



[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]

Thank you for your request made under the Official Information Act 1982 (OIA), transferred to Inland Revenue from the Office of the Minister of Finance, Hon Nicola Willis, on 3 October 2025. You requested the following (numbered for ease of responding):

1. *Inland Revenue Report IR2025/221: Report back on Working for Families public consultation and next steps*
2. *Inland Revenue Report IR2025/306: Draft Cabinet paper Income Tax (FamilyBoost) Amendment Bill: Approval for introduction*
3. *Inland Revenue Report IR2025/327: Evaluation and monitoring of Investment Boost*
4. *Inland Revenue Report IR2025/336: Tax debt*
5. *Inland Revenue Briefing Note BN2025/357: Slides ahead of discussion with Minister of Finance*

Information partially released

I am partially releasing documents 1, 3, 4, and 5, attached as **Appendix A**, with some information withheld or refused under the following sections of the OIA, as applicable:

- 9(2)(a) – to protect the privacy of natural persons;
- 9(2)(f)(iv) – to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials
- 9(2)(g)(i) – to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty, and
- 18(d) – the information requested publicly available.

The attachment to document 1 is publicly available on Inland Revenue's tax policy website (taxpolicy.ird.govt.nz). You can find the document by searching for [Summary of consultation on the Government discussion document 'Empowering families: increasing certainty and preventing debt in the Working for Families scheme'](#), and has therefore been refused in full under section 18(d) of the OIA.

Information refused

I am refusing the release of document 2 under section 18(d) of the OIA, as it is publicly available on Inland Revenue's tax policy website. You can find it by searching for [Ensuring FamilyBoost reaches more families – information release](#).

The attachment to document 2 is withheld in full under section 9(2)(g)(i) of the OIA. As required by section 9(1) of the OIA, I have considered whether the grounds for withholding the information requested is outweighed by the public interest. In this instance, I do not consider that to be the case. Please note that fully redacted pages have been removed from the release.

Please note that some information in the publicly available document has been withheld under the OIA grounds outlined within the document itself.

Right of review

If you disagree with my decision on your OIA request, you have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the OIA. You can contact the office of the Ombudsman by email at: info@ombudsman.parliament.nz.

Publishing of OIA response

We intend to publish our response to your request on Inland Revenue's website (ird.govt.nz) as this information may be of interest to other members of the public. This letter, with your personal details removed, may be published in its entirety. Publishing responses increases the availability of information to the public and is consistent with the OIA's purpose of enabling more effective participation in the making and administration of laws and policies and promoting the accountability of officials.

Thank you again for your request.

Yours sincerely



Kerryn McIntosh-Watt
Policy Director



**MINISTRY OF SOCIAL
DEVELOPMENT**
TE MANATŪ WHAKAHIATO ORA



Tax policy report: Report back on Working for Families public consultation and next steps

| | | | |
|------------------------|----------------|-----------------------|--|
| Date: | 20 August 2025 | Priority: | High |
| Security level: | In Confidence | Report number: | IR2025/221 T2025/2105 REP/25/8/616 |

Action sought

| | Action sought | Deadline |
|---|---------------------------------|-------------------|
| Minister of Finance | Agree to recommendations | 10 September 2025 |
| Minister for Social Development and Employment/Minister for Child Poverty Reduction | Agree to recommendations | 10 September 2025 |
| Minister of Revenue | Agree to recommendations | 10 September 2025 |

Contact for telephone discussion (if required)

| Name | Position | Telephone | Suggested first contact |
|-----------------|--|------------------|-------------------------------------|
| Maraina Hak | Policy Lead, Inland Revenue | s 9(2)(a) | <input checked="" type="checkbox"/> |
| Melissa Siegel | Principal Policy Advisor, Inland Revenue | s 9(2)(a) | <input type="checkbox"/> |
| Alex Harrington | Principal Advisor, Welfare and Oranga Tamariki, The Treasury | s 9(2)(a) | <input checked="" type="checkbox"/> |
| Alana Roughan | Principal Policy Analyst, Ministry of Social Development | s 9(2)(a) | <input checked="" type="checkbox"/> |
| Deborah Tucker | Principal Analyst, Child Wellbeing and Poverty Reduction Group, Ministry of Social Development | s 9(2)(a) | <input type="checkbox"/> |

20 August 2025

Minister of Finance
Minister for Social Development and Employment
Minister for Child Poverty Reduction
Minister of Revenue

Report back on Working for Families public consultation and next steps

Purpose

1. This report outlines the outcome of public consultation on the Working for Families discussion document, *Empowering families: increasing certainty and preventing debt in the Working for Families scheme* ("the discussion document"), which was released at Budget 2025. It seeks your agreement to proactively release the summary of consultation attached as appendix 1, and informs you of next reporting dates for the project.

Public consultation

2. Inland Revenue and the Ministry of Social Development jointly ran public consultation on the discussion document from 22 May (Budget Day) to 3 July 2025 (six weeks).
3. Public consultation was sought through written submissions and engagement sessions with key stakeholder groups or individuals. Officials used a mix of engagement approaches to promote submissions, including targeted social media and search engine advertisements. Inland Revenue also reached out directly to families using "IR Connection", a research panel made up of customers who have signed up to receive surveys and test concepts for Inland Revenue.
4. We received 42 written submissions, including 31 external submissions from individuals or groups, and 11 submissions from Inland Revenue operational staff. We also conducted nine engagement sessions with key stakeholders. We expect stakeholders will have continued interest in meeting on this work, including stakeholders who officials did not engage with in this round of consultation (such as Māori organisations including the Māori Women's Welfare League).

Key themes

5. Stakeholders highlighted that the impact of debt on families is a constant source of stress, affecting decisions to undertake work and entrenching hardship. Stakeholders considered that debt creation is largely due to government error and the complexity of navigating the system.
6. In terms of managing Working for Families entitlements, stakeholders broadly agreed that it was difficult to estimate income for the year ahead, and using past actual income could be an improvement. Mixed feedback on using a shorter period of assessment highlighted the complexity of the issue and that it could be helpful to engage further on the options. Stakeholders noted the benefits of most people having greater certainty of payments as well as debt reduction. However, they were concerned about trade-offs in income adequacy and less certainty for some people such as those who work variable hours, move on or off benefit, or lose their job.
7. For transitions between benefit and work, issues raised included the complexity of payments, poor financial returns from work and difficulty navigating the system.

Suggestions included improving how agencies work together, improving transparency and accessibility, and providing better supports for people in work.

8. We received limited feedback on residency requirements or the definition of family scheme income, but there was broad support for simplifying current rules provided there is clear communication of changes and safeguards for information-sharing.
9. Some Inland Revenue operational staff also commented on broader administrative issues that are already being addressed through operational changes or could be resolved by shifting administration of Working for Families entitlements to one agency (which was not included as an option in the discussion document). We will provide advice on potential changes to joint administration in our next report.

Proactive release of the summary of submissions

10. Given public interest in Working for Families, we recommend proactively releasing the attached summary of consultation. This could be published on the Inland Revenue and the Ministry of Social Development websites. The summary would also be shared with stakeholders who participated in the public consultation.

