



# House of Commons

Wednesday 6 November 2024

## Votes and Proceedings

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The House met at 11.30 am.

Prayers

- 1 Questions to (1) the Secretary of State for Wales  
(2) the Prime Minister**

- 2 Urgent Question: Small boat crossings (Dame Angela Eagle)**

- 3 Personal Statement (Lee Anderson)**

- 4 Financial Assistance to Ukraine Bill: Presentation (Standing Orders No. 50 and No. 57)**

Darren Jones, supported by the Prime Minister, James Murray, Tulip Siddiq and Emma Reynolds, presented a Bill to make provision for loans or other financial assistance to be provided to, or for the benefit of, the government of Ukraine.

Bill read the first time; to be read a second time on Monday 11 November, and to be printed (Bill 48) with Explanatory Notes (Bill 48–EN).

- 5 Armed Forces Commissioner Bill: Presentation (Standing Order No. 57)**

Secretary John Healey, supported by the Prime Minister, Secretary Angela Rayner, the Chancellor of the Exchequer, Secretary Yvette Cooper, Secretary David Lammy, Secretary Hilary Benn, Secretary Ian Murray, Secretary Jo Stevens, Dan Jarvis, Maria Eagle and Luke Pollard, presented a Bill to establish, and confer functions on, the Armed Forces Commissioner; to abolish the office of Service Complaints Ombudsman; and for connected purposes.

Bill read the first time; to be read a second time on Monday 11 November, and to be printed (Bill 124) with Explanatory Notes (Bill 124–EN).

- 6 Child Criminal Exploitation (No. 2) Bill: Presentation (Standing Order No. 57)**

Victoria Atkins presented a Bill to create an offence of child criminal exploitation; and for connected purposes.

Bill read the first time; to be read a second time on Friday 29 November, and to be printed (Bill 75).

- 7 Horticultural peat (prohibition of sale): Motion for leave to bring in a Bill (Standing Order No. 23)**

Motion made and Question proposed, That leave be given to bring in a Bill to provide for the prohibition of the sale in England of horticultural peat by the end of 2025; to provide for certain exemptions from that prohibition; and for connected purposes.—(Sarah Dyke.)

Motion opposed (Standing Order No. 23(1)).

Question put and agreed to.

*Ordered*, That leave be given to bring in a Bill to provide for the prohibition of the sale in England of horticultural peat by the end of 2025; to provide for certain exemptions from that prohibition; and for connected purposes;

That Sarah Dyke, Wera Hobhouse, Tim Farron, Pippa Heylings, Martin Wrigley, Caroline Voaden, Carla Denyer, Layla Moran, Tessa Munt, Richard Foord, Vikki Slade and Steve Darling present the Bill.

Sarah Dyke accordingly presented the Bill.

Bill read the first time; to be read a second time on Friday 24 January 2025, and to be printed (Bill 122).

**8 Ways and Means: Income Tax (Charge): Adjourned debate on the Question proposed on 30 October**

Debate resumed (Order, 5 November).

Question again proposed, That income tax is charged for the tax year 2025–26.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

**9 Deputy Speaker's Statement: Speaking in the Chamber**

**10 Ways and Means: Income Tax (Charge): Adjourned debate on the Question proposed on 30 October (resumed)**

The House resumed the debate.

The Deputy Speaker announced a time limit on backbench speeches (Standing Order No. 47(1)).

Question put and agreed to.

*Resolved*, That income tax is charged for the tax year 2025–26.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

**11 Ways and Means: Further Budget Resolutions**

The Deputy Speaker then put forthwith the Questions necessary to dispose of the further Motions which were made by the Chancellor of the Exchequer (Standing Order No. 51(3)).

**2. Income tax (main rates)**

*Resolved*, That for the tax year 2025-26 the main rates of income tax are as follows—

- (a) the basic rate is 20%,
- (b) the higher rate is 40%, and
- (c) the additional rate is 45%.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 3. Income tax (default and savings rates)

*Resolved, That—*

(1) For the tax year 2025–26 the default rates of income tax are as follows—

- (a) the default basic rate is 20%,
- (b) the default higher rate is 40%, and
- (c) the default additional rate is 45%.

(2) For the tax year 2025–26 the savings rates of income tax are as follows—

- (a) the savings basic rate is 20%,
- (b) the savings higher rate is 40%, and
- (c) the savings additional rate is 45%.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 4. Income tax (starting rate limit for savings)

*Resolved, That—*

(1) For the tax year 2025–26 the amount specified in section 12(3) of the Income Tax Act 2007 (the starting rate limit for savings) is “£5,000”.

(2) Accordingly, section 21 of that Act (indexation) does not apply in relation to the starting rate limit for savings for that tax year.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 5. Income tax (appropriate percentage for cars)

*Resolved, That* (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made taking effect in a future year increasing the appropriate percentages mentioned in sections 139 to 142 of the Income Tax (Earnings and Pensions) Act 2003.

### 6. Capital gains tax (the main rates)

Question put, *That—*

(1) In section 1H of the Taxation of Chargeable Gains Act 1992 (the main rates of CGT)—

(a) omit subsection (1A) (which sets out the rates for residential property gains accruing to individuals),

(b) in subsection (3) (which sets out the rates for gains accruing to individuals that are not residential property gains or carried interest gains)—

- (i) for “10%” substitute “18%”, and
- (ii) for “20%” substitute “24%”,

(c) omit subsection (4A) (which sets out the rates for residential property gains accruing to personal representatives),

(d) in subsection (6) (which sets out the rates for gains accruing to personal representatives that are not residential property gains or carried interest gains), for “20%” substitute “24%”,

(e) omit subsection (7) (which sets out the rates for residential property gains accruing to trustees), and

- (f) in subsection (8) (which sets out the rates for gains accruing to trustees that are not residential property gains or carried interest gains)—
- (i) omit “Other”, and
  - (ii) for “20%” substitute “24%”.
- (2) The amendments made by this Resolution have effect in relation to disposals made on or after 30 October 2024.
- (3) If an asset is transferred on or after 30 October 2024 under an unconditional contract made before that date, the disposal is, despite section 28(1) of the Taxation of Chargeable Gains Act 1992, to be treated for the purposes of the amendments made by this Resolution as taking place at the time the asset is transferred (rather than at the time the contract is made) unless the contract is an excluded contract.
- (4) A contract is an excluded contract if—
- (a) obtaining an advantage by reason of the application of section 28(1) of the Taxation of Chargeable Gains Act 1992 was no purpose of entering into the contract, and
  - (b) where the parties to the contract are connected persons, the contract was entered into wholly for commercial reasons.
- (5) A contract is not to be regarded as an excluded contract unless the person making the transfer makes a claim which includes a statement that the contract meets the conditions to be an excluded contract.
- (6) But no claim is required if the total amount of—
- (a) the chargeable gain accruing on the disposal, and
  - (b) the chargeable gains accruing on all other disposals made under excluded contracts,
- does not exceed £100,000.
- (7) For this purpose the amount of any gain accruing on a qualifying business disposal is to be taken to be the amount of the gain under section 169N(2) of the Taxation of Chargeable Gains Act 1992.
- (8) If the person making the transfer makes—
- (a) a claim under section 169M of the Taxation of Chargeable Gains Act 1992 in relation to a qualifying business disposal (business asset disposal relief), or
  - (b) a claim under section 169VM of that Act (investors’ relief) in relation to a disposal,
- section 169M(2) and (3) of that Act, or (as the case may be) section 169VM(1) and (2) of that Act, apply to a claim under paragraph (5) in relation to the disposal as they apply to a claim under the section concerned.
- (9) In this Resolution “qualifying business disposal” has the meaning given by Chapter 3 of Part 5 of the Taxation of Chargeable Gains Act 1992.
- (10) In this Resolution any reference to the transfer of an asset includes its conveyance.
- And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

The House divided.

Division No. 28

Ayes: 401 (Tellers: Christian Wakeford, Martin McCluskey)

Noes: 120 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved, That—*

- (1) In section 1H of the Taxation of Chargeable Gains Act 1992 (the main rates of CGT)—
  - (a) omit subsection (1A) (which sets out the rates for residential property gains accruing to individuals),
  - (b) in subsection (3) (which sets out the rates for gains accruing to individuals that are not residential property gains or carried interest gains)—
    - (i) for “10%” substitute “18%”, and
    - (ii) for “20%” substitute “24%”,
  - (c) omit subsection (4A) (which sets out the rates for residential property gains accruing to personal representatives),
  - (d) in subsection (6) (which sets out the rates for gains accruing to personal representatives that are not residential property gains or carried interest gains), for “20%” substitute “24%”,
  - (e) omit subsection (7) (which sets out the rates for residential property gains accruing to trustees), and
  - (f) in subsection (8) (which sets out the rates for gains accruing to trustees that are not residential property gains or carried interest gains)—
    - (i) omit “Other”, and
    - (ii) for “20%” substitute “24%”.
- (2) The amendments made by this Resolution have effect in relation to disposals made on or after 30 October 2024.
- (3) If an asset is transferred on or after 30 October 2024 under an unconditional contract made before that date, the disposal is, despite section 28(1) of the Taxation of Chargeable Gains Act 1992, to be treated for the purposes of the amendments made by this Resolution as taking place at the time the asset is transferred (rather than at the time the contract is made) unless the contract is an excluded contract.
- (4) A contract is an excluded contract if—
  - (a) obtaining an advantage by reason of the application of section 28(1) of the Taxation of Chargeable Gains Act 1992 was no purpose of entering into the contract, and
  - (b) where the parties to the contract are connected persons, the contract was entered into wholly for commercial reasons.
- (5) A contract is not to be regarded as an excluded contract unless the person making the transfer makes a claim which includes a statement that the contract meets the conditions to be an excluded contract.
- (6) But no claim is required if the total amount of—
  - (a) the chargeable gain accruing on the disposal, and
  - (b) the chargeable gains accruing on all other disposals made under excluded contracts,does not exceed £100,000.
- (7) For this purpose the amount of any gain accruing on a qualifying business disposal is to be taken to be the amount of the gain under section 169N(2) of the Taxation of Chargeable Gains Act 1992.

(8) If the person making the transfer makes—

- (a) a claim under section 169M of the Taxation of Chargeable Gains Act 1992 in relation to a qualifying business disposal (business asset disposal relief), or
- (b) a claim under section 169VM of that Act (investors' relief) in relation to a disposal,

section 169M(2) and (3) of that Act, or (as the case may be) section 169VM(1) and (2) of that Act, apply to a claim under paragraph (5) in relation to the disposal as they apply to a claim under the section concerned.

(9) In this Resolution "qualifying business disposal" has the meaning given by Chapter 3 of Part 5 of the Taxation of Chargeable Gains Act 1992.

(10) In this Resolution any reference to the transfer of an asset includes its conveyance.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 7. Capital gains tax (business asset disposal relief)

Question put, That provision may be made increasing the rate specified in section 169N(3) of the Taxation of Chargeable Gains Act 1992, including (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision taking effect in a future year.

The House divided.

Division No. 29

Ayes: 400 (Tellers: Christian Wakeford, Martin McCluskey)

Noes: 120 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved*, That provision may be made increasing the rate specified in section 169N(3) of the Taxation of Chargeable Gains Act 1992, including (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision taking effect in a future year.

