Double deduction of tax at source:

credit through PAYE system for non-refundable foreign tax

Part 42-04-62

This document should be read in conjunction with Paragraph 5, Schedule 24 of the Taxes Consolidation Act 1997

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Revenue
Cáin agus Custaim na hÉireann
Irish Tax and Customs

Table of Contents

1. Introduction

This manual sets out the tax treatment that may be applied by employers in respect of:

i. employees who are tax resident in the State, and

ii. who are employed by an Irish employer under an Irish contract of employment, and

iii. whose employment income is subject to income tax and USC withholdings through the PAYE system, and

iv. who exercise some of the duties of that employment temporarily outside of the State in a jurisdiction with which a double taxation agreement (DTA) is in force, and

v. where the exercise of employment duties in that jurisdiction result in an income tax liability arising on the employment income in that jurisdiction, and

vi. where the DTA in force provides that the employee may claim double taxation relief in the State for the overseas income tax liability.

In such cases, the Irish employer may be required to operate a system of payroll withholding tax on the Irish employment income to account for the foreign income tax liability arising on the income in that jurisdiction. If so, the employee will be subject to simultaneous payroll withholding tax deductions in both jurisdictions on some or all of the Irish employment income, with a consequent reduction in his/her net payroll payments. While double taxation relief may be due to the employee, the employee will only be in a position to claim this relief by filing an Irish tax return after the end of the tax year in which the simultaneous payroll withholding tax deductions were in operation, after establishing his/her final foreign tax liability arising on the employment income.

Where the employer is required to operate a system of payroll withholding tax in Ireland and the overseas jurisdiction to account for the Irish and overseas tax liability arising on the same employment income, Revenue is prepared to consider, on **a case-by-case basis**, the granting tax of double taxation relief in **'real time'** through the PAYE system in respect of the non-refundable foreign tax deducted in accordance with the practice set out in Paragraph 2 below.

2. Practice

2.1. Double Taxation Agreement (DTA) jurisdictions

To alleviate the impact of the double payroll withholding tax liability in the circumstances outlined in Paragraph 1, the Irish employer may process an estimated foreign tax credit through the PAYE system provided:

i. an income tax liability arises on the employment income under domestic tax rules in place in the foreign jurisdiction which is required to be remitted by the employer under a payroll withholding tax mechanism,

ii. the foreign jurisdiction is allocated a taxing right on the employment income under the provisions of a DTA in place with the State, and

iii. to the best of the employer's knowledge of payroll withholding tax requirements in the foreign jurisdiction, the foreign withholding tax will not be refundable to the individual at the year-end, and

iv. The employee makes an application to Revenue on Form Double Deduction 1. Each application will be considered by Revenue on **a case-by-case basis**. For the avoidance of doubt, and where an application is successful, **the employee must still make a formal claim for a foreign tax credit via an income tax return after the end of the tax year,** thereby reconciling the amount of the credit claimed through the PAYE system with the final level of the foreign tax credit which may be due to him/her.

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

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Paragraph 4 of this manual sets out the steps to follow in calculating the credit to be allowed.

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

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End of year example calculations are set out in Appendix 2.

2.1.1. Non-DTA Countries

Individuals who are tax resident in Ireland and employed by an Irish employer under an Irish contract of employment, but who exercise some of the duties of the employment outside of the State in a non-DTA jurisdiction, may be subject to simultaneous deduction of tax at source in the non-DTA jurisdiction. In the absence of a DTA, such individuals are not entitled to a foreign tax credit for tax paid in the non-DTA jurisdiction on the employment income. In addition, there is no statutory basis in the TCA whereby an individual may claim unilateral relief for the tax liability arising in the non-DTA jurisdiction on the employment income.

However, Irish resident employees may be working in a non-DTA jurisdiction on behalf of an Irish employer and are subject to simultaneous deduction of payroll withholding taxes in Ireland and the non- DTA jurisdiction. Such employees may have an expectation that they would be entitled to unilateral relief through the Irish PAYE system in tax year 2023 with regard to the non- refundable foreign tax paid, given that this was provided for in an earlier form of this guidance (see paragraph 2.2 in the following link).

Revenue caseworkers will consider, on a **case-by-case basis**, the granting of unilateral relief for tax year 2023, where the claim is made, through “My Enquiries” to **National Non-Resident Unit, PAYE services Dublin Central, Personal Division**. A completed Form Double Deduction 1 should be submitted, together with relevant information to support the claim.