Timing of further advice and related work

11. Officials will provide further advice later this year on a pathway forward for the work. The report will cover recommendations in relation to options discussed during consultation s 9(2)(f)(iv), distributional and Treaty analysis, initial costings and indicative timeframes. s 9(2)(f)(iv).
12. The proposals could form a significant multi-year reform programme for Inland Revenue and the Ministry of Social Development. Some options could be implemented more quickly than others depending on complexity. Implementation will also depend on agency capacity and system constraints, as well as other work programme priorities.
13. s 9(2)(f)(iv)

Inland Revenue's Working for Families stewardship review

14. Inland Revenue is currently finalising its internally commissioned Working for Families stewardship review, which is a wider review from an Inland Revenue point of view that also covers similar content to the discussion document. Inland Revenue intends to proactively release the final report and supporting documents later in the year in response to an Official Information Act request. Prior to public release, these materials will be shared with the Ministry of Social Development, the Treasury, and Ministers.

Next steps

15. Officials will provide further advice on the proposals later this year including indicative timeframes.
16. If you agree to proactively release the summary of consultation, Inland Revenue and the Ministry of Social Development will work with Ministers' offices on a date to publish this on their websites and provide a copy to stakeholders who participated in the public consultation.

Recommended action

We recommend that you:

1. **note** the summary from public consultation on the Working for Families discussion document, "*Empowering families: increasing certainty and preventing debt in the Working for Families scheme*", attached as appendix 1

Noted

Minister of Finance

Noted

Minister for Social Development and
Employment
Minister for Child Poverty Reduction

Noted

Minister of Revenue

2. **agree** to proactively release the summary of consultation

Yes / No

Minister of Finance

Yes / No

Minister for Social Development and
Employment
Minister for Child Poverty Reduction

Yes / No

Minister of Revenue

3. **note** that officials will provide further advice later this year on policy options and indicative timeframes.

Noted

Minister of Finance

Noted

Minister for Social Development and
Employment
Minister for Child Poverty Reduction

Noted

Minister of Revenue

s 9(2)(a)

Shelley Robertson

Manager, Welfare and Oranga
Tamariki
The Treasury

s 9(2)(a)

Dee Collins

Policy Manager, Welfare System and Income
Support
Ministry of Social Development

s 9(2)(a)

Maraina Hak

Policy Lead
Inland Revenue

Hon Nicola Willis

Minister of Finance
/ / 2025

Hon Louise Upston

Minister for Social Development and
Employment
Minister for Child Poverty Reduction
/ / 2025

Hon Simon Watts

Minister of Revenue
/ / 2025



POLICY

TE TAI ŌHANGA
THE TREASURY
Tax policy report: Evaluation and monitoring of Investment Boost

| | | | |
|------------------------|----------------|-----------------------|--------------------------|
| Date: | 26 August 2025 | Priority: | Medium |
| Security level: | In Confidence | Report number: | IR2025/327 T2025/2216 |

Action sought

| | Action sought | Deadline |
|---------------------|---------------------------------|------------------|
| Minister of Finance | Agree to recommendations | 8 September 2025 |
| Minister of Revenue | Agree to recommendations | 8 September 2025 |

Contact for telephone discussion (if required)

| Name | Position | Telephone | Suggested first contact |
|-----------------|-----------------------|------------------|-------------------------------------|
| Felicity Barker | Policy Lead | s 9(2)(a) | <input checked="" type="checkbox"/> |
| Jean Le Roux | Manager, Tax Strategy | s 9(2)(a) | <input type="checkbox"/> |
| Hien Nguyen | Senior Policy Advisor | s 9(2)(a) | <input type="checkbox"/> |

26 August 2025

Minister of Finance
Minister of Revenue

Evaluation and monitoring of Investment Boost

Purpose

1. This report responds to Cabinet's request for agencies to develop a performance reporting plan for major spending policies. It provides information on how Inland Revenue and the Treasury intend to monitor the impacts of Investment Boost, including being able to estimate the cost of Investment Boost on an ongoing basis.

Context and background

2. Cabinet has made the decision (ECO-24-SUB-0231 refers) that major Budget Spending and savings decisions now need a clear plan for performance reporting. Investment Boost is one of the major spending decisions identified by Treasury that meet this requirement.
3. Inland Revenue and the Treasury have worked together to develop a framework for evaluation and monitoring of the Investment Boost policy.

Monitoring the cost of Investment Boost

4. Inland Revenue will monitor the annual cost of Investment Boost. However, we will only be able to estimate, not measure, the fiscal cost of Investment Boost. The fiscal cost is the annual cost of claims net of an offsetting reduction in residual depreciation over time. The former is measurable or can be estimated, but the offset is not directly measurable as Inland Revenue does not hold information on the underlying depreciation rates and will not be able to determine which assets received Investment Boost and which assets did not. The compliance costs of collecting such information would outweigh any benefits from gathering it. At best, to estimate the net fiscal cost, we would need to estimate, not measure, the offset component.
5. The estimated cost will not be fully comparable to the forecast of the cost of the policy.
6. We expect the estimated cost to be closer to the truth than the forecast because:
 - 6.1 It will be based on firm-level rather than macro-level data.
 - 6.2 It will be more accurate at picking up behavioural factors such as the change in firms' investment behaviours.
 - 6.3 While an estimate, it will be a backward-looking estimate informed by the economic conditions that actually prevailed, rather than a forecast that included predictions of economic conditions.
7. Inland Revenue can start reporting the estimated net fiscal cost of Investment Boost for the 2025/26 tax year onwards, that is from late 2027. The performance reporting for major spending decisions will be published on our website, in our annual report and directly to the Treasury.

Measuring uptake of Investment Boost

8. Inland Revenue can in part measure uptake of the policy through tax returns.
9. Inland Revenue plans to ask for information on the amount of Investment Boost claimed through a question in the IR10 returns. This is an optional form and hence does not have full coverage of taxpayers. However, it does have good coverage of companies and will hence provide a reasonable basis from which to estimate uptake.
10. It is not possible to ask for this information in the 2024/25 tax year returns. We will first collect this information for the 2025/26 tax year returns. Information from IR10s for the 2025/26 tax year will not be available until late 2027.
11. Inland Revenue also plans to collect information on uptake from large businesses through its Basic Compliance Package survey. This is an annual survey of 450 significant enterprises. This information would be available by August 2026.
12. Inland Revenue also plans to undertake a firm survey at the end of 2025. This will provide qualitative information on whether firms are utilising Investment Boost.
13. We note that information on uptake provides limited information on the extent to which Investment Boost has stimulated new investment. This is because uptake covers investment that would have occurred anyway.

Evaluating the economic benefits of Investment Boost

14. There are several options as to how to undertake evaluation of the benefits of Investment Boost. We could take more than one approach. Evaluation can be resource intensive and so more ambitious options will require more resources or require us to outsource work (at a cost).
15. Inland Revenue and the Treasury have worked together to develop a shared monitoring and reporting approach. The spectrum of options can be summarised as:
 - 15.1 Undertaking qualitative surveys to understand firms' self-assessment of whether Investment Boost has impacted their investment decisions.
 - 15.2 Undertaking quantitative modelling work to assess whether Investment Boost has had a significant impact on the level of investment.
 - 15.3 Undertaking quantitative modelling work to assess whether Investment Boost has had a significant impact on other variables such as GDP.
 - 15.4 Keeping abreast of international literature on the impacts of investment tax incentives.

Impacts on investment

16. Inland Revenue intends to undertake some work on determining if Investment Boost has a significant impact on the level of capital investment or investment rate over time or capital investment decisions by firms.
17. We expect that benefits may not be empirically detectable in the short term. They may accumulate over time and suitable data will become available with a lag. This means approaches in the short term will need to focus on qualitative assessment approaches such as self-assessment by firms.

