



 [Print whole section](#)

International related party dealings statistics 2020–21

This annual overview provides key statistics on international related party dealings (IRPDs).

Last updated 23 July 2024

Overview



What this report shows and how to source data.

IRPD statistics



Detailed IRPD statistics and links to additional information on data.gov.au.

Reference material



How we source the IRPD statistics and further information.

QC 72789


Overview

What this report shows and how to source data.

Published 22 July 2024

International related party dealings statistics 2020–21 provides key statistics sourced from processed **international dealings schedules** (IDS) and **local file – part A** (LFPA) lodgments for the 2020–21 and earlier income years.

International related party dealings (IRPDs) are international commercial or financial dealings or relations which can be subject to Subdivision 815-B of the ITAA 1997 or the associated enterprises article of a relevant double tax agreement (DTA). IRPDs therefore include dealings between associated parties such as 2 subsidiaries of the same corporate group.

Each section provides summary tables and charts. You can access detailed statistics in Excel format from data.gov.au  by selecting **link** under the tables or charts. In data.gov.au, press the **Download** button, then open or save the file.

We encourage feedback on how we present this information and what we include. You can:

- email us at IRPDstats@ato.gov.au
- click the grey **Feedback** tab that appears on the right of the screen.

QC 72789

IRPD statistics

Detailed IRPD statistics and links to additional information on data.gov.au.

Last updated 23 July 2024

On this page

[Detailed data](#)

[IRP expenditure](#)

[IRP revenue](#)

[IRP inbound borrowings](#)



[IRP outbound loans](#)

[IRPDs by jurisdiction](#)

[IRPD lodgments](#)

Detailed data

For more detailed data, see:


- [Table 1](#) : Selected items by IRPD type, 2015–16 to 2020–21 income years
- [Table 2](#) : IRP expenditure and revenue by country/jurisdiction, 2016–17 to 2020–21 income years.

IRPD snapshot

The snapshot summarises [IRP expenditure](#) and [IRP revenue](#), including:

- total expenditure and revenue for all entities
- expenditure and revenue broken down by entity type.

Chart 1: IRP expenditure and revenue, 2016–17 to 2020–21 income years

 Chart 1 shows IRP expenditure and revenue values over the last five income years. The link below will take you to the data behind this chart.

Download data from the 2016–17 income year onwards at [Table 3](#) .

Table 1: IRP expenditure by entity type, 2016–17 to 2020–2 years

Entity type	2016–17 (\$m)	2017–18 (\$m)	2018–19 (\$m)	2019–20 (\$m)
Companies	225,194	250,553	271,068	281,317

Partnerships	393	499	484	583
Trusts	1,846	2,052	2,427	2,726
Total	227,433	253,104	273,979	284,625

Table 2: IRP revenue by entity type, 2016–17 to 2020–21 in years

Entity type	2016–17 (\$m)	2017–18 (\$m)	2018–19 (\$m)	2019–20 (\$m)
Companies	143,542	157,869	190,921	200,880
Partnerships	899	1,231	1,166	1,527
Trusts	1,115	1,143	1,028	1,104
Total	145,556	160,243	193,115	203,512

IRP expenditure


This section provides an overview of total [IRP expenditure](#), including break downs by IRPD type.

Chart 2 and **Chart 3** show that IRP expenditure is highly concentrated.

In the 2020–21 income year:

- Entities that disclose more than \$500 million in IRP expenditure
 - account for almost 50% of total IRP expenditure
 - represent 1% of those that disclose IRP expenditure.
- Entities that disclose up to \$10 million in IRP expenditure
 - account for 5% of total IRPD expenditure
 - represent more than 70% of those that disclose IRP expenditure.

Chart 2: IRP expenditure – Pareto chart of ranged IRP expenditure per entity (dollar value), 2020–21 income year

 Chart 2 shows the ranged distribution of IRP expenditure per entity by dollar value for the 2020–21 income year. The link below will take you to the data behind this chart.



Download data for the 2020–21 income year at [Table 3](#) .

Chart 3: IRP expenditure – Histogram of ranged IRP expenditure per entity (counts), 2020–21 income year

 Chart 3 shows the ranged distribution of IRP expenditure per entity by counts for the 2020–22 income year. The link below will take you to the data behind this chart.




Download data for the 2020–21 income year at [Table 3](#) .

