
Public Bill Committee: Tuesday 27 January 2026

Finance (No. 2) Bill

(Amendment Paper)

Except the clauses to be considered in Committee of the whole House: Clauses 1 to 8 and Schedules 1 and 2 (income tax charge and rates); Clauses 9, 10 and 69 (freezing of allowances); Clause 62 and Schedule 12 (agricultural property relief and business property relief); Clauses 63 to 68 (inheritance tax on pension interests); Clauses 83 to 85 and Schedule 13 (gambling duties); Clause 86 (rates of alcohol duty); any new Clauses or new Schedules relating to the subject matter of these Clauses and Schedules.

This document lists all amendments tabled to the Finance (No. 2) 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 Any withdrawn amendments are listed at the end of the document.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 Chair's provisional Selection and Grouping, which sets out the order in which the amendments will be debated.

★ New Amendments.

☆ Amendments which will comply with the required notice period at their next appearance.

New Amendment: NC32

Resolution of the Programming Sub-Committee

The Programming Sub-Committee appointed by the Speaker in respect of the Bill agreed the following Resolution at its meeting on 26 January (Standing Order No. 83C):

That—

1. the Committee shall (in addition to its first meeting at 9.25 am on Tuesday 27 January) meet—
 - (a) at 2.00 pm on Tuesday 27 January;
 - (b) at 11:30 am and 2.00 pm on Thursday 29 January;
 - (c) at 9.25 am and 2.00 pm on Tuesday 3 February;
 - (d) at 11:30 am and 2.00 pm on Thursday 5 February;
 - (e) at 9.25 am and 2.00 pm on Tuesday 10 February;
 - (f) at 9.25 am and 2.00 pm on Tuesday 24 February;

- (g) at 11:30 am and 2.00 pm on Thursday 26 February;
2. the proceedings shall be taken in the following order: Clauses 11 to 43; Schedule 3; Clauses 44 to 45; Schedule 4; Clause 46; Schedule 5; Clause 47; Schedule 6; Clauses 48 and 49; Schedule 7; Clause 50; Schedule 8; Clauses 51 to 54; Schedule 9; Clause 55; Schedule 10; Clause 56; Schedule 11; Clauses 57 to 61; Clauses 70 to 82; Clauses 87 to 100; Schedule 23; Clauses 101 to 136; Schedule 14; Clauses 137 to 140; Schedule 15; Clauses 141 to 148; Schedule 16; Clause 149; Schedule 17; Clause 150; Schedule 18; Clauses 151 to 220; Schedule 19; Clauses 221 to 241; Schedule 20; Clauses 242 to 247; Schedule 21; Clauses 248 to 252; Schedule 22; Clauses 253 to 279; any new Clauses or new Schedules relating to the subject matter of those Clauses or those Schedules; remaining proceedings on the Bill.
 3. the proceedings shall (so far as not previously concluded) be brought to a conclusion at 5.00 pm on Thursday 26 February.

Dan Tomlinson has given notice of his intention to move a motion in the terms of the Resolution of the Programming Sub-Committee [Standing Order No. 83C].

Dan Tomlinson

That, subject to the discretion of the Chair, any written evidence received by the Committee shall be reported to the House for publication.

Dan Tomlinson

Gov 37

Clause 13, page 7, line 37, at end insert—

- “() In section 169I(7D)(b) of TCGA 1992 (material disposal of business assets)—
- (a) for “tenth ” substitute “specified”;
 - (b) at the end insert “(with “specified anniversary” having the meaning given in section 529(2A) of that Act).”

Member's explanatory statement

This amendment to TCGA 1992 would reflect the changes made to section 529 of ITEPA 2003 by clause 13 of the Bill.

Dan Tomlinson

Gov 38

Clause 13, page 7, line 38, for “(7)” substitute “(8)”

Member's explanatory statement

This amendment is consequential on the addition of a new subsection by Amendment 37.

James Wild

29

Mark Garnier
Sir Mel Stride

Clause 15, page 10, line 23, leave out subsection (2)

Member's explanatory statement

This amendment would maintain the rate of income tax relief for investments into venture capital trusts at 30 per cent.

Dan Tomlinson

Gov 3

Clause 15, page 10, line 26, after “the” insert “relevant”

Member's explanatory statement

This amendment, together with Amendment 4, amends section 292A(1) of ITA 2007 to refer to “the relevant company” rather than “the company”.

Dan Tomlinson

Gov 4

Clause 15, page 10, line 30, after “the” insert “relevant”

Member's explanatory statement

See the explanatory statement for Amendment 3.

Dan Tomlinson

Gov 5

Clause 24, page 28, line 25, at end insert—

“61Z2 Disclosures to liable persons

- (1) Subsection (2) applies where an officer of Revenue and Customs considers that a person is, or may be, jointly and severally liable to pay an amount as a result of this Chapter.
- (2) The officer may at any time disclose to the person such information as the officer considers appropriate (whether or not such a disclosure would otherwise be permitted under section 18(2)(a) of CRCA 2005 or any other enactment) for the purposes of informing the person about that liability (“the joint liability”) including—
 - (a) the identity of any person who is an umbrella company, a purported umbrella company or the worker in relation to the arrangements to which the joint liability relates, and
 - (b) information about the nature and extent of the liability of an umbrella company or a purported umbrella company that (by virtue of this Chapter) results, or may result, in the joint liability.

- (3) Information disclosed in reliance on subsection (2) may not be further disclosed without the consent of the Commissioners for His Majesty's Revenue and Customs (which may be general or specific).
- (4) Where a person contravenes subsection (3) by disclosing information relating to a person whose identity—
 - (a) is specified in the disclosure, or
 - (b) can be deduced from it,section 19 of CRCA 2005 (offence of wrongful disclosure) applies in relation to the disclosure as it applies in relation to a disclosure in contravention of section 20(9) of that Act.
- (5) In this section "CRCA 2005" means the Commissioners for Revenue and Customs Act 2005."

Member's explanatory statement

This amendment permits disclosures (whether or not permitted as a result of provision elsewhere) to persons who may be jointly and severally liable as a result of new Chapter 11 of Part 2 of the Income Tax (Earnings and Pensions) Act 2003.

Dan Tomlinson**Gov 6**

Clause 24, page 29, line 31, leave out "a "relevant party" for the purposes" and insert "jointly and severally liable to pay an amount as a result"

Member's explanatory statement

This amendment makes sure that HMRC can use their power to make determinations about PAYE income in relation to persons who are jointly and severally liable to amounts of PAYE income under new section 61Z1 of the Income Tax (Earnings and Pensions) Act 2003.

