Minutes of Meeting

Meeting	TALC BEPS Pillar Two Administration Subgroup
Date	9 June 2026
Location	Remotely via Teams
Attendees	
Revenue	Therese Bourke, Brendan O'Hara (Chairperson), John Quigley, Maura Conneely, Ashling Gallagher (Secretary), Peter Duffy, Donal Rochford
ITI	Clare McGuinness, Cormac Golden, Rory McIver, Laura Armstrong, Paul McKenna, Frances Lenihan
CAI	Gearóid O'Sullivan, Enda Faughnan, Ronan Costello
Law Society	Trevor Glavey, Olivia Long, Conall McMahon Brennan, Elaine Mooney

Minutes

The Chairperson welcomed attendees.

1. Minutes of meeting of 28 April 2026

The minutes of the 28 April 2026 were agreed and will be published to the Revenue website.

Post meeting clarification – The minutes are now live on the Revenue website - https://www.revenue.ie/en/tax-professionals/talc/beps-implementation-sub-committee/pillar-two-admin-subgroup/index.aspx

2. Update from Revenue's Pillar Two implementation team

The Pillar Two implementation team provided the following updates –

a. **Domestic returns**: Revenue is receiving IIR, QDTT and UTPR returns along with payments in advance of the 30 June deadline.

b. **Groups**: The number of groups being finalised on the system is increasing, contact from Revenue to entities in this space is continuing.

c. **Notification of filer/TIR**:
   - Revenue have started to receive the notifications of filer from customers. It was noted that some entities had selected a jurisdiction on ROS to file their TIR when they registered however the notification of filer submitted lists a different jurisdiction. This is creating a mismatch; these entities need to update the jurisdiction in manage roles and groups on ROS.
   - Revenue noted that those working in the PIT environment are successfully filing the TIR in the PIT environment but have not gone on to file their TIR with Revenue. Revenue invites those to file their TIR as this will reduce the level of traffic on the system closer to the filing deadline.
   - Revenue noted that if there is a validation fail on file the TIR will be rejected and will not be considered filed with Revenue.
   - The TIR TDM outlines the errors on the TIR file that will stop a file from being accepted along with the other record errors that will still allow a file to be accepted (i.e. Accepted with errors). Best efforts should be made to correct other record errors where they arise.
   - The OECD published guidance in recent days on known TIR file issues. Revenue confirmed that a solution in the current XML Schema cannot be provided for these issues with workarounds recommended in the recent OECD publication, noting that all jurisdictions are in the same position. Revenue further confirmed that the system has been updated to switch off the 5 validation rules recommended by the OECD. Practitioners noted that the UK had switched off further validations, Revenue outlined that they are proceeding in line with what the OECD have published for validations switch off and cannot comment on other jurisdictions.

- Practitioners asked whether they could view the errors in their file. Revenue confirmed that an error report can be downloaded that lists the errors. The ROS inbox message will outline if the file has been Accepted, accepted with errors or rejected.

3. Matters arising from meeting of 28 April 2026

a. *__Item 1__* - MOCEs

Revenue requested feedback from practitioners if any issues are arising with MOCEs in the Pillar Two space and how they have registered.

Revenue – No issues have been raised, this item will be removed from the agenda.

b. *__Item 2__* – Letters of no objection

The matter of issuing letters of no objection for entities in liquidation was discussed by the group on 17 February and 20 March. Revenue confirmed on 20 March that they are testing the system functionality as to whether it will accept a return or notification on behalf of the entity in liquidation when tax registrations are ceased. Revenue also noted that testing will include group filing for QDTT and UTPR. It was noted by Revenue that if there is any tax at risk then no LONO could issue. Revenue will provide an update on this matter.

Revenue – A system issue remains live on this point, the item will stay on the agenda until resolved.

c. *__Item 3__* – M&A activity – QDTT filings when CEs remaining

A query was raised in relation to the calculation of QDTT where a company is dissolved as a result of a merger. Revenue confirmed that the QDTT return of Irish Co 1 should take into account its results up to the date of merger. If Irish Co 1 is dissolved as a result of the merger the remaining CEs in the pre-existing group should disclose the liability of Irish Co 1 as part of the QDTT group. The QDTT return of Irish Co 2 should take into account its results pre-merger and the results of the combined entity post-merger. Revenue was to check if the system allows a 6-month period.