Chart 4 shows the majority of IRP expenditure (by dollar value) relates to tangible goods of a revenue nature (purchase of trading stock and raw materials), followed by expenditure in respect of services and financial dealings.

Chart 4: IRP expenditure by IRPD type, 2020–21 income year

 Chart 4 shows a breakdown of IRP expenditure by IRPD type for the 2020–21 income year. The link below will take you to the data behind this chart.

Download data for the 2020–21 income year at [Table 3](#) .The following tables provide break downs of IRP expenditure:

- **Table 3** shows the total dollar value by IRPD type
- **Table 4** shows entity counts, averages (means) and medians by IRPD type.

Table 3: IRP expenditure by IRPD type, 2016–17 to 2020–21 years

IRPD type	2016–17 (\$m)	2017–18 (\$m)	2018–19 (\$m)	2019–20 (\$m)
Tangible property of a	150,179	167,347	182,553	185,825

revenue nature				
Royalties and licence fees	7,947	8,369	9,254	9,378
Rent and leasing	1,317	1,000	994	823
Service arrangements	33,137	37,618	43,558	49,666
Total financial dealings	28,878	32,500	31,536	32,805
a) Interest	17,287	17,501	18,324	18,109
b) Guarantees	862	894	925	948
c) Insurance	638	696	689	852
d) Reinsurance	5,340	7,590	6,390	5,941
e) Derivatives	4,419	5,133	4,429	5,745
f) Other financial	332	685	779	1,210
Share-based employee remuneration	823	883	1,077	1,290
Other IRPDs	5,152	5,387	5,008	4,839

Total	227,433	253,104	273,979	284,625
--------------	----------------	----------------	----------------	----------------

Download data from the 2015–16 income year onwards at [Table 1](#) .


**Table 4: IRP expenditure – entity counts, averages and medians
2020–21 income years**

IRPD type	2019–20			Entity count
	Entities (no.)	Average (\$)	Median (\$)	
Tangible property of a revenue nature	3,342	55,602,828	5,961,166	
Royalties and licence fees	1,328	7,061,403	885,967	
Rent and leasing	187	4,399,563	692,008	
Service arrangements	4,973	9,987,054	1,019,165	
Total financial dealings	4,305	7,620,307	316,018	
a) Interest	3,916	4,624,364	311,526	
b) Guarantees	278	3,411,637	140,170	
c) Insurance	391	2,177,904	60,248	

d) Reinsurance	44	135,023,347	40,387,634	
e) Derivatives	174	33,017,148	1,022,371	
f) Other financial	136	8,900,046	292,410	
Share-based employee remuneration	427	3,020,842	305,619	
Other IRPDs	1,316	3,677,191	259,333	
Total	8,091	35,177,980	2,886,417	

In this table:

- Counts, averages (means) and medians are calculated excluding zeros.
- **Total** components don't add to the total count of entities disclosing IRP expenditure because taxpayers may disclose more than one IRPD type.

Download selected data from the 2015–16 income year onwards at [Table 1](#) .

IRP revenue


This section provides an overview of total [IRP revenue](#), including break downs by IRPD type.

Chart 5 and **Chart 6** show that IRP revenue is highly concentrated. In the 2020–21 income year:

- Entities that disclose more than \$500 million in IRP revenue
 - account for more than 60% of total IRP revenue
 - represent 1% of those that disclose IRP revenue.
- Entities that disclose up to \$10 million in IRP revenue

- account for 5% of total IRPD revenue
- represent almost 80% of those that disclose IRP revenue.

Chart 5: IRP revenue – Pareto chart of ranged IRP revenue per entity (dollar value), 2020–21 income year

 Chart 5 shows the ranged distribution of IRP revenue per entity by dollar value for the 2020–21 income year. The link below will take you to the data behind this chart.



Download data for the 2020–21 income year at [Table 3](#) .

Chart 6: IRP revenue – Histogram of ranged IRP revenue per entity (counts), 2020–21 income year

 Chart 6 shows the ranged distribution of IRP revenue per entity by counts for the 2020–21 income year. The link below will take you to the data behind this chart.




Download data for the 2020–21 income year at [Table 3](#) .

Chart 7 shows the majority of IRP revenue (by dollar value) relates to tangible goods of a revenue nature (sale of trading stock and raw materials), followed by revenue in respect of services and financial dealings.

Chart 7: IRP revenue by IRPD type, 2020–21 income year

 Chart 7 shows a breakdown of IRP revenue by IRPD type for the 2020–21 income year. The link below will take you to the data behind this chart.