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2.2. Circumstances where this practice does not apply

The practice outlined in Paragraph 2.1 above **does not** apply where employers hold a PAYE Exclusion Order (section 984 TCA 1997) or are released from the obligation to apply the PAYE system in respect of temporary assignees who work in the State under foreign contracts of employment. In this regard, see

- Tax and Duty Manual Part 42-04-01 which outlines the circumstances under which a PAYE Exclusion Order may be issued to an employer, and

- Tax and Duty Manual Part 42-04-65 which outlines the circumstances where an employer may also be released from the obligation to operate the PAYE system for certain employees (temporary assignees) working in the State under foreign contracts of employment.

Additionally, Form Double Deduction 1 should not be used where there is an expectation at the time of application that the employee's tax residency status in the State will be broken as a result of the temporary assignment overseas. In such cases, an employee should make a claim for Split Year Treatment (SYT).

Tax and Duty Manual Part 34-00-01 provides further information in relation to the statutory residency tests and SYT.

3. Limit on credit for foreign income tax paid

Where a credit is to be given to an Irish resident individual in respect of foreign tax paid on income that is taxable both in this State and in a foreign DTA jurisdiction, such credit shall be the lesser of:

a) the foreign tax payable on the doubly taxed income; or

b) the tax determined by subtracting the net (after tax) foreign income from the re-grossed foreign income (after applying the lower effective rate of tax of this State or the foreign jurisdiction to the net doubly taxed income).

The Irish effective rate of tax for a tax year is ascertained by dividing the income tax payable by an individual by the individual's total income for the relevant tax year (i.e. it is not confined to the tax applicable to salaries and wages).

The foreign effective rate is calculated by dividing the foreign tax payable on the doubly taxed income by the amount of the doubly taxed income.

Examples 1 and 2 in Appendix 1 illustrate how effective rates are calculated for the purposes of granting the 'real time' tax credit.

4. Steps to follow in calculating credit to be allowed

Generally, the following steps will be taken to calculate the credit to be allowed through the PAYE system:

- Estimate the employee's Irish effective rate of income tax on the employment income (before granting a DTA credit or deduction).
- Estimate the employee's foreign effective rate of income tax on the employment income– this may be done in consultation with the employee/employer.
- Estimate the foreign tax credit to be allowed by subtracting the net foreign income from the re-grossed foreign income (after applying the lower effective rate of tax of this State or the foreign jurisdiction to the net doubly taxed income).

Note

If the Irish effective rate is **higher** than the foreign effective rate, a conservative estimate of the foreign tax which will be paid may be granted as a credit through the PAYE system (refer to Appendix 1 Example 1).

If the Irish effective rate is **lower** than the foreign effective rate, relief in respect of the foreign tax paid is granted partly as a credit and partly as a reduction in the amount of the doubly taxed income to be assessed (the latter is effectively a tax deduction). Relief in respect of these amounts will be expressed in 'real time' as a credit through the PAYE system (refer to Appendix 1 Example 2).

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5. Universal Social Charge (USC)

In circumstances where the Irish effective tax rate is lower than the foreign effective rate, some of the foreign tax may be available as a credit against USC payable on the income which is subject to foreign tax. Such credit should only be granted by way of end-of-year review. Refer to worked examples in Appendix 2 and Notes for Guidance for Schedule 24A TCA 1997.

6. Funding of foreign payroll withholding tax liability

To comply with payroll withholding tax obligations arising in the foreign DTA jurisdiction, an Irish employer will be obliged to register as an employer and remit payroll taxes on behalf of the employee who exercises duties there. The Irish employer may operate a "shadow payroll" in the foreign jurisdiction in order to comply with these requirements. In such cases, the foreign payroll withholding tax liabilities may either be funded by the employer or the employee (e.g. where the value of the foreign payroll withholding tax liabilities are deducted from the employee as a net deduction through Irish payroll).

Revenue's treatment of these arrangements is outlined below.

6.1. Employer funds the foreign payroll withholding tax liability

In cases where an employee is assigned temporarily to a foreign DTA jurisdiction during a tax year, the employer may decide to fund the foreign payroll withholding tax liability by not seeking payment of the liabilities from the employee during the year. Instead, the employer may enter into an arrangement with the employee that the employee will seek to fund the repayment of the foreign tax by filing an income tax return and making a claim for foreign tax relief in his/her Irish tax return for the year. This claim will generate a refund of tax which, when it issues, is paid by the employee to the employer.

