



2 September 2024

Dear [REDACTED]

Thank you for your request made under the Official Information Act 1982 (OIA), received on 24 August 2024. You requested the following:

For the tax years 2022, 2023 and 2024 I am seeking the following information regarding income tax on FIFs:

- 1. The sum of 'Total overseas income' declared by individuals. (\$m)*
- 2. The sum of FIF income declared by individuals. (\$m)*
- 3. The sum of individual income tax attributed to FIF income (I.e. at the individuals' marginal tax rates once all other income has been accounted for). If this is not able to be calculated then please provide the median marginal tax rate of individuals paying income tax on FIF income.*
- 4. The count of individuals that have declared overseas income.*
- 5. The count of individuals paying income tax on FIF income.*
- 6. The sum of FIF tax paid by PIEs on behalf of individual members.*
- 7. The count of individual members on behalf of which PIEs have paid FIF taxes.*

Information being released

The table on the following page details information, where held, on the foreign investment funds (FIF) income and overseas income of tax resident individuals (IR3 filers) (questions 1 - 5).

Overseas income data provided in the table is derived from IR3 returns. FIF income data is obtained from the Overseas Income Summary (IR1261), which is only available from the 2022-23 income year. Income tax attributable to FIF income is calculated as the tax on reported FIF income as if it was the last income earned and is net of FIF tax credits.

Please note that tax returns for the 2023-24 income year are not yet due for taxpayers with a tax agent (and extension of time to file), and data for this year is substantially incomplete.

Overseas and FIF income of tax resident individuals	2021-22	2022-23	2023-24^p
Total Overseas income of individuals (\$m)	\$2,280.8m	\$2,197.7m	\$1,012.4m
FIF income of individuals (\$m)	N/A	\$190.9m	\$146.4m
Income tax attributable to FIF income (\$m)	N/A	\$50.4m	\$39.6m
Number of individuals declaring overseas income	117,510	110,390	53,740
Number of individuals declaring FIF income. *	N/A	18,140	10,200

p: part year, data extracted 27 August 2024

*The numbers paying tax on this income could be lower, for example if the taxpayer has losses to offset it against.

Information withheld or refused

Your request for information relating to FIF tax paid by PIEs on behalf of individuals (questions 6 and 7) is refused under section 18(g) of the OIA, as the information is not held by Inland Revenue, and we do not believe it is held by another agency. Data on FIF income of individuals prior to 2022-23 (questions 2, 3 and 5 and displayed as N/A in the table) is also refused under section 18(g) of the OIA.

Right of review

If you disagree with my decision on your OIA request, you can ask an Inland Revenue review officer to review my decision. To ask for an internal review, please email the Commissioner of Inland Revenue at: CommissionersCorrespondence@ird.govt.nz.

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

If you choose to have an internal review, you can still ask the Ombudsman for a review.

Publishing of OIA response

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

Thank you for your request.

Yours sincerely



Sandra Watson
Policy Lead, Forecasting and Analysis