In the short term, Inland Revenue could undertake firm surveys and/or interviews

18. There are two survey approaches that Inland Revenue can utilise in the short term.

Approach 1 – Basic Compliance Package

19. As noted, the Basic Compliance Package includes a survey of around 450 large enterprises each year.
20. Inland Revenue plans to add additional questions to the Basic Compliance Package questionnaire on whether firms are utilising Investment Boost. This can include asking firms how much Investment Boost they have claimed and if they have changed their plans due to Investment Boost. This will provide information on whether Investment Boost has had impacts on firm's decisions.
21. We will send the questionnaires in February 2026 to collect the information. We could report the outcomes when those questionnaires are due to be submitted to us, which is expected to be August 2026.

Approach 2 – Firm survey and/or interview

22. We could undertake a firm survey and/or interview to examine if they have utilised Investment Boost. This would be a new survey for businesses of all sizes focused on Investment Boost specifically. We could ask firms if they have changed their investment plans due to Investment Boost. This survey could be conducted at the end of 2025.
23. Such surveys and qualitative data would not provide statistically robust information but provide a level of information that is useful and timely for policy evaluation. This information would not be directly tied to tax returns and would also focus on changes to investment behaviour. This means that the information will be available earlier than the Basic Compliance Package.

In the longer term, Inland Revenue could undertake more complex modelling

24. There are several approaches to measure the impact of Investment Boost on investment by utilising different data sources. However, we will be unable to do this until sufficient data for these analyses becomes available. Additionally, as noted above, the cumulative benefits may not be detectable for a few years.
25. We expect to be able to start conducting these analyses in late 2028 at the earliest.
26. We note that undertaking these analyses will require a significant investment in modelling capability for Inland Revenue.

Impact on GDP

27. Using Inland Revenue's estimate of the impact of Investment Boost on investment, the Treasury could then estimate the implied impacts on wider macroeconomic variables such as GDP. This evaluation can most likely be completed using the Treasury's existing modelling resources.

Resourcing and funding

28. At present, Inland Revenue expect that monitoring of the benefits of the policy can be met from existing funding. However, if Ministers are ambitious in the level of evaluation they would like to see, this may have resourcing implications.

Next steps

29. Officials are available to meet with you to discuss the different approaches to measure the economic impacts of the policy for Budget 2026. Once we have feedback on the options you prefer, we will engage with the stakeholders to develop a more detailed approach to support final decision making mid-2026.

30. Officials will engage with stakeholders to develop a full strategy of monitoring and evaluation. We expect this to take approximately three months. We will inform the Ministers on the full strategy.

Recommended action

31. We recommend that you:

a) **discuss** the contents of this report at the Joint Ministers' meeting on 8 September 2025.

b) **indicate** which of these following options you would like Inland Revenue/The Treasury to pursue for monitoring and evaluating the policy

i. Collecting information on the uptake of Investment Boost

Request/Do not request

Request/Do not request

ii. Firm-level surveys and/or interviews

Request/Do not request

Request/Do not request

iii. Empirical assessment of investment impacts

Request/Do not request

Request/Do not request

iv. Empirical assessment of GDP impact

Request/Do not request

Request/Do not request

Jean Le Roux

Manager, Tax Strategy
The Treasury

s 9(2)(a)

Felicity Barker

Policy Lead
Inland Revenue

s 9(2)(a)

Hon Nicola Willis

Minister of Finance
/ /2025

Hon Simon Watts

Minister of Revenue
/ /2025



Inland Revenue report: Tax debt

| | | | |
|------------------------|---------------|-----------------------|------------|
| Date: | 4 August 2025 | Priority: | Medium |
| Security level: | In confidence | Report number: | IR2025/336 |

Action sought

| | Action sought | Deadline |
|---------------------|--|-----------------|
| Minister of Finance | <p>Note that a condition of Budget 2025 funding was to report on the current and planned approach to mitigating the growth of tax debt.</p> <p>Note we will provide advice on policy options to reduce tax debt.</p> | 12 August 2025 |
| Minister of Revenue | <p>Note that a condition of Budget 2025 funding was to report on the current and planned approach to mitigating the growth of tax debt.</p> <p>Note we will provide advice on policy options to reduce tax debt.</p> | 12 August 2025 |

Contact for telephone discussion (if required)

| Name | Position | Telephone |
|--------------|--|------------------|
| Tony Morris | Customer Segment Leader, Customer and Compliance Services | s 9(2)(a) |
| Thomas Allen | Principle Policy Advisor, Policy | s 9(2)(a) |

4 August 2025

Minister of Finance
Minister of Revenue

Tax debt

Executive summary

Purpose

1. Budget 2025 provided Inland Revenue with \$35 million per annum for direct tax compliance interventions, tax debt-focused activities, and more effective tax collection. A condition of this funding was for Inland Revenue to report to the Minister of Finance and the Minister of Revenue on its current and planned approach to mitigating the growth of tax debt.
2. This report provides:
 - an overview of the overdue tax debt
 - what Inland Revenue is currently doing to mitigate the growth of tax debt, and
 - what further measures might be required (or we are investigating).

Current state of tax debt

3. Despite 94% of tax due being paid on time, tax debt is growing faster than revenue collection and debt repayments. Around 527,000 taxpayers currently have debt, which currently stands at \$9.3 billion and is forecasted to reach \$10.7 billion by June 2026.
4. There are a number of attributes of the debt book that contribute to its growth and/or make slowing down the growth of tax debt a challenge:
 - As debt ages, it gets harder to collect and it becomes more impaired. Of the 527,000 taxpayers that have debt, nearly half of them have debt greater than two years old.
 - A greater proportion of older debt is comprised of penalties and interest. By the time debt has reached five years of age, penalties and interest make up 65% of the debt.
 - GST and employer (eg, PAYE and KiwiSaver deductions) debt make up on average over 50% of total debt.
 - Small businesses have higher relative debt than other types of taxpayers. These taxpayers make up 64% of total debt.

Current approach to managing debt

5. We have deliberately shifted our stance on debt and are taking a firmer approach, which we are communicating to taxpayers. A greater focus on debt collection, including recruiting staff, and deploying resources into this area is making a difference. As a result, we exceeded our Budget 2024 target for overdue debt collection.
6. We have a range of tools to encourage the payment of debt, such as payment plans and deduction notices. We continue to improve, our data and analytics to better target these interventions. We are already seeing positive results from these interventions.

7. The number of statutory demands (an early step in the liquidation process) has increased from 759 in the year ending 30 June 2022 to approximately 1,750 in the year ending 30 June 2025. While liquidation is a last resort and little overdue debt is collected, it is necessary to prevent insolvent companies from continuing to trade.

Debt interventions

8. We are exploring a range of ideas to prevent debt, to use existing tools more effectively, and to introduce levers to better incentivise compliance and promote tax transparency.
9. GST and employer deductions (eg, PAYE) are the most prominent sources of debt. These taxes are effectively held in trust for the Crown so timely payment of these taxes should not impact the cash flow and viability of healthy businesses. There is a case for stronger tools to encourage earlier payment of this debt.

Debt prevention

10. We are exploring whether aligning filing and payment dates, and increasing filing and payment frequency, may help prevent debt from arising.
11. We are considering how intermediaries can help prevent tax debt by aligning the timing of income and tax payments. We have sought your agreement to consult publicly on proposals to more formally recognise the role of intermediaries in the tax system.
12. s 9(2)(f)(iv)
[Redacted]
13. Work has been underway on an Approved Information Sharing Agreement (AISA) between Inland Revenue and the Ministry of Business, Innovation and Employment (MBIE). Better information sharing between the two agencies will help prevent company "phoenixing" and improve compliance and enforcement through prosecutions of directors for non-compliance.

