

Ireland's 32% Tax Credit

for film and television

90% available up front

€70 million per project cap
No annual limit

International cast and crew
working in Ireland qualify

Available on all goods and
services sourced in Ireland

www.irishfilmboard.ie

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What is the 'Section 481' benefit worth?

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The rate of tax credit is worth up to 32% of eligible Irish expenditure.

Eligible expenditure criteria

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The payable tax credit is based on the cost of all cast and crew working in Ireland, and all goods and services sourced in Ireland. This includes post production and/or VFX.

What types of projects qualify?

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The incentive applies to feature film, television drama (singles or series), animation (excluding computer games) and creative documentary. Projects must pass the Section 481 Cultural Test. For further information about the Cultural Test visit www.irishfilmboard.ie

Who is eligible to apply?

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The application to Revenue is made by the 'Producer Company'.

A 'Producer Company' must:

- Be Irish resident or trading through a branch or agency
- Make film and television for cinema exhibition or broadcast or online
- Be trading for at least 12 months and have filed a corporation tax return with Revenue
- Not be connected to a broadcaster
- Hold 100% shareholding in a 'Qualifying Company'

A 'Qualifying Company' must:

- Be Irish resident or trading through a branch or agency
- Exist as a Special Purpose Vehicle (SPV) to make one film

Is there a cap on the incentive?

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There is no annual cap or limit on the funding of the programme, meaning there is no limit to the value of the cumulative tax credits payable by Revenue. The tax credit has a 'per project' cap of up to 32% of the lower of:

1. All eligible expenditure
2. 80% of the total cost of production
3. €70 million

When is the rebate paid?

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Option A – Single Instalment:
On delivery of the project and submission of a compliance report to Revenue, payment of 100% of the tax credit may be paid by Revenue within 30 days.

Option B – Two Instalments:

First instalment being 90% of the tax credit due, upon:

1. Financial Closing, including proof that 68% of eligible expenditure is lodged to the project's production account;
2. Irish Film Board approval (IFB funded projects only); or
3. Broadcasting Authority of Ireland (BAI) approval (BAI funded projects only); or
4. Where Revenue are provided with a guarantee, bond or similar

banking instrument which secures the 90% payment of the tax credit, and

Second and final instalment being 10% balance on delivery of the project and submission of compliance report to Revenue.

How is payment made by Revenue?

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Payment of the relief may be claimed against the producer company's corporation tax (CT) liabilities. In the event the relief due is greater than any tax due by the producer company, then a payment of the excess will be made by Revenue.

Is there a minimum spend level?

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Projects are excluded from the incentive if their 'eligible expenditure' is less than €125,000, or the total cost of production is less than €250,000.

When are applications made to Ireland's Revenue?

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An application for a certificate entitling the applicant to the tax credit can be submitted at any time up to, but prior to, the completion of the project.

Irish Revenue Commissioners

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Ireland's film and television tax credit is administered by Revenue. For contact details and further information visit www.revenue.ie

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