

Minutes of Main TALC meeting
13 March 2025 at 2.30pm
Council Chamber, Law Society of Ireland, Blackhall Place, Dublin 7 and via Zoom

Item 1 Minutes of Meeting held on 3 December 2024

The minutes were agreed.

Item 2 Review of TALC Subcommittees 2025 Workplans

The Chair noted that the TALC Subcommittees 2025 Workplans have been circulated to the group. It was agreed that a detailed discussion of these was not required at the meeting.

Item 3 Update on Revenue's Customer Charter

Revenue provided a presentation on certain points of their Customer Charter which is now being updated following a comprehensive review.

Revenue noted that they are rolling out new Estimated Response Times (ERTs) for queries received via MyEnquiries in operational areas throughout the year. These ERTs will be calculated based on the response times of similar queries received by Revenue in the past. Revenue also noted that they have already piloted this system in certain areas (such as Stamp Duty) and that it has been very well received (78% of respondents stated that they found the system helpful or very helpful in a recent survey). They are also rolling out a system where you will be given an estimated wait time for telephone enquiries. You will also have the ability to hold your place in the queue and receive a call-back.

Revenue will also be introducing a new Service Delivery Report (SDR). This will be a quarterly report which will help to maintain accountability, as well as educate and inform customers on the services that Revenue delivers. The SDR will be available on the Revenue Website and a draft SDR was provided to the practitioners in attendance at the meeting. The draft SDR included items such as the number of MyEnquiries received, the percentage of cases where the ERT was met or exceeded, and how many customer calls were completed.

Practitioners queried whether an ERT of 5 days meant that the query would be completed within that timeframe, or if it meant that the query would simply be responded to within 5 days. Revenue confirmed that the ERT related to the response time to a query. Revenue noted that putting a timeline on the completion of a query would be more difficult as Revenue may not be given all the relevant information at the time of the enquiry.

Practitioners queried if in the circumstances terminology referring to "completion" could be revisited and noted that it would also be useful to also have a metric for expected completion times. Revenue acknowledged this point but reiterated that when an enquiry is completed is a subjective matter which is also open to interpretation.

Revenue noted that they will endeavour to take the Practitioners points on board but that the ERT is designed to give an estimated response time only.

Practitioners noted lengthy waiting times on the phonelines when contacting some Revenue Divisions during peak periods, with waiting times in excess of 30 minutes. In addition, expected response times to MyEnquiries can be up to 6 months at certain points. They queried whether Revenue could dedicate more resources to shorten these delays.

Revenue acknowledged these delay issues, but also noted that they are facing both resourcing and recruitment challenges. Revenue also added that the new ERT system should help with managing expectations – if a response to a specific query will be 30 days (or more) for example, the taxpayer will be made aware of this at the outset. In addition, the ERTs will provide more visibility to Revenue on queries that take a significant time to be addressed. This will assist with the allocation of resources to reduce backlogs and help to identify opportunities to streamline query handling, complementing current management tools for monitoring MyEnquiries response time. The Exceptional Contacts facility will remain open to practitioners to escalate enquiries that are exceptional in nature and when normal contact channels are not working. Revenue will monitor the exceptional contacts process as the ERT is rolled out to identify if changes should be made to this process.

Practitioners also drew attention to the fact that they received feedback there was an average response time of between 77 and 100 days on RTS queries. Revenue noted that the material included in RTS submissions can often be over 200 pages and will therefore take longer to respond to. They also explained that points may also be referred to the Revenue Legislation Service (RLS) which causes further delays in the response time.