#### 8. Capital gains tax (investors' relief)

Question put, That—

- (a) provision may be made increasing the rate specified in section 169VC(2) of the Taxation of Chargeable Gains Act 1992, including (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision taking effect in a future year, and
- (b) provision may be made reducing the amount specified in sections 169VK(1) and (2) and 169VL(2) and (3) of that Act.

The House divided.

Division No. 30

Ayes: 400 (Tellers: Christian Wakeford, Martin McCluskey)

Noes: 122 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved*, That—

- (a) provision may be made increasing the rate specified in section 169VC(2) of the Taxation of Chargeable Gains Act 1992, including (notwithstanding anything to the

contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision taking effect in a future year, and

(b) provision may be made reducing the amount specified in sections 169VK(1) and (2) and 169VL(2) and (3) of that Act.

9. Capital gains tax (rates on carried interest gains)

*Resolved*, That provision may be made increasing the rates at which carried interest gains are charged to capital gains tax.

10. Corporation tax (charge and main rate for financial year 2026)

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made—

(a) for corporation tax to be charged for the financial year 2026, and

(b) for the main rate of corporation tax for that year to be 25%.

11. Corporation tax (standard small profits rate and fraction for financial year 2026)

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made—

(a) for the standard small profits rate to be 19% for the purposes of Part 3A of the Corporation Tax Act 2010 for the financial year 2026, and

(b) for the standard marginal relief fraction to be 3/200ths for those purposes for that year.

12. Energy (oil and gas) profits levy (increase in rate)

Question put, That—

(1) In section 1 of the Energy (Oil and Gas) Profits Levy Act 2022 (charge to tax), in subsection (1), for “35%” substitute “38%”.

(2) The amendment made by paragraph (1) has effect for accounting periods beginning on or after 1 November 2024.

(3) In the case of an accounting period (a “straddling period”) beginning before 1 November 2024 and ending on or after that date—

(a) the Energy (Oil and Gas) Profits Levy Act 2022 is to apply as if so much of the straddling period as falls before that date, and so much of the straddling period as falls on or after that date, were separate accounting periods, and

(b) the company’s levy profits or loss determined for the straddling period (on the assumption that the whole of that period were a qualifying period) are apportioned to the two separate accounting periods in accordance with section 17 of that Act, which is to apply for the purposes of this Resolution as it applies for the purposes of sections 15 and 16 of that Act.

(4) In the case of a straddling period, the Instalment Payments Regulations 1998 are to apply separately—

(a) in relation to the levy, and

(b) in relation to any other tax chargeable on the company.

(5) In their application as a result of paragraph (4)(a), the Instalment Payments Regulations 1998 are to have effect in relation to the levy—

(a) as if the two separate accounting periods deemed to arise under paragraph (3)

(a) were accounting periods for the purposes of those Regulations and as if the levy were chargeable for those deemed accounting periods, but

- (b) as if the final instalment payment for the deemed accounting period ending on 31 October 2024 became due and payable on the date on which the next instalment payment after 31 October 2024 would have become due and payable for the straddling period in the absence of this Resolution.
- (6) Any reference in the Instalment Payments Regulations 1998 to the total liability of a company is accordingly to be read—
- (a) in their application as a result of paragraph (4)(a), as a reference to the levy, and
  - (b) in their application as a result of paragraph (4)(b), as a reference to the amount that would be the company's total liability for the straddling period if the levy were left out of account.
- (7) For the purposes of the Instalment Payments Regulations 1998—
- (a) a company is to be regarded as a large company as respects the deemed accounting periods under paragraph (3)(a) only if it is a large company for those purposes as respects the straddling period, and
  - (b) any question whether a company is a large company as respects the straddling period is to be determined as it would have been determined apart from section 1 of the Energy (Oil and Gas) Profits Levy Act 2022.
- (8) In this Resolution “the Instalment Payment Regulations 1998” means the Corporation Tax (Instalment Payments) Regulations 1998 (S.I. 1998/3175).
- And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.
- The House divided.
- Division No. 31
- Ayes: 455 (Tellers: Christian Wakeford, Martin McCluskey)
- Noes: 125 (Tellers: David Simmonds, Jerome Mayhew)
- Question agreed to.
- Resolved, That—*
- (1) In section 1 of the Energy (Oil and Gas) Profits Levy Act 2022 (charge to tax), in subsection (1), for “35%” substitute “38%”.
  - (2) The amendment made by paragraph (1) has effect for accounting periods beginning on or after 1 November 2024.
  - (3) In the case of an accounting period (a “straddling period”) beginning before 1 November 2024 and ending on or after that date—
    - (a) the Energy (Oil and Gas) Profits Levy Act 2022 is to apply as if so much of the straddling period as falls before that date, and so much of the straddling period as falls on or after that date, were separate accounting periods, and
    - (b) the company's levy profits or loss determined for the straddling period (on the assumption that the whole of that period were a qualifying period) are apportioned to the two separate accounting periods in accordance with section 17 of that Act, which is to apply for the purposes of this Resolution as it applies for the purposes of sections 15 and 16 of that Act.
  - (4) In the case of a straddling period, the Instalment Payments Regulations 1998 are to apply separately—
    - (a) in relation to the levy, and
    - (b) in relation to any other tax chargeable on the company.



(5) In their application as a result of paragraph (4)(a), the Instalment Payments Regulations 1998 are to have effect in relation to the levy—

(a) as if the two separate accounting periods deemed to arise under paragraph (3)(a) were accounting periods for the purposes of those Regulations and as if the levy were chargeable for those deemed accounting periods, but

(b) as if the final instalment payment for the deemed accounting period ending on 31 October 2024 became due and payable on the date on which the next instalment payment after 31 October 2024 would have become due and payable for the straddling period in the absence of this Resolution.

(6) Any reference in the Instalment Payments Regulations 1998 to the total liability of a company is accordingly to be read—

(a) in their application as a result of paragraph (4)(a), as a reference to the levy, and

(b) in their application as a result of paragraph (4)(b), as a reference to the amount that would be the company's total liability for the straddling period if the levy were left out of account.

(7) For the purposes of the Instalment Payments Regulations 1998—

(a) a company is to be regarded as a large company as respects the deemed accounting periods under paragraph (3)(a) only if it is a large company for those purposes as respects the straddling period, and

(b) any question whether a company is a large company as respects the straddling period is to be determined as it would have been determined apart from section 1 of the Energy (Oil and Gas) Profits Levy Act 2022.

(8) In this Resolution “the Instalment Payment Regulations 1998” means the Corporation Tax (Instalment Payments) Regulations 1998 (S.I. 1998/3175).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 13. Energy (oil and gas) profits levy (relief for investment expenditure)

Question put, That—

(1) The Energy (Oil and Gas) Profits Levy Act 2022 is amended as follows.

(2) For section 2 substitute—

#### **“2 Additional expenditure treated as incurred for purposes of section 1**

(1) This section applies for the purposes of section 1 if, in a qualifying accounting period, a company has incurred investment expenditure.

(2) Expenditure is “investment expenditure” of a company so far as the expenditure—

(a) is capital expenditure on the de-carbonisation of its upstream petroleum production,

(b) is incurred for the purposes of oil-related activities,

(c) is not incurred for disqualifying purposes, and

(d) does not consist of financing costs or decommissioning costs.

(3) For the purposes of section 1 the company is to be treated as if, in addition to the investment expenditure incurred by it in the accounting period, it had incurred in that period expenditure of an amount equal to 66% of the amount of that investment expenditure.

(4) For the purposes of this section—

(a) if investment expenditure is incurred partly for the purposes of oil-related activities and partly for other purposes, the expenditure is to be attributed to the oil-related activities on a just and reasonable basis, and

(b) if a company incurs expenditure part of which is capital expenditure on the de-carbonisation of its upstream petroleum production and part of which is not, the expenditure is to be apportioned on a just and reasonable basis.

(5) This section needs to be read with section 6 (which prevents recycling etc of assets to generate relief)."

(3) Omit sections 3 and 4 (definitions of "operating expenditure" and "leasing expenditure").

(4) In section 7(1) (when investment expenditure is incurred)—

(a) in paragraph (a), omit "in the case of capital expenditure,", and

(b) omit paragraph (b).

(5) In section 18(1) (interpretation), omit the definitions of "leasing expenditure" and "operating expenditure".

(6) The amendments made by this Resolution have effect in relation to expenditure incurred on or after 1 November 2024 (and section 7 of the Energy (Oil and Gas) Profits Levy Act 2022 applies for the purposes of this Resolution as it applies for the purposes of that Act).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

The House divided.

Division No. 32

Ayes: 454 (Tellers: Christian Wakeford, Martin McCluskey)

Noes: 124 (Tellers: David Simmonds, Mr Gagan Mohindra)

Question agreed to.

*Resolved*, That—

(1) The Energy (Oil and Gas) Profits Levy Act 2022 is amended as follows.

(2) For section 2 substitute—

**"2 Additional expenditure treated as incurred for purposes of section 1**

(1) This section applies for the purposes of section 1 if, in a qualifying accounting period, a company has incurred investment expenditure.

(2) Expenditure is "investment expenditure" of a company so far as the expenditure—

(a) is capital expenditure on the de-carbonisation of its upstream petroleum production,

(b) is incurred for the purposes of oil-related activities,

(c) is not incurred for disqualifying purposes, and

(d) does not consist of financing costs or decommissioning costs.

(3) For the purposes of section 1 the company is to be treated as if, in addition to the investment expenditure incurred by it in the accounting period, it had

incurred in that period expenditure of an amount equal to 66% of the amount of that investment expenditure.

(4) For the purposes of this section—

(a) if investment expenditure is incurred partly for the purposes of oil-related activities and partly for other purposes, the expenditure is to be attributed to the oil-related activities on a just and reasonable basis, and

(b) if a company incurs expenditure part of which is capital expenditure on the de-carbonisation of its upstream petroleum production and part of which is not, the expenditure is to be apportioned on a just and reasonable basis.

(5) This section needs to be read with section 6 (which prevents recycling etc of assets to generate relief)."

(3) Omit sections 3 and 4 (definitions of "operating expenditure" and "leasing expenditure").

(4) In section 7(1) (when investment expenditure is incurred)—

(a) in paragraph (a), omit "in the case of capital expenditure," , and

(b) omit paragraph (b).

(5) In section 18(1) (interpretation), omit the definitions of "leasing expenditure" and "operating expenditure".

(6) The amendments made by this Resolution have effect in relation to expenditure incurred on or after 1 November 2024 (and section 7 of the Energy (Oil and Gas) Profits Levy Act 2022 applies for the purposes of this Resolution as it applies for the purposes of that Act).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 14. Energy (oil and gas) profits levy (period for which levy has effect)

Question put, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made for extending the period for which the energy (oil and gas) profits levy has effect until 31 March 2030.

The House divided.

Division No. 33

Ayes: 450 (Tellers: Kate Dearden, Gerald Jones)

Noes: 120 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made for extending the period for which the energy (oil and gas) profits levy has effect until 31 March 2030.

#### 15. Oil and gas (decommissioning of carbon storage installations)

*Resolved*, That provision may be made for relief to be given in the case of payments made into a decommissioning fund in accordance with provision made under Chapter 2 of Part 2 of the Energy Act 2023 (decommissioning of carbon storage installations).