In this instance, the employer has effectively provided a loan to the employee to fund his/ her income tax liability in the foreign DTA jurisdiction whilst carrying out employment duties there. With effect from 1 January 2023, an employee who enters into such an arrangement with his/her employer is considered to be in receipt of a preferential loan until such time as the amounts are repaid to the employer. A preferential loan is a taxable benefit which is within the scope of the PAYE system. For further information on the taxation of preferential loans, please refer to Tax and Duty Manual (TDM) Part 05-01-01d.

In circumstances where a loan which had been made directly or indirectly to an employee is released or written off, either in whole or in part, then a charge to tax arises in respect of the amount written off at that point. For further information in this regard, please refer to TDM Part 05-01-01d.

6.2. Employee funds the foreign payroll withholding tax liability

In cases where the employee funds the foreign payroll withholding tax liability rather than the employer, e.g., in cases where the liability is deducted from the employee through the Irish payroll system, a preferential loan arrangement does not arise. To alleviate the double payroll withholding tax liability, the Irish employer may apply to Revenue for permission to process an estimated foreign tax credit in accordance with Paragraph 4 of this manual.

Appendix 1 - Credit through the PAYE system examples

Note: These examples should only be used for the purposes of estimating the real time credit for foreign tax to be granted in a tax credit certificate and should not be used for the purposes of end of year final liability reviews.

Example 1

In 2022, a single individual earning €156,000 per annum (€3,000 per week) spends 10 weeks working in the UK at a permanent establishment (PE) of his employer and suffers non-refundable UK tax at source on the income attributable to the performance of duties in the UK.

Step 1

Estimate the Irish effective rate of income tax (before granting a DTA credit or deduction).

Wages	€156,000
Tax due:	
€36,800 @ 20% =	€7,360
€119,200 @ 40% =	€47,680
Total tax	€55,040
Less Personal & Employee Tax Credits	(€3,400)
Tax payable	€51,640

Estimated Irish effective rate (€51,640/€156,000) x 100% = 33.1%

Step 2

Estimate the foreign effective rate of income tax

Income taxable in UK [€3,000 per week x 10 weeks]	€30,000
Estimated UK final tax liability	€7,500
Estimated UK effective rate (€7,500/€30,000) x 100% =	25%

Step 3

Estimate the foreign tax credit to be allowed by deducting foreign tax from the income subject to foreign tax, then revising the net income at the lower of the two effective rates.

Doubly taxed income	€30,000
Less foreign tax paid	€7,500
Net doubly taxed income	€22,500
Re-grossed at lower of two effective rates (25%)	
€22,500 / (100-25) % =	€30,000
Foreign tax credit which may be granted	€7,500

In this case, there is no difference between the gross income subject to foreign tax and the revised net income subject to foreign tax, because the foreign effective rate of tax is lower than the Irish effective rate. So, an estimate of the full amount of the foreign tax may be granted as a credit is €7,500 (€750 per week for the 10-week period the individual spends working in the UK).

Example 2

In 2022, a single individual earning €104,000 per annum (€2,000 per week) spends 20 weeks working in Denmark at a PE of his employer and suffers non-refundable Danish tax at source on the income attributable to the performance of duties in Denmark.

Step 1

Estimate the Irish effective rate of income tax (before granting a DTA credit or deduction)

Wages	€104,000
Tax due:	
€36,800 @ 20% =	€7,360
€67,200 @ 40% =	€26,880
Total	€34,240
Less Personal & Employee Tax Credits	€3,400
Tax payable	€30,840 (€593.08 per week)

Estimated Irish effective rate (€30,840/€104,000) x 100% = 29.65%

Step 2

Estimate the foreign effective rate of income tax

Income taxable in Denmark (€2,000 X 20)	€40,000
Estimated final Danish liability tax due	€14,000

Estimated Danish effective rate of tax (€14,000/€40,000) x 100% = 35%

Step 3

Estimate the foreign tax credit to be allowed by deducting foreign tax from the income subject to foreign tax, then re-grossing the net income at the lower of the two effective rates.

