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By Email

ATAD Implementation – Interest Limitation Feedback Statement  
Tax Division  
Department of Finance  
Government Buildings  
Upper Merrion Street  
Dublin 2  
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By email to: [ctreview@finance.gov.ie](mailto:ctreview@finance.gov.ie)

## Responses to the Public Consultation on ATAD Implementation – Interest Limitation Feedback Statement

Dear Sirs

A&L Goodbody welcomes the opportunity to provide input into the consultation exercise initiated by the Department of Finance in respect of Ireland's implementation of the interest limitation provisions of the EU Anti-Tax Avoidance Directive.

We believe there is great value in advance consultation with relevant stakeholders in advance of enacting complex legislation such as this, so as to ensure that there is as broad as possible consideration given to the potential implications of the changes.

In the context of the ATAD directive while clearly Ireland is under an obligation to implement the provisions into Irish law it is important that in doing so and to the extent there is discretion that the law is drafted in such a way that while achieving the policy intent that it does not apply unnecessary or unduly burdensome restrictions or obligations on taxpayers in what is an uncertain business environment.

As the implementation of such interest limitations will have a material impact on a significant proportion of the Irish business sector we believe it is essential that the timescales outlined in the Feedback Statement are kept to. Taxpayers will need to have some certainty as to how the legislation will operate in sufficient time for them to be able to rearrange their funding arrangements in advance of the proposed 1 January 2022 implementation date.

We have provided our responses to certain of the questions raised in the Feedback Statement in tabular format in the schedule to this letter. To the extent that any of our comments are unclear or require further expansion, we would be happy to engage with department officials if this would be considered useful.

Yours faithfully

A&L Goodbody



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