Using existing tools more effectively

14. We are exploring opportunities to speed up and automate notices to banks to retrieve information on taxpayers and to recover overdue tax debt.
15. We are trialling a new service and outsourcing smaller debts to Baycorp when earlier action may prevent the debt growing to unsustainable levels. The pilot covers 3,000 cases and runs until September 2025.

Better levers

16. We are considering whether we can improve tax transparency through existing credit reporting rules, which give us the ability to pass on information to credit agencies in cases of serious non-compliance. s 9(2)(f)(iv)
[Redacted]
17. s 9(2)(f)(iv)
[Redacted]
18. We are continuing to consider tools used in other countries and whether those tools could apply in the New Zealand context.

Next steps

19. We plan to report to you on our progress before the end of the financial year. We are happy to discuss the contents of this report with you if requested.

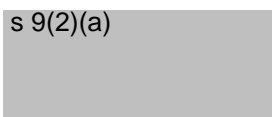
20. We plan to report back separately with advice on policy options to reduce tax debt in the final quarter of this year.

Recommended action

We recommend that you:

1. **Note** that a condition of Budget 2025 funding was for Inland Revenue to report to the Minister of Finance and the Minister of Revenue on its current and planned approach to mitigating the growth of tax debt.
2. **Note** that we plan to report before the end of the financial year with a further progress update on how our approach is addressing the growth of debt.
3. **Note** we plan to provide advice on policy options to reduce tax debt in the final quarter of this year.

s 9(2)(a)



Tony Morris
Customer Segment Leader
4 / 8 / 2025

Hon Nicola Willis
Minister of Finance
/ /2025

Hon Simon Watts
Minister of Revenue
/ /2025

Background

21. Fiscal sustainability is a key priority for the Government. Investing in increasing tax revenue is one way of supporting this objective. Budget 2025 provided Inland Revenue with funding of \$35 million per annum for direct compliance interventions, debt-focused activities and more effective tax collection. This investment is forecast to return \$4 to \$1 in the first year and \$8 to \$1 in subsequent years, resulting in \$980 million additional revenue and a reduction in impairment over the forecast period.¹
22. While additional revenue is being raised from compliance activities, overdue tax and entitlements debt currently stands at \$9.3 billion. Tax debt has grown by \$1.3 billion since June 2024 and it is forecast to be \$10.7 billion by June 2026.²
23. Managing debt is an important part of maximising revenue over time. Effective debt recovery not only brings in additional cash (which can be used to pay down Crown debt), it also protects the value of the Government's tax revenue base by minimising future impairment and reducing write-offs.
24. A condition of the Budget 2025 funding was for Inland Revenue to report to the Minister of Finance and the Minister of Revenue on its current debt collection activities and on potential future measures to mitigate the growth in overdue tax debt (CAB-25-MIN-0126.57 refers).
25. This report only covers tax debt in the first instance. This includes overdue tax and entitlements, including Working for Families and COVID-19 support products. Strategies have been developed that are specific to the nature of student loan and child support debt. However, learnings or interventions might arise in the analysis of the tax debt book that may be applicable to other types of debt.

Overview of tax debt

Drivers of debt

26. Growing tax debt is not specific to New Zealand. Many OECD countries are experiencing growth in tax debt, particularly among small businesses and sole traders.³ The key driver is the persistently weak global post-pandemic recovery, rising costs, and global trade disruptions, which have strained businesses and households, making it harder for some to meet or prioritise tax obligations.
27. During periods of economic hardship, taxpayers often face cashflow constraints. In these situations, they may treat Inland Revenue as a de facto lender, perceiving penalties and interest as more manageable than borrowing from third parties or defaulting on other obligations. Inland Revenue also focused on providing relief and support to individuals and businesses during the pandemic. This diverted resources away from its usual compliance activities. While arguably necessary at the time, less engagement with taxpayers has had a negative impact on their compliance behaviour and attitude towards paying tax debt. These taxpayers are now struggling to get back on track, in part due to the accumulation of interest and penalties on their debt and debt to other creditors. Delayed liquidation actions have also meant that some businesses have continued to trade and accumulate tax debt and debt to other businesses with whom they have been trading.

¹ The Budget 2025 forecast period of 2025/26 to 2028/29.

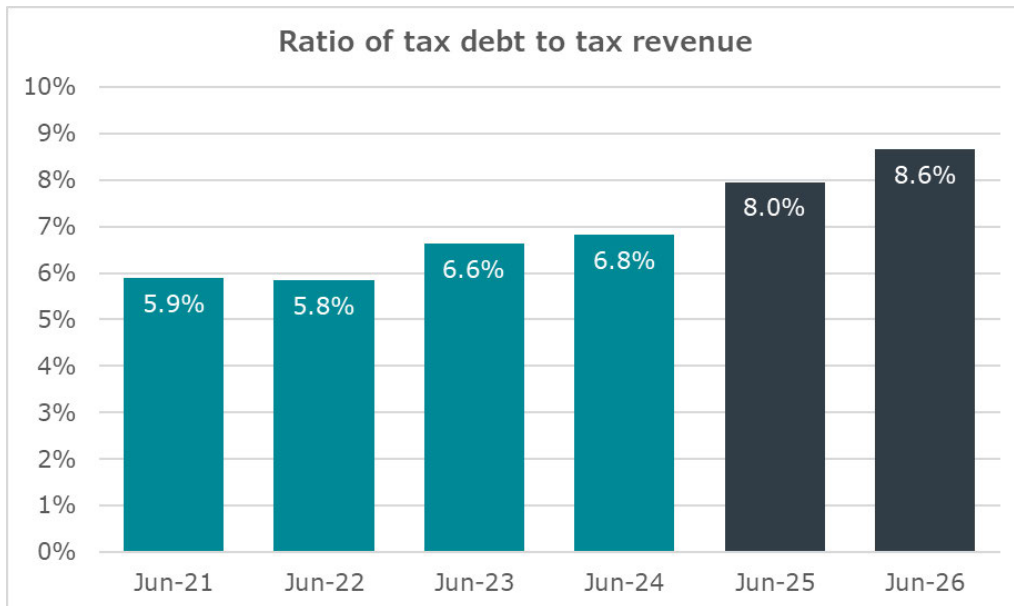
² Excluding student loan, child support, and small business cash flow debt.

³ In Australia, for example, the tax debt book has doubled since 2019 to reach AU\$52 billion by 2024.

Tax debt is outpacing revenue growth

28. Tax debt has been growing quicker than assessed revenue and debt repayments. The ratio of tax debt to tax revenue was 5.9% in 2021 and is expected to grow to 8.0% in 2025 (see Figure 1).

Figure 1: Ratio of tax debt to tax revenue



29. By June 2026 the tax debt book is forecast to be \$10.7 billion. The forecast impairment and write-off appropriation required at this level of debt is forecast to be \$1.5 billion in the same year. In general, as the debt book grows and ages, the appropriation required for the impairment and debt write-offs will also increase.