Revenue – Revenue confirmed the system will accept a 6-month period but contact will need to be made through MyEnquiries with a Pillar Two caseworker who will adjust the system in the background.

d. *__Item 4__* – M&A activity – QDTT filings when no CEs remaining

Revenue requested that the live details of the below case are provided so it can be tested on the system -
"Filing requirements for CEs that move groups mid-year: This question is best explained by way of an example.

Example:
a. Irish Co is a CE of Group 1. Group 1 has a fiscal year of 1 January 2024 – 31 December 2024.
b. Irish Co is transferred to Group 2 on 1 July 2024. Group 2 has a fiscal year of 1 April 2024 – 31 March 2025.
c. Irish Co is the only Irish CE in Group 1 and Group 2 (meaning being added to a QDTT group is not possible).

How should Irish Co manage its QDTT filing obligations, as the fiscal year for Group 1 and Group 2 is not aligned? Should Irish Co 1 file a QDTT return for the period 1 January 2024 – 30 June 2024 (the period it is part of Group 1) and a separate QDTT return for the period 1 July 2024 – 31 March 2025? Or should Irish Co file a 15-month QDTT return for the period 1 January 2024 – 31 March 2025?"

Revenue – No details have been received on this example, Revenue need the details of the live case to work through. As no details have been received this item will be removed from the agenda.

e. *<u>Item 5</u>* – Domestic mergers and filing requirements

Revenue to provide update on TDM wording in relation to domestic mergers and the filing requirements.

Revenue – The domestic mergers TDM wont issue until the system is worked through and the IT build is complete.

f. *<u>Item 6</u>* – GIR reporting

The following matter was raised and Revenue outlined that they would seek international clarification –

"We request urgent clarification from Revenue that Sections 2 & 3 and Columns 1.4.2 - 1.4.9 for the GIR do not need to be completed in respect of out-of-scope entities or jurisdictions for a fiscal year. We have outlined below supporting analysis and precedent in other jurisdictions below.

The GIR is structured to provide general information regarding the MNE Group as a whole at Section 1, and multiple jurisdictional sections based on a single template that need to be completed for jurisdictions where the MNE Group operates.

The general section identifies the Filing Constituent Entity and outlines its corporate structure. It also includes a summary table that provides a high-level overview of the application of the GloBE rules in respect of every jurisdiction where the MNE Group is operating.

The return is structured to provide graduated levels of reporting in terms of the application of the rules in each jurisdiction, as follows.

- *A high level of reporting (at Section 3) applies to jurisdictions which are fully in scope of the rules, and which do not qualify for safe harbours or exclusions. Section 3 requires substantial information reporting including full GloBE calculations and details of QDMTT.*

- *A reduced level of reporting (at Section 2) applies to jurisdictions where jurisdictional safe harbours or exclusions apply.*

- *The level of reporting is reduced even further where no jurisdiction has taxing rights for a fiscal year. In this regard, whilst general information still needs to be included in respect of entities in all jurisdictions, Note 1.1 of Page 51 of the January 2025 GIR guidance provides that Columns 1.4.2 - 1.4.9 of the high-level summary of Globe Information do not need to be completed in cases where no jurisdiction has taxing rights (i.e., Column 1.4.4 would be empty) with respect to the jurisdiction identified in 1.4.1.*

Looking at the GIR guidance as a whole, there seems to be a clear intention that out-of-scope entities do not need to report GloBE information and calculations in the GIR.

However, the introductory commentary in paragraph 4 on page 5 of the OECD 2025 GIR guidance indicates that sections need to be completed for every jurisdiction where the MNE Group is operating (see paragraph 4 on page 5 of the OECD 2025 GIR guidance). It would seem unequal to relieve out-of-scope entities from the summary information in the table at Section 1.4.1 whilst at the same time requiring them to report substantial reporting at Section 3. It also results in a disproportionate administrative cost and effort for no clear reason as there is no tax to be collected in these cases.

This issue is causing concern and difficulty in the context of the GIR for the year ended December 2024 for groups with large cohorts of out-of-scope entities and is particularly relevant for US or Chinese owned groups which have substantial operations in the parent jurisdiction and have downstream Irish Constituent Entities (CEs) in scope of the GloBE rules.

We understand that certain jurisdictions, such as, Canada, the Netherlands and the UK, have confirmed that full information is not required for out-of-scope entities. In the case of the Netherlands, we understand that the Dutch authorities have indicated that the GIR for out-of-scope jurisdictions should include information required on the basis of article 44(5) (a)-(b) of the EU Minimum Tax Directive (details of entities, tax ID numbers, the jurisdiction which they are located and their status under the rules as well as information on the overall corporate structure of the MNE group including controlling entities held by other constituent entities) but that no information is required under Article 44(5)(c) .