Download data for the 2020–21 income year at [Table 3](#) .

The following tables provide break downs of IRP revenue:

- **Table 5** shows the total dollar value by IRPD type
- **Table 6** shows entity counts, averages (means) and medians by IRPD type.

Table 5: IRP revenue by IRPD type, 2016–17 to 2020–21 inc

IRPD type	2016– 17 (\$m)	2017– 18 (\$m)	2018– 19 (\$m)	2019– 20 (\$m)

Tangible property of a revenue nature	93,912	104,659	126,381	131,529
Royalties and licence fees	2,419	2,637	3,187	3,282
Rent and leasing	369	292	337	315
Service arrangements	28,434	31,664	36,095	40,695
Total financial dealings	14,658	15,947	21,019	21,619
a) Interest	3,236	3,441	3,783	3,721
b) Guarantees	209	248	180	174
c) Insurance	89	161	498	497
d) Reinsurance	4,342	5,343	5,791	5,770
e) Derivatives	3,659	3,885	8,364	5,931
f) Other financial	3,122	2,870	2,404	5,525
Share-based employee remuneration	146	176	194	269

Other IRPDs	5,618	4,868	5,903	5,803
Total	145,556	160,243	193,115	203,512

Download data from the 2015–16 income year onwards at [Table 1](#) .


Table 6: IRP revenue – counts, averages and medians, by IRPD type and income years

IRPD type	2019–20			Error (no.)
	Entities (no.)	Average (\$)	Median (\$)	
Tangible property of a revenue nature	2,379	55,287,499	1,084,367	
Royalties and licence fees	522	6,286,898	637,095	
Rent and leasing	121	2,601,554	472,641	
Service arrangements	4,393	9,263,640	1,529,540	
Total financial dealings	2,086	10,363,847	202,745	
a) Interest	1,907	1,951,406	182,329	
b) Guarantees	58	2,995,856	181,678	

c) Insurance	95	5,232,888	166,592	
d) Reinsurance	41	140,743,699	20,425,275	
e) Derivatives	158	37,539,060	1,356,447	
f) Other financial	62	89,114,614	354,019	
Share-based employee remuneration	82	3,282,539	172,960	
Other IRPDs	1,182	4,909,555	400,573	
Total	6,249	32,567,119	2,088,244	

In this table:

- Counts, averages (means) and medians are calculated excluding zeros.
- **Total** components don't add to the total count of entities disclosing IRP revenue because taxpayers may disclose more than one IRPD type.

Download selected data from the 2015–16 income year onwards at [Table 1](#) .

IRP inbound borrowings

This section provides statistics for IRP inbound borrowings. The average quarterly balance of debt interests on issue to related parties (inbound borrowings) is broken down into:

- **Interest-free** debt, where no interest or other return is payable
- **Interest-bearing** debt, where interest or other return is payable.

Table 7: IRP inbound borrowings, 2016–17 to 2020–21 income years

IRP inbound borrowings	2016–17 (\$m)	2017–18 (\$m)	2018–19 (\$m)	2019–20 (\$m)	
Average debt balance	535,117	525,116	534,278	536,185	5
a) Interest-free	108,776	113,188	114,592	106,403	
b) Interest-bearing	426,341	411,928	419,686	429,782	4
Interest expense	17,287	17,501	18,324	18,109	
Implied interest rate (%)	4.0%	4.2%	4.3%	4.2%	


Table 8: IRP inbound borrowings – entity counts, averages 2020–21 income years

IRP inbound borrowings	2019–20			
	Entities (no.)	Average (\$)	Median (\$)	Entities (no.)
Average debt balance	6,676	80,315,323	5,994,058	6,42

a) Interest-free	3,561	29,880,153	3,503,847	3,35
b) Interest-bearing	3,968	108,311,964	7,940,907	3,80
Interest expense	3,916	4,624,364	311,526	3,76

For table 7 and table 8:

- **Interest expense** includes interest expenditure for accounting purposes and capitalised interest deducted for income tax purposes.
- The **implied interest rate** is calculated on interest-bearing debt and excludes some interest where no average debt balance is disclosed due to data issues.
- Entity counts for **interest-free** and **interest-bearing** debt don't add to total entity counts because the same taxpayer may issue interest-free and interest-bearing debt.
- Counts, averages (means) and medians are calculated excluding zeros.