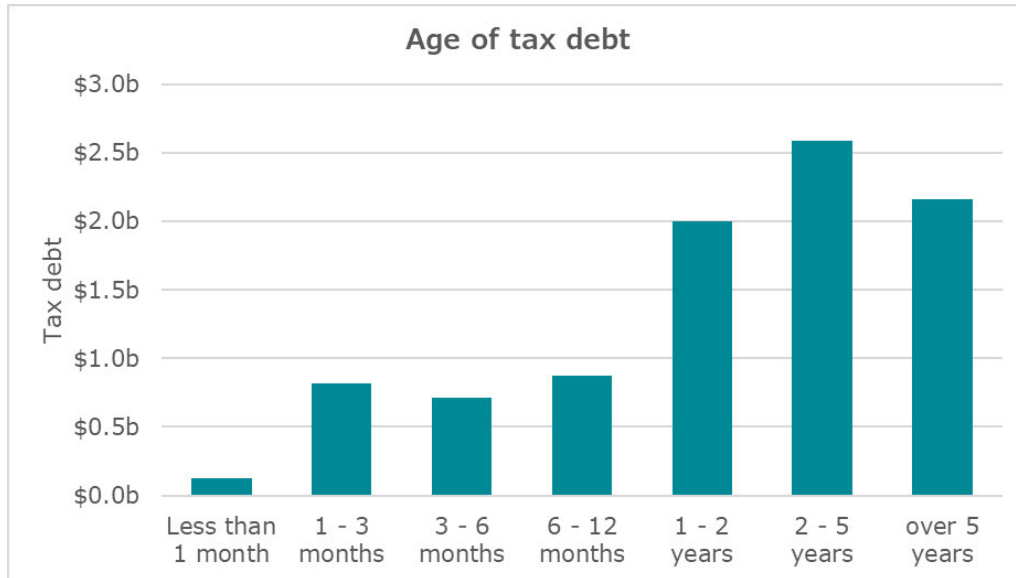
Aging tax debt harder to collect, attracts penalties and interest, and more impaired

30. While tax debt is increasing, the age of the debt is also growing. Old debt is harder and more resource-intensive to collect. It is also more impaired, which translates into a greater expense on the Government's books. Debt less than two years old is impaired on average by 51%. Debt over two years old is impaired on average by 88%.⁴

31. Figure 2 shows the age of debt broken down by different time periods.

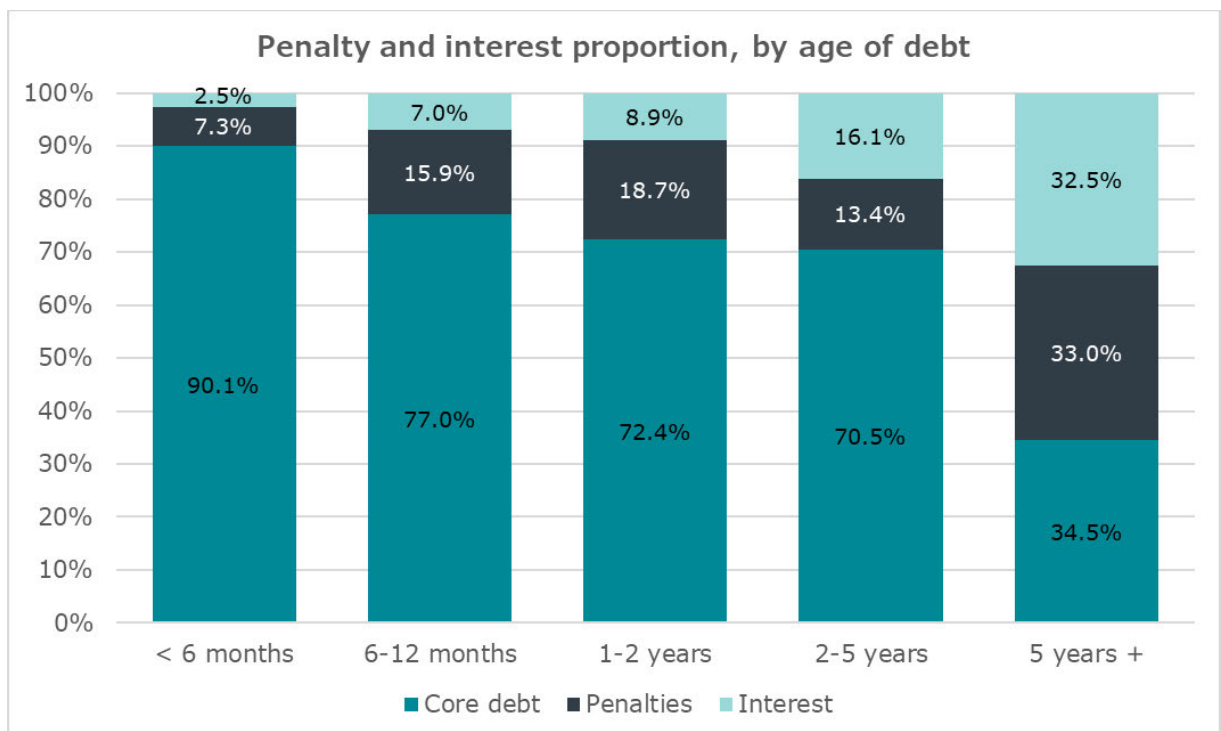
⁴ These figures are for the total weighted debt book based on the age of the debt.

Figure 2: Age of tax debt as at June 2025



- 32. Currently, around 527,000 taxpayers have debt, nearly half of these taxpayers (around 248,000 or 47%) have debt greater than two years old. These taxpayers are typically less engaged.
- 33. As debt ages, penalties and interest compound the growth of the debt. By the time debt has reached five years of age, penalties and interest comprise 65% of the total debt (see Figure 3). The current debt that is two to five years of age has benefitted from interest and penalties remission during COVID-19. There is a question as to how effective penalties are at deterring debt or encouraging payment after a period of time.

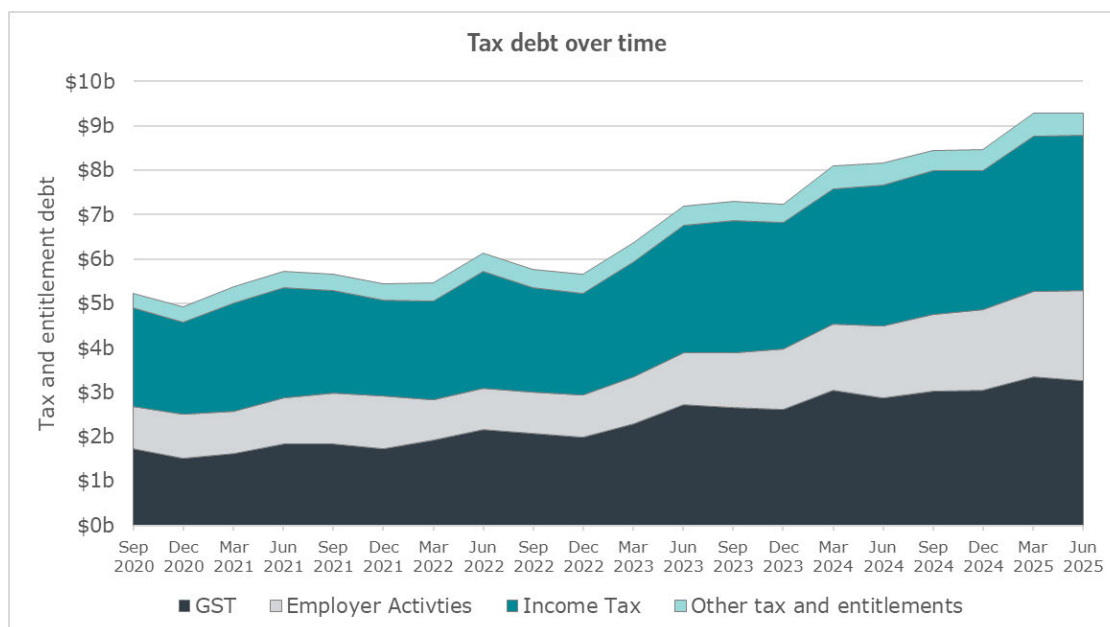
Figure 3: Penalty and interest proportion, by age of debt, as at June 2025



GST and employer tax debt are of particular concern

34. Although GST and employer deductions (eg, PAYE, KiwiSaver deductions) are reasonably stable as a proportion of taxpayer debt over time, they average over 50% of total debt (see Figure 4). In June 2025, GST comprised 35% and employer deductions 22% of total tax debt. These are taxes essentially held in trust for the Crown, and their payment should not impact on the cash flow of businesses. The Crown must fund the shortfall when taxpayers do not pass on these taxes. Not paying these taxes on time could indicate that a taxpayer is experiencing financial difficulty or cash-flow issues.