Doubly taxed income	€40,000
Less Danish tax	(€14,000)
Net doubly taxed income	€26,000

Revise at the lower of the two effective rates (29.65%) to ascertain revised gross

€26,000 / (100-29.65%) =	€36,958
Foreign tax credit (€36,958 – €26,000) =	€10,958

Tax value of the deduction (€40,000 – €36,958) @ 40% =	€1,217
Total	€12,175
Weekly tax credit (€12,175/ 20 weeks) =	€608.75

As credit should not be granted in respect of amounts in excess of the tax being deducted (€30,840/52 = €593.08 per week), credit is restricted to €593.08 per week.

The €1,217 deduction above is included to compensate the individual for tax deducted by the employer on the gross amount of the foreign income (€40,000), as opposed to the revised gross (€36,958).

Appendix 2 – Final Liability Examples

Note: Where the Irish effective rate is higher, credit for the full amount of the foreign tax may be granted. Where the Irish effective rate is lower, the following worked examples illustrate the final liability computation for both Income Tax and Universal Social Charge.

Example 1

Income from Irish employment €100,000 (€80,000 earned in Ireland, €20,000 earned abroad with €7,000 foreign non-refundable tax paid) – all figures in Euro, except percentages.

INCOME TAX COMPUTATION 2021		
	Single	**Married/Civil Partnership - One Income**
@ 20%	35,300 @ 20% = 7,060	44,300 @ 20% = 8,860
@ 40%	64,700 @ 40% = 25,880	55,700 @ 40% = 22,280
Gross tax	32,940	31,140
Less tax credits	3,300	4,950
Net tax	29,640	26,190
Irish effective rate	(29,640 / 100,000) x 100% = 29.64%	(26,190 / 100,000) x 100% = 26.19%
Foreign effective rate	(7,000 / 20,000) x 100% = 35%	(7,000 / 20,000) x 100% = 35%
Revise net income earned abroad at lower effective rate for revised gross	13,000 / (100 – 29.64%) = 18,476	13,000 / (100 – 26.19%) = 17,613

Credit for foreign tax (i.e. difference between revised gross and net income earned abroad)	18,476 – 13,000 = 5,476	17,613 – 13,000 = 4,613
Tax value of revised gross (i.e. reduction in tax liability by virtue of income reduction)	(Reduction: 20,000 – 18,476 = 1,524) 1,524 @ 40% = 610	(Reduction: 20,000 – 17,613 = 2,387) 2,387 @ 40% = 955
Aggregate of Credit for foreign tax and tax value of revised can be granted	5,476 + 610 = 6,086	4,613 + 955 = 5,568

Note: In cases where the final foreign tax credit is lower than the amount of the real-time credit claimed through the PAYE system, the difference may result in an underpayment of tax on the employment income for the year.

USC COMPUTATION 2021		
	Single	**Married/Civil Partnership - One Income**
Remaining foreign tax available for offset against USC liability	7,000 – (5,476 + 610) = 914	7,000- (4,613 + 955) = 1,432
USC due on €100,000 employment income	12,012 @ 0.5% = 60 8,675 @ 2% = 174 49,357 @ 4.5% = 2,221 29,956 @ 8%= 2,396 100,000 4,851	12,012 @ 0.5% = 60 8,675 @ 2% = 174 49,357 @ 4.5% = 2,221 29,956 @ 8%= 2,396 100,000 4,851
USC effective rate	(4,851 / 100,000) x 100% = 4.85%	(4,851 / 100,000) x 100% = 4.85%
USC due and paid under PAYE system on Irish income earned abroad	20,000 x 4.85% = 970	20,000 x 4.85% = 970
Remaining foreign tax available for offset against USC liability	914	1,432
Refund of USC	914	970

Example 2

Income from Irish employment €35,800 (€29,800 earned in Ireland, €6,000 earned abroad with €1,200 foreign non-refundable tax paid) – all figures in Euro, except percentages.