Dan Tomlinson**Gov 7**

Clause 24, page 29, line 32, leave out from "ITEPA" to end of line 33 and insert "(umbrella companies)—"

Member's explanatory statement

This amendment is consequential on Amendment 6.

Dan Tomlinson**Gov 8**

Clause 24, page 29, line 34, leave out from first "to" to "as" in line 35 and insert "that amount"

Member's explanatory statement

This amendment is consequential on Amendment 6.

Dan Tomlinson

Gov 9

Clause 25, page 30, line 21, at end insert “, or

(ii) a director or shadow director of such a person.”

Member's explanatory statement

This amendment expands the persons to whom the Commissioners are not required to make a loan charge settlement offer so as to include directors and shadow directors of a promoter or introducer.

Dan Tomlinson

Gov 10

Clause 25, page 32, line 12, at end insert—

““shadow director” has the meaning given by section 251 of the Companies Act 2006.”

Member's explanatory statement

This amendment inserts a definition for the purpose of Amendment 9.

Dan Tomlinson

Gov 11

Clause 27, page 33, line 15, at end insert—

“(da) adapting provision made under section 25(6), in cases where a settlement offer is made to a person who is not an individual, about the calculation of settlement amounts (including provision for the calculation to be different to what is required by section 25(6));”

Member's explanatory statement

This amendment clarifies that the loan charge settlement scheme can provide for the calculation of the settlement amount to be adapted where a settlement offer is made to a person who is not an individual.

Jack Rankin

2

Schedule 3, page 268, line 14, at end insert—

“PART 1A

AMENDMENT OF TRANSFER OF ASSETS ABROAD PROVISIONS

7A In section 737 of ITA 2007 (exemption: all relevant post-4 December 2005 transactions), after subsection (4) insert—

“(4A) In relation to income falling within subsection (4B) which arises to a person abroad on or after 6 April 2025, in determining whether Condition A or Condition B is satisfied, no regard is to be had to any purpose of avoiding liability to taxation for which the relevant

transactions or any of them were effected if and to the extent the relevant transfer and any associated operation were effected before 6 April 2025 in a qualifying tax year.

- (4B) This subsection applies to income which would be relevant foreign income if it were the individual's or in relation to earlier tax years was income with a non-UK source in respect of which a non-UK domiciled individual would have been taxable only on a remittance basis (assuming any required claim and other steps had been made) if it had been the individual's.
- (4C) For the purposes of subsection (4A) a qualifying tax year is one for which the individual was not resident in the UK or (for tax years earlier than 2013/14) not ordinarily resident in the UK or, if resident or, as the case may be, ordinarily resident in the UK for that year, the individual was entitled to be taxed on the remittance basis for that year.""

Member's explanatory statement

This amendment modifies the "motive defence" in section 737 of ITA 2007. It ensures that when determining if a transaction had a tax avoidance purpose, no regard is given to avoidance motives for transactions effected before 6 April 2025 if the individual was non-resident or entitled to the remittance basis at that time.

Jack Rankin

49

☆ Schedule 3, page 268, line 14, at end insert—

"PART 1B

TRANSITIONAL PROTECTION FOR PRE-6 APRIL 2025 TRANSFER STRUCTURES

7A After section 720 of ITA 2007 insert—

"720ZA Transitional preservation of deferral for pre-6 April 2025 transfer structures

- (1) This section applies where—
- (a) income arises to a person abroad on or after 6 April 2025,
 - (b) the income arises directly or indirectly from a transfer of assets, or an associated operation, made or effected on or before 5 April 2025 ("the legacy structure"), and
 - (c) immediately before 6 April 2025, the individual who would (apart from this section) be treated as liable under this Part was an individual who, for one or more tax years prior to 2025–26, was charged income tax on foreign income and gains only to the extent that such income or gains were remitted to the United Kingdom under the law then in force.
- (2) For the purposes of this Part and any other provision of the Income Tax Acts which would otherwise treat income as arising to an

individual by reason of a transfer of assets, income to which this section applies is not to be treated as arising to the individual in the tax year in which it arises to the person abroad.

- (3) Income to which this section applies is to be treated as arising to the individual in the tax year in which—
 - (a) the income, or
 - (b) any benefit derived directly or indirectly from that income, is remitted to, received in, or used in the United Kingdom.
- (4) For the purposes of determining whether any liability arises under subsection (3), or under this Part or any other provision treating income as arising by reason of a transfer of assets—
 - (a) the continued existence, administration, refinancing, servicing, variation or discharge of obligations of the legacy structure,
 - (b) the retention, accumulation, investment, reinvestment or economic growth of income or assets within the legacy structure, and
 - (c) any associated operation undertaken wholly or mainly for the purpose of preserving, maintaining or unwinding the legacy structure or obligations incurred before 6 April 2025,
 are not to be treated as conferring enjoyment, providing a benefit or giving rise to a charge solely by reason of the deferral of taxation until remittance.
- (5) This section does not apply to income arising from capital or value added to the legacy structure on or after 6 April 2025.
- (6) In this section—

“associated operation” has the meaning given by section 719;

“Income Tax Acts” has the meaning given by section 831.””

Member's explanatory statement

This amendment creates a transitional protection for legacy structures established before 6 April 2025 by former remittance basis users. It ensures that income within such structures is taxed only when remitted to the UK and prevents the maintenance, refinancing, or growth of the structure from being treated as tax avoidance or a taxable benefit.

James Wild

33

Mark Garnier
Sir Mel Stride

Schedule 3, page 268, line 19, at end insert—

“TRF available to non-residents

8A Omit sub-paragraph 1(7).”

Member's explanatory statement

This amendment provides that the Temporary Repatriation Facility is also available to non-residents.

James Wild

34

Mark Garnier
Sir Mel Stride

Schedule 3, page 268, line 19, at end insert—

“Removal of requirement that individual must have been subject to the remittance basis for a past year

8A Omit sub-paragraph 1(5).”

Member's explanatory statement

This amendment would enable offshore trust beneficiaries who have not themselves used the remittance basis to use the TRF.