Download selected data from the 2015–16 income year onwards at [Table 1](#) .

IRP outbound loans

This section provides statistics for IRP outbound loans. The average quarterly balance of debt interests held in related parties (outbound loans) is broken down into:

- **Interest-free** debt, where no interest or other return is charged
- **Interest-bearing** debt, where interest or other return is charged.

Table 9: IRP outbound loans, 2016–17 to 2020–21 income y

IRP outbound loans	2016– 17 (\$m)	2017– 18 (\$m)	2018– 19 (\$m)	2019– 20 (\$m)	2020– 21 (\$m)
Average debt balance	153,735	153,854	161,918	165,609	163,735
a) Interest- free	34,525	35,647	35,859	38,952	33,735
b) Interest- bearing	119,210	118,208	126,059	126,657	129,999
Interest revenue	3,236	3,441	3,783	3,721	3,721
Implied interest rate (%)	2.7%	2.9%	2.9%	2.9%	2.9%


Table 10: IRP outbound loans – entity counts, averages and 2020–21 income years

IRP outbound loans	2019–20			2020–21
	Entities (no.)	Average (\$)	Median (\$)	
Average debt balance	3,999	41,412,567	4,120,058	3,974
a) Interest- free	2,581	15,091,725	2,486,336	2,460

free				
b) Interest-bearing	1,910	66,312,624	6,963,696	1,967
Interest revenue	1,907	1,951,406	182,329	1,930

For table 9 and table 10:


- **Interest revenue** includes interest revenue for accounting purposes and capitalised interest returned for income tax purposes.
- The **implied interest rate** is calculated on interest-bearing debt and excludes some interest where no average debt balance is disclosed due to data issues.
- Entity counts for **interest-free** and **interest-bearing** debt don't add to total entity counts because the same taxpayer may hold interest-free and interest-bearing debt.
- Counts, averages (means) and medians are calculated excluding zeros.

Download selected data from the 2015–16 income year onwards at [Table 1](#) .

IRPDs by jurisdiction

This section provides statistics for total [IRP expenditure](#) and [IRP revenue](#) according to the jurisdiction or country where the related party is located.

Chart 8: Jurisdictions by IRPD value, 2020–21 income year

 Chart 8 shows the top 3 jurisdictions by IRPD value for the 2020–21 income year. The link below will take you to the data behind this chart.


Download data for the 2020–21 income year at [Table 3](#) .

Table 11: Top 10 jurisdictions by IRP expenditure, 2018–19 income years

Jurisdiction (Top 10 rank)	IRP expenditure (\$m)			% share of total	2018-19 2019-20 2020-21
	2018-19	2019-20	2020-21	2020-21	
1. Singapore	76,921	80,648	67,224	24.8%	-
2. United States	36,043	36,623	37,012	13.6%	
3. Japan	22,492	21,018	21,235	7.8%	
4. United Kingdom	17,932	19,940	20,808	7.7%	
5. Germany	16,176	16,748	17,007	6.3%	
6. Switzerland	13,964	14,081	13,286	4.9%	
7. Ireland	7,522	9,355	10,801	4.0%	
8. Hong Kong	8,753	10,020	9,081	3.3%	
9. Netherlands	8,598	9,412	8,523	3.1%	
10. China	6,996	6,814	7,419	2.7%	
All other jurisdictions	59,259	59,872	59,117	21.8%	

Table 12: Top 10 jurisdictions by IRP revenue, 2018–19 to 2 years

Jurisdiction (Top 10 rank)	IRP revenue (\$m)			% share of total	
	2018–19	2019–20	2020–21	2020–21	2020–21
1. Singapore	73,189	76,494	83,678	40.7%	
2. United States	24,861	25,477	26,531	12.9%	
3. United Kingdom	15,998	18,883	19,315	9.4%	
4. Switzerland	13,998	14,025	12,931	6.3%	
5. Japan	11,871	13,521	10,572	5.1%	-1%
6. Hong Kong	10,375	11,209	8,563	4.2%	-2%
7. New Zealand	7,103	7,472	7,957	3.9%	
8. China	4,727	5,648	5,807	2.8%	
9. Germany	3,152	3,633	3,791	1.8%	
10. Ireland	3,092	3,775	3,631	1.8%	

All other jurisdictions	24,242	23,043	22,600	11.0%	
--------------------------------	--------	--------	--------	-------	--

For table 11 and table 12:

- **Top 10 rank** reflects the ten countries or jurisdictions with the highest dollar value of IRP expenditure or of revenue in the 2020–21 income year.
- The sum of IRP expenditure or IRP revenue for all jurisdictions may not reconcile to total IRP expenditure or revenue elsewhere in these statistics due to source data limitations and differences. Refer to **Methodology** for more information.

