

Deputy Jonathan Renouf
Chair
OECD Pillar 2 Implementation Sub-Panel
By email

15 August 2024

Dear Chair,

Corporate Services Scrutiny Sub-Panel – OECD Pillar 2 Implementation:

Lodging And Debate Timeline & Consultation Stakeholders

Thank you for your letter dated 8th August 2024 regarding the lodging and debate timeline for the OECD Pillar 2 implementation in Jersey.

The Assistant Minister for Treasury and Resources is working on the detail of this brief and is on annual leave at present. He is aware of the letter and committed to giving full consideration to the questions it contains. However, it is not achievable to provide the Panel with a full response to this second letter in the time period it specifies of seven days. The Assistant Minister therefore proposes a follow up meeting to discuss the issues raised in more detail.

On the specific issue of stakeholder consultation, we can reassure the sub-Panel that affected groups, trade bodies and advisers have been widely consulted in Jersey, the UK, US, EU and further afield. This work has taken place over the past two years through numerous 1-1 meetings between taxpayers and Revenue Jersey as well as through broader means of consultation. The Government issued an "[OECD Pillars 1 & 2 tax policy reflections paper](#)" in April 2022, followed by targeted stakeholder outreach on draft legislation in June 2024.

The individual feedback provided by affected multinational groups has been specific to the facts and circumstances of their individual operations and the effect of Pillar 2 on those operations. Furthermore, these groups in the Pillar 2 population are covered by strict OECD country-by-country reporting confidentiality rules and other safeguards. These include provisions limiting the use of any information that is held by Revenue Jersey.

This limits the specific feedback that can be shared with the sub-Panel. However, Revenue Jersey will work on collating trends and general points that have emerged from the engagement. We can provide this to you and discuss it further when we next meet.

Yours sincerely,



Deputy Elaine Millar
Minister for Treasury & Resources



Deputy Ian Gorst
Minister for External Relations