As such, we understand that the jurisdictional sections of the GIR (i.e. Sections 2 and 3, or the summary of same at Section 1.4) do not need to be completed in respect of out-of-scope entities or jurisdictions where no jurisdiction has taxing rights in respect of entities in that jurisdiction under QDMTT, IIR or UTPR for a fiscal year.

In our view, the above disclosure approach is consistent with the GloBE rules and is proportionate in the context of the collection of top-up tax for a fiscal year. It is also consistent with the approach to the dissemination of GloBE information included on page 8 of the OECD January 2025 Globe Information Return publication whereby information is shared with a jurisdiction according to a jurisdiction's taxing rights and requirements. If a jurisdiction has not introduced GloBE collection rules, for a fiscal year, it should be reasonable to assume that they do not need all the ETR computational data for that year.

The abovementioned guidance indicates that the Inclusive Framework adopted the following dissemination approach for the purposes of the GIR which applies a targeted approach for each MNE Group, whereby:

- *the jurisdiction of the UPE is provided with the GIR as a whole;*
- *jurisdictions with taxing rights under the GloBE rules are provided with the sections of the GIR that relate to the ETR and Top-up Tax computation, allocation and attribution for those jurisdictions in respect of which they have taxing rights (including jurisdictions that have introduced a QDMTT); and*
- *all implementing jurisdictions where CEs of the MNE Group are located are provided with general information and the corporate structure, which covers all the data points necessary to verify whether they have any taxing rights over any other jurisdiction under the GloBE rules.*

We ask Revenue to please confirm that Sections 2 & 3 and Columns 1.4.2 - 1.4.9 for the GIR do not need to be completed in respect of out-of-scope entities or jurisdictions for a fiscal year.

In this context, an out-of-scope entity for a fiscal year refers to an entity in a jurisdiction, where no jurisdiction has taxing rights in respect of the entities in that jurisdiction under QDMTT, IIR or UTPR for a fiscal year. An out-of-scope jurisdiction is a jurisdiction where no jurisdiction has taxing rights in respect of the entities in that jurisdiction under QDMTT, IIR or UTPR for a fiscal year.

It is worth noting that under the dissemination approach, if a GIR is filed elsewhere, Revenue will not receive any information in respect of jurisdictions where no taxing rights apply. Similarly, Revenue will not be required to exchange information in relation to these jurisdictions if a GIR is filed in Ireland."

Revenue – This item was taken with item 7 below.

g. *Item 7* – Transitional CbC safe harbour for out-of-scope jurisdictions
The following matter was raised and Revenue outlined that they would seek international clarification –

"We request clarification regarding claims for transitional CbC safe harbour (TSH) where an MNE group wishes to rely on the TSH and has out-of-scope entities or jurisdictions for a fiscal year. Clarity is sought regarding the approach to such entities as the TSH is only available in future years where it is correctly applied in earlier years. As such, a mistake in respect of 2024 could preclude people relying on it in 2025 and future years.

*We understand that the Dutch tax authority has confirmed that computations for the TSH will only be required in the fiscal year (and later years) in which the CEs located in the jurisdiction become subject to the GloBE rules and that it is **not** necessary for a MNE group to tick the box to opt for the TSH in the GIR for Fiscal Year 2024 for an out-of-scope jurisdiction to enable it to opt in for the TSH for Fiscal Year 2025.*

We ask Revenue to please clarify that TSH elections are not required for out-of-scope jurisdictions or entities (as outlined above) for a fiscal year, and that is not necessary for a MNE group to tick the box to opt for the TSH in the GIR for Fiscal Year 2024 for an out-of-scope jurisdiction to enable it to opt in for the TSH for Fiscal Year 2025.