## 16. Pillar Two (Pillar Two territories etc)

*Resolved, That—*

(1) The Finance (No. 2) Act 2023 is amended as follows.

(2) In section 241 (Pillar Two territories) at the end insert—

“(4) A territory outside the United Kingdom is to be treated as a Pillar Two territory for the purposes of any accounting period that concluded before the first regulations under this section have been made if it is a territory in which a tax applies for that accounting period—

(a) that is a Qualified IIR for the purposes of the Pillar Two rules, or

(b) that it is reasonable to conclude is likely to be a Qualified IIR for the purposes of those rules.”

(3) In section 256 (qualifying domestic top-up tax) at the end insert—

“(5) A tax (other than domestic top-up tax which is always a qualifying domestic top-up tax) is to be treated as a qualifying domestic top-up tax for the purposes of any accounting period that concluded before the first regulations under this section have been made if—

(a) it is a Qualified Domestic Minimum Top-up Tax for that accounting period for the purposes of the Pillar Two rules, or

(b) it is reasonable to conclude that it is likely to be a Qualified Domestic Minimum Top-up Tax for that accounting period for the purposes of those rules.”

(4) In Schedule 16A (qualifying domestic top-up tax safe harbour election)—

(a) in paragraph 1(3), in the words before paragraph (a), for “may only be made” substitute “is only valid”, and

(b) in paragraph 2—

(i) the existing text becomes sub-paragraph (1), and

(ii) after that sub-paragraph insert—

“(2) A qualifying domestic top-up tax is to be treated as accredited for the purposes of any accounting period that concluded before the first regulations under this paragraph have been made if—

(a) the tax falls within Chapter 5.5 to 5.7 of the QDMTT safe harbour guidance, or

(b) it is reasonable to conclude that the tax is likely to fall within Chapter 5.5 to 5.7 of that guidance.

(3) For the purposes of sub-paragraph (2) the “QDMTT safe harbour guidance” means Chapter 5 of Tax Challenges Arising from the Digitalisation of the Economy – Administrative Guidance on the Global Anti-Base Erosion Model Rules (Pillar Two), July 2023, published by the OECD on 17 July 2023.”

(5) The amendments made by this Resolution come into force on 7 November 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

## 17. Pillar Two (UTPR etc)

*Resolved*, That provision (including provision having retrospective effect) may be made—

- (a) for the purpose of implementing the UTPR within the meaning of the Pillar Two rules,
- (b) for the purpose of ensuring that changes (or anticipated changes) to those rules are taken into account in the provision made by Parts 3 and 4 of the Finance (No. 2) Act 2023 and otherwise in connection with the application of those rules, and
- (c) about the exclusion from Part 4 of that Act of certain entities which are not members of a multinational group.

## 18. Offshore receipts in respect of intangible property

*Resolved*, That provision may be made repealing Chapter 2A of Part 5 of the Income Tax (Trading and Other Income) Act 2005.

## 19. Application of PAYE in relation to internationally mobile employees

*Resolved*, That provision may be made for replacing section 690 of the Income Tax (Earnings and Pensions) Act 2003 in cases where employees are internationally mobile.

## 20. Advance pricing agreements

*Resolved*, That provision (including provision having retrospective effect) may be made for the purposes of section 219(2) of the Taxation (International and Other Provisions) Act 2010.

## 21. First-year allowances (electric vehicles)

*Resolved*, That provision may be made extending the date by which expenditure must be incurred to qualify for an allowance under section 45D or 45EA of the Capital Allowances Act 2001.

## 22. Commercial letting of furnished holiday accommodation

*Resolved*, That provision (including provision having retrospective effect) may be made abolishing the special rules relating to the commercial letting of furnished holiday accommodation.

## 23. Expenditure on visual effects in films and television programmes

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made amending Part 14A of the Corporation Tax Act 2009 so as to provide for the payment of credits to companies in respect of expenditure incurred on the use of computer technology to create or alter images for inclusion in a film or television programme.

## 24. Relief for films, television programmes and video games (certification etc)

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made amending Part 14A of the Corporation Tax Act 2009 in relation to—

- (a) the certification of films, television programmes and video games, and
- (b) the treatment of expenditure that is not paid within a specified period after the end of an accounting period.

## 25. Research and development

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision (including provision having retrospective effect) may be made—

- (a) about the application of Chapter 2 of Part 13 of the Corporation Tax Act 2009 in relation to Northern Ireland, and
- (b) substituting a new sub-paragraph (4) for paragraph 21(4) of Schedule 1 to the Finance Act 2024.

## 26. Employee-ownership trusts (requirements as to trustees etc)

*Resolved*, That—

*Introduction*

(1) The Taxation of Chargeable Gains Act 1992 is amended as follows.

*Requirement for trustees of employee-ownership trusts to be UK resident*

(2) In section 236H(4) (disposals to employee-ownership trusts), before paragraph (a) insert—

“(aa) that the trustees of the settlement are resident in the United Kingdom at the time of the disposal and continue to be UK resident for the remainder of the tax year in which that time falls,”.

(3) In section 236O(2) (no section 236H relief if disqualifying event in next tax year), before paragraph (a) insert—

“(aa) the trustees of the settlement cease to be resident in the United Kingdom,”

(4) In section 236P (events which trigger deemed disposal and reacquisition by trustees), after subsection (3) insert—

“(3A) See also section 80 (trustees ceasing to be resident in UK), which provides for similar consequences in circumstances where the trustees of the settlement cease to be resident in the United Kingdom.”

(5) In section 236Q(1)(c) (relief for deemed disposals under section 71), for “236H(4)(a)” substitute “236H(4)(aa)”.

*Trustee independence*

(6) In section 236H(4), after paragraph (b) insert—

“(ba) that the settlement meets the trustee independence requirement (see section 236LA) at the time of the disposal and continues to meet that requirement for the remainder of the tax year in which that time falls,”

(7) After section 236L insert—

**“236LA Trustee independence requirement**

(1) A settlement meets the trustee independence requirement if—

- (a) less than 50% of the trustees are persons who are excluded participators, and
- (b) excluded participators do not have control of the settlement.

(2) In this section “excluded participator” means—

- (a) a person that is an excluded participator within the meaning given by section 236J, other than a person who is an excluded participator

only as a result of a connection falling within section 286(3) (trustees regarded as connected with settlors etc), or

(b) a company not falling within paragraph (a), if 50% or more of its directors are persons falling within that paragraph.

(3) Excluded participators have control of the settlement if one or more excluded participators, acting alone or together without the trustees who are not excluded participators, have power under the trust instrument or by law to—

(a) dispose of, advance, lend, invest, pay or apply settlement property;

(b) vary or terminate the settlement;

(c) add or remove a person as a beneficiary or to or from a class of beneficiaries;

(d) appoint or remove trustees or give another individual control over the settlement;

(e) direct the exercise of a power mentioned in sub-paragraphs (a) to (d)."

(8) In section 236O(2), after paragraph (b) insert—

"(ba) the settlement ceases to meet the trustee independence requirement,"

(9) In section 236P(2) (events which trigger deemed disposal and reacquisition by trustees), after paragraph (b) insert—

"(ba) the settlement ceases to meet the trustee independence requirement,"

*Temporary breach of trustee independence requirement or residence requirement arising from death of trustee*

(10) In section 236O, after subsection (2) insert—

"(2A) Where—

(a) a disqualifying event falling within subsection (2)(aa) occurs (trustees cease to be resident in the United Kingdom),

(b) the event only occurs as a result of the death of a trustee of the settlement, and

(c) within the period of 6 months beginning with the death of the trustee, the trustees become resident in the United Kingdom,

the disqualifying event is to be ignored.

(2B) Where—

(a) a disqualifying event falling within subsection (2)(ba) occurs (trustee independence requirement ceases to be met),

(b) the event only occurs as a result of—

(i) the death of a trustee of the settlement, or

(ii) the death of a director of a company that is a trustee of the settlement, and

(c) within the period of 6 months beginning with that death, the settlement meets the trustee independence requirement,

the disqualifying event is to be ignored."

(11) In section 236P, after subsection (2) insert—

“(2A) Where—

(a) a disqualifying event falling within subsection (2)(ba) occurs (trustee independence requirement ceases to be met),

(b) the event only occurs as a result of—

(i) the death of a trustee of the settlement, or

(ii) the death of a director of a company that is a trustee of the settlement, and

(c) within the period of 6 months beginning with that death, the settlement meets the trustee independence requirement,

the disqualifying event is to be ignored.”

*Consideration requirement*

(12) In section 236H(4), after paragraph (c) insert—

“(ca) that the trustees have taken all reasonable steps to secure that—

(i) the consideration for the disposal does not exceed the market value of the ordinary share capital at the time of the disposal, and

(ii) where some or all of the consideration for the disposal is deferred, that the rate of any interest payable in relation to the deferral does not exceed a reasonable commercial rate,”.

(13) In section 236Q, in subsection (1)(c), for “(d)” substitute “(c) and (d)”.

*Extended period for disqualifying events*

(14) In section 236O—

(a) in the heading, for “tax year” substitute “four tax years”, and

(b) in subsection (1)(b), for “the tax year” substitute “any of the first four tax years”.

(15) In section 236P(1), after “end of the” insert “fourth”.

(16) In section 236R—

(a) in the heading, for “tax year” substitute “four tax years”, and

(b) in subsection (1)(b), for “the tax year” substitute “any of the first four tax years”.

*Commencement*

(17) The amendments made by this Resolution have effect in relation to disposals made on or after 30 October 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

27. Employee-ownership trusts (claims and reliefs)

*Resolved*, That provision may be made—

(a) about the information to be included in claims under sections 236H and 236Q of the Taxation of Chargeable Gains Act 1992,

(b) for relief for bonus payments under Chapter 10A of Part 4 of the Income Tax (Earnings and Pensions) Act 2003 not to be precluded by the exclusion of directors from the scheme under which the payments are awarded, and



(c) for a relief from income tax on distributions made to trustees of an employee-ownership trust by the company to which the trust relates to meet the costs of the trust acquiring ordinary share capital of the company.

#### 28. Pensions (overseas transfer charge)

*Resolved, That—*

(1) In Part 4 of the Finance Act 2004 (pensions), omit section 244C (exclusion from overseas transfer charge where receiving scheme in EEA state or Gibraltar, and member resident in UK or EEA state).

(2) Paragraphs (3) to (5) contain amendments consequential on the repeal made by paragraph (1).

(3) In Part 4 of the Finance Act 2004—

(a) in section 244J (persons liable to charge), in subsection (4), omit “or 244C”, and

(b) in section 244K (meaning of “transferred value”), in subsection (6), omit “or 244C”.

(4) In the Pension Schemes (Information Requirements for Qualifying Overseas Pension Schemes, Qualifying Recognised Overseas Pension Schemes and Corresponding Relief) Regulations 2006 (S.I. 2006/208)—

(a) in regulation 3 (information to be provided to QROPS) in paragraph (2C)—

(i) for “neither” substitute “not”, and

(ii) omit paragraph (b) and the “nor” before it,

(b) in regulation 3AF (information provided by member to QROPS: inward and outward transfers), in paragraph (1)(b)(ii), omit “or 244C”,

(c) in regulation 3AG (provision of information about liability for overseas transfer charge), in paragraph (2)(d), omit “or 244C”, and

(d) in regulation 3AH (accounting for overseas transfer charge where change of circumstances), in paragraph (1)(a)(ii), omit “or 244C(3)”.

