FINANCIAL JUSTICE IRELAND | MEDIA BRIEFING

Ireland, Global Tax Justice and the UN Tax Convention

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NEWS ANGLE

As the UN convenes in Nairobi this month to negotiate new international tax rules, the international community faces a generational opportunity to clamp down on multinational corporations that continue to game the international tax system. Many large multi-national corporations play 'tax games' by booking disproportionate shares of their profits in low tax jurisdictions, like Ireland. This is despite the fact that the bulk of the economic activity to generate those profits does not take place in those jurisdictions. This is called 'profit shifting' and is a clever way for corporations to reduce their global tax bills.

Ireland must decide to join numerous countries across the globe who are seeking to confront profit-shifting that costs national economies hundreds of billions of euro every year. Otherwise, Ireland risks being part of the problem of global tax avoidance that hoovers up corporate profits from low-income countries and elsewhere, reducing funds for the sustainable development goals and climate adaptation in the process. The Irish Government prefers to have global tax governance run through the OECD, where rich countries can continue to call the shots on global tax. Financial Justice Ireland is supporting Global South states who have demanded global tax be negotiated through the more democratic forum of the United Nations. Through a more democratic process, all states can build fairer tax rules, not just rules that suit a rich club of countries.

Overview - what's at stake during the Sixth Session of the UN Intergovernmental Negotiating Committee on International Tax Cooperation in Nairobi?

Ireland has benefited from real jobs and investment by US multinationals, but also from the allocation of disproportionately large corporate profits to Ireland. This has generated very high (and highly concentrated) corporation tax revenues, reaching almost €33 billion in 2025, an eye-watering record. Global rules that allow large multinationals to shift where they book profits and pay taxes reduces other countries' capacity to finance public services. The UN Tax Convention offers a chance to make international tax cooperation more inclusive and to negotiate fairer taxing rights for UN member states. Financial Justice Ireland (FJI) is calling on the Irish Government to stand for tax justice by supporting fairer global rules that govern how multi-national corporations allocate their profits and pay their taxes .

Important information for journalists

- Corporation tax receipts in Ireland exceeded €30 billion in 2025, as detailed in "*The long road to global tax justice: Ireland, the Global South and the UN Tax Convention*" November 2026, policy briefing prepared for Financial Justice Ireland by Dr Nessa Ní Chasaide
- Ireland is collecting disproportionate corporate tax revenue as a result of profit shifting by large US multi-national corporations operating in Ireland. Profit shifting is when multinational corporate groups move profits to low tax jurisdictions in order to reduce their global tax bills. Profit shifting reduces corporate tax

bills globally while allowing low tax jurisdictions, like Ireland, to claim the tax rewards, rather than the jurisdictions that generate the profits.

- The research briefing tells the story of how Ireland became such a major centre for profit shifting by US multi-national corporations.
- The research also highlights the risky nature of Ireland's position, drawing attention to the evidence presented by the Irish Fiscal Advisory Council that three multinational groups account for almost half of Irish corporation tax receipts, making public finances vulnerable to shifts in corporate fortunes.
- The current UN tax negotiations were initiated following a proposal by the African Group of nations. The negotiations aim to develop a framework convention alongside initial protocols on cross-border services and tax disputes. The African Group comprises 54 of the continent's nation-states, and is therefore the largest regional group at the UN.

What's currently at stake

The negotiations offer an opportunity to reconsider who gets to decide global tax rules, which countries are entitled to tax multinational profits, and how those decisions affect public revenues.

FJI's central message

Ireland has facilitated corporate tax avoidance by US multi-national corporations over many years. Now it is time for Ireland to change its stance and to stand up for global tax justice.

Ireland's role: success, dependence and global consequences

How Ireland became a centre for multinational profits

FJI's research traces three successive arrangements that helped make Ireland attractive to multinational corporate groups: the historical export-manufacturing tax model; the "Double Irish/Dutch Sandwich" structure; and the more recent onshoring of intellectual property assets by large US firms. Ireland has attracted genuine manufacturing, technology and pharmaceutical activity, alongside supporting accounting arrangements by US firms, that enable them to book unusually large profits in the jurisdiction.

Overreliance on a narrow pool of corporate tax receipts exposes Ireland to significant risk

Large corporation tax receipts help fund public spending today. Our paper highlights how their increasing concentration among a handful of US multinational groups leaves Ireland exposed to decisions taken by companies and policymakers outside Ireland.

Solidarity with the Global South

Corporate tax avoidance affects countries differently. Lower-income states are especially vulnerable because corporate tax represents a significant share of their tax revenue. This makes lower income countries more dependent on corporate tax receipts than most higher-income countries. Therefore, any loss to this revenue seriously compromises the ability of these states to adequately fund essential services. Under the existing

system, countries where multinational corporations generate sales or carry out activity may receive less taxing power than they should. For FJI, the imperative is global tax justice. We understand that the staggering profits booked in the Global North originate through the ongoing pillaging of the world's poorest countries. We need tax justice now so that low-income economies can boost public revenues, invest in climate adaptation to support safe and secure futures for all.