The above approach is consistent with the following OECD commentary:

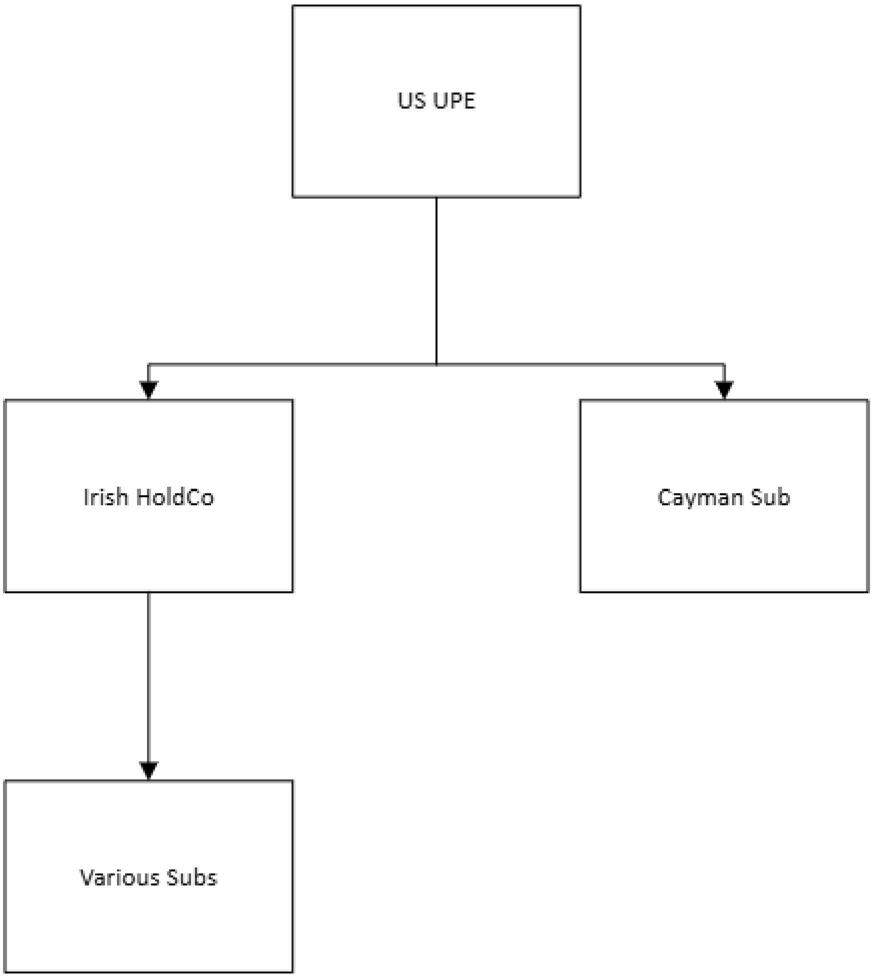
- *Page 54 of the OECD GIR January 2025 guidance provides: "The Filing Constituent Entity shall complete Section 2 on a jurisdictional basis, for each jurisdiction where exceptions to the GloBE computation apply." The exceptions to the GloBE computation do not apply to out-of-scope jurisdictions because they are not in scope of the Pillar Two rules for the fiscal year. Therefore, no Section 2 reporting should be required for that jurisdiction for that fiscal year.*

- *The commentary in paragraph 35 on page 13 of the OECD December 2022 Safe Harbours and Penalty Relief publication, as set out below, which is also included in paragraph 27 on page 331 of the OECD 2025 consolidated commentary, states:*

  *"35. If an MNE Group has not applied the Transitional CbCR Safe Harbour with respect to a jurisdiction in a **Fiscal Year in which it is subject to the GloBE Rules**, the MNE Group cannot qualify for that safe harbour for that jurisdiction in a subsequent year ("once out, always out" approach)."*

  Example

If we take a simple example of the below organisation chart whereby a US UPE, owns 100% of a Cayman Sub and also owns 100% of Irish Hold Co which owns a number of subsidiaries.



In this example, the US UPE will not apply the IIR given the US has not implemented the rules. Instead, the Irish HoldCo will apply the IIR to its subsidiaries. However, no IIR is currently applied to Cayman Sub, as the Cayman Islands does not apply the QDTT and UTPR until fiscal periods beginning on or after 1 January 2025. As such, the Cayman Sub is not subject to the GloBE rules.

However, in respect of Fiscal Year 2025, the UTPR will apply to Cayman Sub. An analysis at that point must be taken to understand if the Cayman Sub meets the conditions of the transitional safe harbour.

As outlined above, we would ask Revenue to clarify that a TSH election is not required in respect of Cayman Sub in respect of Fiscal Year 2024 and in the absence of such an election, Cayman Sub can continue avail of the TSH in respect of the Fiscal Year 2025."

Revenue – Revenue took items 6 and 7 together. Revenue outlined that full replies from other jurisdictions which have been contacted have not yet been received. Revenue acknowledged the importance of these matters for in scope entities and outlined that an update will be provided to the group as a post meeting clarification by email once available.

