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 Ireland

16 January 2018

Mr Kieran Lenihan  
 Clerk to the Committee of Public Accounts  
 Leinster House  
 Dublin 2

**Re: Examination of the Revenue Commissioners' administration of corporation tax**

Dear Mr Lenihan,

Thank you for your letter dated 4 January 2018 inviting Glanbia plc to contribute to the work of the Public Accounts Committee as it examines the Revenue Commissioners' administration of corporation tax.

From your letter we note that the Committee's examination is focused on matters of economy, efficiency and effectiveness relating to Revenue's administration of corporation tax.

As I'm sure you are aware we are an indigenous Irish company, headquartered in Kilkenny, which has grown from our dairy co-operative roots to a position where we now sell a range of nutrition products in over 130 countries around the world. We are very pleased to be afforded the opportunity to provide the Committee with our insight and experience of the company's interaction with Revenue with regard to corporation tax. We feel the best way to assist the Committee in its work is to set out a summary of our long standing relationship with Revenue on corporation tax matters. We note that the Committee is interested in the evaluation of systems, procedures and practices and so our summary below is focused on giving the Committee an insight into the practical aspects from the perspective of a corporate taxpayer. As you are aware the interaction between Revenue and companies tax resident in Ireland is governed by tax legislation and company law and it is unnecessary to outline that here.

### **Compliance**

Each September we submit to Revenue an individual annual corporation tax return (CT1) for each active Irish tax resident Glanbia plc group company. Glanbia plc has done this for over ten years on the Revenue Online Service ("ROS").

*Registered Office:*  
 Glanbia House, Kilkenny, Ireland.  
 Registered in Ireland as a public  
 limited company  
 Number: 129933

Around the same time (deadline 23 September) we send supporting paper corporation tax computations to Revenue and (until 2013) a copy of the related audited financial statements.

Until 2013 we also couriered a paper copy of the related audited financial statements for each Irish group company but, commencing with our submission for FY2013, we are now obliged to use iXBRL to electronically file our audited financial statements information on ROS. As you may know, iXBRL (extensible business reporting language) is a global standard for exchanging business information adapted by Revenue to facilitate the more efficient transfer of financial information for review and interrogation by Revenue. From our perspective, we appreciate this enhancement of ROS as it facilitates us transferring a lot of financial information securely.

We also submit to Revenue (deadline 30 September) a return of payments to third parties where payments to a single person exceed €6,000 in aggregate in the period covered by the return. We are obliged to submit this return (Form 46G) on ROS since 2011. While the reason for submission online is to facilitate Revenue's review and interrogation of the data, Glanbia plc benefits from having a more efficient and secure means of transferring voluminous information.

### **Revenue Online Service ("ROS")**

Glanbia plc considers ROS to be an excellent system and in our view it compares very favourably with systems available in other tax jurisdictions in which we operate. ROS enables us to pay corporation tax electronically, view corporation tax assessments, review our filing status with Revenue (against deadlines), register newly incorporated Glanbia companies for tax online, deregister Glanbia companies that have become inactive, etc.

In this regard ROS is mutually beneficial as it reduces the requirement for manual intervention and other time incurred by Revenue personnel on routine administration; from our perspective, as a corporate taxpayer, we have real-time access to important information including access outside of normal office hours.

### **Large Cases Division**

Since 2004 Glanbia plc is under the remit of Revenue's Large Cases Division (Betting, Food & Media District), Limerick, for corporation tax (and for other tax heads). Revenue assigned a case manager to Glanbia who built up an in-depth knowledge of our business in Ireland. Initially this was achieved through written business briefings and meetings with Glanbia personnel. Over the years the case managers have deepened their understanding of our business, including through a site visit to a number of our Irish manufacturing sites and to our shared services centre.

As you know, in any large organisation it can take quite some time to identify the appropriate department or person to address a query. Having one point of engagement between Revenue and Glanbia plc has greatly facilitated more timely resolution of various issues and answers to queries since 2004, whether coming from Revenue or Glanbia plc.

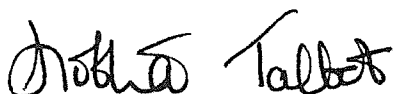
As an Irish corporate taxpayer Glanbia plc is very supportive and appreciative of the concept of Large Cases Division and, in particular, having case managers who are given the time to learn the business of the relevant taxpayer. We hope this way of working will continue as being monitored by an experienced case manager is a very efficient and business-like way for large multinational taxpayers to interact with Revenue on corporation tax matters.

In fact we consider that this should be part of Ireland's offering to attract foreign direct investment i.e. make it known that Ireland has a best-in-class tax administration including both efficient online systems (e.g. ROS) and availability of senior Revenue personnel to resolve technical issues promptly and efficiently.

We trust that this outline of our interactions with Revenue is of some value to the Committee in its examination of Revenue's administration of corporation tax. Having considered the matter we believe that Glanbia plc could add little, if any, further insight or value by accepting your invitation to attend a meeting with the Committee and so we have decided to decline.

On behalf of Glanbia plc I would like to take this opportunity to wish the Committee well with its work.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Siobhán Talbot', written in a cursive style.

**Siobhán Talbot**  
**Group Managing Director**

