

Transfer Pricing Country Profile

Name of Country: IRELAND

Date of profile: October 2008

No.	Item	Reference to and wherever possible text of the provisions. Wherever needed and possible, a translation into one of the OECD official languages would be welcome.
1	Reference to the Arm's Length Principle	<p>Ireland has not enacted comprehensive transfer pricing rules. There are some specific areas that have special rules concerning transactions between related parties such as artificial reductions in the profits of Irish branches or agencies of non-resident persons (Section 1036 of the Taxes Consolidation Act, 1997). There are also general features of Irish tax law, such as the criteria for the deductibility of trading expenses, that may apply to disallow payments that are not arms' length.</p> <p>The Taxes Consolidation Act 1997 (and amendments made to that Act by subsequent Finance Acts) may be accessed on Irish Statute Book</p>
2	Reference to the OECD Transfer Pricing Guidelines (if any)	None
3	Definition of related parties	No general definition
4	Transfer pricing methods	Based on the OECD Transfer Pricing Guidelines
5	Transfer pricing documentation requirements	We have no special requirements. However, we expect taxpayers to keep adequate documentation to be able to justify their pricing arrangements as being arm's length in response to any transfer pricing audits.
6	Specific transfer pricing audit procedures and / or specific transfer pricing penalties	None
7	Relevant regulations on Advance Pricing Arrangements	None
8	Link to relevant Government Internet sites	http://www.revenue.ie/
9	Other relevant information	<p>The competent authority for transfer pricing MAPs/APAs is: Director, Corporate Business and International Division, Office of the Revenue Commissioners, Stamping Building, Dublin Castle, Dublin 2, Ireland.</p> <p>Tel: + 353 1 674 8020 or 674 8639 Fax: + 353 1 679 3314</p>