(5) In the Registered Pension Schemes (Provision of Information) Regulations 2006 (S.I. 2006/567)—

(a) in regulation 11BB (information provided by members to scheme administrators), in paragraph (1)(b)(ii), omit “or 244C”, and

(b) in regulation 12A (information provided by scheme administrators to members), in paragraph (2)(d), omit “or 244C”.

(6) Subject to paragraphs (7) and (8), the amendments made by this Resolution have effect in relation to transfers made on or after 30 October 2024.

(7) The amendments do not have effect in relation to a transfer that is made—

(a) in execution of a request made before 30 October 2024, and

(b) before 30 April 2025.

(8) Where—

(a) the repeal made by paragraph (1) does not have effect in relation to a transfer, but

(b) the tax consequences of that transfer depend on the tax consequences of a later transfer in relation to which the repeal does have effect,

the tax consequences of the earlier transfer are to be determined as if the repeal did not have effect in relation to the later transfer.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

29. Pensions (schemes established or administered in EEA states)

*Resolved*, That provision may be made about pension schemes established in, or administered by persons resident in, EEA states, including (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision taking effect in a future year.

30. Alternative finance arrangements (capital gains tax etc)

*Resolved*, That provision may be made for the purposes of capital gains tax, income tax and corporation tax in relation to alternative finance arrangements where the customer has a beneficial interest in an asset and disposes of some or all of that interest to the financier.

31. Statutory neonatal care pay

*Resolved*, That provision may be made in relation to statutory neonatal care pay.

32. Persons not domiciled in United Kingdom

*Resolved*, That provision may be made for the purposes of income tax, capital gains tax and inheritance tax for replacing rules which operate by reference to the place where a person is domiciled with rules which operate by reference to where a person is (or is not) resident during a specified period, including—

- (a) provision for a new temporary tax to be chargeable on amounts designated by persons who have been subject to the remittance basis as a result of being domiciled outside the United Kingdom, and
- (b) provision amending the application of the replaced rules in cases where they continue to have effect.

33. Minor amendments relating to trusts

*Resolved*, That provision may be made—

- (a) amending sections 645 and 646 of the Income Tax (Trading and Other Income) Act 2005 (settlements),
- (b) amending Chapter 2 of Part 13 of the Income Tax Act 2007 in relation to sections 721 and 728 of that Act and repealing section 742A of that Act (transfer of assets abroad),
- (c) repealing section 1E(4) of the Taxation of Chargeable Gains Act 1992 and amending section 87G of, and paragraph 6 of Schedule 5 to, that Act (provisions relating to trusts), and
- (d) amending sections 80(1) and 81(1) of the Inheritance Tax Act 1984 (provisions relating to trusts).

34. Value added tax (private school fees)

Question put, That—

(1) The Value Added Tax Act 1994 is amended in accordance with paragraphs (2) to (5).

(2) In Schedule 9 (exemptions)—

(a) in Group 6 (education)—

- (i) in item 3(b)(i), after “5A” insert “(or would be so exempt but for item 1 or 2 of Part 3)”, and

(ii) in item 4, after “item 1” insert “(whether or not that supply also falls within item 1 or 2 of Part 3)”, and

(b) after Part 2 (the groups) insert—

**“PART 3**

**EXCEPTIONS**

*Item No.*

1 The provision of education by a private school, other than—

- (a) the provision of the teaching of English as a foreign language,
- (b) the provision of education in a nursery class, or
- (c) the provision of a higher education course.

2 The provision of vocational training by a private school.

3 The provision of board and lodging which is closely related to a supply of a description falling within item 1 or 2.

*Notes:*

(1) A “private school” means an institution which is either—

- (a) a school —
  - (i) at which full-time education is provided for pupils of compulsory school age or, in Scotland, school age (whether or not such education is also provided for pupils under or over that age),
  - (ii) where fees or other consideration are payable for that provision of full-time education, and
  - (iii) which is not a nursery school, or
- (b) an institution —
  - (i) which is wholly or mainly concerned with providing education suitable to the requirements of persons over compulsory school age (or, in Scotland, school age) but under 19,
  - (ii) at which full-time education is provided for such persons,
  - (iii) where the provision of full-time education falling within subparagraph (ii) is wholly or mainly provision in respect of which fees or other consideration are payable, and
  - (iv) which is not an independent training or learning provider.

(2) In Note (1)(b) an “independent training or learning provider” means an institution—

- (a) at which education or training is provided for persons over compulsory school age (or, in Scotland, school age) but under 19 under a contract with a relevant contracting authority, and
- (b) where the consideration for the provision falling within paragraph (a) is payable by the relevant contracting authority under that contract.

(3) For the purposes of Note (2), a “relevant contracting authority” means the Secretary of State, Medr (Commission for Tertiary Education and Research), the Department for the Economy in Northern Ireland or Skills Development Scotland.

(4) For the purposes of items 1 and 2, the provision of education or vocational training at a private school by any eligible body other than a private school is to be treated as provision by a private school if—

(a) the eligible body and that private school are connected within the meaning of section 1122 of the Corporation Tax Act 2010 (connected persons), or

(b) the provision by the eligible body is a result of arrangements the main purpose, or one of the main purposes, of which is to secure that the provision is an exempt supply.

(5) For the purposes of Note (4)—

(a) “arrangements” include any agreement, understanding, scheme, transaction or series of transactions (whether or not legally enforceable), and

(b) an “eligible body” has the meaning given by Note (1) to Group 6.

(6) For the purposes of item 1—

(a) a “nursery class” means a class that is composed wholly (or almost wholly) of children who—

(i) are under compulsory school age or, in Scotland, school age, and

(ii) would not be expected to attain that age while in that class, and

(b) a “higher education course”—

(i) in relation to England and Wales, has the meaning given by section 83(1) of the Higher Education and Research Act 2017;

(ii) in relation to Scotland, means a course of any description mentioned in section 5(3) of the Further and Higher Education (Scotland) Act 2005;

(iii) in relation to Northern Ireland, means a course of any description mentioned in paragraph 1 of Schedule 1 to the Further Education (Northern Ireland) Order 1997 (S.I. 1997/1772 (N.I. 15)).

(7) For the purposes of item 2 “vocational training” has the meaning given by Note (3) to Group 6.

(8) In these Notes, “compulsory school age”, “pupil”, “school” and “school age” have the meanings given by the Education Act 1996, the Education (Scotland) Act 1980 and the Education and Libraries (Northern Ireland) Order 1986 (S.I. 1986/594 (N.I. 3)) in relation to England and Wales, Scotland and Northern Ireland respectively.”

(3) In section 31 (exempt supplies), in subsection (1), for “Schedule 9” substitute “Part 2 of Schedule 9 and it is not of a description specified in Part 3 of that Schedule”.

(4) In section 8 (reverse charge on supplies received from abroad), in subsection (4A), for “Schedule 9” substitute “Part 2 of Schedule 9 and not specified in Part 3 of that Schedule”.

(5) In section 43 (groups of companies), in subsection (2A)—

(a) in paragraph (b), for “Schedule 9” substitute “Part 2 of Schedule 9 or are within any of the descriptions specified in Part 3 of that Schedule”, and

(b) in paragraph (c), for “Schedule 9” substitute “Part 2 of Schedule 9 or which do fall within any of the descriptions specified in Part 3 of that Schedule”.

(6) Paragraph (7) applies to the provision of education services during a school term if a payment in respect of the services was received by the person providing the services on or after 29 July 2024 and before 30 October 2024.

(7) That provision is treated for the purposes of the charge to VAT as a supply taking place on the later of—

(a) 1 January 2025, and

(b) the first day of that term.

Accordingly, that provision is not to be regarded (as a result of provision made by or under the Value Added Tax Act 1994) as a supply taking place at any other time.

(8) But paragraph (7) does not apply to the provision of education services by a school if the school is approved under section 342 of the Education Act 1996 (approval of non-maintained special schools).

(9) In paragraphs (6) to (8) “the provision of education services” means a provision of education, vocational training or board and lodging falling within Part 3 of Schedule 9 (exceptions).

(10) Paragraphs (6) to (9) are to be read as if they were contained in the Value Added Tax Act 1994.

(11) This Resolution comes into force on 30 October 2024 and has effect in relation to any provision of education, vocational training or board and lodging on or after 1 January 2025 (whenever that supply is treated as taking place for the purposes of the charge to VAT).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

The House divided.

Division No. 34

Ayes: 383 (Tellers: Kate Dearden, Gerald Jones)

Noes: 184 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved*, That—

(1) The Value Added Tax Act 1994 is amended in accordance with paragraphs (2) to (5).

(2) In Schedule 9 (exemptions)—

(a) in Group 6 (education)—

(i) in item 3(b)(i), after “5A” insert “(or would be so exempt but for item 1 or 2 of Part 3)”, and

(ii) in item 4, after “item 1” insert “(whether or not that supply also falls within item 1 or 2 of Part 3)”, and

(b) after Part 2 (the groups) insert—

**"PART 3**  
**EXCEPTIONS**

*Item No.*

- 1 The provision of education by a private school, other than—
- (a) the provision of the teaching of English as a foreign language,
  - (b) the provision of education in a nursery class, or
  - (c) the provision of a higher education course.
- 2 The provision of vocational training by a private school.
- 3 The provision of board and lodging which is closely related to a supply of a description falling within item 1 or 2.

*Notes:*

- (1) A "private school" means an institution which is either—
- (a) a school —
    - (i) at which full-time education is provided for pupils of compulsory school age or, in Scotland, school age (whether or not such education is also provided for pupils under or over that age),
    - (ii) where fees or other consideration are payable for that provision of full-time education, and
    - (iii) which is not a nursery school, or
  - (b) an institution —
    - (i) which is wholly or mainly concerned with providing education suitable to the requirements of persons over compulsory school age (or, in Scotland, school age) but under 19,
    - (ii) at which full-time education is provided for such persons,
    - (iii) where the provision of full-time education falling within subparagraph (ii) is wholly or mainly provision in respect of which fees or other consideration are payable, and
    - (iv) which is not an independent training or learning provider.
- (2) In Note (1)(b) an "independent training or learning provider" means an institution—
- (a) at which education or training is provided for persons over compulsory school age (or, in Scotland, school age) but under 19 under a contract with a relevant contracting authority, and
  - (b) where the consideration for the provision falling within paragraph (a) is payable by the relevant contracting authority under that contract.
- (3) For the purposes of Note (2), a "relevant contracting authority" means the Secretary of State, Medr (Commission for Tertiary Education and Research), the Department for the Economy in Northern Ireland or Skills Development Scotland.

(4) For the purposes of items 1 and 2, the provision of education or vocational training at a private school by any eligible body other than a private school is to be treated as provision by a private school if—

(a) the eligible body and that private school are connected within the meaning of section 1122 of the Corporation Tax Act 2010 (connected persons), or

(b) the provision by the eligible body is a result of arrangements the main purpose, or one of the main purposes, of which is to secure that the provision is an exempt supply.

(5) For the purposes of Note (4)—

(a) “arrangements” include any agreement, understanding, scheme, transaction or series of transactions (whether or not legally enforceable), and

(b) an “eligible body” has the meaning given by Note (1) to Group 6.