James Wild

35

Mark Garnier
Sir Mel Stride

Schedule 3, page 268, line 19, at end insert—

“Trustee designation

8A After paragraph 1 insert—

“Trust cleansing facility charge

1A (1) The Trustees of a settlement may in the tax year 2025/26 or 2026/27 make a claim in relation to any or all of the following (“trust income or gains”)—

- (a) a section 1(3) amount of the settlement for any tax year before 2025/26,
- (b) an OIG amount of the settlement for any tax year before 2025/26,
- (c) a section 1(3) amount in a schedule 4C pool of the settlement for any tax year before 2025/26,
- (d) protected foreign source income or transitional trust income of the settlement for the purposes of section 643A of ITTOIA 2005,
- (e) any relevant foreign income of the settlement for any tax year before 2025/26 that would, if remitted, be treated under section 648(3) of ITTOIA 2005 as arising only if and when remitted, and

- (f) foreign relevant income of the settlement for the purposes of chapter 2 of part 13 of ITA 2007 (transfer of assets abroad) for any tax year before 2025/26.
- (2) On the making of such a claim the Trustees shall be subject to the TRF charge and paragraph 1(8) shall apply to the Trustees as it applies to an individual.
- (3) The amount of trust income or gains of the settlement for the category or categories in respect of which a claim is made shall be reduced accordingly.””

Member's explanatory statement

This amendment enables trustees to pay a TRF charge on the trust's past FIG while retaining the funds within the trust.

James Wild

30

Mark Garnier
Sir Mel Stride

Schedule 3, page 271, line 26, leave out from “amount” to end and insert “is the lower of—

- (a) the value of the amount when it first arose to the individual, or
- (b) its value on 6 April 2025.”

Member's explanatory statement

This amendment provides that where an investment derived from foreign income has fallen in value, the temporary repatriation facility (TRF) charge is paid on the reduced value of the investment at the point the TRF opened.

Jack Rankin

1

Andrew Griffith

Schedule 3, page 275, line 20, at end insert—

“Disregard of payments or transfers connected with designated qualifying overseas capital

15A After paragraph 13B (as inserted by paragraph 15 of this Schedule) insert—

“Disregard of payments or transfers made in connection with the remittance of designated qualifying overseas capital

13C(1) This paragraph applies where an amount is remitted to the United Kingdom in a qualifying year in respect of the deemed income of an individual and—

- (a) the income is treated as income of the individual under section 721 or 728 of ITA 2007 by reference to income arising

- to a person abroad in the tax year 2024-25 or an earlier tax year,
- (b) the deemed income falls within section 721(1)(a) or section 728(1)(a) and is qualifying overseas capital by virtue of paragraph 2, and
 - (c) the qualifying overseas capital is designated by the individual.
- (2) Subject to sub-paragraph (3), no payment or transfer of assets made in a qualifying year for the purpose of, or in connection with, the remittance of that designated qualifying overseas capital to the individual (whether by the person abroad, or any company or settlement), to the extent that the amount or value of such payments or transfers in that qualifying year does not exceed the aggregate amount of remittances within sub-paragraph (1) for that year, is capable of—
- (a) being or giving rise to income which is treated as income of the individual under section 721 or 728 of ITA 2007 or any provision of Chapter 5 of Part 5 of ITTOIA 2005;
 - (b) satisfying the capital sum conditions in section 729 of ITA 2007;
 - (c) being or giving rise to income which is taken into account for the purpose of increasing the total relevant income under section 733 of ITA 2007 in relation to that individual or any other individual; or
 - (d) being or giving rise to income arising under a settlement for the purposes of section 648(1) of ITTOIA 2005.
- (3) When making a designation as qualifying overseas capital in relation to deemed income within sub-paragraph (1) for a qualifying year, the individual must specify the amount, the nature and the parties to the payments or transfers of assets within sub-paragraph (2) which have been or will be made during the qualifying year for the purpose of, or in connection with, the remittance of such deemed income.
- (4) Where a sequence of two or more payments or transfers is made in a qualifying year for the purpose of, or in connection with, the remittance of the same amount of deemed income in that qualifying year, then for the purpose of determining whether the amount or value of such payments or transfers exceeds the amount of the remittance of such deemed income, that sequence is to be treated as a single payment or transfer with an amount or value equal to the payment or transfer within the sequence with the highest amount or value.
- (5) In this paragraph “qualifying year” means any of the tax years 2025-26, 2026-27 or 2027-28.

Disregard of payments or transfers made in connection with the provision of certain benefits

- 13D(1) This paragraph applies where—
- (a) an amount of deemed income is qualifying overseas capital in relation to an individual by virtue of paragraph 6(1)(c), and
 - (b) the individual designates that income as qualifying overseas capital.
- (2) Subject to sub-paragraph (3), no payment or transfer of assets made in a qualifying year for the purpose of, or in connection with, the provision of any benefit to the individual which gave rise to the deemed income within paragraph 6(1)(c) (whether by the person abroad, or any company or settlement), to the extent that the amount or value of such payments or transfers in that qualifying year does not exceed the aggregate amount or value of the benefits provided in that qualifying year, is capable of—
- (a) being or giving rise to income which is treated as income of the individual under section 721 or 728 of ITA 2007 or any provision of Chapter 5 of Part 5 of ITTOIA 2005;
 - (b) satisfying the capital sum conditions in section 729 of ITA 2007;
 - (c) being or giving rise to income which is taken into account for the purpose of increasing the total relevant income under section 733 of ITA 2007 in relation to that individual or any other individual; or
 - (d) being or giving rise to income arising under a settlement for the purposes of section 648(1) of ITTOIA 2005.
- (3) When making a designation as qualifying overseas capital in relation to deemed income within sub-paragraph (1) for a qualifying year, the individual must specify the amount, the nature and the parties to the payments or transfers of assets within sub-paragraph (2) which have been or will be made during the qualifying year for the purpose of, or in connection with, the provision of the benefits within sub-paragraph (2).
- (4) Where a sequence of two or more payments or transfers is made in a qualifying year for the purpose of, or in connection with, the provision of the same amount or value of benefits falling within sub-paragraph (2) in that qualifying year, then for the purpose of determining whether the amount or value of such payments or transfers exceeds the amount or value of such benefits, that sequence is to be treated as a single payment or transfer with an amount or value equal to the payment or transfer within the sequence with the highest amount or value.
- (5) In this paragraph “qualifying year” means any of the tax years 2025-26, 2026-27 or 2027-28.””

Member's explanatory statement

This amendment prevents "double counting" and knock-on tax charges when designated qualifying overseas capital is remitted (or where related benefits are provided) during the Temporary Repatriation Facility years, by disregarding connected payments/transfers up to the value of the remittances or benefits in that year.

James Wild

31

Mark Garnier
Sir Mel Stride

Schedule 3, page 275, line 38, leave out "paragraphs 9 to 16" and insert "paragraphs 9 to 12 and 14 to 16"

James Wild

32

Mark Garnier
Sir Mel Stride

Schedule 3, page 276, line 3, at end insert—

"(3) The amendments made by paragraph 13 of this Schedule have effect where the matched capital payment referred to in sub-paragraph 8(2C)(b) Finance Act 2025 (as inserted by paragraph 13 of this Schedule) is made on or after 26 November 2025."

