



Minutes of the Business Tax Stakeholder Forum

18 October 2024

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

Attendance

Organisation	Members
CCAB-I	Crona Clohisey
	Gearoid O'Sullivan
	Enda Faughnan
	Sarah Meredith
Law Society of Ireland	Aidan Fahy
	Andrew Quinn
Irish Tax Institute	Anne Gunnell
	Peter Reilly
	Emma Arlow
	David Fennell
	Gareth Bryan
AmCham	Anne Harvey
	Colm O'Callaghan
IBEC	Gerard Brady
	Ken Byrne
	Yvonne Devereux
Department of Finance	Sinead Ryan (Chair)
Presenters; Deirdre Donaghy, Gary Hynds, Hazel Ryan, Ciaran Parkin, Michael Cantwell, Zainab Javaid, Sonia O'Loughlin (Department of Finance);	
Observers; Christine Kelly (IDA Ireland); Donal Leahy (Enterprise Ireland); Stuart Keegan, Padraig O'Sullivan (Department of Enterprise Trade and Employment); Brian Feehily, Jonathan Kenna, Joyce Browne (Department of Finance); Keith Noonan, Alan Carey, Paul Tancred (Revenue Commissioners)	



1. Introduction

The Chair welcomed stakeholders, introduced the meeting, and reminded stakeholders of the forum's workings. In addition, the Chair explained the new structure of the two tax divisions and the intention to maintain the forum and to continue and build on the Department's positive engagement with stakeholders.

2. Update on Domestic Tax Developments

Officials provided updates on domestic tax developments. The first section of this update was an overview of Budget 2025 and Finance Bill 2024 items. Stakeholders noted these items.

The second domestic update related to the Participation Exemption Regime. The work at the BTSF sub-group on this topic was noted, and the participants expressed their thanks. There was an exchange with officials on a number of specific elements of the regime and the likely next steps. Officials from the Department confirmed that, in the near term, there will be a public consultation concerning foreign branches.

The third element of this section concerned the Public Consultation on the Tax Treatment of Interest in Ireland. Officials provided an overview of the consultation and explained that this was an opportunity for stakeholders to provide input and inform the Department.

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. This included Pillar Two implementation and Pillar One state of play. Stakeholders noted this update, and there was a discussion on existing and future Pillar Two administrative guidance and stakeholder engagement.

Regarding tax treaties, it was confirmed that the Government had authorised the signature of a new tax treaty with Liechtenstein. Updates were also provided on treaty priorities as per the tax treaty policy statement. Department of Finance provided a comprehensive update on open tax discussions at EU level, the incoming Commission and related Presidency planning. Stakeholders commented on the organisation changes related to the Directorate-General for Taxation and Customs Union as part of the new Commission.



4. Any Other Business

Department officials provided a short update on ongoing simplification work across the Department and at the EU level. Officials outlined the scale and complexity of the range of issues raised by stakeholders in the context of tax simplification in recent months and outlined the need to gather further feedback in order to define and prioritise this work. The work of the Revenue TALC sub-group on administrative simplification was noted. Stakeholders suggested that a twin-track approach focusing on SMEs and large companies might be effective and committed to providing further feedback in the coming months.