Practitioners noted that annual VAT filers who were previously on a fixed direct debit are now being moved to a variable direct debit this month with a requirement to now file bi-monthly. It was noted that there was no lead in time or consultative process for this change. Revenue responded by saying that this is part of a multi-phased project to modernise banking and payments services and a general communication will issue shortly to those affected, including their agents. This will be followed by more tailored mailshots to customers as they roll off their annual filing pattern, giving three months' notice of the actions needed to move to a bi-monthly filing pattern and set up a Variable Direct Debit. No change will take place until July 2025 at the earliest. As an example, the first targeted mailshot will issue in May to a small cohort of customers (and their agents) with an annual VAT filing period ending in June 2025. These customers will file their annual return as normal in July and then change to a bi-monthly pattern, with the first bi-monthly return to be filed in September. Practitioners expressed concern as to the impact such changes may have on resources of tax agents that are responsible for the preparation and/or submission of the VAT returns for their clients.

Item 4 Changes to the option to file draft financial statements for iXBRL purposes

Revenue's current administrative practice regarding iXBRL filing deadlines allows for the filing of Financial Statements (FS) in iXBRL format, before the filing of the Form CT1, at the same time as filing the CT1 or within 3 months after the due date for filing the CT1. Detailed guidance is set out in Revenue's Tax and Duty Manual Part 41A-03-01.

Should a company choose to file its iXBRL Financial Statements within 3 months after the due date for filing of the Form CT1, it is important to note that the Form CT1 is deemed to be incomplete where the iXBRL FS have not been filed during this 3 month period.

Revenue noted that it was always their intention that draft accounts should only be filed in exceptional circumstances in accordance with the TDM guidelines. Furthermore, this administrative practice to file draft FS was in place prior to the additional 3 month filing administrative practice. The TDM states that Revenue is prepared to accept that if the filer is satisfied that the only issue outstanding is the signatures by the Director(s), then it is in order to file draft FS without prior permission. In such circumstances, there is no need to resubmit the iXBRL FS, provided no other changes to final FS. However, where there are any other issues giving rise to the draft FS, filers are required to contact Revenue and request permission to submit draft FS.

Revenue has come across instances of where permission was not sought to file draft FS in accordance with the TDM guidelines and due to the material changes in final FS (with subsequent changes not notified to Revenue) such changes gave rise to restriction of losses and/or imposition of late filing surcharges. Revenue are concerned with data quality issues and inappropriate use of filing draft FS.

Practitioners accepted that the intention was that draft accounts should only be filed in exceptional circumstances, however, they highlighted the difficulties that could arise where there was a change in approach by Revenue in the middle of the year. They noted that auditors are independent of the taxpayer and are not within their control and many audits have already been scheduled for this year before this change in approach had been communicated. A longer lead in time and/or transition period would greatly assist.

Revenue listened to these points and said that they will consider their position. That said, they did reiterate that this approach was always intended to be reserved for exceptional circumstances and that it was becoming too commonplace. It was agreed that this issue should be discussed further between Revenue's Large Corporates Division (LCD) and the relevant representative bodies.

Item 5 Update on Enhanced Reporting Requirements (ERR)

Revenue noted that although they did not have any updated statistics relating to ERR, there would be a feature contained in the Annual Report which will be published in the coming weeks. It was also noted that ERR issues are surfaced in TALC Audit meetings.

Revenue confirmed that there are currently no specific compliance programmes being run in relation to ERR, however, they are collecting valuable risk-related data which will enable Revenue to make more targeted interventions and assessments and avoid unnecessary reviews of compliant taxpayers in the future.

Practitioners queried whether there is any benefit to the way in which data is currently being collected (real time reporting), and whether it could be changed to monthly or bi-weekly reports (or whenever a company's payroll is operated). Revenue responded that this is how the law operates and that it was not appropriate for them to comment on the underlying policy position. They added that TALC's function is to discuss the administration of the tax code as it exists.

Practitioners sought confirmation that Revenue will not apply the €4,000 penalties to innocent errors made in relation to the ERR, as opposed to cases where there was a deliberate non-filing made in relation to the ERR. Revenue noted that they don't have a specific policy on this point, but that they will take a reasonable approach in practice.