Member's explanatory statement

These amendments provide that a double tax charge created by paragraph 13 of Schedule 3 shall not apply retrospectively.

Dan Tomlinson

Gov 20

Schedule 6, page 318, line 41, at end insert—

"(ba) in subsection (4)(b), for "issuing company", in both places it occurs, substitute "borrower",

Member's explanatory statement

The amendment deals with a missing consequential change to section 154 of the Taxation (International and Other Provisions) Act 2010 (transfer pricing).

Dan Tomlinson

Gov 21

Schedule 8, page 358, line 9, leave out "50" and insert "50A"

Member's explanatory statement

This amendment is consequential on Amendment 22.

Dan Tomlinson

Gov 22

Schedule 8, page 379, line 26, at end insert—

“50A In Schedule 16 (multinational top-up tax: transitional provision), after paragraph 2 insert—

“Transitional extension to deadline for elections

2A (1) Schedule 15 (multinational top-up tax: elections) has effect in its application to a pre-2026 election as if in paragraphs 1(2)(b) and 2(2)(b) of that Schedule for “no later than” there were substituted “before the end of the period of 12 months beginning with the day after”.

(2) In sub-paragraph (1), a “pre-2026 election” means an election which specifies an accounting period ending before 31 December 2025 as—

- (a) in the case of an election to which paragraph 1 of Schedule 15 applies, the first accounting period for which the election is to have effect, or
- (b) in the case of an election to which paragraph 2 of Schedule 15 applies, the accounting period for which the election is to have effect.””

Member's explanatory statement

This amendment extends the deadline for making an election to which Schedule 15 of the Finance (No. 2) Act 2023 applies in cases where the election specifies an accounting period ending before 31 December 2025.

Dan Tomlinson

Gov 23

Schedule 8, page 379, line 27, leave out paragraph 51 and insert—

“51 (1) In FA 1989, in section 178 (setting of rates of interest), subsection (2) is amended as follows.

(2) In paragraph (x)—

- (a) for “51” substitute “33A”;
- (b) after “Finance” insert “(No.2)”;

(3) In paragraph (y), for “51” substitute “33A”.”

Member's explanatory statement

This amendment deals with a consequential amendment that was missed when paragraph 33A was inserted in Schedule 14 to the Finance (No.2) Act 2023 by the Finance Act 2024.

Dan Tomlinson

Gov 24

Schedule 8, page 379, line 38, at end insert—

“(3A) The amendment made by paragraph 50A has effect in relation to accounting periods beginning on or after 31 December 2023.”

Member's explanatory statement

This amendment provides for the amendment inserted by Amendment 22 to have effect in relation to accounting periods beginning on or after 31 December 2023.

James Wild

41

Mark Garnier
Sir Mel Stride

Schedule 10, page 395, line 28, at end insert—

“(1A) The Treasury must, each tax year, amend the amount specified under section 681I(1)(b) by the change in the level of the consumer prices index in the previous tax year.”

Member's explanatory statement

This amendment would provide for the £35,000 income threshold for implementation of the winter fuel payment charge to be uprated annually in line with the consumer prices index.

Mr Joshua Reynolds

47

Martin Wrigley

Clause 74, page 91, line 20, leave out from “(1)” to the end of line 25 and insert “may not be made unless a draft of the instrument has been laid before, and approved by resolution of, the House of Commons.”

Member's explanatory statement

This amendment would require that all regulations made under this section are subject to the affirmative procedure.

Mr Joshua Reynolds

48

Martin Wrigley

Clause 74, page 91, line 25, at end insert—

“(6) Before laying regulations under subsection (1), the Treasury must make a statement setting out the extent to which the regulations made under this section meet the following objectives—

- (a) that no infected or affected person, or their family, will be subject to inheritance tax in respect of infected blood compensation payments under the regulations,
- (b) that the regulations provide fair and consistent treatment for all victims regardless of when their compensation was paid or when deaths occurred,
- (c) that the relief provides compensation for physical harm and psychological trauma experienced by affected family members, and
- (d) that administrative processes established for the purposes of implementation of this section will not create additional distress or burden for bereaved families.”

Member's explanatory statement

This amendment would require that, prior to making regulations under the section, the Chancellor should make a statement on the extent to which the regulations meet certain objectives in respect of the treatment of victims and their families.

Mr Joshua Reynolds

46

Martin Wrigley

Clause 74, page 91, line 25, at end insert—

- “(7) The Treasury must make regulations under subsection (1) within 60 days of the passing of this Act.
- (8) Before making regulations under subsection (1), the Treasury must consult—
 - (a) organisations representing infected and affected individuals,
 - (b) the Infected Blood Compensation Authority, and
 - (c) bereaved families of victims who have died awaiting compensation.
- (9) The regulations made under subsection (1) must make provision for identifying and assisting the estates of deceased victims in claiming inheritance tax relief, including—
 - (a) outreach to known affected families,
 - (b) assistance with evidence gathering where medical records have been destroyed,
 - (c) clear and accessible guidance in plain language, and
 - (d) a dedicated helpline staffed by trained caseworkers familiar with the infected blood scandal.
- (10) The Treasury must, within 6 months of regulations under this section coming into force, and every 6 months thereafter, lay before Parliament a report on—
 - (a) the number of victims who have died since the previous report while awaiting compensation,
 - (b) the number of estates that have received inheritance tax relief,
 - (c) the average time taken to process claims for relief,
 - (d) any identified barriers preventing families from accessing their entitlement, and

- (e) steps taken to expedite outstanding infected blood compensation claims.”

Member's explanatory statement

This amendment requires the Chancellor of Exchequer to make regulations under this section within 60 days of Royal Assent. It requires mandatory consultation with those directly affected, and a support service to help bereaved families navigate the system. It also places a six-monthly reporting requirement on the Government.

James Wild

42

Mark Garnier
Sir Mel Stride

Clause 79, page 95, line 37, at end insert—

- “(3B) Section (3A) does not apply to journeys by private hire vehicle or taxi in rural areas.”

Member's explanatory statement

This amendment would exempt journeys by taxi and private hire vehicle in rural areas from the provisions of subsection (3A) of section 79.

James Wild

36

Mark Garnier
Sir Mel Stride

Page 95, line 28, leave out Clause 79

James Wild

43

Mark Garnier
Sir Mel Stride

Clause 80, page 96, line 28, at end insert—

- “(2A) The Treasury must, each year, amend by order the applicable limit set under section 5A(2)(a) by the change in the level of the consumer prices index in the previous tax year.”

