
Submission to the Public Consultation on the Statement of Strategy 2025-2028 for Revenue

American Chamber of Commerce Ireland (AmCham)
submission to Revenue.

March 2025

The American Chamber of Commerce Ireland

The Voice of US-Ireland Business

The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and investment.

Introduction

AmCham appreciates the opportunity to contribute to Revenue's Statement of Strategy 2025-2028. Revenue's role in the effective and fair administration of taxes and duties is core to sustaining Ireland's reputation as a leading international hub for investment and business. AmCham recognises Revenue's continuous efforts to foster a compliance-oriented environment that encourages voluntary adherence to tax obligations, crucial to maintaining trust and transparency in Ireland's taxation framework.

In an increasingly complex global tax landscape, Revenue's commitment to strategic innovation, and customer-centric service is more important than ever. These attributes enhance Ireland's competitiveness and attractiveness as a destination for foreign direct investment.

Compliance Driven

Revenue plays a critical role in ensuring compliance through audits and administrative processes. Timely processes for audits, Revenue guidance, and responses to queries are essential for US MNCs in Ireland and Irish-headquartered groups to maintain operational effectiveness and to plan and allocate resources efficiently. AmCham recommends that Revenue adopt clearer timelines and ensure consistent communication across companies to resolve audits and queries promptly, supporting operational efficiency and enhancing business confidence.

Consistency

Consistency and clarity in administrative interpretation are vital components of effective tax administration, fostering predictability for businesses operating in Ireland.

Legislative interpretations by Revenue should strive to be consistent. Recently, changes to the treatment of staff entertainment expenses and professional subscriptions were made without corresponding legislative amendments by the Department of Finance. Sudden shifts like this create inefficiencies for taxpayers. Revenue should aim to ensure consistent interpretations, accompanied by transparent and timely communication of any changes.

Technology

AmCham recognises Revenue's ongoing commitment to investing in the development and maintenance of its core IT systems and digital technologies, including the shift towards real-time systems. Revenue's investment in technology has improved customer interfaces and reporting mechanisms.

The expansion of real-time engagement and reporting capabilities has been particularly valuable to members. Revenue should continue to maintain this focus on technological advancement, ensuring continued efficiency gains, simplification, and enhanced user experiences.

Simplification

The simplification of administrative processes is essential for facilitating voluntary compliance and reducing operational complexity for businesses. Revenue should work with the Department of Finance to modernise and simplify the tax code, particularly with regard to complex areas such as interest deductibility rules, multi-tier tax rates, and reducing the challenging timelines and costs associated with R&D audits.

For example, the CT1 form is excessively detailed, lengthy, and administratively cumbersome, increasing the risk of unintended errors. A simplified CT1 form that excludes irrelevant sections based on taxpayer profiles would significantly reduce administrative burdens, enhance accuracy, and support greater compliance efficiency.

In addition, given the current amount of information required in the CT1 form, it is necessary to ensure that the supporting guidance notes and explanatory notes are detailed and accessible. Therefore, a comprehensive document explaining each box and section on the CT1 form would be welcome.

Simplification in these and other administrative areas will positively contribute to Ireland's attractiveness as a location for international business.

Resourcing

Adequate resourcing of Revenue's Competent Authority team is essential to ensure efficiency and responsiveness in managing international tax matters for MNCs operating in Ireland. The Competent Authority team requires additional resources to improve communication, accelerate response times, and expedite decision-making processes. Revenue should prioritise increased resourcing in this area to enhance Ireland's capability in resolving international disputes and maintaining tax certainty for taxpayers.

Competitiveness

Maintaining Ireland's competitiveness as a top location for international business investment is vital in an increasingly competitive geopolitical landscape. Effective and streamlined tax administration directly impacts this competitive positioning.

Revenue should continue to focus strategically on maintaining clear, consistent, and timely tax administration processes. Addressing administrative burdens, improving consistency, and ensuring timely resolutions of compliance queries will further strengthen Ireland's attractiveness for international business investment.