Figure 4: Tax debt over time



NB: Employer deductions consist of PAYE, KiwiSaver, student loans.

Small businesses have higher relative debt and poorer debt outcomes

35. Small businesses have higher relative debt than other taxpayer segments.⁵ These taxpayers make up \$6 billion, or 64%, of the total \$9.3 billion tax debt.
36. For very small businesses (less than five employees), the proportion of tax debt to tax revenue is 40%, and 43% of their debt is greater than two years old. Consequently, very small businesses account for 50% of all debt written off. This group is likely hit the hardest by economic conditions and therefore has the most pronounced cashflow issues contributing to higher levels of tax debt.

Current approach to managing debt

Reduce opportunities for non-compliance

37. Inland Revenue's approach to managing debt has shifted significantly in recent years. A key guiding principle is "getting it right from the start", which attempts to avoid more costly interventions later. Improved withholding and information collection now means that instead of individuals completing tax returns, returns are automatically generated using data from employers, banks, and financial institutions.⁶ Following the individual income tax assessment process,⁷ there is often very little tax to pay. Without this shift, we may have experienced even greater growth in tax debt.

⁵ Small businesses include individuals who have business income.

⁶ Refer to Outcome 1 of the Inland Revenue Business Transformation Final Business Case Addendum, March 2022.

⁷ So far over 3.5 million automated assessments have been issued for the 2024-25 income year.

38. For individuals with less simple tax affairs and businesses, the process is more complex. Most of these taxpayers are required to pay provisional tax, as well as file employer and GST returns. For these taxpayers, there are greater opportunities to miss filing and payment dates.

More resources deployed to debt collection and notifying stakeholders

39. Since COVID-19, resources have been redeployed back into compliance activities. These resources have been supplemented as a result of Budget 2024 funding, which has allowed Inland Revenue to recruit an additional 85 customer services officers solely focused on collecting debt. The target for overdue tax collected for the 2024–25 income year was at least \$4,080 million, the result for this year is \$4,286 million.
40. We are deliberately shifting our stance on debt and taking a firmer approach. We have developed a communications approach and key messages that we are beginning to use with media, business, trade groups and the tax community to communicate what we are doing about debt. We are reinforcing expectations that everyone pays their tax on time and that there are consequences for non-compliance. But at the same time, we are clear that help is available to support customers who may be experiencing difficulties, treating people with respect, and managing debt in a fair and transparent way.

Tools currently available to encourage compliance and payment of debt

41. We are conscious of the financial pressures that individuals and businesses may be under and will continue to work with all taxpayers that are in debt to find an acceptable way to resolve those debts. We use a full range of levers to encourage taxpayers to comply with their tax obligations and collect any missed payments. Our response is proportionate to the situation, increasing in severity when considering factors like the level of debt or risk of continued non-compliance.
42. Some of the key interventions and tools we will continue to use include:

| | | |
|--|--|--|
| <p>Automated system reminders – Designed to promote self-service options and encourage customers to engage with Inland Revenue without the need for direct contact.</p> | <p>Penalties and interest – Incentivise taxpayers to pay tax debt.</p> | <p>Relief provisions – Help customers to get back on track, including instalment arrangements and write-off provisions under certain conditions like hardship. We also offer advisory services to help taxpayers manage their debt.</p> |
| <p>Tailored and more direct engagement – Phone conversations, case management and suggesting legal action for non-payment.</p> | <p>Deduction notices – Requires third parties to redirect funds or a portion of salary or wage payments to Inland Revenue instead of paying them to the taxpayer.</p> | <p>Bankruptcy or liquidation – This is a last resort option after all other interventions have failed to collect the debt.</p> |

Improved analytics and data matching to better target interventions

43. We have improved our analytics and data matching that can be used to identify at-risk customers and to target interventions. We use a tool called *Decision support manager*, which supports the way we manage collections. Some examples of improvements to the tool include:
- **Recognising taxpayers that will self-correct:** This has allowed us to direct resources to taxpayers that need more direct intervention to get back on track.
 - **Offering pre-approved arrangements:** We identify taxpayers that can repay debt through an instalment arrangement. The uptake in pre-approved arrangements has

been positive with 14% (at \$34 million) of customers accepting arrangements and 14% (at \$8.9 million) paying the debt in full.

- **Better targeting of bank deduction notices:** We utilise the information from banks to better target customers (based on their interest income) to directly deduct from their bank account. This has allowed us to collect \$9.3 million from 3,800 customers over six weeks.

Forecasting debt

44. A key driver of managing the debt book is the ability to more accurately forecast the growth in the book and the forecast impact on this growth of interventions or economic or customer behavioural changes. This will help us to understand the impact of the levers available to us. Enhanced forecasting of debt will flow onto forecasting the impact on impairment and write-off expense and the ability to manage the appropriation. We are investing in building this modelling capability ahead of the next forecasting rounds.

Significant increase in liquidations

45. The number of statutory demands (early step in the liquidation process) has increased from 759 in the year ending 30 June 2022 to approximately 1,750 in the year ending 30 June 2025. Capacity constraints on the part of Inland Revenue, the courts, and MBIE limit the ability to increase this much further.
46. We receive very little overdue debt from liquidations, but they are necessary to prevent insolvent companies from continuing to trade. As at 30 June 2024, more than 15% of total tax debt was owed by companies in liquidation. We are also exploring Inland Revenue's ability to identify potentially insolvent businesses earlier and considering what actions could be taken to reduce the number of businesses that continue to trade while effectively insolvent.

Debt interventions

47. We have identified three areas of focus to further step up Inland Revenue's debt collection activities:
 - **Prevention:** Making it less likely debt will arise by identifying at risk taxpayers before they accrue significant debt.
 - **Improving efficiency and effectiveness of current interventions:** Doing what we do now but better and on a larger scale.
 - **Better levers:** More measures that create consequences for non-compliance, including making it transparent which taxpayers are not meeting their obligations as opposed to those that are.
48. Relative to other jurisdictions, we have fewer measures that might influence taxpayer behaviour. GST and employer debt (such as PAYE) are taxes effectively held in trust so timely payment of these taxes should not impact on the cash flow and viability of healthy businesses.
49. Given that GST and employer deductions (eg, PAYE) are two of the most pronounced sources of debt, measures that encourage or require early passing on of this Crown revenue are likely to be the most effective. There is a case for stronger tools to encourage earlier payment of this debt, particularly given the recent growth of GST and employer debt.
50. What follows are potential areas and measures that we recommend for further development and consultation.