Member's explanatory statement

This amendment would provide for the £200 applicable limit to be uprated annually in line with the consumer prices index.

Dan Tomlinson

Gov 27

Schedule 23, page 535, line 22, after “from” insert “premises in”

Member's explanatory statement

This amendment together with Amendments 28 and 26 revises the inserted sub-paragraph (za) of regulation 13(2) of SI 2002/761 to accommodate expected changes to provisions of the law relating to Scottish aggregates tax.

Dan Tomlinson**Gov 28**

Schedule 23, page 535, line 23, after "Ireland" insert "operated or used by a person registered under section 24 of the Act for any purpose specified in subsection (6) of that section"

Member's explanatory statement

See the explanatory statement for Amendment 27.

Dan Tomlinson**Gov 26**

Schedule 23, page 535, line 24, leave out from "waters" to end of line 25

Member's explanatory statement

See the explanatory statement for Amendment 27.

Dan Tomlinson**Gov**

Page 533, line 18, that Schedule 23 be transferred to the end of line 5 on page 468.

Member's explanatory statement

This motion moves Schedule 23 to after Schedule 13 so as to correct the order of the Schedules.

Mr Joshua Reynolds**44**

Martin Wrigley

Clause 107, page 129, line 32, at end insert—

- "(10) Before giving a direction under sub-paragraph (1), the Secretary of State must lay before Parliament an impact statement setting out—
- (a) the evidence on which the Secretary of State has concluded that the conditions in sub-paragraph (1) have been met,
 - (b) an assessment of the potential impact on consumer prices and UK supply chains,
 - (c) the reasons why a direction is considered necessary in the circumstances, and
 - (d) whether coordination with other jurisdictions, including the European Union, has been considered.
- (11) A direction under sub-paragraph (1) shall cease to have effect if, within the period of 21 sitting days beginning with the day on which the statement under

sub-paragraph (10) is laid, either House of Parliament resolves that the direction should be annulled.”

Member's explanatory statement

This amendment would require the Secretary of State to provide Parliament with an impact statement before directing the TRA to initiate a dumping or subsidisation investigation, and would give Parliament the power to annul such directions within 21 sitting days.

Mr Joshua Reynolds

45

Martin Wrigley

Clause 107, page 129, line 43, at end insert—

“(6A) In paragraph 17, at end insert—

“(11) Before making a recommendation under paragraph 17, the TRA must prepare and publish an assessment of—

- (a) the likely impact of the proposed anti-dumping amount or countervailing amount on consumer prices,
- (b) the effect on UK businesses that use the goods subject to investigation as inputs in their production processes,
- (c) the overall impact on the UK economy, including benefits to UK producers and costs to UK consumers and supply chains, and
- (d) whether a lower duty than the margin of dumping or amount of subsidy would be sufficient to remedy any injury to UK industry.

(12) The Secretary of State must have regard to the assessment made under sub-paragraph (11) when making a decision on whether to accept the TRA's recommendation and at what level to set any anti-dumping or countervailing duties.””

Member's explanatory statement

This amendment would require the Trade Remedies Authority to assess and publish the consumer and wider economic impact of proposed anti-dumping or countervailing duties.

Dan Tomlinson

Gov 12

Clause 110, page 134, line 20, at end insert—

“(2A) In consequence of the amendments made by the preceding subsections, in section 189 of the Economic Crime and Corporate Transparency Act 2023, in subsections (3)(b)(ii) and (11) (which operate by reference to provisions amended by this section), for “large or very large” substitute “in any of bands B to D”.”

Member's explanatory statement

This amendment makes a consequential amendment as a result of the new bands.

Dan Tomlinson

Gov 13

Clause 138, page 146, line 24, at end insert—

“() Sections 114(4) (production only in accordance with regulations) and 117(1) (duty to stamp in accordance with regulations) come into force on such day as the Treasury may by regulations appoint.”

Member's explanatory statement

This amendment would allow the requirements to produce and stamp vaping products in accordance with regulations to be brought into force at the same time as the regulations.

Dan Tomlinson

Gov 14

Clause 138, page 146, line 27, after “2027” insert “, and have effect in relation to vaping products irrespective of when they were produced or imported”

Member's explanatory statement

This amendment would clarify (in light of the fact that stamping requirements are to be set out in regulations) that the criminal offences can apply to vaping products produced or imported before the Act is passed or the regulations are made.

Dan Tomlinson

Gov 15

Clause 146, page 154, line 17, at end insert—

“(4A) In determining the “baseline free allocation percentage” in relation to a CBAM sector, ignore any scheme year in which there were no sectoral emissions.”

Member's explanatory statement

This amendment clarifies that scheme years in which there were no sectoral emissions should be ignored when determining the baseline free allocation percentage in relation to a CBAM sector.

Dan Tomlinson

Gov 16

Clause 225, page 211, line 24, leave out “an amount within paragraph (a) or (b)” and insert “a tax payable to HMRC or to national insurance contributions”

Member's explanatory statement

This amendment corrects an inconsistency.

Dan Tomlinson

Gov 17

Clause 225, page 211, line 26, leave out “including a relevant anti-avoidance penalty”

Member's explanatory statement

This amendment is consequential on Amendment 18.

Dan Tomlinson

Gov 18

Clause 225, page 211, line 27, at end insert—

“(da) a civil penalty (not within paragraph (d)) relating to an obligation contained in a provision made by or under any enactment relating to tax;”

Member's explanatory statement

This amendment provides that a civil penalty relating to an obligation contained in a provision made by or under a tax enactment (such as an obligation in the disclosure of tax avoidance schemes provisions) falls within the definition of “relevant amount” for the purposes of clauses 224 and 225.

Dan Tomlinson

Gov 19

Clause 225, page 211, line 28, leave out “(d)” and insert “(da)”

Member's explanatory statement

This amendment is consequential on Amendment 18.

Dan Tomlinson

Gov 39

Clause 225, page 212, line 22, leave out paragraph (a)

Member's explanatory statement

This amendment omits penalties under the disclosure of tax avoidance schemes provisions from the definition of “relevant anti-avoidance penalty”.

Dan Tomlinson

Gov 40

Clause 225, page 212, line 28, leave out paragraph (d)

Member's explanatory statement

This amendment omits penalties under the disclosure of tax avoidance schemes (VAT and other indirect taxes) provisions from the definition of “relevant anti-avoidance penalty”.

Dan Tomlinson

Gov 25

Schedule 21, page 514, line 38, at end insert—

“(aa) in sub-paragraph (3), for “individual” substitute “person”;

Member's explanatory statement

This amendment corrects a missed consequential amendment.