INCOME TAX COMPUTATION 2021		
	Single	Married/Civil Partnership - One Income
@ 20%	35,300@ 20% = 7,060	35,800 @ 20% = 7,160
@ 40%	500@ 40% = 200	
Total	7,260	7,160
Tax Credits	3,300	4,950
Tax	3,960	2,210
Irish effective rate	(3,960 / 35,800) x 100% = 11.06%	(2,210 / 35,800) x 100% = 6.17%
Foreign effective rate	(1,200 / 6,000) x 100% = 20%	(1,200 / 6,000) x 100% = 20%
Revised net income earned abroad at lower effective rate for revised gross	4,800 / (100 – 11.06%) = 5,397	4,800 / (100 – 6.17%) = 5,116

Credit for foreign tax (i.e. difference between revised gross and net income earned abroad)	5,397 - 4,800 = 597	5,116 – 4,800 = 316
Tax value of revised gross (i.e. reduction in tax liability by virtue of income reduction)	(Reduction: 6,000 – 5,397 = 603) 500 @ 40% = 200 103 @ 20% = 21 603 221	(Reduction: 6,000 – 5,116 = 884) 884 @ 20% = 177
Aggregate of Credit for foreign tax and tax value of revised can be granted	597 + 221 =818	316 + 177 =493

USC COMPUTATION 2021		
	Single	**Married/Civil Partnership - One Income**
Remaining foreign tax available for offset against USC liability	1,200 – (597 + 221) = 382	1,200 - (316 + 177) = 707
USC due on €35,800 employment income	12,012 @ 0.5% = 60 8,675 @ 2% = 174 15,113 @ 4.5% = 680 35,800 914	12,012 @ 0.5% = 60 8,675 @ 2% = 174 15,113 @ 4.5% = 680 35,800 914
USC effective rate	(914 / 35,800) x 100% = 2.55%	(914 / 35,800) x 100% = 2.55%
USC due and paid under PAYE system on Irish income earned abroad	6,000 @ 2.55% = 153	6,000 @ 2.55% = 153
Remaining foreign tax available for offset against USC liability	382	707
Refund of USC due	153	153

Example 3

A. Married/Civil Partnership with one income under joint assessment.

   Income from Irish employment €60,000 (€44,000 earned in Ireland, €16,000 earned abroad with €5,000 foreign non-refundable tax paid) – all figures in Euros, except percentages.

B. Married/Civil Partnership with joint income and assessed to tax under joint assessment.

   Income from Irish employment (Assessable spouse) €36,000 (€20,000 earned in Ireland, €16,000 earned abroad with €5,000 foreign non-refundable tax paid) – Non-assessable spouse/civil partner's income is €24,000 all earned in Ireland - all figures in Euros, except percentages.

INCOME TAX COMPUTATION 2021		
	A. Married/Civil Partnership - One Income, Joint Assessment	**B. Married/Civil Partnership – Two incomes, Joint Assessment**
@ 20%	44,300 @ 20% = 8,860	60,000 @ 20% = 12,000
@ 40%	15,700 @ 40% = 6,280	
Gross tax	15,140	12,000
Less tax credits	Personal Credit 3,300 PAYE credit (self) 1,650 4,950	Personal Credit 3,300 PAYE credit (self) 1,650 PAYE Credit (spouse/partner) 1,650 6,600
Net tax	10,190	5,400
Irish effective rate	(10,190 / 60,000) x 100% = 16.98%	(5,400 / 60,000) x 100% = 9%
Foreign effective rate	(5,000 / 16,000) x 100% = 31.25%	(5,000 / 16,000) x 100% = 31.25%
Revised foreign income	11,000 / (100 – 16.98%) = 13,250	11,000 / (100 – 9%) = 12,088
Foreign tax credit	13,250 – 11,000 = 2,250	12,088 – 11,000 = 1,088
Reduction in foreign income expressed as a credit	(Reduction: 16,000 – 13,250) = 2,750 2,750 @ 40% = 1,100	(Reduction: 16,000 – 12,088) = 3,912 3,912 @ 20% = 782
Aggregate of foreign tax credit and reduction in foreign income expressed as a credit may be granted	2,250 + 1,100 = 3,350	1,088 + 782 = 1,870

USC COMPUTATION 2021			
	A. Married/Civil Partnership - One Income, Joint Assessment	**B. Married/Civil Partnership – Two incomes, Joint Assessment** **Assessable spouse/partner**	**Spouse/Civil Partner**
Available foreign tax remaining for USC	5,000 – (2,250 + 1,100) = 1,650	5,000 -(1,088 + 782) = 3,130	No income earned abroad
USC pay and USC deducted	12,012 @ 0.5% = 60 8,675 @ 2% = 174 39,313 @ 4.5% = 1,769 60,000 2,003	12,012 @ 0.5% = 60 8,675 @ 2% = 174 15,313 @ 4.5% = 689 36,000 923	12,012 @ 0.5% = 60 8,675 @ 2% = 174 3,313 @ 4.5% = 149 24,000 383
USC effective rate	(2,003 / 60,000) x 100% = 3.34%	(923 / 36,000) x 100% = 2.56%	N/A
USC attributed to foreign income	16,000 x 3.34% = 534	16,000 x 2.56% = 410	No income earned abroad
Additional double taxation relief due for USC J v N = O (lower amount)	1,650 v 534	3,130 v 410	Nil
Refund of USC	534	410	Nil

Note: The remaining foreign tax of the assessable spouse is not available for offset against spouse/civil partner's USC liability.

