

**Minutes**  
**Indirect TALC Meeting**  
**12th June 2019 at 10.30 am**  
**Basement Conference Room, Stamping Building, Dublin Castle**

**Item 1 – Minutes of the last meeting**

- The minutes of the meeting held on 13<sup>th</sup> March 2019 were approved.

**Item 2 – Draft guidance on holding companies and VAT deductibility**

- It was noted that draft guidance had been issued to the Committee and that significant progress had been made in this area. Members noted that further examples would provide extra clarity for readers.
- It was agreed that members would revert with comments on the draft guidance by 30<sup>th</sup> June and that Revenue would publish the guidance in July.

**Item 3 – Website: Feedback on VAT content**

- **Local authorities' guidance:** Members queried whether the guidance in this area could be expanded to incorporate more detailed guidance which was issued in 2010 but is no longer available. Revenue agreed to consider this.
- It was agreed that this item could be included under AOB going forward.

**Item 4 – TOB**

**4.1. Partnerships/Co-ownerships**

- It was noted that Revenue was awaiting feedback from the committee and it was agreed that this would be provided prior to the next meeting.

**4.2. Mergers**

- Members queried whether guidance would be published in this area. It was noted that this was not an extremely urgent issue, but Revenue agreed to consider it further.

**Item 5 – Revenue's correspondence policy**

- Members queried whether it is possible for Revenue correspondence, particularly VAT aspect queries, to be issued electronically via ROS/My Enquiries to reduce the occurrence of missing correspondence. Members also felt that there are inconsistencies in what correspondence is issued to agents.
- Revenue noted that it is currently not possible to issue correspondence through ROS for aspect query interventions due to technical obstacles, but Revenue agreed to consider the matter further.
- It was also noted that the Code of Practice for Revenue Audit is under review and this issue is on the TALC Audit sub-committee agenda. Members agreed that it was a more appropriate forum and members were encouraged to engage with that forum in relation to the matter of correspondence being copied to agents.

## Item 6 – EU Update

- Revenue provided an update on EU matters including the Payment Service Providers Proposal, the SME proposal, the Definitive regime and the VAT rates proposal. Members were again encouraged to engage with us on these files as they have the potential to have significant impact on taxpayers.
- A VAT on Financial Services study has been launched by the Commission and proposals for Directive change will follow when this is completed next Summer.
- Members raised questions about the practical implications of the Quick Fixes proposal. Revenue welcomed feedback and comments on this package of measures as guidance may be required. It was noted that no issues have been raised with Revenue by practitioners to date and, if there are areas that need clarification, we cannot await Commission guidance as this may not be available before they come into effect next January.

## Item 7 – AOB

- Review of VAT grouping: It was noted that the subgroup had met twice and that the meetings had been very productive. Revenue are working on guidance and expect to have a draft available by the end of August.
- Reclaiming VAT outside VAT periods: This matter was discussed internally with the district concerned. Revenue accepts that while it does happen that invoices are included in later returns, it is for Districts to determine if this is appropriate on a case by case basis. There has been no policy change in this regard.
- Two-tier VAT registration: Members queried how a domestic only registration could be checked as valid under the new system in respect of domestic supplies and sought clarity on the level of due diligence required for intra-EU registrations. Revenue agreed to consider these issues further.
- Financial Services guidance: Members queried if further guidance could be provided in the financial services area. Revenue agreed to consider this if members identified where specific gaps arise.

Action Points	Responsible	Timescale
Guidance on holding companies and VAT deductibility <ul style="list-style-type: none"><li>- Members to revert with comments on draft guidance</li><li>- Revenue to finalise and publish guidance</li></ul>	Members Revenue	30 <sup>th</sup> June 2019 July 2019
Revenue to consider whether further guidance is required for local authorities	Revenue	Next meeting
TOB <ul style="list-style-type: none"><li>- Members to provide further information in relation to partnerships/co-ownerships</li><li>- Revenue to consider publishing guidance in relation to mergers</li></ul>	Members Revenue	Next meeting Next meeting
Revenue to consider if correspondence could be issued electronically	Revenue	Next meeting
Revenue to issue draft guidance on VAT grouping	Revenue	End of August
Revenue to consider issues raised on Two-tier VAT registration	Revenue	Next meeting
Members to identify specific gaps in financial services guidance	Members	Next meeting

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**Attendees**

**ITI**

Gabrielle Dillon

David Duffy

Brian Butler

**CCAB-I**

Kevin Elliott (Chair)

Philip Nolan

Cróna Clohisey

**Law Society**

Donal Kennedy

David Lawless

**Revenue**

Gerard Moran\*

Sinéad O'Meara (Secretary)

Ita Foster

Dermot Donegan

Lena McNamara

\*Designated Public Official, *Regulation of Lobbying Act 2015*

**Apologies**

**Law Society**

Michael O'Connor

**Revenue**

Davena Lyons

Humphrey O'Sullivan