James Wild

NC1

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on the impact of section 15

- (1) The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 15 on—
- (a) early-stage investment volume,
 - (b) investor participation, and
 - (c) international competitiveness.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report to the House on the impact of section 15 on early-stage investment volumes, investor participation and the UK's international competitiveness.

James Wild

NC2

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on the impact of section 28

- (1) The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 28 on—
- (a) business investment levels,
 - (b) capital-intensive sector employment,
 - (c) the manufacturing sector,
 - (d) small and medium-sized enterprises, and
 - (e) the public finances.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report to the House on the impact of section 28 on business investment, employment in capital-intensive sectors, the manufacturing sector, small and medium-sized enterprises and the public finances.

James Wild

NC3

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Review of the impact of section 30

- (1) The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of the expiry in 2027 of the 100% allowance made under section 30.
- (2) The report under subsection (1) must assess the case for long-term capital allowance support for zero-emission cars and electric vehicle charging points to maintain UK competitiveness in green technology.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to review and report on the impact of the expiry in 2027 of the 100% allowance made under section 30, including the case for ongoing capital allowance support for zero-emission cars and electric vehicle charging points.

James Wild

NC4

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on the impact of section 48 (international controlled transactions)

- (1) The Chancellor of the Exchequer must, within 6 months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 48 on—
 - (a) cross-border trade, and
 - (b) administrative burdens on businesses.
- (2) The report under subsection (1) must in particular set out the steps the Government intends to take to consult affected businesses and stakeholders on the operation of section 48.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report to the House on the impact of section 48 on cross-border trade and business administrative burdens, and to set out how affected businesses and stakeholders will be consulted.

James Wild

NC5

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Pillar Two competitive safeguards and review

- (1) The Chancellor of the Exchequer must, every six months beginning from the day on which this Act is passed, review the implementation of the provisions of section 50 and Schedule 8.
- (2) Any review under subsection (1) must consider—
 - (a) whether other major economies are implementing Pillar Two on comparable timelines and with comparable scope,
 - (b) any competitive disadvantage to UK-based multinationals from implementation of section 50,
 - (c) any impact arising from differentiated treatment for the US, and
 - (d) proposals for remedial measures to address any competitive disadvantage to the UK that has been identified.
- (3) The Chancellor of the Exchequer must lay before the House of Commons a copy of any review undertaken under subsection (1).”

Member's explanatory statement

This new clause would require regular reviews of the implementation of section 50 and Schedule 8, including consideration of international implementation of Pillar Two, any competitive disadvantage for UK-based multinationals and possible remedial measures.

James Wild

NC6

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on legacies to charities

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 52 on—

- (a) charitable giving through estates, and
- (b) charity sector income.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 52 on charitable giving through estates and on the income of the charity sector.

James Wild

NC7

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on charitable investments purpose test

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 53 on charity investment strategies.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 53 on charity investment strategies.

James Wild

NC8

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on tainted charity donations

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 54 and Schedule 9 on—

- (a) legitimate charitable giving, and
- (b) prevention of tax avoidance.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 54 and Schedule 9 on legitimate charitable giving and the prevention of tax avoidance.

James Wild

NC9

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Review of outcome test

- (1) The Chancellor of the Exchequer must within two years of the passing of this Act, review implementation of the outcome test under section 54.
- (2) The review must assess whether the outcome test is clearer and more effective than the purpose test.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to review the implementation of the outcome test in section 54 and to assess whether it is clearer and more effective than the existing purpose test.

James Wild

NC10

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Review of uprating of Winter Fuel Payment charge cap

- (1) The Chancellor of the Exchequer must, within 12 months of this Act being passed, lay before the House of Commons a report on the impact of uprating, by reference to the consumer prices index, the level of the winter fuel payment charge specified under Schedule 10.
- (2) The report under subsection (1) must in particular assess the impact of such uprating on—
 - (a) households liable to the winter fuel payment charge, and
 - (b) Exchequer receipts.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of uprating the winter fuel payment charge cap in line with the consumer prices index on liable households and on Exchequer receipts.

James Wild

NC11

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Impact assessment on carried interest reforms

The Chancellor of the Exchequer must, within 2 years of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 56 on—

- (a) the UK’s competitiveness in attracting and retaining fund managers,
- (b) the level and composition of investment into the UK, and
- (c) revenues collected compared to forecast revenues.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 56 on the UK’s ability to attract and retain fund managers, on investment into the UK and on realised revenues compared with forecasts.

James Wild

NC12

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on decommissioning relief agreements

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 61 on—

- (a) North Sea decommissioning activity,
- (b) employment levels in the UK oil and gas industry,
- (c) capital expenditure in the UK oil and gas industry,
- (d) UK oil and gas production,
- (e) UK oil and gas demand, and
- (f) the Scottish economy and economic growth in Scotland.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 61 on North Sea decommissioning, employment and capital expenditure in the UK oil and gas industry, UK production and demand, and the Scottish economy.

James Wild

NC13

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on gifts exemption

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 75 on—

- (a) the volume and value of charitable donations,
- (b) the financial position and funding mix of charities and registered clubs,
- (c) donor behaviour, including any changes in the use of tax-relieved giving, and
- (d) Exchequer revenues, including any distributional impacts across different types and sizes of charities.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 75 on charitable donations, the finances of charities and registered clubs, donor behaviour and Exchequer revenues.

James Wild

NC14

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Report on VAT for private hire and taxi vehicles

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 79 on—

- (a) the taxi and private hire industry,
- (b) driver earnings,
- (c) vulnerable passengers,
- (d) rural communities, and
- (e) passenger fares.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 79 on the taxi and private hire industry, driver earnings, vulnerable passengers, rural communities and passenger fares.

James Wild

NC15

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Review of extension of three-year period for UK listing relief

- (1) The Chancellor of the Exchequer must, within 12 months of this Act being passed, publish and lay before Parliament a report on the potential benefits of extending beyond three years the period for which UK listing relief applies under section 82.
- (2) The report under subsection (1) must assess the—
 - (a) impact that extending the period could have on the attractiveness of UK markets for new listings,
 - (b) potential effects on capital raising and investment in the UK, and
 - (c) implications for Exchequer revenues.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the potential benefits of extending beyond three years the period for which UK listing relief applies under section 82, including effects on the attractiveness of UK markets, capital raising and Exchequer revenues.

James Wild

NC16

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Review of effects of section 88 on illicit tobacco market

The Chancellor of the Exchequer must, within six months of this Act being passed, publish an assessment of the impact of the provisions made under section 88, on the illicit tobacco market.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to publish an assessment of the impact of section 88 on the illicit tobacco market.