(6) For the purposes of item 1—

(a) a “nursery class” means a class that is composed wholly (or almost wholly) of children who—

(i) are under compulsory school age or, in Scotland, school age, and

(ii) would not be expected to attain that age while in that class, and

(b) a “higher education course”—

(i) in relation to England and Wales, has the meaning given by section 83(1) of the Higher Education and Research Act 2017;

(ii) in relation to Scotland, means a course of any description mentioned in section 5(3) of the Further and Higher Education (Scotland) Act 2005;

(iii) in relation to Northern Ireland, means a course of any description mentioned in paragraph 1 of Schedule 1 to the Further Education (Northern Ireland) Order 1997 (S.I. 1997/1772 (N.I. 15)).

(7) For the purposes of item 2 “vocational training” has the meaning given by Note (3) to Group 6.

(8) In these Notes, “compulsory school age”, “pupil”, “school” and “school age” have the meanings given by the Education Act 1996, the Education (Scotland) Act 1980 and the Education and Libraries (Northern Ireland) Order 1986 (S.I. 1986/594 (N.I. 3)) in relation to England and Wales, Scotland and Northern Ireland respectively.”

(3) In section 31 (exempt supplies), in subsection (1), for “Schedule 9” substitute “Part 2 of Schedule 9 and it is not of a description specified in Part 3 of that Schedule”.

(4) In section 8 (reverse charge on supplies received from abroad), in subsection (4A), for “Schedule 9” substitute “Part 2 of Schedule 9 and not specified in Part 3 of that Schedule”.

(5) In section 43 (groups of companies), in subsection (2A)—

(a) in paragraph (b), for “Schedule 9” substitute “Part 2 of Schedule 9 or are within any of the descriptions specified in Part 3 of that Schedule”, and

(b) in paragraph (c), for “Schedule 9” substitute “Part 2 of Schedule 9 or which do fall within any of the descriptions specified in Part 3 of that Schedule”.

(6) Paragraph (7) applies to the provision of education services during a school term if a payment in respect of the services was received by the person providing the services on or after 29 July 2024 and before 30 October 2024.

(7) That provision is treated for the purposes of the charge to VAT as a supply taking place on the later of—

- (a) 1 January 2025, and
- (b) the first day of that term.

Accordingly, that provision is not to be regarded (as a result of provision made by or under the Value Added Tax Act 1994) as a supply taking place at any other time.

(8) But paragraph (7) does not apply to the provision of education services by a school if the school is approved under section 342 of the Education Act 1996 (approval of non-maintained special schools).

(9) In paragraphs (6) to (8) “the provision of education services” means a provision of education, vocational training or board and lodging falling within Part 3 of Schedule 9 (exceptions).

(10) Paragraphs (6) to (9) are to be read as if they were contained in the Value Added Tax Act 1994.

(11) This Resolution comes into force on 30 October 2024 and has effect in relation to any provision of education, vocational training or board and lodging on or after 1 January 2025 (whenever that supply is treated as taking place for the purposes of the charge to VAT).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 35. Stamp duty land tax (additional dwellings: purchases before 1 April 2025)

Question put, That—

(1) Section 1 of the Stamp Duty Land Tax (Temporary Relief) Act 2023 (which provides for reduced rates of stamp duty land tax for transactions before 1 April 2025) is amended as follows.

(2) In subsection (3) (which deals with purchases of additional dwellings), for the Table A mentioned there substitute—

“TABLE A: RESIDENTIAL

<i>Part of relevant consideration</i>	<i>Percentage</i>
So much as does not exceed £250,000	5%
So much as exceeds £250,000 but does not exceed £925,000	10%
So much as exceeds £925,000 but does not exceed £1,500,000	15%
The remainder (if any)	17% ”.

(3) The amendment made by this Resolution has effect in relation to land transactions the effective date of which falls on or after 31 October 2024 but before 1 April 2025.

(4) But the amendment made by this Resolution does not have effect in relation to a land transaction which—



- (a) is effected in pursuance of a contract entered into before 31 October 2024, and  
(b) is not excluded.
- (5) For this purpose a land transaction is excluded if—
- (a) there is any variation of the contract, or assignment of rights under the contract, on or after 31 October 2024,
  - (b) the transaction is effected in consequence of the exercise on or after that date of any option, right of pre-emption or similar right, or
  - (c) on or after that date, there is an assignment, subsale or other transaction relating to the whole or part of the subject-matter of the contract as a result of which a person other than the purchaser under the contract becomes entitled to call for a conveyance.
- (6) In consequence of the provision made by the preceding paragraphs, the Stamp Duty Land Tax (Temporary Relief) Act 2020 is amended as follows.
- (7) In section 1 (reduced rates of SDLT in relation to land transactions the effective date of which falls in the period beginning with 8 July 2020 and ending with 30 June 2021)—
- (a) in subsection (6) (which provides an exception from section 44(8) of the Finance Act 2003 where the contract is completed after 30 June 2021), for the words from “that the modifications” to the end substitute “the reason given by subsection (6A)”, and
  - (b) after subsection (6) insert—  
“(6A) For this purpose, the sole reason is either—
    - (a) that the modifications made by this section have no effect in relation to that conveyance, or
    - (b) that both paragraph (a) applies and the increased rates provided for by Resolution 35 of the House of Commons (stamp duty land tax (additional dwellings: purchases before 1 April 2025)) would have had effect in relation to that conveyance.”
- (8) In section 1A (reduced rates of SDLT in relation to land transactions the effective date of which falls in the period beginning with 1 July 2021 and ending with 30 September 2021)—
- (a) in subsection (5) (which provides an exception from section 44(8) of the Finance Act 2003 where the contract is completed after 30 September 2021), for the words from “that the modifications” to the end substitute “the reason given by subsection (5A)”, and
  - (b) after subsection (5) insert—  
“(5A) For this purpose, the sole reason is either—
    - (a) that the modifications made by this section have no effect in relation to that conveyance, or
    - (b) that both paragraph (a) applies and the increased rates provided for by Resolution 35 of the House of Commons (stamp duty land tax (additional dwellings: purchases before 1 April 2025)) would have had effect in relation to that conveyance.”
- (9) In a case where—
- (a) as a result of section 44(4) of the Finance Act 2003 the effective date of a land transaction is before 31 October 2024, and

(b) the contract concerned is completed by a conveyance on or after that date, section 44(8) of that Act is not to apply in relation to that conveyance if the sole reason that (but for this paragraph) it would have applied is that the increased rates provided for by this Resolution would have had effect in relation to that conveyance.

(10) Section 44(10) of the Finance Act 2003 applies for the purposes of paragraph (9).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

The House divided.

Division No. 35

Ayes: 378 (Tellers: Gerald Jones, Kate Dearden)

Noes: 116 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved, That—*

(1) Section 1 of the Stamp Duty Land Tax (Temporary Relief) Act 2023 (which provides for reduced rates of stamp duty land tax for transactions before 1 April 2025) is amended as follows.

(2) In subsection (3) (which deals with purchases of additional dwellings), for the Table A mentioned there substitute—

“TABLE A: RESIDENTIAL

<i>Part of relevant consideration</i>	<i>Percentage</i>
So much as does not exceed £250,000	5%
So much as exceeds £250,000 but does not exceed £925,000	10%
So much as exceeds £925,000 but does not exceed £1,500,000	15%
The remainder (if any)	17% ”.

(3) The amendment made by this Resolution has effect in relation to land transactions the effective date of which falls on or after 31 October 2024 but before 1 April 2025.

(4) But the amendment made by this Resolution does not have effect in relation to a land transaction which—

- (a) is effected in pursuance of a contract entered into before 31 October 2024, and
- (b) is not excluded.

(5) For this purpose a land transaction is excluded if—

- (a) there is any variation of the contract, or assignment of rights under the contract, on or after 31 October 2024,
- (b) the transaction is effected in consequence of the exercise on or after that date of any option, right of pre-emption or similar right, or
- (c) on or after that date, there is an assignment, subsale or other transaction relating to the whole or part of the subject-matter of the contract as a result of which a person other than the purchaser under the contract becomes entitled to call for a conveyance.

(6) In consequence of the provision made by the preceding paragraphs, the Stamp Duty Land Tax (Temporary Relief) Act 2020 is amended as follows.

(7) In section 1 (reduced rates of SDLT in relation to land transactions the effective date of which falls in the period beginning with 8 July 2020 and ending with 30 June 2021)—

(a) in subsection (6) (which provides an exception from section 44(8) of the Finance Act 2003 where the contract is completed after 30 June 2021), for the words from “that the modifications” to the end substitute “the reason given by subsection (6A)”, and

(b) after subsection (6) insert—

“(6A) For this purpose, the sole reason is either—

(a) that the modifications made by this section have no effect in relation to that conveyance, or

(b) that both paragraph (a) applies and the increased rates provided for by Resolution 35 of the House of Commons (stamp duty land tax (additional dwellings: purchases before 1 April 2025)) would have had effect in relation to that conveyance.”

(8) In section 1A (reduced rates of SDLT in relation to land transactions the effective date of which falls in the period beginning with 1 July 2021 and ending with 30 September 2021)—

(a) in subsection (5) (which provides an exception from section 44(8) of the Finance Act 2003 where the contract is completed after 30 September 2021), for the words from “that the modifications” to the end substitute “the reason given by subsection (5A)”, and

(b) after subsection (5) insert—

“(5A) For this purpose, the sole reason is either—

(a) that the modifications made by this section have no effect in relation to that conveyance, or

(b) that both paragraph (a) applies and the increased rates provided for by Resolution 35 of the House of Commons (stamp duty land tax (additional dwellings: purchases before 1 April 2025)) would have had effect in relation to that conveyance.”

(9) In a case where—

(a) as a result of section 44(4) of the Finance Act 2003 the effective date of a land transaction is before 31 October 2024, and

(b) the contract concerned is completed by a conveyance on or after that date,

section 44(8) of that Act is not to apply in relation to that conveyance if the sole reason that (but for this paragraph) it would have applied is that the increased rates provided for by this Resolution would have had effect in relation to that conveyance.

(10) Section 44(10) of the Finance Act 2003 applies for the purposes of paragraph (9).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

36. Stamp duty land tax (additional dwellings: purchases on or after 1 April 2025)

Question put, That provision may be made amending paragraph 1(2) of Schedule 4ZA to the Finance Act 2003 so as to increase the rates of stamp duty land tax mentioned there.

The House divided.

Division No. 36

Ayes: 373 (Tellers: Gerald Jones, Keir Mather)

Noes: 110 (Tellers: David Simmonds, Jerome Mayhew)

Question agreed to.

*Resolved*, That provision may be made amending paragraph 1(2) of Schedule 4ZA to the Finance Act 2003 so as to increase the rates of stamp duty land tax mentioned there.

37. Stamp duty land tax (purchases by companies)

*Resolved*, That—

(1) In—

(a) paragraph 3(1)(a) of Schedule 4A to the Finance Act 2003 (higher rate of SDLT for purchases by companies etc), and

(b) step 4 in section 74(1A) of the Finance Act 2003 (exercise of collective rights by tenants of flats where condition in paragraph 3(3) of that Schedule is met),

for “15%” substitute “17%”.

(2) The amendments made by this Resolution have effect in relation to land transactions the effective date of which falls on or after 31 October 2024.