Item 6 Issues arising in relation to withholding tax refunds for IREFS

Practitioners noted that there are severe delays in obtaining IREF refunds. Practitioners noted that refunds are sometimes taking more than 2 years to process. It was accepted by all that this is a complex area. However, it was requested that efforts be made to decrease this processing time.

Revenue noted that this point may need to be raised again with Direct TALC. They also added that the Revenue Financial Services Division is in the process of putting together a response on this which will be shared with the Practitioners in due course.

Item 7 Simplification – Form CT1

Practitioners noted that one of the key functions of TALC is the simplification of the administration of tax – in light of this they queried whether the CT1 (which now stands at 62 pages in length) could be shortened or streamlined. It was also added that there was no Revenue guidance for certain panels of the return.

Revenue acknowledged these points and stated that they would welcome a comprehensive review and streamlining of the CT1. They also acknowledged that there were multiple CT1 releases last year due to having to accommodate two complex mandatory requirements and this was unsatisfactory. They confirmed that this year there would only be one release in April (perhaps with some minor enhancements in June).

Revenue invited suggestions for a larger review and streamlining of the CT1 for 2026 and the practitioner bodies were invited to submit suggestions for consideration at the June meeting of TALC Collections.

Item 8 Recent DAC 7 and MRDP reporting changes

The Chair noted that the public was only given notice in November 2024 of the introduction of the Model Reporting Rules for Digital Platform Operators (MRDP) (in respect of, the UK, New Zealand and Canada), and guidance issued in December 2024 despite having a filing deadline of 31 January 2025. Practitioners requested for any future partner jurisdictions that greater notice should be provided for any additional reporting requirements.

Revenue acknowledged this request and referred to a note from their International Taxes Division which will be circulated to the Practitioners in due course.

Revenue also noted that although it will not be possible to announce any potential new partner jurisdictions in advance of a formal agreement, they will endeavour to ensure that at least 3 months' notice will be given to the public going forward.

It is hoped that any new reporting obligations will be announced by 30 September in advance of the following January, or as soon as they are entered into (that said there may at times be unforeseen circumstances which could delay this timeline). Revenue added that if practitioners have any queries on the note from the International Taxes Division (when received) these can be directed to the Main TALC Revenue point of contact. This issue could also be raised at TALC Direct in the future if needed.

Item 9 AOB

The Chair noted that Practitioners have encountered difficulties in obtaining stamp duty reference numbers (TRNs) for non Irish residents recently.

There has been a change in practice whereby Revenue is no longer accepting certain requests sent to agreed stamp duty email addresses under previously agreed procedures – it has been indicated that all applications must now be made through MyEnquiries. This applies to both the activation of PPS numbers obtained from the DSP and the obtaining of TRNs by foreign bodies corporate. This can cause delays, which are problematic given the short deadlines for payment of stamp duty.

Revenue officials agreed to look into this further, but stated that, in general, generic email addresses have been closed and that communication is directed through MyEnquiries. This ensures that requests can be properly tracked and processed.

Revenue requested a note from the Practitioners outlining any issues faced by them following this change of practice, which they will take away and discuss internally.

Revenue also noted that they will take a common-sense approach to any foreign language documents submitted in connection with TRN applications – Certified English translations may not be required in all cases.

Revenue closed the meeting by requesting that any briefings that are put out by bodies which refer to matters discussed at TALC meetings be accurate in all respects. They suggested that the relevant bodies should contact Revenue in advance to confirm the statements with them prior to their publication.

ITI	Revenue	CCAB-I	Law Society
Anne Gunnell Mary Healy Pat Mahon Tom Maguire	Joe Howley Tom O'Connell Gillian Ryan Tom James Mairead McGuinness Brian Boyle Therese Bourke	Enda Faughnan Brian Purcell Gráinne McDermott Gearóid O'Sullivan Peter Vale Noreen Lehane	James Somerville (Chair) Aidan Fahy Caroline Devlin Sonya Manzor