



Irish tax authorities update guidance on CbC reporting

Global Transfer Pricing Alert 2016-039

Irish Revenue updated their [guidance](#) on country-by-country (CbC) reporting on 9 December 2016. The update includes a number of technical amendments and clarifications, and a reminder for Irish resident constituent entities of a multinational group within the remit of CbC reporting that notification must be made to Irish Revenue before 31 December 2016 if the accounting year end for CbC reporting purposes is 31 December 2016.

Immediate action required: Notification requirements

When a global multinational group is required to file a CbC report for the year ending on 31 December 2016, the Irish resident constituent entities of the group must provide notification to Irish Revenue ***before the end of December 2016***. Notification is required on the Revenue Online System (ROS) platform, and the guidance notes published by Irish Revenue contain a step-by-step guide that provides detailed instructions.

Amendments to guidance notes

The update contains some minor technical amendments and clarifications to assist companies to understand their CbC reporting obligations in Ireland. The main changes from the last update on 13 October 2016 are as follows:

- Clarification that when there is more than one Irish resident constituent entity in a group, one entity may be nominated to notify on behalf of other Irish resident constituent entities. This nomination option is available only when the secondary reporting mechanism does not take place, i.e. local filing of a CbC report. In effect, the nomination option can be used only when the CbC report for the group is filed by an ultimate parent or appointed surrogate parent.

- Irish Revenue acknowledge that at the time the Irish constituent entity of a group provides notification, the identity of the group company that is the reporting entity may not be known. This can occur for a number of reasons, including when a jurisdiction has not yet formally introduced a CbC reporting requirement, or if the relevant competent authority agreement is not yet in place. As a transitional arrangement, Irish Revenue will allow Irish resident constituent entities to provide notification based on a preliminary assessment of the identity and tax residence of the reporting entity for the group. To the extent this identity subsequently changes, a corrected notification can be made.
- Some minor amendments are included in Appendix III of the guidance notes, which contain the step-by-step guide to providing notification by companies or their agents on the ROS platform, including a new email contact for queries relating to the CbC reporting notification procedure.

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