(3) But the amendments made by this Resolution do not have effect in relation to a land transaction which—

(a) is effected in pursuance of a contract entered into before that date, and

(b) is not excluded.

(4) For this purpose a land transaction is excluded if—

(a) there is any variation of the contract, or assignment of rights under the contract, on or after 31 October 2024,

(b) the transaction is effected in consequence of the exercise on or after that date of any option, right of pre-emption or similar right, or

(c) on or after that date, there is an assignment, subsale or other transaction relating to the whole or part of the subject-matter of the contract as a result of which a person other than the purchaser under the contract becomes entitled to call for a conveyance.

(5) In a case where—

(a) as a result of section 44(4) of the Finance Act 2003 the effective date of a land transaction is before 31 October 2024, and

(b) the contract concerned is completed by a conveyance on or after that date,

section 44(8) of that Act is not to apply in relation to that conveyance if the sole reason that (but for this paragraph) it would have applied is that the increased rates provided for by this Resolution would have had effect in relation to that conveyance.

(6) Section 44(10) of the Finance Act 2003 applies for the purposes of paragraph (5).

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

## 38. Annual tax on enveloped dwellings (alternative finance arrangements)

*Resolved*, That provision may be made for the purposes of annual tax on enveloped dwellings in relation to land sold to a financial institution and leased under alternative finance arrangements.

## 39. Stamp taxes (testing of financial market infrastructure technologies or practices)

*Resolved*, That provision may be made conferring power on the Treasury to make provision about stamp duty or stamp duty reserve tax in connection with regulations made under section 13 of the Financial Services and Markets Act 2023.

## 40. Inheritance tax (nil rate band etc for tax years 2028–29 and 2029–30)

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made amending section 86 of the Finance Act 2021 so that the nil rate band, the residential enhancement and the taper threshold remain at their current amounts for the tax years 2028–29 and 2029–30.

## 41. Inheritance tax (employee benefit trusts)

*Resolved*, That provision may be made for the purposes of inheritance tax in relation to property becoming subject to a trust for the benefit of employees.

## 42. Inheritance tax (agricultural land subject to environmental management agreement)

*Resolved*, That provision (including provision having retrospective effect) may be made for treating land and buildings as agricultural property for the purposes of agricultural property relief from inheritance tax where the land is subject to an agreement entered into with a public authority for the purpose of protecting, restoring or enhancing the natural environment, or natural resources, of land or water.

## 43. Inheritance tax (statements about national savings accounts)

*Resolved*, That provision may be made revoking regulation 55 of the National Savings Regulations 2015 and regulation 90 of the National Savings (No. 2) Regulations 2015.

## 44. Rates of alcohol duty

Question put, That—

(1) Part 2 of the Finance (No. 2) Act 2023 (alcohol duty) is amended as follows.

(2) For Schedule 7 (main rates) substitute—

## "SCHEDULE 7

## RATES OF ALCOHOL DUTY

TABLE 1

<b>Alcoholic strength of alcoholic product</b>	<b>Rate of duty per litre of alcohol in the product</b>
Less than 3.5%	£9.61
At least 3.5% but less than 8.5%	See Table 2
At least 8.5% but not exceeding 22%	£29.54
Exceeding 22%	£32.79

TABLE 2

<b>Description of alcoholic product (of an alcoholic strength of at least 3.5% but less than 8.5%)</b>	<b>Rate of duty per litre of alcohol in the product</b>
(a) Still cider	£10.02
(b) Sparkling cider of an alcoholic strength not exceeding 5.5%	
Beer	£21.78
(a) Spirits, wine and other fermented products	£25.67".
(b) Sparkling cider of an alcoholic strength exceeding 5.5%	
(3) For Schedule 8 (reduced rates for qualifying draught products) substitute—	

## "SCHEDULE 8

*QUALIFYING DRAUGHT PRODUCTS: REDUCED RATES*

<b>Description of alcoholic product</b>	<b>Rate of duty per litre of alcohol in the product</b>
Alcoholic products of an alcoholic strength of less than 3.5%	£8.28
(a) Still cider of an alcoholic strength of at least 3.5%	£8.63
(b) Sparkling cider of an alcoholic strength of at least 3.5% but not exceeding 5.5%	
(a) Beer, spirits, wine and other fermented products of an alcoholic strength of at least 3.5% (but less than 8.5%)	£18.76".
(b) Sparkling cider of an alcoholic strength exceeding 5.5%	
(4) For Schedule 9 (duty discount for small producer alcoholic products)—	

## "SCHEDULE 9

*SMALL PRODUCER ALCOHOLIC PRODUCTS: DUTY DISCOUNT***PART 1***ALCOHOLIC PRODUCTS, OTHER THAN QUALIFYING DRAUGHT PRODUCTS OF AN ALCOHOLIC STRENGTH OF LESS THAN 8.5%***Alcoholic products, other than spirits, of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	9.61	-
2	5	50	2.44	48.05
3	50	100	1.47	157.99
4	100	200	0.49	231.28
5	200	600	-	280.15
6	600	1000	-	280.15
7	1000	4500	-0.08	280.15

**Spirits of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	6.35	-
2	5	50	2.44	31.76
3	50	100	1.47	141.70
4	100	200	0.49	214.99
5	200	600	-	263.86
6	600	1000	-	263.86
7	1000	4500	-0.08	263.86

**Still cider of an alcoholic strength of at least 3.5%; sparkling cider of an alcoholic strength of at least 3.5% but not exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	10.02	-
2	5	50	2.55	50.10
3	50	100	1.53	164.78
4	100	200	0.51	241.24
5	200	600	-	292.21
6	600	1000	-	292.21
7	1000	4500	-0.08	292.21

**Beer of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	19.94	-
2	5	112.5	11.08	99.68
3	112.5	225	9.97	1290.33
4	225	450	5.54	2411.75
5	450	900	3.32	3657.77
6	900	1350	-	5153.00
7	1350	4500	-1.64	5153.00

**Wine and other fermented products of an alcoholic strength of at least 3.5%;  
sparkling cider of an alcoholic strength exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	25.67	-
2	5	50	2.61	128.35
3	50	100	2.61	245.84
4	100	200	1.31	376.37
5	200	600	-	506.91
6	600	1000	-	506.91
7	1000	4500	-0.14	506.91

**Spirits of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	20.89	-
2	5	50	2.61	104.43
3	50	100	2.61	221.92
4	100	200	1.31	352.46
5	200	600	-	483.00
6	600	1000	-	483.00
7	1000	4500	-0.14	483.00

**PART 2**

QUALIFYING DRAUGHT PRODUCTS OF AN ALCOHOLIC STRENGTH OF LESS THAN 8.5%

**Alcoholic products, other than spirits, of an alcoholic strength of less than 3.5%**



Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	8.28	-
2	5	50	2.11	41.40
3	50	100	1.26	136.13
4	100	200	0.42	199.28
5	200	600	-	241.38
6	600	1000	-	241.38
7	1000	4500	-0.07	241.38

**Spirits of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	5.47	-
2	5	50	2.11	27.37
3	50	100	1.26	122.09
4	100	200	0.42	185.24
5	200	600	-	227.34
6	600	1000	-	227.34
7	1000	4500	-0.06	227.34

**Still cider of an alcoholic strength of at least 3.5%; sparkling cider of an alcoholic strength of at least 3.5% but not exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	8.63	-
2	5	50	2.20	43.15
3	50	100	1.32	141.93
4	100	200	0.44	207.78
5	200	600	-	251.68
6	600	1000	-	251.68
7	1000	4500	-0.07	251.68

**Beer of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	17.17	-
2	5	112.5	9.54	85.86
3	112.5	225	8.59	1111.41
4	225	450	4.77	2077.34
5	450	900	2.86	3150.59
6	900	1350	-	4438.49
7	1350	4500	-1.41	4438.49

**Wine and other fermented products of an alcoholic strength of at least 3.5%;  
sparkling cider of an alcoholic strength exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	18.76	-
2	5	50	1.91	93.80
3	50	100	1.91	179.66
4	100	200	0.95	275.06
5	200	600	-	370.46
6	600	1000	-	370.46
7	1000	4500	-0.11	370.46

**Spirits of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	15.26	-
2	5	50	1.91	76.32
3	50	100	1.91	162.18
4	100	200	0.95	275.58
5	200	600	-	352.98
6	600	1000	-	352.98
7	1000	4500	-0.10	352.98".

(5) In consequence of the amendments made by the preceding paragraphs of this Resolution, in Schedule 2 to the Travellers' Allowances Order 1994 (which provides in certain circumstances for a simplified calculation of excise duty on goods brought into Great Britain)—

- (a) in the entry relating to beer, in the second column, for “£0.88” substitute “£0.91”,
- (b) in the entry relating to still wine, in the second column, for “£3.28” substitute “£3.40”,
- (c) in the entry relating to sparkling wine, in the second column, for “£3.28” substitute “£3.40”,
- (d) in the entry relating to cider, in the second column, for “£0.44” substitute “£0.46”,
- (e) in the entry relating to sparkling cider of an alcoholic strength not exceeding 5.5% by volume, in the second column, for “£0.44” substitute “£0.46”,
- (f) in the entry relating to sparkling cider of an alcoholic strength exceeding 5.5% but less than 8.5% by volume, in the second column, for “£1.73” substitute “£1.80”,
- (g) in the entry relating to other fermented products, in the second column, for “£3.28” substitute “£3.40”, and
- (h) in the entry relating to spirits, in the second column, for “£11.88” substitute “£12.30”.

(6) The amendments made by this Resolution come into force on 1 February 2025.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

The House divided.

Division No. 37

Ayes: 371 (Tellers: Keir Mather, Gerald Jones)

Noes: 77 (Tellers: Kirsty Blackman, Tessa Munt)

Question agreed to.

*Resolved*, That—

(1) Part 2 of the Finance (No. 2) Act 2023 (alcohol duty) is amended as follows.