Download data from the 2016–17 income year onwards at [Table 2](#) .

IRPD lodgments


This section provides statistics for IRPD lodgments by entity and report type.

IRPD statistics for [IRP expenditure](#) and [IRP revenue](#) are sourced from processed:

- International dealings schedules (IDS)
- Local file – part A (LFPA) lodgments from **country-by-country (CBC)** reporting entities, comprising
 - entities that disclose IRPDs in the LFPA and not in the IDS, most of which adopt the local file administrative solution (admin solution)
 - entities that disclose IRPDs in both the IDS and the LFPA (non-admin solution).

IRPD lodgments refers to lodgments by entities that disclose monetary IRPDs (excluding foreign exchange gains and losses) in the IDS or LFPA.

Chart 9: IRPD lodgments by entity type, 2016–17 to 2020–21 income years

 Chart 9 shows lodgment numbers by entity type over the last five income years, with companies, partnerships and trusts continuing to grow in number. The link below will take you to the data behind this chart.


Download data from the 2016–17 income year onwards at [Table 3](#) .

Table 13: Count of IRPD lodgments by entity and report type, 2020–21 income year

Report type	Companies (no.)	Partnerships (no.)	Trusts (no.)	Total (no.)
IDS	5,917	65	951	6,933
LFPA	3,806	26	94	3,926
a) Admin solution	2,878	16	40	2,934
b) Non-admin solution	928	10	54	992
Total	9,723	91	1,045	10,859

Chart 10 and **Table 14** show most [IRP expenditure](#) and [IRP revenue](#) (by dollar value) in 2020–21 is disclosed by CBC reporting entities that adopt the admin solution.

Chart 10: Value of IRPD lodgments by report type, 2015–16 to 2020–21 income years

 Chart 10 shows the value of IRPD lodgments by report type for the last six income years. Taxpayers are increasingly adopting the administrative solution to report their IRPDs. The link below will take you to the data behind this chart.

In this chart – **Value** refers to the total dollar value of [IRP expenditure](#) and [IRP revenue](#).

Download data from the 2015–16 income year onwards at [Table 3](#).

**Table 14: Value of IRPD lodgments by report type, 2016–17
2020–21 income years**

Report type	2016–17 (\$m)	2017–18 (\$m)	2018–19 (\$m)	2019–20 (\$m)	2020–21 (\$m)
IDS	49,678	55,188	56,383	49,955	49,955
LFPA	323,311	358,160	410,711	438,182	438,182
a) Admin solution	92,435	237,180	297,996	374,740	374,740
b) Non-admin solution	230,877	120,980	112,716	63,443	63,443
Total	372,989	413,348	467,095	488,137	488,137

In this table – **Value** refers to the total dollar value of [IRP expenditure](#) and [IRP revenue](#).

QC 72789

Reference material

How we source the IRPD statistics and further information.

Last updated 23 July 2024

On this page

[Methodology](#)

[Other relevant publications](#)

[Definitions](#)

Methodology

IRPD statistics is based on cleansed IRPD data as at **16 February 2023**, combining data from processed IDS and LFPA lodgments.

The IRPD statistics in *IRPD statistics 2020–21* reflect the most complete picture of total IRPDs.

To meet privacy and confidentiality requirements, some items may be aggregated with other items or not included.

Totals in tables and charts may differ from the sum of components due to rounding.

Data sources

International dealings schedule (IDS)

Companies, partnerships, trusts with IRPDs greater than \$2 million are required to lodge an IDS. For **small business entities** there is a **higher threshold** of the lesser of \$5 million or 50% of **aggregated turnover**. IRPDs are disclosed by IRPD type in the aggregate at **Section A** of the IDS.

Local file – part A (LFPA)

Country-by-country (CBC) reporting entities are required to lodge country-by-country (CBC) reporting statements, which include the local file.

The **local file** includes part A (LFPA), which collects IRPD data for individual IRP transactions, at a more detailed level than the aggregated IRPD data in the IDS.