Prevention

51. Preventing debt from arising is the most effective way to mitigate it. Strategies such as increasing withholding taxes, enhancing deductions at source, and integrating tax obligations into the natural systems of business operations can help ensure timely payments.
52. A key issue is the time gap between tax assessment and payment due dates. For example, employers are required to file soon after they pay their employees but are not required to pay at the same time, instead they have until the 20th of the month to pay. Ideally, to maximise revenue collection, payments should be due as soon as (or as close to when) the tax is assessed.
53. The frequency of filing and payment can also be a factor. For example, small businesses can file every six months. If they miss a couple of filing/payment dates, the debt can quickly become hard to manage. Australia is trialling the threat of increasing GST filing frequencies for non-compliant taxpayers to reduce GST debt. We are assessing whether better alignment of filing and payments dates, as well as the increasing frequency of filing/payments, could prevent debt from arising.
54. The following initiatives provide opportunity to prevent debt.
 - s 9(2)(f)(iv) [Redacted]
 - s 9(2)(f)(iv) [Redacted]
 - **Information sharing with MBIE:** Work has been underway on an Approved Information Sharing Agreement (AISA) between Inland Revenue and MBIE. The AISA will allow both agencies to share more information, helping to prevent company “phoenixing”, improve compliance and enforcement, and increase prosecutions of directors for non-compliance.

Improving efficiency and effectiveness of current interventions

s 9(2)(f)(iv) [Redacted]

[Redacted]

[Redacted]

Greater use of third parties

57. The volume of overdue debt cases means that the bar for personalised intervention is high. As a result, some taxpayers do not get contacted for some time after they get into debt. We are trialling a new service and outsourcing smaller debts to Baycorp when

earlier action may prevent the debt growing to unsustainable levels. The pilot covers 3,000 cases and runs until September 2025. It will test whether using a third-party provider is an efficient and effective way to engage with taxpayers with low levels of debt.

Better levers

Promoting tax transparency

58. We are investigating what levers we currently have that might promote tax transparency, whether they are being used effectively, and if additional measures might be useful. Tax transparency plays a crucial role in promoting trust, accountability, and fairness in the tax system.
59. We have the ability to pass on information to credit agencies in cases of serious non-compliance. Credit reporting was introduced in 2017 to encourage compliance and to help the business community by increasing the visibility of significant tax debts. The rules require that the debt exceeds \$150,000,⁸ the business is notified before reporting, and reasonable efforts are made to collect the unpaid tax. Due to the uncertainty as to what qualifies as "reasonable efforts" and the high threshold, we have only reported 27 taxpayers to a single credit reporting agency since the introduction of this lever.
60. We are doing interpretive work on credit reporting. This work covers whether the threat of credit reporting is effective, particularly early on when a taxpayer first gets into debt. Depending on the outcome of that work, changes might be required to ensure the rules are workable in practice.
61. s 9(2)(f)(iv)

Incentivising compliance

62. We are investigating other levers that might incentivise compliance, specifically levers to increase the consequences of sustained non-compliance and unpaid tax debt.
63. We have the ability to pass tax debt on to directors and shareholders. This lever was introduced in 1992 and was specific to situations where an arrangement has been entered when the company cannot meet a tax liability.⁹ Due to the narrow application of the rule and the burden of proof required, this lever has been rarely used.
64. s 9(2)(g)(i)
65. s 9(2)(g)(i)
66. We continue to investigate tools and policy settings that other jurisdictions have available to incentivise compliance and reduce tax debt, and whether these tools/settings might be effective in the New Zealand context. Subject to your

⁸ Or the amount must be more than a year old and is more than 30% of the taxpayer's gross income.

⁹ This prevents the assets of the company being stripped leaving the company unable to meet its tax liability.

agreement, we can update you on our assessment of these tools and/or policy settings as part of reporting back on the credit reporting and director/shareholder liability rules.

Next steps

67. Reducing the growth of debt is a significant challenge and it will take some time to address the problem, but we are making progress. We plan to report to you on our progress before the end of the financial year. We are happy to discuss the contents of this report with you.

68. We plan to report back with advice on policy options to reduce tax debt in the final quarter of this year. s 9(2)(f)(iv)

[Redacted]

[Redacted] s 9(2)(g)(i)

[Redacted]

[Redacted]



**Policy
Taukaea**

55 Featherston Street
PO Box 2198
Wellington 6140
New Zealand

T. 04 890 1500

Briefing note

Reference: BN2025/357

Date: 21 August 2025

To: Revenue Advisor, Minister of Finance – Carl Harris
Revenue Advisor, Minister of Revenue – Angela Graham
Private Secretary, Minister of Revenue – Helen Kuy

From: Phil Whittington

Subject: **Slide pack for Minister of Finance meeting, Tuesday 26 August**

Purpose

1. This briefing note attaches a slide pack for use as the basis for a conversation between the Minister of Finance and officials from IRD and the Treasury on Tuesday 26 August. The pack covers selected messages from Inland Revenue's draft long term insights briefing. The pack and conversation are intended to guide discussion and inform the Minister ahead of any Budget 26 discussions on tax reform.

Consultation with the Treasury

2. The Treasury was informed about this briefing note.

Phil Whittington
Chief Economist, Policy, Inland Revenue

s 9(2)(a)



Inland Revenue
Te Tari Taake

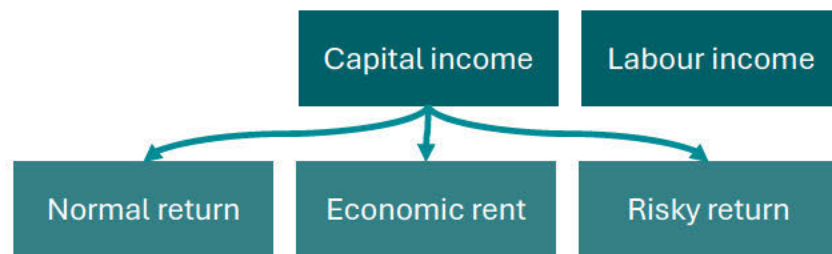
Tax system discussion

Building on IRD's draft Long-term insights briefing – *Stable bases, flexible rates*

Thinking about tax reform starts from thinking about economic bases we might want to tax

- Reform discussions can get trapped in detail before deciding what **economic feature** we want to tax
- Better to think about **fundamental economic** bases and how they interact with our actual tax system
- **We can tax capital income and/or labour income**

Figure 1: Economic factors - capital and labour income



Most tax bases can be assessed as to how they tax:

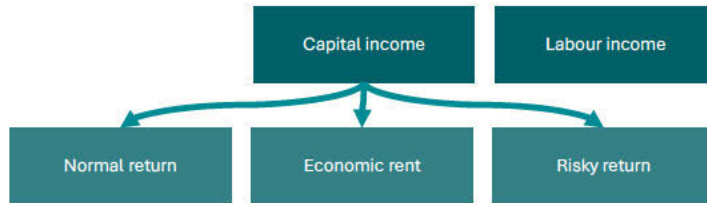
1. Capital income
2. Labour income

Some definitions: normal returns are sensitive to tax and arguably the most inefficient tax base

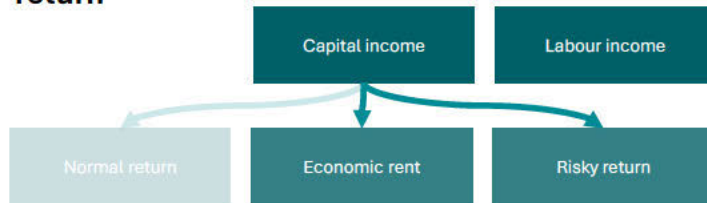
- **Labour income:** the return from using time and skill. Taxing labour income aligns with “ability to pay” principle
- **Normal returns:** the return from delaying consumption. Also known as the “risk-free return”
 - **Prima facie case against taxing** because it’s like a distortionary consumption tax – taxes future consumption much more heavily than consumption today
 - Arguments for and against in LTIB – **consensus view that there is a case to tax, but potentially at lower rate**
- **Economic rent:** the return above the normal level due to (e.g.) market power, scarcity, or other advantages not attributable to risk or effort. **Very efficient to tax** as tax will not discourage the activity
- **Risky return:** Additional expected return that compensates for uncertainty and possibility of loss. Can be good to tax but only from a “risk-sharing” perspective: government gets upside but also **shares in downside** and earns the risky return. Still gives entrepreneurs incentives to take risks

