

THE STATES OF DELIBERATION
of the
ISLAND OF GUERNSEY

15th July, 2026

Proposition No. P. 2026/49

Policy & Resources Committee

Tax Reform 2026

AMENDMENT

Proposed by: Deputy A Matthews

Seconded by: Deputy A Sloan

In Proposition 1, immediately after the words “Appendix 7” insert the following words
“subject to zero rating food and non-alcoholic drink for any goods and services tax”.

Rule 4(1) Information

- a) The proposition contributes to the States’ objectives and policy plans by ensuring Guernsey’s tax system remains fair and just.
- b) In preparing this proposition members of Policy and Resources have been informed but no formal consultation has taken place.
- c) The proposition has been submitted to His Majesty’s Procureur for advice on any legal or constitutional implications.
- d) The financial implication of carrying out this amendment is to reduce the revenue raised from a goods and services tax.
- e) Drafting advice has been sought from the States’ Greffier.

Explanatory Note

This amendment seeks to introduce a 0% rate for food and non-alcoholic drink.

Resolutions of November 2024 instructed the Policy & Resources Committee to consider the zero-rating of food for GST. However, in February 2026 resolutions relating to “Tax Reform: Workstream 1” directed that if introduced, GST should be applied at a standard rate of 5% and that all foodstuffs should be subject to the 5% rate.

Subsequently, the “Workstream 2” element of tax reform has concluded without recommending significant increase in the contribution of corporate tax. Furthermore, the current “Tax Reform 2026” Policy Letter specifies a standard rate of 3% for GST, as set out in Appendix 7, Figure A7.1.

A component part of the decision to forgo the zero-rating element for food from GST proposals was that a differing 6% rate requirement would exceed that of Jersey’s GST rate of 5% and could be seen as uncompetitive or more difficult to administer.

A crude estimation of the revenue difference can be obtained by considering the February 2026 Policy Letter, which indicated that a 6% standard rate for GST without food, when compared to a 5% rate with food included, such that the food element represented approximately one-sixth of the base consumption revenue. Applying this ratio to the revised revenue projection set out in Appendix 7 for GST only, and excluding the ISE Scheme revenue since this is not affected by a zero-rate for food, would result in a one-sixth decrease in the projected £46m revenue, or approx.. -£7.7m annual difference with the unamended propositions.

This amendment does not propose a compensatory increase in the standard rate of GST to balance the shortfall. For example, an increase to 4% would exceed the projected revenue when compared to the unamended propositions. The Committee *for* Policy and Resources would of course be at liberty to bring changes to revise the standard rate to address a shortfall at any time.

This amendment also does not alter the Essentials Cost Relief Payment scheme. The scheme was modelled on a similar scheme in applied in Jersey which was initially designed to compensate for the application of food to GST in Jersey. With food set to a zero rate, a revised calculation of “Minimum Income Standards” to address households with an income above the threshold for income support but which would be negatively affected by the imposition of GST to a basket of “essential” goods may be considered. The mandate for amending the rates of the Essential Cost Relief scheme would rest with the Committee *for* Employment and Social Security.