James Wild

NC17

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Statement on increases to vehicle excise duty for cars and light goods vehicles

- (1) The Chancellor of the Exchequer must, within six months of this Act being passed, make a statement to the House of Commons, on the increase to vehicle excise duty made under section 89.
- (2) The statement under subsection (1) must include details of the impact on—
 - (a) the automotive sector,
 - (b) household incomes, and
 - (c) the UK economy.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to make a statement to the House on the impact of the increase to vehicle excise duty under section 89 on the automotive sector, household incomes and the UK economy.

James Wild

NC18

Mark Garnier
Sir Mel Stride

To move the following Clause—

“Statements on HGV Vehicle Excise Duty and HGV Road User Levy

- (1) The Chancellor of the Exchequer must, within six months of this Act being passed, make a statement to the House of Commons on the increase to HGV

vehicle excise duty made under sections 90 to 93 and the increase to the HGV Road User Levy made under section 95.

- (2) The statement under subsection (1) must include details of the impact on the—
- (a) haulage sector,
 - (b) decarbonisation of the logistics industry, and
 - (c) UK economy."

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to make a statement to the House on the increases to HGV vehicle excise duty under sections 90 to 93 and to the HGV Road User Levy under section 95, including their impact on the haulage sector, decarbonisation of logistics and the UK economy.

James Wild

NC19

Mark Garnier
Sir Mel Stride

To move the following Clause—

"Report on expensive car supplement

- (1) The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 94 on—
- (a) the automotive sector,
 - (b) the sale of hybrid cars, and
 - (c) vehicle excise duty revenues from high-value vehicles.
- (2) The review must consider whether the threshold set under section 94 remains appropriate."

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 94 on the automotive sector, sales of hybrid cars and vehicle excise duty revenues from high-value vehicles, and to consider whether the threshold remains appropriate.

James Wild

NC20

Mark Garnier
Sir Mel Stride

To move the following Clause—

"Review of bands and rates of air passenger duty

- (1) The Chancellor of the Exchequer must, within 18 months of this Act being passed, publish an assessment of the impact of the changes to air passenger duty made under section 96 on—

- (a) the aviation industry,
 - (b) passengers,
 - (c) household finances, and
 - (d) the public finances.
- (2) The assessment under subsection (1)(c) must consider how households at a range of different income levels are affected by the changes under section 96."

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to publish an assessment of the impact of changes to air passenger duty under section 96 on the aviation industry, passengers, household finances at different income levels, and the public finances.

James Wild

NC21

Mark Garnier
Sir Mel Stride

To move the following Clause—

"Report on Climate Change Levy rates

The Chancellor of the Exchequer must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 97 on—

- (a) energy-intensive industries, and
- (b) the UK's international competitiveness."

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 97 on energy-intensive industries and the UK's international competitiveness.

James Wild

NC22

Mark Garnier
Sir Mel Stride

To move the following Clause—

"Review of landfill tax changes

- (1) The Chancellor of the Exchequer must, within 12 months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 98.
- (2) The report under subsection (1) must in particular assess any effects on—
 - (a) construction and infrastructure projects,
 - (b) investment in ports,
 - (c) levels of recycling and illegal dumping,

- (d) progress towards the Government's environmental objectives, and
- (e) Exchequer revenues."

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report on the impact of section 98, including any effects on construction and infrastructure projects, port investment, recycling and illegal dumping, progress towards environmental objectives and Exchequer revenues.

James Wild

NC23

Mark Garnier
Sir Mel Stride

To move the following Clause—

"Report on aggregates levy rate

The Treasury must, within six months of this Act being passed, lay before the House of Commons a report on the impact of implementation of the provisions of section 99 on—

- (a) the construction industry, and
- (b) infrastructure projects."

Member's explanatory statement

This new clause would require the Treasury to report on the impact of section 99 on the construction industry and infrastructure projects.

James Wild

NC24

Mark Garnier
Sir Mel Stride

To move the following Clause—

"Report on impact of section 13 (Enterprise management incentives: thresholds and period for exercise)

- (1) The Chancellor of the Exchequer must, within two years of the coming into force of section 13, lay before the House of Commons a report on the impact of that section.
- (2) The report under subsection (1) must, in particular, assess the impact on—
 - (a) the recruitment and retention of skilled employees in qualifying companies,
 - (b) high-growth and innovative companies, and
 - (c) the Exchequer finances."

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to report to the House of Commons on the impact of section 13 on recruitment and retention in qualifying companies, on high-growth and innovative businesses, and on the Exchequer finances.

Mr Joshua Reynolds

NC25

Martin Wrigley

To move the following Clause—

“Report on fairness and scope of the loan charge settlement opportunity

- (1) HM Revenue and Customs must, within 12 months of the passing of this Act, lay before the House of Commons a report on the operation and impact of any loan charge settlement opportunity established under section 25 of this Act.
- (2) The report under subsection (1) must in particular consider—
 - (a) whether the terms of the settlement opportunity are available to individuals who have previously settled or fully paid liabilities arising from disguised remuneration loan arrangements,
 - (b) whether the terms of the settlement opportunity are available to individuals with disguised remuneration loan arrangements falling outside the loan charge years specified in Part 7A of the Income Tax (Earnings and Pensions) Act 2003,
 - (c) the extent to which any differences in treatment between these groups and those eligible for the settlement opportunity affect perceptions of fairness, and
 - (d) the potential impact of such perceptions on future tax compliance and trust in the tax system.
- (3) The report must include—
 - (a) an assessment of whether extending more favourable settlement terms to the groups described in subsection (2)(a) and (b) would improve fairness and consistency, and
 - (b) any recommendations HMRC consider appropriate in light of that assessment.”

Member's explanatory statement

This new clause would require HMRC to report on the operation and fairness of the new loan charge settlement opportunity. It would consider whether more favourable terms are, or should be, available to those who have already settled or fully paid liabilities, and to those with arrangements outside the loan charge years.

Mr Joshua Reynolds

NC26

Martin Wrigley

To move the following Clause—

“Report on the treatment of disguised remuneration arrangements outside the loan charge years

- (1) HM Revenue and Customs must lay before the House of Commons a report on the treatment, under any loan charge settlement opportunity established under section 25 of this Act, of disguised remuneration arrangements falling outside the 2010/11 to 2018/19 tax years.
- (2) The report under subsection (1) must in particular consider—
 - (a) the extent to which disguised remuneration income from tax years outside the loan charge period is excluded from the settlement terms,
 - (b) the number of taxpayers with disguised remuneration arrangements which HMRC consider to fall outside the loan charge but within Part 7A of the Income Tax (Earnings and Pensions) Act 2003,
 - (c) the interaction between settlements pursued in respect of such arrangements and those relating to the loan charge, and
 - (d) whether excluding factually linked arrangements from the settlement opportunity may prevent taxpayers achieving a full and final resolution of their tax affairs.
- (3) The report must include—
 - (a) an assessment of whether including disguised remuneration arrangements that are factually linked to the loan charge period (whether arising before, during or after that period) would improve the effectiveness, fairness and finality of the settlement process, and
 - (b) any recommendations HMRC considers appropriate.”

