24 May, 2023

Mr Jason Lange

Executive Director

Office of Impact Analysis

Department of the Prime Minister and Cabinet

1 National Circuit

BARTON ACT 2600

Dear Mr Lange

**Impact Analysis – Multinational Tax Transparency – Second Pass Final Assessment**

I write in relation to the attached Impact Analysis prepared for the government’s multinational tax transparency election commitments. In line with best practice guidance, the impact analysis focuses on the election commitment (with reference to the status quo) and the manner in which the commitment should be implemented.

I am satisfied the Impact Analysis addresses the issues raised in your letter of 17 May 2023. Specifically, the analysis now includes:

* further details clarifying the policy objective and outcomes,
* a clearer explanation of impacts and the net benefit of government intervention, including how stakeholder feedback was incorporated in the decision-making process, and
* an evaluation plan outlining Treasury’s approach to ensuring the changes can be implemented successfully.

The assumptions underpinning the calculation of the compliance cost estimates have also been further detailed.

The government’s transparency election commitments are part of a broader legislative package targeting multinationals and corporate entities. While the implementation of these commitments reflects stakeholder feedback to reduce compliance burdens, there will be some upfront compliance costs (re-estimated to be around $30 million). A regulatory offset has not been identified; however, Treasury is seeking to pursue net reductions in compliance costs and will work with affected stakeholders and across Government to identify regulatory burden reductions where appropriate.

Accordingly, I am satisfied that the Impact Analysis is now consistent with the six principles for Australian Government policy makers as specified in the Australian Government Guide to Policy Impact Analysis.

I submit the Impact Analysis to the Office of Impact Analysis for formal final assessment

Yours sincerely

Diane Brown

Deputy Secretary

Revenue, Small Business and Housing Group

The Treasury