
Committee of the whole House: Wednesday 10 January 2024

Finance Bill (Amendment Paper)

Clauses to be considered in Committee of the whole House: Clause 1 (capital allowances: permanent full expensing etc for expenditure on plant or machinery); Clause 2 and Schedule 1 (new regime for research and development carried out by companies); Clause 21 and Schedule 12 (Pillar Two); Clause 25 (rebate on heavy oil and certain bioblends used for heating); Clause 27 (interpretation of VAT and excise law); Clauses 31 to 34 and Schedule 13 (tax evasion and avoidance); any new Clauses or new Schedules relating to the subject matter of those Clauses and Schedules.

This document lists all amendments tabled to the Finance Bill. Any withdrawn amendments are listed at the end of the document. The amendments are arranged in the order in which it is expected they will be decided.

This document should be read alongside the provisional Selection and Grouping by the Chairman of Ways and Means, which sets out the order in which the amendments will be debated.

*CLAUSES 1 AND 2 AND SCHEDULE 1; ANY NEW CLAUSES OR
NEW SCHEDULES RELATING TO THE SUBJECT MATTER OF THOSE CLAUSES
AND THAT SCHEDULE*

Sarah Olney

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Clause 1, page 2, line 3, at end insert—

“(3) The provisions of subsection (1) shall only be applied to water companies after they have published a costed, time-limited plan, demonstrating the way in which these capital allowances will be used to prevent sewage discharges.”

Member's explanatory statement

This amendment would require water companies to demonstrate how they will use capital allowances to prevent sewage discharges in order to benefit from full expensing.

James Murray

NC1

Tulip Siddiq

To move the following Clause—

“Review of reliefs for research and development

- (1) The Chancellor of the Exchequer must, within three months of this Act being passed, publish a review of the implementation costs of the measures in section 2 incurred by—
 - (a) HMRC, and
 - (b) businesses.
- (2) The review under subsection (1) must include details of the implementation costs of all measures related to credit or relief for research and development that have been introduced since December 2019.”

Member's explanatory statement

This new clause would require the Chancellor to publish a review setting out the total implementation costs of all changes to research and development reliefs in the current Parliament.

Sarah Olney

NC3

To move the following Clause—

“Assessment of impact of Act on business investment and economic growth

Within six months of the passage of this Act, the Chancellor of the Exchequer must carry out an assessment of the impact of section 2 and Schedule 1 of this Act on business investment and economic growth, and lay a report of that assessment before both Houses of Parliament.”

Member's explanatory statement

This new clause would require the government to produce an assessment of the impact of the Bill's new regime for research and development carried out by companies. This assessment would need to examine the impact on business investment and economic growth.

James Murray

NC6

Tulip Siddiq

To move the following Clause—

“Review of business taxes and reliefs

- (1) The Chancellor of the Exchequer must, within three months of this Act being passed—
 - (a) conduct a review of business taxes and reliefs, and

- (b) lay before the House of Commons a report setting out recommendations arising from the review and a roadmap for their implementation.
- (2) The review must make recommendations on how to—
 - (a) use business taxes and reliefs to encourage and increase the investment of profits and revenue;
 - (b) ensure businesses have more certainty about the taxes to which they are subject; and
 - (c) ensure that the system of reliefs operates effectively to incentivise investment, including for small businesses.
- (3) In this section, “business taxes and reliefs” include any taxes paid, or reliefs claimed, by businesses, including provisions made under sections 1 and 2 of this Act.”

Member's explanatory statement

This new clause would require the Chancellor to conduct a review of business taxes and reliefs, and to make recommendations on how to increase certainty and investment.

*CLAUSE 21 AND SCHEDULE 12; CLAUSES 31 AND 32 AND SCHEDULE 13;
CLAUSES 33 AND 34; ANY NEW CLAUSES OR NEW SCHEDULES RELATING
TO THE SUBJECT MATTER OF THOSE CLAUSES AND THOSE SCHEDULES*

James Murray

NC2

Tulip Siddiq

To move the following Clause—

“Review of measures to tackle evasion and avoidance

- (1) The Chancellor of the Exchequer must, within three months of this Act being passed, publish a review of the measures in sections 31 to 33 to tackle evasion and avoidance.
- (2) The review under subsection (1) must include details of—
 - (a) the average sentence handed down in each of the last five years for the offences listed in section 31;
 - (b) the range of sentences handed down in each of the last five years for the offences listed in section 31;
 - (c) the number of stop notices issued in each of the last five years to which the measures in section 33 would apply; and
 - (d) the estimated impact on revenue collected in each of the next five financial years resulting from the introduction of the measures in sections 31 to 33.”

Member's explanatory statement

This new clause would require the Chancellor to publish details of the sentences given and stop notices issued in each of the last five years to tackle evasion and avoidance, as well as the revenue

expected to be generated from the measures to tackle evasion and avoidance in this Act in each of the next five years.