NOTES regarding the USC

(1) USC is assessed on each individual separately. In cases of joint assessment, it may be necessary to attribute the balance of any foreign tax available for offset against USC to each individual's source of foreign income.

(2) Income which is liable to USC consists of 'relevant emoluments' and 'relevant income'. Further information on allowable deductions can be obtained in Tax and Duty Manual Part Part 18D-00-01.

Appendix 3 – Form Double Deduction 1

Double Deduction 1

Credit through the PAYE System for non-refundable foreign tax

Part A should be completed by an individual who:

- is tax resident in Ireland, and
- is employed by an Irish employer, under an Irish contract of employment, and
- exercises some of the duties of the employment outside the State in a DTA jurisdiction, and
- is liable to simultaneous deduction of Irish tax and non-refundable foreign tax at source from the same income.

Part A to be completed by employee

Employee: Name	
Employee: Address	
Employee: PPS Number	
Employer: Name	
Employer: Irish Address	
Employer: Employer registered number	
Year of claim	
Intended date of departure from the State	
Intended date of return to the State	

Expected work pattern during period of temporary assignment in the foreign jurisdiction (e.g. how many workdays per week/month in the State and foreign jurisdiction)	
Are you tax resident in Ireland for the year of claim (Yes/ No)	
Foreign jurisdiction where some of the duties of your employment are exercised	
Estimated total income from all sources for year of claim	
Estimated annual tax payable in Ireland for year of claim	
Estimated income subject to tax in foreign jurisdiction for year of claim (i.e. doubly taxed income)	
Estimated non-refundable foreign tax payable in foreign jurisdiction for the year of claim	

I understand that a real time foreign tax credit is granted subject to the conditions outlined in Paragraph 2 of this manual, including the requirement to deliver an Income Tax return for a year of claim.

____

Signature of claimant

Date:

PART B (for Revenue use only)

(A)	Estimated total income from all sources for year of claim	
(B)	Estimated annual tax payable in Ireland for year of claim	
(C)	**Irish Effective rate**	**(B / A) x 100%**
(D)	Estimated income subject to tax in foreign jurisdiction for year of claim (i.e. doubly taxed income)	
(E)	Estimated non-refundable foreign tax payable in foreign jurisdiction for the year of claim.	
(F)	**Foreign effective rate:**	**(E / D) x 100%**

Compare Irish effective rate (C) and foreign effective rate (F)

If the foreign effective rate (F) is lower than the Irish effective rate (C) credit of the amount at (E) may be granted in the year of claim	If the Irish effective rate (C) is lower than the foreign effective rate (F) **Step 1 (revised foreign income)** (D - E) / (100 – C)% = G **Step 2 (Foreign tax credit)** G – (D – E) = H **Step 3 (reduction in foreign income expressed as a credit)**

	(D – G) x marginal tax rate = I Credit of the aggregate of the amounts at Step 2 and Step 3 may be granted in the year of claim. **Note: The foreign tax credit as calculated at Step 2 above must not exceed the sum ascertained by multiplying the amount of the foreign income by the individuals IER.**

PART C (For Revenue use only for end of year calculation): Additional double taxation relief in respect USC where the Foreign Effective Rate is greater than the Irish Effective Rate.

(J)	Available Foreign Tax remaining for USC	**E – (H + I)**
(K)	Amount of income liable to USC	
(L)	Amount of USC Payable for year of claim	
(M)	USC Effective rate	**(L / K) x 100%**
(N)	USC attributable to foreign income	**D x M**
(O)	Additional double taxation relief due in respect of USC	Compare amount at **J v N** allow the lower amount.

Note: additional USC relief is added to relief calculated in PART B of this form.

Please forward completed applications to the Non-Resident Unit, PAYE Services Dublin Central, Personal Division.