

**Minutes**  
**Indirect TALC Meeting**  
**10:30am, Wednesday 19 November 2025**  
**Conference Room – Bishop’s Square, Dublin 2**

**Item 1 – Minutes of Previous Meeting**

The draft minutes of the September (quarterly) and October (special Finance Bill briefing) meetings were agreed.

**Item 2 – Matters Arising**

**2.1 Action Points from last Meeting**

- RCT & VAT on property related transactions

Revenue expects to update the TDMs shortly to incorporate the specific guidance notes published following Indirect TALC queries. Work on the Finance Bill has had to take priority in recent weeks. This item has now been removed from the agenda.

- PSWT

Revenue advised that the RCT rules apply first to the transaction and that the VAT follows that treatment. The PWST rules apply under different legislation and there is no cross-over. Therefore, the queries raised by the Law Society are best addressed to Direct and Capital TALC; if there are any VAT issues, these can return to Indirect TALC when the direct taxes aspects are clear. The Law Society agreed to bring the matter up at Direct and Capital TALC.

- Registrations

CCAB-I updated the group that they had been in touch with Revenue Registrations Branch directly and were happy with the responses received.

**2.2 TALC Sub-groups**

The sub-group on VAT groups met on 18 November. It was confirmed that a decision on the territorial scope of VAT grouping has been made by Revenue and will be announced via new TDMs that will issue after this meeting today. Revenue thanked the sub-group members for their contribution to its work which informed the decision regarding territorial scope. It was agreed that the sub-group will remain active for a further period to provide a forum where practitioners and Revenue can discuss any additional matters that arise in this regard. Also, Revenue have established

an internal working group in order to ensure consistency in treatment across all VAT groups in the case base.

Meetings of the VAT Modernisation subgroup were held on 26 September and 24 October – see item 4 below. Next meeting expected in the new year.

Revenue advised that it is continuing to analyse the legislation and expects to meet again with the Indirect TALC subgroup on Partnerships/Co-ownerships in the new year.

### **2.3 Second Sale Post Completion/Two Year Rule**

Revenue advised that written responses to the scenarios submitted by Indirect TALC members will issue before the next meeting. Work on the Finance Bill has had to take priority in recent weeks.

## **Item 3 – Finance Bill Matters**

### **3.1 Technical briefing on Committee Stage changes**

- Revenue briefed the group on two Indirect Taxes changes arising from the Committee Stage consideration of the Finance Bill:

Excise – Ireland is currently seeking a derogation from the EU’s Emissions Trading System extension (ETS2), and in support of this the Finance Bill (as initiated) provided for restriction of certain reliefs under two carbon taxes – Natural Gas Carbon Tax and Solid Fuels Carbon Tax. A similar provision relating to the carbon component of Mineral Oil Tax was brought forward by the Minister at Committee Stage and added to the Bill following agreement by the Committee.

VAT – The Budget Night Financial Resolution (BNFR) to apply the second reduced rate of 9% to the supply of apartments as part of a social policy came into legal effect from 8 October 2025. This provision, running until 31 December 2030, was included in the Finance Bill as initiated. The Minister brought an amendment at Committee Stage that would extend application of the 9% rate to construction services associated with the construction of apartments. The amendment was agreed by the Committee for inclusion in the Bill (the amendment did not yet come into law).

However, during the Select Committee debate, the Minister had stated that he was continuing to review the matter and that there may be further refinements (at Report Stage). Revenue confirmed that the Committee Stage provision is not in law yet, but is due to be effective from the conclusion of the Report Stage. This means that there will be different legislation for two periods: one from 8 October to Report Stage, and a second period from Report Stage to 31 December 2030.

### **3.2 Apartments 9% Rate**

Revenue undertook that guidance would be published as soon as possible after the Finance Bill provisions come into law. The guidance would cover both the application of the 9% rate to apartments that was already legislated under the BNFR, and also the measures eventually enacted in

the Finance Bill. The guidance would make clear the timeframes to which the different legislative provisions apply.

Revenue invited comments and views from the representative bodies about the legislation and the development of guidance, whether at the meeting or afterwards by way of written comment. There was a detailed discussion, with the main aspects being:

- The differences in what supplies are covered by the BNFR and the Committee Stage amendments.
- The impact the changes will have in terms of site and build contracts, which some commented were the norm in the industry.
- The application of the legislation to residential vs non-residential aspects of apartment blocks and construction services, for example car parking, gyms, business hubs, swimming pool, common areas (internal and external), roads and utilities etc.
- The definition of 'construction' in the VAT Directive and the use of the word 'development' in the Irish legislation.

The Law Society undertook to submit a selection of examples, to aid Revenue in the drafting of guidance, and to ensure that all the key scenarios they see in practice were identified and could be addressed. They also undertook to submit some further information on points raised regarding construction services.

Revenue welcomed the insights from the discussion and the offers of written examples and further information.

