NOTE ON COUNTRY-SPECIFIC ANALYSIS: IRELAND

Through the collaboration of members of the Inclusive Framework on BEPS, Anonymised and Aggregated Country-by-Country Report (CbCR) statistics have been published. Further information about these data can be found in the Corporate Tax Statistics publication. While these CbCR statistics represent an important new source of data on the global tax and economic activities of multinational enterprises (MNEs), they are subject to a number of data limitations. These limitations are detailed in the disclaimer accompanying the dataset.

A number of jurisdictions have carried out analysis on their CbCR data to investigate the potential impact of some of the limitations for their country data. This document contains analysis carried out by Ireland.

This document does not represent the views of the OECD, the Inclusive Framework or their respective memberships. This document is provided on the OECD website for the information of CbCR-data users and its publication does not imply any endorsement or approval of its contents by the OECD, the Inclusive Framework or their respective memberships.

2016

Country by Country Reporting – Data Cleaning and Analysis

The first Country by Country ("CbC") reports filed in Ireland were for 2016. Analysis and data cleaning were undertaken on these on returns by Irish Revenue in 2018/2019.

The first year's data (2016) required considerable data cleaning and validation before summary tables were provided to the OECD. This has been productionised, to a degree, for future years through Revenue's data warehouse and business intelligence portal. Data are extracted from returns and run through statistical software for checking and validation.

The following checks were done on the data received on the CbC reports.

a) Potential duplicate returns are checked. One duplicate return was identified.
b) Outliers among the fields returned were identified and reviewed with the tax office / Revenue case manager of the companies in question. All outliers reviewed were found to be correct.
c) Returns indicating "stateless" entities were checked by the tax office / Revenue case manager for the company. The inputs were found to be correct. Discussed below.
d) Irish CbC data were compared to published US CbC information. No issues were identified.
e) CbC data were reviewed for consistency with previous years data, as filed on Irish Corporation Tax returns. No issues were identified. Differences arise from definitions used for profits and tax liabilities. These can impact on the calculation of effective tax rates.
f) The summary data to be provided to the OECD was adjusted to ensure that Revenue's statistical disclosure controls protocol was maintained. Information supplied to OECD at an aggregation level that protects the confidentiality of taxpayer information.

Note on "Stateless" entities:
The 2016 reports filed in Ireland indicate 5 "stateless" entities. While the reports for these do not materially affect the Irish CbC statistics, they were sent to the relevant Revenue case managers to ascertain the reason for these entities. Reviews suggest they are US single member limited liability companies (LLC's) that are not taxed separately in any jurisdiction. These entities are wholly owned by US entities but are disregarded for US tax purposes, with all the activities of these LLCs being included in their owner's US income tax returns but feature on CbC reports filed in Ireland as stateless entities included in the overall report for the parent located here.