



FUELLING
PROSPERITY

Tax Disputes

Things you need
to know.



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The Changing Environment

Inland Revenue activity has become more aggressive in recent times, with the government pressing for more revenue collection and media and public attitudes hardening against perceived corporate tax avoidance. This is expected to intensify in the coming years.

In our experience, Inland Revenue is:

- requesting more information from businesses
- conducting more audits and taking longer to conclude them

- increasingly reluctant to negotiate a settlement
- moving more matters to formal disputes, including litigation.

All tax issues are coming under more audit scrutiny, with particular attention being paid to international tax issues.

As Inland Revenue gets better at risk assessment and shares more information with other tax authorities, there is an increased potential for more aggressive tax adjustments, with a commensurate increase in the potential for tax disputes.



New Zealand is not alone. KPMG's International Global Tax Benchmarking Survey 2016 confirms that behaviour is changing among tax authorities worldwide. Feedback suggests that executives are finding today's tax administrations increasingly difficult to deal with.

Source: KPMG International 2016



Our services in a nutshell

KPMG's national team of specialists has extensive experience assisting organisations resolve tax disputes, whilst maintaining an effective working relationship with Inland Revenue. We assist with all aspects of tax disputes, including:

1. Assessing uncertain tax positions and filing strategies
2. Preparation and filing of voluntary disclosures and section 113 requests
3. Management and advice in respect of contentious risk reviews and audits
4. Responding to information requests and advice in respect of preserving privilege and tax advice non-disclosure rights
5. Time-bar waiver requests
6. Management of and advice in respect of the statutory disputes process
7. Undertaking settlement negotiations and mitigation of penalties.



95% of tax disputes considered by the Disputes Revenue Unit went in favour of the Commissioner. KPMG's Tax Disputes team can help prevent, manage and resolve tax disputes.