(2) For Schedule 7 (main rates) substitute—

“SCHEDULE 7

*RATES OF ALCOHOL DUTY*

TABLE 1

<b>Alcoholic strength of alcoholic product</b>	<b>Rate of duty per litre of alcohol in the product</b>
Less than 3.5%	£9.61
At least 3.5% but less than 8.5%	See Table 2
At least 8.5% but not exceeding 22%	£29.54
Exceeding 22%	£32.79

TABLE 2

Description of alcoholic product (of an alcoholic strength of at least 3.5% but less than 8.5%)	Rate of duty per litre of alcohol in the product
(a) Still cider	£10.02
(b) Sparkling cider of an alcoholic strength not exceeding 5.5%	
Beer	£21.78
(a) Spirits, wine and other fermented products	£25.67".
(b) Sparkling cider of an alcoholic strength exceeding 5.5%	
(3) For Schedule 8 (reduced rates for qualifying draught products) substitute—	

## "SCHEDULE 8

*QUALIFYING DRAUGHT PRODUCTS: REDUCED RATES*

Description of alcoholic product	Rate of duty per litre of alcohol in the product
Alcoholic products of an alcoholic strength of less than 3.5%	£8.28
(a) Still cider of an alcoholic strength of at least 3.5%	£8.63
(b) Sparkling cider of an alcoholic strength of at least 3.5% but not exceeding 5.5%	
(a) Beer, spirits, wine and other fermented products of an alcoholic strength of at least 3.5% (but less than 8.5%)	£18.76".
(b) Sparkling cider of an alcoholic strength exceeding 5.5%	
(4) For Schedule 9 (duty discount for small producer alcoholic products)—	

## "SCHEDULE 9

*SMALL PRODUCER ALCOHOLIC PRODUCTS: DUTY DISCOUNT*

## PART 1

*ALCOHOLIC PRODUCTS, OTHER THAN QUALIFYING DRAUGHT PRODUCTS OF AN ALCOHOLIC STRENGTH OF LESS THAN 8.5%*

**Alcoholic products, other than spirits, of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	9.61	-
2	5	50	2.44	48.05
3	50	100	1.47	157.99
4	100	200	0.49	231.28
5	200	600	-	280.15
6	600	1000	-	280.15
7	1000	4500	-0.08	280.15

**Spirits of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	6.35	-
2	5	50	2.44	31.76
3	50	100	1.47	141.70
4	100	200	0.49	214.99
5	200	600	-	263.86
6	600	1000	-	263.86
7	1000	4500	-0.08	263.86

**Still cider of an alcoholic strength of at least 3.5%; sparkling cider of an alcoholic strength of at least 3.5% but not exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	10.02	-
2	5	50	2.55	50.10
3	50	100	1.53	164.78
4	100	200	0.51	241.24
5	200	600	-	292.21
6	600	1000	-	292.21
7	1000	4500	-0.08	292.21

**Beer of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	19.94	-
2	5	112.5	11.08	99.68
3	112.5	225	9.97	1290.33
4	225	450	5.54	2411.75
5	450	900	3.32	3657.77
6	900	1350	-	5153.00
7	1350	4500	-1.64	5153.00

**Wine and other fermented products of an alcoholic strength of at least 3.5%; sparkling cider of an alcoholic strength exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	25.67	-
2	5	50	2.61	128.35
3	50	100	2.61	245.84
4	100	200	1.31	376.37
5	200	600	-	506.91
6	600	1000	-	506.91
7	1000	4500	-0.14	506.91

**Spirits of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	20.89	-
2	5	50	2.61	104.43
3	50	100	2.61	221.92
4	100	200	1.31	352.46
5	200	600	-	483.00
6	600	1000	-	483.00
7	1000	4500	-0.14	483.00

**PART 2****QUALIFYING DRAUGHT PRODUCTS OF AN ALCOHOLIC STRENGTH OF LESS THAN 8.5%****Alcoholic products, other than spirits, of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	8.28	-
2	5	50	2.11	41.40
3	50	100	1.26	136.13
4	100	200	0.42	199.28
5	200	600	-	241.38
6	600	1000	-	241.38
7	1000	4500	-0.07	241.38

**Spirits of an alcoholic strength of less than 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	5.47	-
2	5	50	2.11	27.37
3	50	100	1.26	122.09
4	100	200	0.42	185.24
5	200	600	-	227.34
6	600	1000	-	227.34
7	1000	4500	-0.06	227.34

**Still cider of an alcoholic strength of at least 3.5%; sparkling cider of an alcoholic strength of at least 3.5% but not exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	8.63	-
2	5	50	2.20	43.15
3	50	100	1.32	141.93
4	100	200	0.44	207.78
5	200	600	-	251.68
6	600	1000	-	251.68
7	1000	4500	-0.07	251.68

**Beer of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	17.17	-
2	5	112.5	9.54	85.86
3	112.5	225	8.59	1111.41
4	225	450	4.77	2077.34
5	450	900	2.86	3150.59
6	900	1350	-	4438.49
7	1350	4500	-1.41	4438.49

**Wine and other fermented products of an alcoholic strength of at least 3.5%; sparkling cider of an alcoholic strength exceeding 5.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	18.76	-
2	5	50	1.91	93.80
3	50	100	1.91	179.66
4	100	200	0.95	275.06
5	200	600	-	370.46
6	600	1000	-	370.46
7	1000	4500	-0.11	370.46

**Spirits of an alcoholic strength of at least 3.5%**

Discount band	Start threshold (hectolitres)	End threshold (hectolitres)	Marginal discount (£)	Cumulative discount (£)
1	0	5	15.26	-
2	5	50	1.91	76.32
3	50	100	1.91	162.18
4	100	200	0.95	275.58
5	200	600	-	352.98
6	600	1000	-	352.98
7	1000	4500	-0.10	352.98".

(5) In consequence of the amendments made by the preceding paragraphs of this Resolution, in Schedule 2 to the Travellers' Allowances Order 1994 (which provides in certain circumstances for a simplified calculation of excise duty on goods brought into Great Britain)—



- (a) in the entry relating to beer, in the second column, for “£0.88” substitute “£0.91”,
- (b) in the entry relating to still wine, in the second column, for “£3.28” substitute “£3.40”,
- (c) in the entry relating to sparkling wine, in the second column, for “£3.28” substitute “£3.40”,
- (d) in the entry relating to cider, in the second column, for “£0.44” substitute “£0.46”,
- (e) in the entry relating to sparkling cider of an alcoholic strength not exceeding 5.5% by volume, in the second column, for “£0.44” substitute “£0.46”,
- (f) in the entry relating to sparkling cider of an alcoholic strength exceeding 5.5% but less than 8.5% by volume, in the second column, for “£1.73” substitute “£1.80”,
- (g) in the entry relating to other fermented products, in the second column, for “£3.28” substitute “£3.40”, and
- (h) in the entry relating to spirits, in the second column, for “£11.88” substitute “£12.30”.

(6) The amendments made by this Resolution come into force on 1 February 2025.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 45. Abolition of duty stamps for alcoholic products

*Resolved*, That provision be made repealing section 112 of, and Schedule 12 to, the Finance (No. 2) Act 2023.

#### 46. Rates of tobacco products duty

*Resolved*, That—

(1) In Schedule 1 to the Tobacco Products Duty Act 1979 (table of rates of tobacco products duty), for the Table substitute—

##### “TABLE

1 Cigarettes	An amount equal to the higher of—
	(a) 16.5% of the retail price plus £334.58 per thousand cigarettes, or
	(b) £446.67 per thousand cigarettes.
2 Cigars	£417.33 per kilogram
3 Hand-rolling tobacco	£476.83 per kilogram
4 Other smoking tobacco and chewing tobacco	£183.49 per kilogram
5 Tobacco for heating	£343.91 per kilogram”.

(2) In consequence of the provision made by paragraph (1), in Schedule 2 to the Travellers’ Allowances Order 1994 (which provides in certain circumstances for a simplified calculation of excise duty on goods brought into Great Britain)—

- (a) in the entry relating to cigarettes, for "£422.80" substitute "£446.67",
  - (b) in the entry relating to hand rolling tobacco, for "£412.32" substitute "£476.83",
  - (c) in the entry relating to other smoking tobacco and chewing tobacco, for "£173.68" substitute "£183.49",
  - (d) in the entry relating to cigars, for "£395.03" substitute "£417.33",
  - (e) in the entry relating to cigarillos, for "£395.03" substitute "£417.33", and
  - (f) in the entry relating to tobacco for heating, for "£97.66" substitute "£103.17".
- (3) The amendments made by this Resolution come into force at 6 pm on 30 October 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 47. Rates of vehicle excise duty

*Resolved*, That provision may be made increasing the rates of vehicle excise duty in Schedule 1 to the Vehicle Excise and Registration Act 1994.

#### 48. Vehicle excise duty (zero-emission vehicles etc)

*Resolved*, That provision may be made for the purposes of vehicle excise duty—

- (a) aligning the treatment of zero-emission vehicles with electronically propelled vehicles, and
- (b) treating in specified circumstances an EU certificate of conformity or UK approval certificate as specifying a CO2 figure of zero.

#### 49. Rates of HGV road user levy

*Resolved*, That provision may be made increasing the rates of HGV road user levy.

#### 50. Rates of air passenger duty (current and future years)

*Resolved*, That provision may be made increasing the rates of air passenger duty, including (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision taking effect in a future year.

#### 51. Rates of climate change levy (future years)

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made taking effect in a future year increasing the rates of climate change levy.

#### 52. Rates of landfill tax

*Resolved*, That provision may be made increasing the rates of landfill tax.

#### 53. Rate of aggregates levy

*Resolved*, That provision may be made increasing the rate of aggregates levy.

#### 54. Rate of plastic packaging tax

*Resolved*, That provision may be made increasing the rate of plastic packaging tax.

#### 55. Rates of soft drinks industry levy

*Resolved*, That provision may be made increasing the rates of soft drinks industry levy.

## 56. Avoidance involving limited liability partnerships

*Resolved*, That—

(1) After section 59A of the Taxation of Chargeable Gains Act 1992 insert—

**“59AA Limited liability partnerships: deemed disposal**

(1) This section applies where—

(a) a member of a limited liability partnership (the “LLP”) contributed an asset to the LLP in circumstances where section 59A(1) applied in relation to the LLP, and

(b) the LLP disposes of the asset, or part of the asset, to the member, or a person connected with the member, in circumstances where section 59A(1) has ceased to apply in relation to the LLP.

(2) The asset is deemed to have been disposed of and reacquired by the member—

(a) immediately before it was contributed to the LLP, and

(b) for a consideration equal to its market value at that time.

(3) But—

(a) any chargeable gain or allowable loss accruing under subsection (2) is to be treated as accruing at the time the asset, or part of the asset, is disposed of by the LLP (as described in subsection (1)(b)), and

(b) for the purposes of Schedule 2 to the Finance Act 2019 (returns for disposals of UK land), the disposal under subsection (2) is to be treated as completed at that time.

(4) Any chargeable gain accruing on the deemed disposal is to be reduced by an amount that is just and reasonable, having regard to any chargeable gain that has otherwise accrued to the member by reference to the asset or part of the asset.”

(2) The amendment made by this Resolution has effect from 30 October 2024 but does not have effect where section 59A(1) of the Taxation of Chargeable Gains Act 1992 ceased to apply in relation to the limited liability partnership before that date.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

## 57. Loans to participators

*Resolved*, That provision may be made repealing section 464B of the Corporation Tax Act 2010.

## 58. OECD crypto-asset reporting framework

*Resolved*, That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made amending section 349(2) of the Finance (No. 2) Act 2023 to add a reference to the OECD Crypto-Asset Reporting Framework (published in 2022).

## 59. Vaping products (preparing for new tax)

*Resolved*, That provision may be made conferring power on the Commissioners for His Majesty's Revenue and Customs to prepare for a new tax relating to vaping products.

60. Carbon border adjustment mechanism (preparing for new tax etc)

*Resolved*, That provision may be made—

- (a) conferring power on the Commissioners for His Majesty's Revenue and Customs to prepare for a new tax relating to emissions embodied in imported goods, and
- (b) about the disclosure of information for any purpose connected with the new tax.

61. Correction of wrong cross-reference etc

*Resolved*, That provision may be made correcting errors in section 151I(1) of the Taxation of Chargeable Gains Act 1992, section 1179AE(2) of the Corporation Tax Act 2009 and section 4(2)(a) of the Taxation (Post-transition Period) Act 2020.

62. Incidental provision etc

*Resolved*, That provision (including provision having retrospective effect) may be made which is incidental to, or consequential on or otherwise connected with, provision authorised by any other Resolution.