What is being negotiated at the UN?

- A Framework Convention on International Tax Cooperation, including principles and commitments for international tax rules.
- An initial protocol on taxation of income from cross-border services.
- An initial protocol on preventing and resolving cross-border tax disputes.

The process is significant because the African Group helped move the debate into a universal UN forum. Our research paper identifies more equitable allocation of taxing rights, including consideration of treating multinationals as unified groups and apportioning profit based on where economic activity occurs, as a necessary reform, central to progress on international tax rules.

Ireland's negotiating position: the questions to ask

FJI's analysis of the Irish Government's submissions to the UNTC, August 2026, identifies concerns about making new agreements supplementary to existing tax arrangements, the scope of taxing rights and optional commitments.

The Irish Government's submissions to the UNTC, August 2026

- Ireland's submission on Workstream I
- Ireland's submission on Workstream II
- Ireland's submission on Workstream III

FJI argues that these positions risk limiting the Convention's ability to change the current distribution of taxing rights. This is FJI's assessment of Ireland's submissions, not an agreed UN finding.

Our Question to the Government: Will Ireland support a binding, ambitious UN Convention that can improve the fair allocation of taxing rights, even where that requires revisiting established OECD approaches?

What Financial Justice Ireland is calling for

1. Support fairer taxing rights and effective multilateral rules

Ireland should support proposals at the UN that align countries' taxing rights with real economic activity, not profit shifting. Ireland should support democratic decision-making in the negotiations, including majority voting when necessary.

2. Put policy coherence for sustainable development into practice
Ireland should align its business tax policy with its commitment to supporting Global South states to meet the sustainable development goals.

3. Build an economy less exposed to multinational tax concentration
Ireland should support a broader discussion about building a more balanced economy. To build a more resilient economy, we need to reduce dependence on both a narrow group of multinational taxpayers and corporate profit-allocation arrangements that are vulnerable to change.

Spokesperson messages
Hilary Darcy, Director of Financial Justice Ireland, commented:

> **On Ireland:** "Ireland's corporate tax success contains a serious contradiction: a system that has rewarded Ireland can make it harder for other countries to raise the revenues they need."
>
> **On the UN:** "The UN Tax Convention is a chance to put the interests of all countries - not only the wealthiest rule-makers - at the centre of international tax cooperation."

Dr. Nessa Ní Chasaide, policy advisor to Financial Justice Ireland, said:

> **On the future:** "Ireland can defend good jobs *and* support fair taxation. We want a strong, diverse economy without permanent reliance on profits booked by a handful of global corporations."

FAQs from journalists
Is FJI calling for Ireland to raise its headline corporation tax rate? No specific change to the headline rate is proposed in our paper, "*The long road to global tax justice: Ireland, the Global South and the UN Tax Convention*". Its principal focus is on how taxing rights are allocated internationally, policy coherence in taxation, and the sustainability of Ireland's economic model.

Does Ireland have real multinational investment? Yes. 312,468 people were directly employed in 2025 as a result of FDI companies supported by Ireland's Industrial Development Authority. FJI expressly distinguishes genuine employment and production from financial and accounting arrangements that can result in disproportionate profit booking.

Would reform reduce Irish corporation tax receipts? Yes. Corporate tax receipts in Ireland would reduce under new global tax allocation rules. However, the impact on FDI jobs is less clear and likely to be less serious.

Is a UN agreement already in place? No. The framework convention and protocols are under negotiation; their final content and adoption are due to be finalised in mid-2027. The Sixth Session of the UN Intergovernmental Negotiating Committee on International Tax Cooperation will be held in Nairobi from the 30th of November to the 10th of December. The final text of the Framework Convention on International Tax Cooperation and its two early protocols is expected to be submitted to the UN General Assembly for consideration in 2027.

Notes to editors

About this journalists' briefing

Primary source: Dr Nessa Ní Chasaide (November 2026), "The long road to global tax justice: Ireland, the Global South and the UN Tax Convention", policy briefing prepared for Financial Justice Ireland is available at this link. This media note is a summary adapted for journalists.

Useful evidence in the FJI research

- Pages 5 - 6: Ireland's corporation tax growth, Figure 1 (Revenue) and Figure 2 (Irish Fiscal Advisory Council) on concentration.
- Pages 7 - 9: historical mechanisms: export manufacturing, Double Irish, and intellectual-property onshoring.
- Pages 10 - 13: critique of OECD-led reform, US - Ireland dynamics and the opening for UN negotiations.
- Pages 14 - 16: allocation of taxing rights and Ireland's negotiating positions.
- Pages 16 - 17: the two-pronged policy agenda for Ireland.

Media enquiries

- Contact hilary@financialjustice.ie Director, Financial Justice Ireland
- Media interviews: Dr Nessa Ní Chasaide

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