Minutes

TALC Sub-committee 'BEPS Implementation' Meeting

Date 24 June 2019

Location & Time Conference Room 1, Blocks 8-10, Dublin Castle 10.00 am

Introduction

Minutes of meeting of 17 May 2019 were approved by all attendees.

Item 1: Exit Tax Draft Guidance

Practitioners and Revenue discussed outstanding issues in relation to the Exit Tax draft guidance. Clarification was given by Revenue on the issues and stipulated that the guidance will be published shortly.

Item 2: CFC Draft Guidance

A detailed discussion was held in relation to CFC draft guidance. Revenue will circulate a further copy of the draft guidance for final agreement with a view to publication by the beginning of July.

Item 2: CFC Form CT1 reporting requirements

Revenue briefed practitioners on the intended layout to capture CFC filing requirements on Form CT1. Practitioners provided some comments in relation to the layout with regard to the application of transfer pricing legislation, which Revenue will consider.

Attendees of meeting of 24 June 2019:

CCAB – I: Enda Faughnan

Revenue: Gerry Howard, Caitriona Crowley, Michael Buckley, Alan Carey, Maresa

Hempenstall, Audrey Bridgeman

Law Society: Caroline Devlin, Aidan Fahy

ITI: David Fennell, Sharon Burke, Stephen Ruane, Tom Maguire