Finance: Money

King's Recommendation signified.

*Resolved*, That, for the purposes of any Act of the present Session relating to finance, it is expedient to authorise the payment out of money provided by Parliament of—

- (a) any expenditure incurred by the Commissioners for His Majesty's Revenue and Customs which is attributable to amendments of Part 14A of the Corporation Tax Act 2009, and
- (b) any expenditure incurred by virtue of the Act by the Secretary of State in connection with the disclosure of information for any purpose connected with a new tax relating to emissions embodied in imported goods.

**12 Finance Bill**

*Ordered*, That a Bill be brought in upon the foregoing Resolutions;

That the Chairman of Ways and Means, the Prime Minister, the Chancellor of the Exchequer, Darren Jones, James Murray and Tulip Siddiq present the Bill.

James Murray accordingly presented a Bill to make provision in connection with finance.

Bill read the first time, to be read a second time on Monday 11 November, and to be printed (Bill 125) with Explanatory Notes (Bill EN-125).

**13 Statutory Instruments: Motions for Approval**

(1) Motion made and Question put forthwith (Standing Order No. 118(6)), That the draft Scotland Act 1998 (Specification of Devolved Tax) (Building Safety) Order 2024, which was laid before this House on 10 September, be approved.—(*Christian Wakeford*.)

Question agreed to.

(2) Motion made and Question put forthwith (Standing Order No. 118(6)), That the draft Immigration and Nationality (Fees) (Amendment) Order 2024, which was laid before this House on 12 September, be approved.—(*Christian Wakeford*.)

Question agreed to.

(3) Motion made and Question put forthwith (Standing Order No. 118(6)), That the draft Animal Welfare (Livestock Exports) Enforcement Regulations 2024, which were laid before this House on 12 September, be approved.—(*Christian Wakeford*.)

Question agreed to.

(4) Motion made and Question put forthwith (Standing Order No. 118(6)), That the draft Online Safety Act 2023 (Priority Offences) (Amendment) Regulations 2024, which were laid before this House on 12 September, be approved.—(*Christian Wakeford.*)

Question agreed to.

(5) Motion made and Question put forthwith (Standing Order No. 118(6)), That the draft Franchising Schemes (Franchising Authorities) (England) Regulations 2024, which were laid before this House on 9 September, be approved.—(*Christian Wakeford.*)

Question agreed to.

#### 14 Adjournment

Subject: Adequacy of the road fuel market (Graeme Downie)

*Resolved*, That this House do now adjourn.—(*Christian Wakeford.*)

Adjourned at 9.36 pm until Monday 11 November (Order, 9 October).

## Other Proceedings

### *Lords Messages*

#### 15 Arbitration Bill [Lords]

The Lords have passed a Bill to amend the Arbitration Act 1996; and for connected purposes, to which they desire the agreement of the Commons.

### *First Reading and Printing of Lords Bills*

#### 16 Arbitration Bill [Lords]

Bill read the first time; to be read a second time on Monday 11 November, and to be printed (Bill 57) with Explanatory Notes (Bill 57-EN).

Bill stood referred to a second reading committee (Standing Order No. 59).

### *General Committees: Reports*

#### 17 Fifth Delegated Legislation Committee

Clive Efford (Chair) reported the draft Packaged Retail and Insurance-based Investment Products (Retail Disclosure) (Amendment) Regulations 2024, the draft Consumer Composite Investments (Designated Activities) Regulations 2024, the draft Securitisation (Amendment) (No. 2) Regulations 2024 and the draft Prudential Regulation of Credit Institutions (Meaning of CRR Rules and Recognised Exchange) (Amendment) Regulations 2024.

#### 18 Sixth Delegated Legislation Committee

Carolyn Harris (Chair) reported the draft Barnsley and Sheffield (Boundary Change) Order 2024.

**19 Seventh Delegated Legislation Committee**

Valerie Vaz (Chair) reported the Windsor Framework (Non-Commercial Movement of Pet Animals) Regulations 2024.

*General Committees: Appointments*

*The Speaker appoints the Chair of General Committees and members of Programming Sub-Committees, and allocates Statutory Instruments to Delegated Legislation Committees.*

*The Committee of Selection nominates Members to serve on General Committees (and certain Members to serve on Grand Committees).*

**20 Commonwealth Parliamentary Association and International Committee of the Red Cross (Status) Bill [Lords] Committee**

Members: Kevin Bonavia, Bambos Charalambous, Stephen Doughty, Cat Eccles, Alan Gemmell, Monica Harding, Adam Jogee, Alicia Kearns, Alice Macdonald, Gordon McKee, Calum Miller, Dr Andrew Murrison, Kate Osamor, Priti Patel, Jack Rankin, Sam Rushworth and Anna Turley

**21 First Delegated Legislation Committee (draft European Bank for Reconstruction and Development (Further Payments to Capital Stock) Order 2024)**

Members: Mrs Elsie Blundell, Dawn Butler, Markus Campbell-Savours, Lewis Cocking, Daisy Cooper, Gareth Davies, Marsha De Cordova, Mary Glendon, Clive Jones, Lincoln Jopp, Alicia Kearns, Amanda Martin, Andrew Ranger, Tulip Siddiq, David Taylor, Christian Wakeford and Imogen Walker

**22 Second Delegated Legislation Committee (draft Radio Equipment (Amendment) (Northern Ireland) Regulations 2024)**

Members: Mr Bayo Alaba, Daisy Cooper, Neil Coyle, Ms Stella Creasy, Steve Darling, Cat Eccles, Natalie Fleet, George Freeman, Andrew Griffith, Fabian Hamilton, Dr Neil Hudson, Preet Kaur Gill, Peter Lamb, Anna McMorrin, Justin Madders, Kate Osborne and Mike Wood

**23 Third Delegated Legislation Committee (draft Criminal Finances Act 2017 and Economic Crime and Corporate Transparency Act 2023 (Consequential Amendments) Regulations 2024)**

Members: David Baines, Lorraine Beavers, Catherine Fookes, Peter Fortune, John Grady, Dan Jarvis, Kim Johnson, Preet Kaur Gill, Keir Mather, Brian Mathew, Perran Moon, Joy Morrissey, Ben Obese-Jecty, Chris Philp, Lisa Smart, Michael Wheeler and John Whitby

**24 Fourth Delegated Legislation Committee (draft Local Loans (Increase of Limit) Order 2024)**

Members: Dame Harriett Baldwin, Olivia Blake, Daisy Cooper, Emily Darlington, Gareth Davies, Sarah Gibson, Claire Hazelgrove, Darren Jones, Jerome Mayhew, Mr Connor Rand, Dr Neil Shastri-Hurst, Nick Smith, Alistair Strathern, Jon Trickett, Christian Wakeford, David Williams and Steve Witherden

**25 Seventh Delegated Legislation Committee (draft Windsor Framework (Non-Commercial Movement of Pet Animals) Regulations 2024)**

Members: Steve Barclay and Daniel Zeichner discharged and Emma Hardy and Joy Morrissey nominated in substitution.

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*Select Committees: Reports***26 Backbench Business Committee**

Determination of business to be taken on Thursday 14 November in Westminster Hall (Bob Blackman).

**27 Environmental Audit Committee**

(1) *Correspondence with the Secretary of State for Energy Security and Net Zero relating to the predecessor Committee's Report — Enabling sustainable electrification of the economy*: Written evidence, to be published;

(2) *Correspondence with the Secretary of State for Environment, Food and Rural Affairs relating to the predecessor Committee's Report — Environmental audit in the 2019 Parliament*: Written evidence, to be published;

(3) *Correspondence with the Secretary of State for Transport relating to the predecessor Committee's Report — Net zero and UK shipping*: Written evidence, to be published (Mr Toby Perkins).

**28 Health and Social Care Committee**

*The 10 Year Health Plan*: Written evidence, to be published (HC 386) (Layla Moran).

**29 Procedure Committee**

(1) *Written Parliamentary Questions: Departmental Performance in Session 2022–23: Government Responses*: First Special Report, to be printed (HC 325);

(2) *Correspondence from the Leader of the House*: Written evidence, to be published (Cat Smith).

**30 Statutory Instruments (Joint Committee on)**

Fourth Report, to be printed, with the formal minutes relating to the Report (HC 291-iv) (Sir Bernard Jenkin).

**31 Statutory Instruments (Select Committee on)**

Second Report, to be printed, with the formal minutes relating to the Report (HC 294-ii) (Sir Bernard Jenkin).

**32 Treasury Committee**

*Budget 2024*: Oral evidence, to be published (HC 320) (Dame Meg Hillier).

**33 Women and Equalities Committee**

*Tackling non-consensual intimate image abuse*: Oral evidence, to be published (HC 336) (Sarah Owen).

*Sir Lindsay Hoyle*

Speaker

## Westminster Hall

The sitting began at 9.30 am.

Business appointed by the Chairman of Ways and Means (Standing Order No. 10(6))

**1 UK supply chains and Uyghur and Turkic Muslim forced labour in China**

*Resolved*, That this House has considered UK supply chains and Uyghur and Turkic Muslim forced labour in China.—(*Blair McDougall*.)

**2 Funding for Peak Forest and Macclesfield Canals**

*Resolved*, That this House has considered funding for Peak Forest and Macclesfield Canals.—(*Lisa Smart*.)

*The sitting was suspended between 11.23 am and 2.30 pm (Standing Order No. 10(1)(b)).*

**3 Government policies on tackling fuel poverty**

*Resolved*, That this House has considered Government policies on tackling fuel poverty.—(*Mr Alistair Carmichael*.)

**4 Potential merits of energy rebates for the Highlands and Islands**

*Resolved*, That this House has considered the potential merits of energy rebates for the Highlands and Islands.—(*Graham Leadbitter*.)

*The sitting was suspended between 4.11 pm and 4.30 pm.*

**5 Furniture poverty**

*Resolved*, That this House has considered furniture poverty.—(*Sam Carling*.)

Sitting adjourned without Question put (Standing Order No. 10(14)).

Adjourned at 5.29 pm until Tuesday 12 November.

*Ms Nusrat Ghani*

Chairman of Ways and Means

## Papers Laid

Papers subject to Affirmative Resolution

**1 Banks and Banking**

Draft Silicon Valley Bank UK Limited Compensation Scheme Order 2024 (by Act), with an Explanatory Memorandum (by Command) (*Tulip Siddiq*)



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Papers subject to Negative Resolution

**2 Medicines**

Medicines (Gonadotrophin-Releasing Hormone Analogues) (Emergency Prohibition) (Extension) (No. 2) Order 2024 (SI, 2024, No. 1110), dated 6 November 2024 (by Act), with an Explanatory Memorandum and an Impact Assessment (by Command) (Secretary Wes Streeting)

Other papers

**3 Independent Expert Panel**

Report by the Independent Expert Panel: The Conduct of Lee Anderson MP (by Standing Order), to be printed (HC 372) (Clerk of the House)

**4 Social Security Administration**

Report and Accounts of the National Insurance Fund Investment Account for the year ending 31 March 2024, with the Report of the Comptroller and Auditor General (by Act), to be printed (HC 318) (Tulip Siddiq)

**5 Standards**

Report of the Parliamentary Commissioner for Standards for 2023–24 (by Standing Order), to be printed (HC 252) (Clerk of the House)