Where statistics are sourced from the LFPA, IRPD data is aggregated to the taxpayer level, to align with IDS reporting.

Administrative solution

The **local file administrative solution** (admin solution) can be chosen by **CBC reporting entities** to minimise duplicated IRPD reporting in the IDS and LFPA:

- If a CBC reporting entity chooses to lodge the LFPA at the same time as the tax return, the IRPD labels at questions 2 to 17 in Section A of the IDS don't need to be completed.
- Alternatively, if the admin solution is not adopted, CBC reporting entities are generally required to disclose IRPDs in the IDS and the LFPA.

Where a CBC reporting entity has not adopted the admin solution, statistics may be sourced from the IDS or the LFPA, depending on the nature of the IRPD statistic and other considerations.

Hybrid IRPD data

The statistics in *IRPD statistics* are sourced from curated, hybrid population datasets that combine IRPD data from IDS and LFPA lodgments.

General IRPD statistics

- Where Section A of the IDS has been completed, IRPD data from the IDS is generally used, instead of the LFPA.
- Where Section A of the IDS has **not** been completed, a 'reconstruction' of IDS data for IRPDs (at the taxpayer level) is derived from LFPA data.

Example: general IRPD statistics

Taxpayer	Section A	LFPA	IRPD data source
The Trustee for 123 Trust	✓	X	Reported IDS data
ABC Pty Ltd	X	✓	Reconstructed IDS data
XYZ Limited	✓	✓	Reported IDS data

--	--	--	--

1. *The Trustee for 123 Trust* is not required to lodge an LFPA because it is not a CBC reporting entity. The taxpayer's IRPDs are sourced from Section A of the IDS.
2. *ABC Pty Ltd* has adopted the **local file administrative solution**. As the taxpayer has not completed Section A of the IDS, the taxpayer's IRPDs are sourced from reconstructed IDS data derived from the LFPA.
3. *XYZ Limited* is a CBC reporting entity that did not adopt the admin solution. The taxpayer disclosed IRPDs in Section A of the IDS, **and** subsequently lodged an LFPA. The taxpayer's IRPDs are sourced from Section A of the IDS.

IRPD statistics by jurisdiction

- Where an LFPA has been lodged, IRPD data from the LFPA is generally used, instead of the IDS. The LFPA collects jurisdictional data for all IRPDs.
- Where an LFPA has **not** been lodged, the IRPD data at questions 3 to 4 in **Section A** of the IDS is used. IDS reporting at these questions is limited to a subset of countries with the highest dollar value of IRPDs.

Example: IRPD statistics by jurisdiction

Taxpayer	Section A	LFPA	Jurisdictional data source
The Trustee for 123 Trust	✓	X	Reported IDS data
ABC Pty Ltd	X	✓	LFPA jurisdictional data
XYZ Limited	✓	✓	LFPA jurisdictional data

4. *The Trustee for 123 Trust* is not required to lodge an LFPA because it is not a CBC reporting entity. The taxpayer's IRPDs are sourced from Section A of the IDS, noting that the jurisdiction of all IRPDs may not be disclosed.
5. *ABC Pty Ltd* has adopted the **local file administrative solution**. The taxpayer's IRPDs by jurisdiction are sourced from the LFPA.
6. *XYZ Limited* is a CBC reporting entity that did not adopt the admin solution. The taxpayer disclosed IRPDs in Section A of the IDS **and** subsequently lodged an LFPA. The taxpayer's IRPDs by jurisdiction are sourced from the LFPA, which discloses the jurisdiction of all IRPDs.

Data cleansing and other issues

Data cleansing

Some IRPD data from the LFPA and IDS is affected by a range of reporting and other data integrity issues, the impact of which can be pronounced for the LFPA because IRPDs are reported at the transaction level.

As part of the compilation of *IRPD statistics*, cleansing procedures have been applied to IRPD data to remediate these issues where possible. Many of the most significant revisions have been applied after consultation with concerned entities.

Examples of data integrity issues include:

- transcription errors
- typographical errors involving similar country codes
- transposition errors which overstate or understate reported IRPDs
- other unintentional misreporting, where IRPDs haven't been disclosed correctly.

Authorised deposit-taking institutions (ADIs)

IRPD statistics excludes data reported by authorised deposit-taking institutions (ADIs), and foreign banks and branches (banks).

We exclude these records, which relate to a small number of entities, to present a more meaningful overview of statistics for IRPDs.