Income tax taxes all forms of income, but consumption tax exempts normal returns

Income tax taxes all forms of income



Consumption tax (e.g. GST) exempts normal return



- **More GST, less income tax:** lower tax on normal returns (e.g. Budget 2010 tax switch)
- **More income tax, less GST:** higher tax on normal returns
- Because we can vary income tax rates and consumption tax rates, **we can choose how heavily we want to tax normal returns/savings**

We think better to primarily look at income tax and GST rather than new tax bases if we need more revenue

- Most other bases overlap with these existing bases but are worse
 - **Wealth tax** is a tax on normal returns, but not economic rents or risky returns. Large compliance costs
 - **Stamp duty** is a lump-sum charge on changing ownership – worse than a land tax in terms of taxing economic rent
 - **Payroll taxes** are taxes on labour income but not as comprehensive as GST as hard to include self-employed
 - **Land tax** has some attractive efficiency effects (no distortion as hard to create or destroy land) but may be seen as unfair as targets one form of wealth
 - **Inheritance tax** is a tax on wealth transferred at death – there may be a case to tax depending on distributional goals, but unlikely to be a major revenue source
- **Corrective taxes** worth looking at but not as major revenue sources

Instead of varying GST/income tax, we could try to design variability into our income tax with a dual income tax

- **Dual Income Tax** taxes the normal return to savings and foreign investment at a lower rate
- Dual Income Taxes are widely used in **Nordic Countries***
- **Downsides:** requires CGT, would take years of reform

* Denmark, Finland, Iceland, Norway, and Sweden

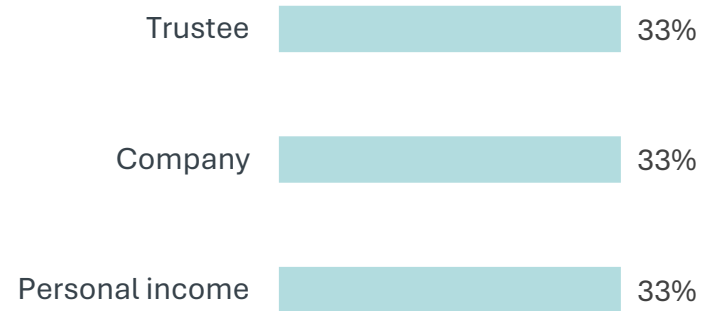
Norway collects a lot of tax revenue, but has low income tax on savings and investment

| Norway | Rate |
|---------------------------|-------|
| Tax-to-GDP | 39% |
| Corporate rate | 22% |
| Tax on normal return | 22% |
| Top labour income rate | 46.7% |
| Top rate on economic rent | 46.7% |

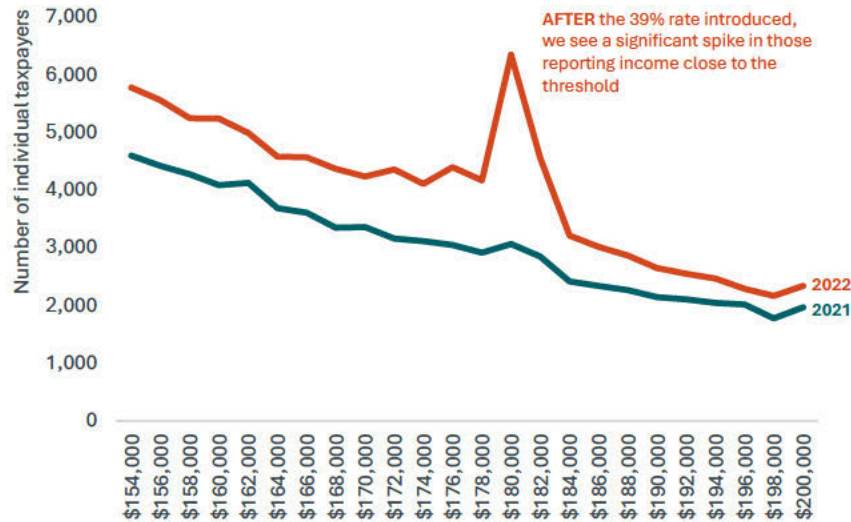
Current income tax makes it hard to raise significantly more revenue

- New Zealand historically operated a model based on **alignment** of three key tax rates
- This worked very well before **PIEs**, and before the **39%** rate
- Misalignment creates tax-driven distortions for entity choice (e.g. company vs trust vs sole trader)

Alignment of 3 key rates from 1989 - 2000



We see tax-driven structuring due to existing difference between 39% personal and 28% company rate



- 39% rate plus **misalignment** creates incentives to earn income through other entities
- Have similar issues with **Portfolio Investment Entities (PIEs)**
- But:
 - Increasing company tax has high economic costs
 - Reducing top personal rate very expensive

Source: IRD statistics on personal incomes for 2021 and 2022 tax years

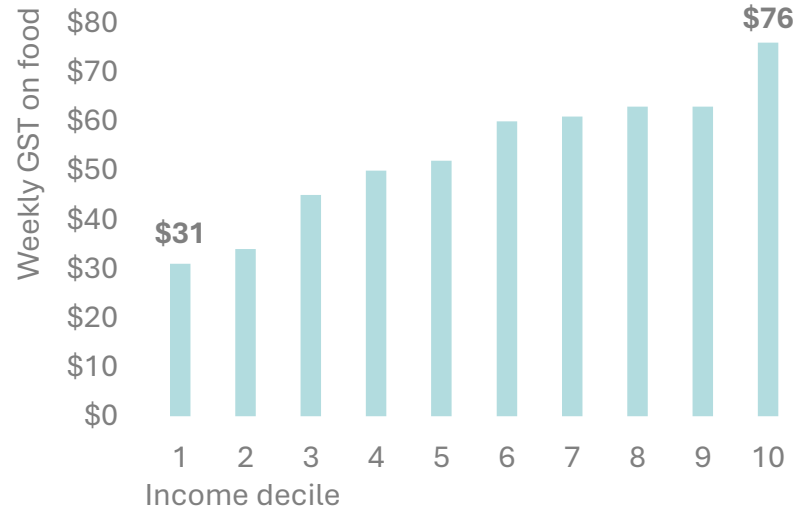
What about a tax switch – more GST but less income tax?

- New Zealand's GST is world leading in its breadth and simplicity
- Very effective tool for raising revenue, but if this came at the cost of its breadth and simplicity we would have undermined our best tax
- **Can we reduce pressure for exemptions by designing compensation regime for particular groups?**

Exemptions are less targeted than credit schemes

- **VAT exemptions** are common internationally
- Provide a larger **absolute** benefit to high-income households
- **Transfers** can be more effectively targeted
- Several countries have implemented **GST low-income rebate** schemes

Highest income decile would gain \$76 per week from no GST on food, vs \$31 for lowest income decile



Low-income transfer can mitigate the impacts of a GST increase on low-income families

- In the LTIB we simulate a **3-percentage point increase in GST**
- A 3-pp increase in GST generates **~\$5.5 billion**
- **Target compensation group:** families <60% of median family disposable income
- Fully compensating these families would cost **~\$0.44 billion, or 8% of the revenue gain**
- **Downsides**
 - Effective marginal tax rates are higher
 - Another complicated benefit/tax credit to add to the mix
- **Simpler to just increase particular benefits?**