



Minutes of the Business Tax Stakeholder Forum

12 April 2024

Venue: Whitaker Room, Department of Finance, Government Buildings, Upper Merrion Street, Dublin 2

Attendance

Organisation	Members
<i>CCAB-I</i>	Crona Clohisey
	Gearoid O'Sullivan
	Enda Faughnan
	Sarah Meredith
<i>Law Society of Ireland</i>	Aidan Fahy
<i>Irish Tax Institute</i>	Anne Gunnell
	Peter Reilly
	David Fennell
	Gareth Bryan
<i>AmCham</i>	Gretta Clerkin
	Colm O'Callaghan
<i>IBEC</i>	Gerard Brady
	Ken Byrne
	Yvonne Devereux
<i>Department of Finance</i>	Clare Costello (Chair)
<p>Presenters; Deirdre Donaghy, Gary Hynds, Ciaran Conroy, Ciaran Parkin, Rafal Saniternik, Leona Cantillon, Sonia O'Loughlin (Department of Finance); Eugene Creighton, John Bradley (Revenue Commissioners)</p> <p>Observers; Christine Kelly (IDA Ireland); Donal Leahy (Enterprise Ireland); Sabha Greene, Padraig O'Sullivan (Department of Enterprise Trade and Employment); Sinead Ryan, Ian Kavanagh, Brian Feehily, Robert O'Donnell, Eoin Battigan (Department of Finance); Keith Noonan, Alan Carey, Tony Barrett (Revenue Commissioners)</p>	



1. Introduction

Officials from the Department of Finance introduced the meeting and reminded stakeholders of the forum's workings. Officials gave an overview of the upcoming restructuring of the Department of Finance's Tax Division and emphasized its continued willingness to engage with stakeholders.

2. Update on Domestic Tax Developments

Officials provided updates on domestic tax developments. These included an overview of the introduction of a participation exemption, more specifically the Department's recently published feedback statement / strawman proposal; an update on the review of Ireland's interest deductibility rules; and an overview of the ongoing review of share based remuneration. An abridged update was provided on topics such as the Funds Review, tax simplification, and the changes to the debt warehousing scheme.

Stakeholders noted the various updates and sought clarification on a number of points.

3. Update on EU and International Tax Developments

Officials provided updates on recent developments on the OECD global tax agreement, including on Pillar One, the domestic implementation of Pillar Two and recent developments regarding international tax cooperation at the UN. In addition, an overview of current developments in EU legislative direct tax files, including FASTER, Unshell, and BEFIT, was provided. A high-level summary of Ireland's tax treaty policy and update regarding our tax treaty network was also presented.

Stakeholders noted the various updates as well as the increased workload on businesses due to Pillar Two implementation.

4. Ireland's Competent Authority Function for Dispute Resolution

Revenue officials provided a presentation titled "Ireland's Competent Authority Function for Dispute Resolution." This presentation covered Revenue's role in cross-border dispute resolution and Mutual Agreement Procedures.

Stakeholders provided feedback on the process and noted the statistics provided.