



Policy & Resources Committee

Response to a Question Pursuant to Rule 14 of the Rules of Procedure of the States of Deliberation and their Committees

Subject: Pillar II: Alderney-related revenues

States' Member: Deputy M Helyar

Date received: 4th January 2026

Date of reply: 19th January 2026

Question 1:

In relation to the implementation of the OECD Pillar II (GloBE) rules, including the Qualified Domestic Minimum Top-up Tax and any other related measures, what is the most recent estimate used by the Policy & Resources Committee of:

- a. the total annual Pillar II-related tax expected to be raised from all in-scope businesses within the Bailiwick of Guernsey; and
- b. the annual Pillar II-related tax expected to be raised from in-scope businesses whose relevant economic activity, profits or place of establishment is in Alderney, however constituted (including companies, partnerships, branches or other entities)?

(Please provide the figures in pounds sterling, for each of the next 5 financial years for which estimates have been prepared).

Answer:

- (a) As set out in the 2026 Budget, the most recent estimate used by the Policy & Resources Committee of the total annual Pillar II-related tax expected to be raised from all in-scope businesses within Guernsey, Alderney and Herm for 2026 is £40m.
- (b) See response to 3.

Question 2:

For the avoidance of doubt, the figures requested in 1(b) should:

- a. not be aggregated with, or netted off against, estimates relating to businesses in any other island or jurisdiction;
- b. not be grouped or combined by sector, activity or type of entity; and
- c. if currently embedded within a wider model, be extracted and stated as a separate numerical amount, rather than described only in qualitative or percentage terms.

If more than one modelling scenario has been used (for example, central, upside,

downside), please provide the Alderney-specific figure for each scenario, clearly labelled.

Answer:

See response to 3.

Question 3:

If no specific Alderney-related estimate of Pillar II-related tax receipts has been produced at any stage of the policy development, modelling or decision-making process, please state this explicitly. If such estimates exist in any form (for example, as internal working assumptions, scenario analyses, or components within wider modelling for Guernsey and Alderney), please state the most recent Alderney-specific figures, together with:

- a. the date on which they were produced; and**
- b. the purpose for which they were prepared.**

Answer:

No specific estimate of Pillar II-related tax receipts in relation to in scope businesses whose relevant economic activity, profits or place of establishment is in Alderney has been produced at any stage of the policy development, modelling or decision-making process. This is as, from a tax perspective, Pillar II applies to in-scope businesses in Guernsey which for tax purposes includes Alderney and Herm. Companies are also not required to provide information on their tax return which indicates in which island their economic activity takes place, so whilst the company may be registered in Alderney, its activity may well take place in Guernsey, and vice versa. Therefore, the Revenue Service has not categorised any of the analysis in the manner requested and does not have the information so to do.

Within the estimate of annual Pillar II-related tax expected to be raised from all in-scope businesses, the amount attributable to Alderney registered companies for 2026 based on the latest information available (and using the same methodology as the total of £40m) is £2.5m.

No forecasts for Pillar II receipts in future years have yet been prepared due to the inherent uncertainty in estimating this income stream.

Question 4:

These questions relate solely to aggregate forecast revenues and not to any identifiable individual taxpayer. Please confirm that there is no legal or policy impediment to publishing the aggregate Alderney-specific estimates requested in 1(b) and 2, or, if you contend that such an impediment exists, identify the specific statutory provision or formal policy relied upon.

Answer:

See response to 3.

Question 5:

Please also provide a brief description of the methodology used to derive the Alderney-specific estimates, including any material assumptions made as to:

- a. the number and nature of in-scope Alderney businesses; and**
- b. their forecast effective tax rates and liabilities under the Pillar II framework.**

Answer:

As set out in the response to question 3, the aggregate figure provided relates to all Alderney registered companies regardless of where their economic activity takes place.