



Minutes of the Business Tax Stakeholder Forum

20 October 2025

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

Attendance

Organisation	Members
<i>CCAB-I</i>	Gearóid O'Sullivan
	Maura Ginty
	Enda Faughnan
	Sarah Meredith
<i>Law Society of Ireland</i>	Aidan Fahy
<i>Irish Tax Institute</i>	Anne Gunnell
	Peter Reilly
	Emma Arlow
	David Fennell
	Gareth Bryan
<i>AmCham</i>	Colm O'Callaghan
	Greta Clerkin
<i>IBEC</i>	Gerard Brady
	Yvonne Devereux
	Ken Byrne
<i>Department of Finance</i>	Sinead Ryan (Chair)
Presenters: Leona Cantillon, Matthew Coakley, Ciaran Conroy, Ellie Cuffe, Deirdre Donaghy, Sorsha Foran, Gary Hynds, Ciara Lonergan, Peadar O'Broin, Robert O'Donnell, Clare Wardell (Department of Finance).	
Observers: Christine Kelly (IDA Ireland); Alexa Toomey (Enterprise Ireland); Stuart Keegan (Department of Enterprise Tourism and Employment); Colin Byrne, Fiona Flynn, Robert Hopkins, Zainab Javaid, Jonathan Kenna, Evan Lombard, Joanne Mulholland, Aisling Murphy (Department of Finance); Alan Carey, Keith Noonan, Shane O'Brien, Paul Tancred (Revenue Commissioners).	



1. Introduction

The Chair welcomed stakeholders, introduced the meeting, and outlined the agenda. The Chair spoke to the uncertain international macro environment as a backdrop and noted that officials would provide updates on relevant areas related to Budget 2026. In addition, the Chair highlighted that there would be a presentation on the upcoming Irish Presidency of the Council of the European Union, which is a new topic not previously covered during a Business Tax Stakeholder Forum meeting. The Chair also reminded attendees of the necessity of recording their attendance at the meeting in the Lobbying Register.

2. Update on Domestic Developments (Department of Finance)

Officials provided an update on domestic developments with a brief overview of the updates to business supports and investor supports in Budget 2026 and Finance Bill 2025. This was followed by more detailed updates on several measures.

The changes to the Participation Exemption Regime were outlined by officials. An update on the R&D tax credit regime was provided which included the status of the R&D review and set out the intent of the R&D Compass which was announced on Budget Day. An update on developments relating to the tax recommendations of the Funds Sector 2030 report was presented to stakeholders, with detail on retail investment recommendations and a planned roadmap for the taxation of retail investment provided. Officials also updated on the action plan for the reform of Ireland's taxation regime for interest, highlighting that a public consultation will commence on 21 November and run until mid-January 2026. In addition, an overview of the 2025 SARP and FED reviews and key recommendations was provided, with officials outlining the related Finance Bill 2025 changes to the schemes.

Stakeholders noted these updates and sought clarification on a number of points. More detail on the content of the R&D Compass was requested, with officials confirming the upcoming publication. Stakeholders queried what potential supports are envisaged to encourage innovation, noting the important role it plays in attracting investment. Stakeholders asked about the intended approach to deemed disposal rules. Stakeholders were updated on the engagement with the European Commission regarding outbound payment defensive measures and how this informed policy decisions with regard to the Investment Limited Partnership dividend withholding tax exemption.



3. Irish Presidency of the Council of the European Union (Department of Finance)

An overview of the upcoming Irish Presidency of the Council of the European Union (July-December 2026) and the role of the Department of Finance was provided to delegates, including the preparations to date and notifying stakeholders of the development of themes and key files likely to feature.

Stakeholders were prompted to share their views on developing key themes and identification of priorities for the Irish Presidency with the Department of Finance. Stakeholders took note of the upcoming consultation process and informed the Department of Finance that they were also involved in broader Presidency consultation processes.

4. EU and International Tax Developments (Department of Finance)

The Department of Finance provided an overview of developments on the OECD global tax agreement in 2025. This included a status update on the implementation of Pillar Two of the agreement, and the ongoing technical negotiations at the OECD to design a Side-by-Side solution. Stakeholders commented on the uncertainty arising from the open negotiations, noting the updates, and welcoming further clarity.

An update on the intergovernmental negotiating committee of a Framework Convention on International Tax Cooperation at the UN was also provided by officials, with the three workstreams and negotiating timeline out to 2027 presented. The Department of Finance gave a brief update on Ireland's tax treaty policy.

Officials set out the developments in the EU tax agenda since the fifth meeting of the BTSF, focused on EU tax simplification, EU direct tax files, and upcoming legislative proposals: a recast of the Directive on Administrative Cooperation and a Tax Omnibus Directive.

Stakeholders noted the various updates.

5. Any Other Business

Under AOB, stakeholders raised the recent Revenue guidance on the tax treatment of the provision of food and drink to employees and directors, which was noted by the Department of Finance.

Stakeholders also sought clarity on the division of work on OECD Pillar Two, seeking to understand which body is responsible for different queries. The Department of Finance clarified the position and noted that there are ongoing discussions at the OECD, with OECD Administrative Guidance due to be updated.

The Chair thanked participants for their continued cooperation and welcomed inputs from stakeholders at future meetings.