consideration Declared |                |                |                |              |                |
|--|----------------------------------|----------------|----------------|----------------|--------------|----------------|
|  | 2016<br>€m                       | 2017<br>€m     | 2018<br>€m     | 2019<br>€m     | 2020<br>€m   | 2021<br>€m     |
| Shares/Securities - Quoted                 | 41.4                             | 87.9           | 121            | 111.5          | 108.5        | 244.0          |
| Shares/Securities - Unquoted               | 298.6                            | 683.1          | 771.2          | 693.6          | 688.3        | 1,333.8        |
| Agricultural Land/Buildings                | 9.1                              | 28             | 26.7           | 62.3           | 30.9         | 33.2           |
| Development Land                           | 6.3                              | 0              | 0.6            | 0.3            | 0.2          | 0.5            |
| Commercial Premises                        | 25.5                             | 25.8           | 44.9           | 46.6           | 29.9         | 40.9           |
| Residential Premises                       | 6.3                              | 12.9           | 20             | 13.3           | 15.3         | 19.8           |
| Shares or Securities exchanged (S. 913(5)) | 0.4                              | 96.1           | 11             | 35.4           | 7.1          | 90.1           |
| Other Assets                               | 30.1                             | 81.9           | 91             | 91.8           | 96.4         | 120.5          |
| <b>Total Consideration</b>                 | <b>418.1</b>                     | <b>1,015.7</b> | <b>1,086.5</b> | <b>1,054.7</b> | <b>976.7</b> | <b>1,882.8</b> |

| Description of Assets                      | 2022<br>€m     |
|--|----------------|
| Shares/Securities - Quoted                 | 267.3          |
| Shares/Securities - Unquoted               | 1,598.9        |
| Agricultural Land/Buildings                | 61.2           |
| Development Land                           | 0.8            |
| Commercial Premises                        | 45.5           |
| Residential Premises                       | 34.4           |
| Shares or Securities exchanged (S. 913(5)) | 37.0           |
| Other Assets                               | 224.9          |
| <b>Total Consideration</b>                 | <b>2,269.9</b> |

**Revised Entrepreneur Relief by type of taxpayer claiming**

| Year | Number of Cases | Farmers           |                | Proprietary Directors |                   |                | Proprietary Director/Farmers |                   |                |
|------|-----------------|-------------------|----------------|-----------------------|-------------------|----------------|------------------------------|-------------------|----------------|
|      |                 | Relief Claimed €m | Relief Cost €m | Number of Cases       | Relief Claimed €m | Relief Cost €m | Number of Cases              | Relief Claimed €m | Relief Cost €m |
| 2017 | 128             | 27.5              | 6.3            | 609                   | 278.0             | 63.9           | 54                           | 16.5              | 3.8            |
| 2018 | 136             | 36.9              | 8.5            | 589                   | 309.0             | 71.1           | 50                           | 25.5              | 5.9            |
| 2019 | 182             | 34.7              | 8.0            | 621                   | 327.0             | 75.3           | 51                           | 19.9              | 4.6            |
| 2020 | 136             | 29.6              | 6.8            | 668                   | 343.0             | 78.9           | 49                           | 22.1              | 5.1            |
| 2021 | 178             | 54.5              | 12.5           | 831                   | 499.9             | 115.0          | 66                           | 39.0              | 9.0            |
| 2022 | 189             | 46.0              | 10.6           | 883                   | 557.6             | 128.2          | 53                           | 25.7              | 5.9            |