Practitioners - The importance of a timely response to these matters was emphasised and a request was made for a timeline on a response from Revenue

Revenue – Revenue is aiming to have a reply to these queries issued by the end of the week but cannot guarantee this timeline.

Action point – Revenue to revert to the group on these matters asap.

Post meeting clarification – Revenue provided confirmation to the group by email on 12/06/26 that –

1. There is no requirement to complete sections 2 and 3 of the GIR in relation to entities or jurisdictions in respect of which no jurisdiction has taxing rights under the GloBE Rules or a QDMTT.
2. There is no requirement to apply the transitional CbCR safe harbour for fiscal years for jurisdictions in respect of which no jurisdiction has taxing rights under the GloBE Rules or a QDMTT, in order to be able to avail of the safe harbour in subsequent fiscal years.

4. Queries arising

a. ***Item 8*** **– Common approach published by the OECD on 18 May 2026**[1]

i. Where an exchange of information agreement is not yet activated between Ireland and another jurisdiction and the GIR is filed in the other jurisdiction by 30 June 2026, can Revenue confirm that the GIR will be considered to have been filed on time from an Irish perspective?

Revenue – Filing in a jurisdiction that doesn't have an agreement in place won't satisfy the filing obligations. If filing in an implementing jurisdiction that hasn't yet signed/activated the exchange agreement, but the jurisdiction is listed in the Annex of the OECD common approach then it will be accepted provided the entity has satisfied the notification of filer obligations.

ii. Can Revenue confirm that all elections made in the GIR filed elsewhere will therefore also be considered valid for Irish purposes?

Revenue – Yes.

iii. Can Revenue provide any information on the expected approach where an information exchange relationship has still not been activated by the end of 2026. (For example, will Revenue engage with taxpayers in advance of the year-end and request that a local filing be made?)

Revenue – Revenue is currently anticipating that all jurisdictions listed in the Annex will have activated exchange agreements by the end of the year. There is no guidance yet on the approach if this does not transpire.

Practitioners – What happens where other jurisdictions have relaxed the TIR filing deadline?

Revenue – Revenue will take this away and consider.

Action point – Revenue will look at the implications of filing in a jurisdiction that has extended the TIR filing deadline.

iv. We would welcome confirmation from Revenue that, in line with the OECD "common understanding", no penalties will be applied and that this is possible under legislation due to the transitional penalty relief measures in Section 111AAAB TCA 1997.

Revenue – Penalties will not be applied as per the legislation where "reasonable care" is taken.

---

[1] https://www.oecd.org/en/about/news/announcements/2026/05/global-minimum-tax-release-of-a-common-understanding-of-implementing-jurisdictions-and-further-administrative-guidance-to-support-compliance.html

5. Next meeting
The next meeting of the group will be organised for the week of 13 July June online, an email will issue shortly.

6. AOB

a. CbCR/TCSH interaction

Practitioners – Practitioners asked if errors on a CbCR would deem it invalid for safe harbour purposes.

Revenue – Revenue requested that this query be sent in via email so Revenue could look at the detail.

Action point – Practitioners to provide full details of this query.

b. QDTT groups

Practitioners – Practitioners noted that the letters issued from Revenue on the group formations was helpful however some confusion has arisen with respect to different dates appearing on these communications. Practitioners asked if there is a hard deadline on finalising the groups.

Revenue – Revenue outlined that for the system to generate the group return the group has to be in place therefore the sooner this is done the better. Revenue confirmed there is no formal deadline however if a group return is to generate in time for 30 June then the earlier the group is formed the better.

c. Letters of no objection

Practitioners – Practitioners noted that letters from Revenue have been issued stating that no letters of no objection will be issued until the Pillar Two compliance obligations are fulfilled.

Revenue – Revenue outlined that the Pillar Two team is working closely with the CGs in this space and as noted under item 2 a system issue in relation to this matter is being worked through.

d. Validation errors

Practitioners - Practitioners asked how they can communicate issues on validation errors to Revenue.

Revenue – The TIR TDM outlines how to correctly channel queries on the TIR to Revenue. Revenue noted that if an exceptional contact is required this can be facilitated.

e. GIR/out of scope entities

Practitioners – Practitioners reiterated the importance of a timely reply on this matter as discussed under item 7 and asked if an update could be provided by the end of the week.

Revenue – Revenue agreed to aim to provide an update by the end of the week.