Member's explanatory statement

This new clause would require HMRC to report on the exclusion from the new loan charge settlement opportunity of disguised remuneration arrangements outside the loan charge years, including arrangements which HMRC considers to fall outside the loan charge but within the disguised remuneration rules.

Mr Joshua Reynolds

NC27

Martin Wrigley

To move the following Clause—

“Report on winter fuel payment charge and related compliance and collection measures

- (1) The Commissioners for HM Revenue and Customs must lay before the House of Commons a report on the operation and effects of the charge applied to winter fuel payments where an individual's income exceeds the relevant threshold, including the compliance and collection arrangements introduced under section 55 and Schedule 10 in relation to that charge.
- (2) The report under subsection (1) must in particular consider—

- (a) the effect of the charge on people whose income exceeds the threshold by a small amount, and any resulting behavioural impacts,
- (b) the administrative complexity and proportionality of introducing a tapered abatement for winter fuel payments,
- (c) the potential effect of updating section 7 of the Taxes Management Act 1970 so that a winter fuel payment charge becomes a notifiable liability for tax assessment purposes, including the operation of penalties for failure to notify, and the interaction with existing exceptions for liabilities reflected in PAYE tax coding adjustments or where a taxpayer has already been issued a notice to file a self-assessment return, and
- (d) the operation and effectiveness of any new PAYE regulation provisions that allow winter fuel payment charges to be collected via tax code adjustments in year, and which allow HMRC to repay any overpaid income tax related to the charge via the tax code within the same year."

Member's explanatory statement

This new clause would require HMRC to report to Parliament on the operation of the winter fuel payment charge, including its effect on people whose income exceeds the threshold by a small amount. The report would also cover the implications of updating section 7 of the Taxes Management Act 1970 to make winter fuel payment charge liabilities notifiable for tax assessment purposes.

Mr Joshua Reynolds

NC28

Martin Wrigley

To move the following Clause—

"Implementation of section 35 (Restriction of relief on disposals to employee-ownership trusts

- (1) HM Revenue and Customs must, as part of the implementation of the provisions of section 35, make an assessment of the potential benefits of establishing a digital application process for taxpayers seeking to pay capital gains tax by instalments under section 280 of TCGA 1992 in respect of disposals to employee ownership trusts.
- (2) The assessment made under subsection (1) must consider potential guidance on eligibility criteria and processing timescales."

Member's explanatory statement

This new clause would require HMRC to assess the potential benefits of establishing a digital application process for taxpayers to pay capital gains tax by instalments in respect of disposal to employee ownership trusts as part of the implementation of section 35.

Mr Joshua Reynolds

NC29

Martin Wrigley

To move the following Clause—

“Report on the impact of section 35

The Chancellor of the Exchequer must, within 12 months of this section coming into force, lay before the House of Commons a report assessing the impact of the changes made under section 35 on small and medium-sized enterprises, including—

- (a) the number of EOT transactions completed compared to the previous three-year average,
- (b) any administrative costs and burdens reported by businesses and tax advisers,
- (c) the incidence and value of dry tax charges arising, and
- (d) recommendations for any modifications to the instalment payment regime under Section 280 of TCGA 1992.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to lay a report before the House of Commons on the impact of section 35 on small and medium-sized enterprises.

James Wild

NC31

Mark Garnier
Sir Mel Stride

☆ To move the following Clause—

“Review of effects of sections 87 and 88 on illicit tobacco market

The Chancellor of the Exchequer must, within six months of this Act being passed, publish an assessment of the impact of the provisions made under sections 87 and 88 on the illicit tobacco market.”

Member's explanatory statement

This new clause would require the Chancellor of the Exchequer to publish an assessment of the impact of sections 87 and 88 on the illicit tobacco market.

James Wild

NC32

★ To move the following Clause—

“Air passenger duty change on boarding passes

The Chancellor of the Exchequer must by regulations require travel operators who are liable to air passenger duty to ensure that in the case where a boarding pass is issued, the change in the level of air passenger duty made under section 96 and charged in respect of the passenger's journey, is clearly stated on the boarding pass.”

Order of the House

[16 December 2025]

That the following provisions shall apply to the Finance (No. 2) Bill:

Committal

- 1. The following shall be committed to a Committee of the whole House—
 - (a) Clauses 1 to 8 and Schedules 1 and 2 (income tax charge and rates);
 - (b) Clauses 9, 10 and 69 (freezing of allowances);
 - (c) Clause 62 and Schedule 12 (agricultural property relief and business property relief);
 - (d) Clauses 63 to 68 (inheritance tax on pension interests);
 - (e) Clauses 83 to 85 and Schedule 13 (gambling duties);
 - (f) Clause 86 (rates of alcohol duty);
 - (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 two days.
- 4. The proceedings—
 - (a) shall be taken on each of those days 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
First day	
Clauses 1 to 6 and Schedule 1; Clauses 7 and 8 and Schedule 2; any new Clauses or new Schedules relating to the subject matter of those Clauses and those Schedules	Two hours after the commencement of proceedings on the Bill on the first day.
Clauses 9, 10 and 69; any new Clauses or new Schedules relating to the subject matter of those Clauses	Four hours after the commencement of proceedings on the Bill on the first day.

Clause 62 and Schedule 12; any new Clauses or new Schedules relating to the subject matter of that Clause and that Schedule

Six hours after the commencement of proceedings on the Bill on the first day.

Second day

Clauses 63 to 68; any new Clauses or new Schedules relating to the subject matter of those Clauses

Two hours after the commencement of proceedings on the Bill on the second day.

Clauses 83 to 85 and Schedule 13; any new Clauses or new Schedules relating to the subject matter of those Clauses and that Schedule

Four hours after the commencement of proceedings on the Bill on the second day.

Clause 86; any new Clauses or new Schedules relating to the subject matter of that Clause

Six hours after the commencement of proceedings on the Bill on the second day.

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 26 February 2026.
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.

Withdrawn Amendments

The following amendments were withdrawn on 26 January 2026:

NC30