The dealings reported by these entities can distort or skew IRPD statistics because:

- banking operations may involve more extensive overseas branch operations than for other industries – the obligation to report, or to not report, dealings between offshore branches and overseas related entities in any particular year may depend on a range of specific factual circumstances and tax rules
- transitional and special reporting rules apply to local file reporting for banks
- data quality issues.

Taxation statistics

We also publish IRPD statistics in *Taxation statistics 2020–21*.

When analysing IRPD statistics, you should be aware that:

- *Taxation statistics* also provides non-IRPD statistics from the IDS.
- *Taxation statistics* provides limited IRPD statistics from the IDS for the 2012–13 to 2017–18 income years. However, the IRPD statistics in *Taxation statistics 2020–21* exclude IRPDs reported in the LFPA, where the majority of IRPDs (by dollar value) are now disclosed.
- *IRPD statistics* provides IRPD statistics for the 2015–16 income year onwards. The IRPD statistics in *IRPD statistics 2020–21*
 - include IRPDs reported in the IDS and LFPA
 - are curated to minimise the impact of legislative and reporting changes
 - reflect comprehensive data cleansing to address data integrity issues.

Other relevant publications

Schedules and instructions

- International dealings schedule 2021
- Local file instructions 2021
- Local file/master file 2021

Taxation statistics

- Taxation statistics 2020–21

Definitions

IDS

International dealings schedule

IRP

International related party

IRPDs

International related party dealings

IRPD type

The type of IRPD based on:

- transaction category groupings or transaction categories in the LFPA
- equivalent questions/labels in Section A of the IDS (*International related party dealings*).

The following table summarises the IRPD types presented in these statistics, along with the LFPA transaction category groupings and IDS questions used.

Table 15: IRPD types and LFPA/IDS data source

IRPD type	LFPA transaction category grouping	IDS question(s)
Tangible property of a revenue nature	IRPDs in tangible property of a revenue nature	Question 5
Royalties and licence fees	IRPD use rights	Question 6

Rent and leasing	IRPD use rights	Question 7
Service arrangements	IRPD service arrangements	Question 8
Interest	IRPD debt interests (including ordinary loans and borrowings)	Question 11a–c
Guarantees	Other kinds of IRPDs of a financial nature	Question 11d
Insurance	Other kinds of IRPDs of a financial nature	Question 11e
Reinsurance	Other kinds of IRPDs of a financial nature	Question 11f
Derivatives	IRPD derivative transactions	Question 9
Other financial	Other kinds of IRPDs of a financial nature	Question 11h
Share-based employee remuneration	IRPD share-based employment remuneration	Question 15
Other IRPDs	Other revenue IRPDs	Question 12

IRP expenditure

Expenditure incurred for IRPDs, including capitalised interest deducted.

For the purposes of these statistics, IRPD expenditure generally excludes:

- consideration paid for IRPDs of a non-revenue (capital) nature
- foreign exchange losses deducted for IRPDs.

IRP revenue

Revenue earned or derived from IRPDs, including capitalised interest returned.

For the purposes of these statistics, IRPD revenue generally excludes:

- consideration received for IRPDs of a non-revenue (capital) nature
- foreign exchange gains returned for IRPDs.

Jurisdiction

The country or jurisdiction in which the non-resident counterparty to an IRPD is located.

For the purposes of the LFPA, jurisdiction is based on either:

- the country of the permanent establishment of the IRP (if applicable), otherwise
- the country of tax residence of the IRP.

LFPA

Local file – part A. An LFPA must be lodged by **country-by-country (CBC) reporting entities** with IRPDs for income years from 1 January 2016, unless exempted or excluded.

QC 72789

Our commitment to you

We are committed to providing you with accurate, consistent and clear information to help you understand your rights and entitlements and meet your obligations.

If you follow our information and it turns out to be incorrect, or it is misleading and you make a mistake as a result, we will take that into account when determining what action, if any, we should take.

Some of the information on this website applies to a specific financial year. This is clearly marked. Make sure you have the information for the right year

before making decisions based on that information.

If you feel that our information does not fully cover your circumstances, or you are unsure how it applies to you, contact us or seek professional advice.

Copyright notice

© Australian Taxation Office for the Commonwealth of Australia

You are free to copy, adapt, modify, transmit and distribute this material as you wish (but not in any way that suggests the ATO or the Commonwealth endorses you or any of your services or products).