#### **Item 4 – VAT Modernisation Update**

Revenue provided an update covering a range of points:

- As noted at the Indirect TALC special meeting following publication of the Finance Bill, the Minister for Finance's Budget speech announced the phased roll-out of domestic electronic invoicing arrangements for business-to-business transactions, in the context of the ViDA change to EU VAT law. Details of the plans are set out in the paper "VAT Modernisation: Implementation of eInvoicing in Ireland" published by Revenue on 8 October following the Budget announcement. The first phase of the roll-out will come into effect in November 2028.
- The VAT Modernisation subgroup met twice since the last quarterly meeting of Indirect TALC, on 26 September and 24 October 2025. The September meeting focussed on the implementation of ViDA, including updates regarding the development of EU guidance and recent Fiscalis meetings in that regard. The October meeting discussed the Budget announcement and the schedule for the roll-out of domestic eInvoicing.

- Revenue are engaging with stakeholders who have reached out with queries or submissions, particularly following the Budget announcement.
- Revenue will be presenting at a number of events in early 2026, explaining the VAT Modernisation plans, the ViDA provisions, and covering the recent announcement on eInvoicing.
- A survey on VAT Modernisation/eInvoicing has been prepared and will issue shortly to VAT-registered entities that come within the ambit of Revenue's Large Corporates Division. The survey will ask some general questions and the information generated will assist Revenue with the system design and preparations for roll-out of eInvoicing.

### **Item 5 – EU Update**

Revenue provided an update on EU developments relevant to VAT. The following were the main points:

- No further VAT Working Party meetings are expected under the Danish presidency as the topics under discussion (removal of the €150 IOSS limit and extension to customs warehouses) are dependent on agreement being reached in the Customs Reform package discussions. There has been some movement in this regard, with the announcement the previous week of political agreement between MS on removal of the €150 customs duty exemption from when the EU Customs Agency and EU Customs Data Hub are available which is expected to be mid-2028. The Commission and Council have agreed to consider how it could be operated earlier, with early 2026 mentioned, using a simplified calculation method. This may result in progress in the VAT arena on the removal of the IOSS ceiling, but this not yet certain.
- Separately, the proposed new e-commerce handling fee is expected to be introduced and collected with effect from November 2026. The level of the fee is not yet agreed; €2 per parcel is the current proposal, although some Member States consider this to be too low.
- The 2026 work programme of the EU Commission was published on 21 October. The aforementioned items (removal of the IOSS €150 ceiling and extension to customs warehouse) are the only VAT matters mentioned in the plan.
- On 14 November, the EU Commission published a proposal to amend Council Regulation 904/2010 to improve access of the European Public Prosecutor's Office (EPPO) and the European Anti-Fraud Office (OLAF) to VAT information at Union level. The amendments aim to bolster the combat against cross-border VAT fraud, ensure coordinated investigations and prosecutions, and strengthen collaboration among national tax authorities, EPPO, and OLAF. The proposals impact on how VAT information is accessed, stored, and exchanged, particularly through EU central electronic systems (e.g. CESOP, central VIES) and the Eurofisc network.

## **Item 6 – Any Other Business**

### **6.1 VAT56A**

The CCAB-I looked for an update on the VAT56A procedure and suggested a subgroup to progress the issue of renewals. Revenue advised that they are not aware of issues encountered with renewals and would welcome specific details if issues were encountered.

Revenue advised that they are actively reviewing the topic internally and will continue to update Indirect TALC. It is not expected a sub-group will be required but this can be revisited as the review work progresses.

### **6.2 Landlord's concession/shared services**

The Law Society raised the possibility of extending the shared services concession, which currently applies to landlords, to management companies who provide shared services on behalf of a landlord. They noted that the object of the concession was to ensure that there was not VAT locked in and suggested it was unfair if landlords could reclaim VAT but management companies acting on their behalf to provide the same services could not.

Revenue confirmed that it will not extend the scope of the concession. The members agreed to remove the item from the agenda going forward.

### **6.3 Outgoing Chair**

As this was the final quarterly meeting of the year, the members thanked the outgoing Chair of Indirect TALC, Matthew Broadstock, who held the position in 2025 on behalf of the Law Society.

Revenue will hold the Chair in 2026. Meeting dates for the coming year will be notified once the meeting dates for Main TALC have been announced.

<b>Action Points</b>	<b>Agenda Item</b>	<b>Responsible</b>	<b>Timescale</b>
Provide written responses to scenarios relating to Second Sale Post Completion/Two Year Rule	2.3	Revenue	Before next meeting
Law Society to submit factual/contractual scenarios to inform examples for Revenue guidance on 9% rate for apartments.	3.2	Law Society	As soon as possible

### **Attendees**

#### **Consultative Committee of Accountancy Bodies - Ireland**

Mairead Hennessy (attended remotely)

Noreen Lehane

#### **Irish Tax Institute**

Oonagh Carney

Brian Colfer

Nick O'Brien

Lorraine Sheegar

#### **Law Society**

Matthew Broadstock – Indirect TALC Chair 2025

Donal Kennedy

David Lawless

Trish McCarvill

#### **Revenue**

Anne Dullea

Chad Egan

Ita Foster

Deirdre Hanlon\*

Amy Prendiville - Secretary

\*Designated Public Official, Regulation of Lobbying Act 2015