Sarah Olney

NC4

To move the following Clause—

“Assessment of impact of Act on multinational profit shifting and tax competition between jurisdictions

- (1) Within six months of the passage of this Act, the Chancellor of the Exchequer must carry out an assessment of the impact of section 21 and Schedule 12 of this Act on multinational profit shifting and tax competition between jurisdictions, and lay a report of that assessment before both Houses of Parliament.
- (2) The report must consider the efficacy of the measures contained in section 21 and Schedule 12 in achieving the policy objective of combatting base erosion and profit shifting.”

Member's explanatory statement

This new clause would require the government to produce an assessment of the impact of the Bill's “Pillar Two” measures, in order to ascertain whether these measures have been successful in achieving their policy aims.

Sarah Olney

NC5

To move the following Clause—

“Tax compliance reporting

- (1) Within six months of the passage of this Act, the Chancellor of the Exchequer must carry out an assessment of the impact of sections 31 to 34 and Schedule 13 of this Act.
- (2) The report must consider the capacity and ability of HMRC to enforce compliance with the measures contained in sections 31 to 34 and Schedule 13 of this Act, including setting out staffing arrangements within HMRC's Customer Compliance Group for undertaking enforcement work relating to sections 31 to 34 and Schedule 13 of this Act.”

Member's explanatory statement

This new clause would require the government to produce an assessment of the impact of the Bill's tax evasion and avoidance measures. The assessment would need to examine whether the capacity and ability of HMRC was sufficient to properly enforce those measures.

James Murray

NC7

Tulip Siddiq

To move the following Clause—

“Review of effectiveness of section 31 measures in preventing fraud involving taxpayers’ money

- (1) The Chancellor of the Exchequer must, within three months of this Act being passed, conduct a review of the effectiveness of the provisions of section 31 in preventing fraud involving taxpayers’ money.
- (2) The review must evaluate the effectiveness of the provisions of section 31 in preventing fraud involving taxpayers’ money through comparison with the effectiveness of—
 - (a) other measures that seek to prevent fraud involving taxpayers’ money, and
 - (b) the approach taken in other countries.”

Member's explanatory statement

This new clause would require the Chancellor to review the effectiveness of measures in this Act to prevent fraud involving taxpayers’ money, and to compare them with other measures that seek to prevent fraud involving taxpayers’ money and the approach taken in other countries.

Order of the House

[13 December 2023]

That the following provisions shall apply to the Finance Bill:

Committal

1. The following shall be committed to a Committee of the whole House—
 - (a) Clause 1 (capital allowances: permanent full expensing etc for expenditure on plant or machinery);
 - (b) Clause 2 and Schedule 1 (new regime for research and development carried out by companies);
 - (c) Clause 21 and Schedule 12 (Pillar Two);
 - (d) Clause 25 (rebate on heavy oil and certain bioblends used for heating);
 - (e) Clause 27 (interpretation of VAT and excise law);
 - (f) Clauses 31 to 34 and Schedule 13 (tax evasion and avoidance);
 - (g) any new Clauses or new Schedules relating to the subject matter of the Clauses and Schedules mentioned in paragraphs (a) to (f).
2. The remainder of the Bill shall be committed to a Public Bill Committee.

Proceedings in Committee of the whole House

3. Proceedings in Committee of the whole House shall be completed in one day.
4. The proceedings—
 - (a) shall be taken on that day in the order shown in the first column of the following Table, and
 - (b) shall (so far as not previously concluded) be brought to a conclusion at the times specified in the second column of the Table.

Proceedings	Time for conclusion of proceedings
Clauses 1 and 2 and Schedule 1; any new Clauses or new Schedules relating to the subject matter of those Clauses and that Schedule	2 hours after the commencement of proceedings on the Bill.
Clause 21 and Schedule 12; Clauses 31 and 32 and Schedule 13; Clauses 33 and 34; any new Clauses or new Schedules relating to the subject matter of those Clauses and those Schedules	4 hours after the commencement of proceedings on the Bill.
Clauses 25 and 27; any new Clauses or new Schedules relating to the subject matter of those Clauses	6 hours after the commencement of proceedings on the Bill.

Proceedings in Public Bill Committee etc

5. Proceedings in the Public Bill Committee shall (so far as not previously concluded) be brought to a conclusion on Thursday 18 January 2024.
6. The Public Bill Committee shall have leave to sit twice on the first day on which it meets.
7. When the provisions of the Bill considered, respectively, by the Committee of the whole House and by the Public Bill Committee have been reported to the House, the Bill shall be proceeded with as if it had been reported as a whole to the House from the Public Bill Committee.

Proceedings on Consideration and Third Reading

8. Proceedings on Consideration shall (so far as not previously concluded) be brought to a conclusion one hour before the moment of interruption on the day on which those proceedings are commenced.
9. Proceedings on Third Reading shall (so far as not previously concluded) be brought to a conclusion at the moment of interruption on that day.

Programming committee

10. Standing Order No. 83B (Programming committees) shall not apply to proceedings in Committee of the whole House, to proceedings on Consideration or to proceedings on Third Reading.