

## The Complete Property Tax Blitz

Wednesday, 13 December 2017

### Programme:

Time	Topic	Speaker
09.15 – 09.30	Registration	
09.30 – 10:30	<b>Stamp Duty Considerations</b> <ul style="list-style-type: none"> <li>• Assess how much stamp duty is payable on a property transaction: <ul style="list-style-type: none"> <li>- Distinguish between residential and commercial property</li> <li>- Transactions involving mixed use property</li> <li>- Implications for holding properties in investment vehicles such as funds, QIFs and unit trusts</li> <li>- Site sales combined with building contracts (residential &amp; commercial)</li> <li>- Leases</li> <li>- Anti-avoidance: <ul style="list-style-type: none"> <li>a. Sub-sales</li> <li>b. Resting on contract, building licence, long agreement for lease</li> </ul> </li> </ul> </li> <li>• Returns and payments</li> <li>• Finance Bill 2018 changes</li> </ul>	Darragh Duane, <i>PwC</i>
10:30 – 10:45	Q&A session	
10:45 – 11:00	Tea/Coffee Break	
11:15 – 12:30	<b>Development land issues – the critical tax issues</b> <ul style="list-style-type: none"> <li>• Land dealing &amp; transactions in developed land for individuals and corporates</li> <li>• What is development?</li> <li>• Trading versus investment</li> <li>• Personal versus corporate</li> <li>• Revenue versus capital expenditure</li> <li>• Transfers to trading stock – income tax provisions &amp; capital allowances</li> <li>Investment land – part disposals, development land provisions, available reliefs, latent gains, losses &amp; withholding tax</li> </ul> <b>Debt write off &amp; property disposals</b> <ul style="list-style-type: none"> <li>• Debts set off against profits and subsequently released</li> <li>• Release of debts when dealing in/developing land</li> <li>• Debt releases and capital losses</li> </ul>	Paula Keaney, <i>Doyle Keaney</i>

Time	Topic	Speaker
	<ul style="list-style-type: none"> <li>• CAT and debt forgiveness arrangements</li> <li>• Debt restructuring</li> </ul>	
<b>12:30 – 13:30</b>	<b>Lunch</b>	
<b>13:30 – 14:30</b>	<ul style="list-style-type: none"> <li>• Tax implications of investing in property - Rental income (differentiate between Irish and foreign property) <ul style="list-style-type: none"> <li>- Current property incentives</li> <li>- Legacy property incentives</li> <li>- USC property surcharge</li> <li>- Specified reliefs and HIER</li> </ul> </li> <li>• Capital allowances on disposal of property</li> <li>• Leases – what’s within the income tax charge?</li> <li>• Property and fund structures e.g. REITS, QIAIF/ICAV and section 110</li> <li>• Tax issues for foreign investors</li> <li>• Receiver Issues</li> <li>• Tax implications of investing in property – capital disposals (differentiate between Irish and foreign property) <ul style="list-style-type: none"> <li>- Reliefs</li> <li>- Withholding tax</li> </ul> </li> </ul>	Paula Keaney, <i>Doyle Keaney</i>
<b>14:30 – 14:45</b>	<b>Q&amp;A session</b>	
<b>14:45 – 15:00</b>	<b>Tea/Coffee break</b>	
<b>15:00 - 16:15</b>	<b>Indirect Tax implications</b> <ul style="list-style-type: none"> <li>• VAT on property post 2008 rules</li> <li>• Transfer of Business Relief – let properties</li> <li>• Capital Goods scheme</li> <li>• Letting transactions - transitional properties</li> <li>• Waivers of exemption and options to consider</li> <li>• VAT reverse charge in the context of property</li> <li>• Special Condition 3 considerations</li> <li>• Forced sales</li> <li>• Leased property</li> <li>• Revenue’s Construction Project</li> </ul>	Gabrielle Dillon, <i>Dermot O’Brien and Associates</i>
<b>16:15 – 16:30</b>	<b>Q&amp;A session</b>	



## Speakers:

**Darragh Duane** is a Tax Director in PwC and leads PwC Ireland's Stamp Duty Group. Darragh joined PwC in 1999 and has worked in the firm's dedicated Stamp Duty Practice since 2002. Darragh advises a wide range of multinational and indigenous corporate clients, as well as high net worth individuals, on all areas of Irish stamp duty. Darragh is involved in the design and implementation stages of projects and assists his clients in identifying and solving stamp duty issues, reviewing legal agreements for stamp duty content, liaising with other tax and legal advisers and negotiating with the Revenue Commissioners. Darragh has written articles for the Irish Tax Review, ISF Magazine and a number of Sunday newspapers. Darragh is also involved in the formulation of stamp duty syllabi for the Irish Taxation Institute, has lectured in stamp duty for the Institute, and is a regular speaker at Institute conferences.

**Paula Keaney** is a co-founder of Doyle Keaney Tax Advisors, a tax practise providing practical and innovative solutions for clients. a Chartered Tax Adviser (CTA) and a fellow of the Association of Chartered Certified Accountants (FCCA) with over 18 years of experience in tax, having previously worked in Grant Thornton, Ernst & Young and Mazars. Paula has presented on various tax technical issues for the Irish Tax Institute, Association of Chartered Accountants, Association of Chartered Certified Accountants, The Law Society of Ireland and other professional bodies. She has also contributed articles to the Irish Tax Review. Paula area of expertise is providing tax advice to high net worth individuals and owner managed businesses. She specialises in advising on property transactions, tax efficient succession planning, M&A and debt restructuring.

**Gabrielle Dillon** is a Director with Dermot O'Brien & Associates, a firm specialising in VAT consultancy services, having previously worked in the VAT department of BDO Simpson Xavier. She is a Chartered Tax Adviser (CTA) and has lectured on the Institute's education programme. She is currently the co-author of the Institute's Value-Added Tax book and author of "VAT News" and "VAT Cases" in the *Irish Tax Review*.