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IRD issues practice note (DIPN 55) on research and development (R&D) expenditure

DIPN 55, recently issued by the Inland Revenue Department (IRD), is 100-page long containing 25 examples illustrating the various issues discussed in the practice note. These issues include what constitutes an R&D project for different industries, e.g., those applicable to Fintech and the development of software.

This long practice note provides detailed explanation and guidance on the normal or enhanced tax deductions for R&D expenditure under the recently enacted provisions contained in the Inland Revenue Ordinance (IRO), including:

(i) that a project must strive to make an "advance in science and technology" if it is to qualify as a "qualifying R&D activity" eligible for the enhanced tax deductions;

(ii) "qualifying expenditure" on a "qualifying R&D activity" that is undertaken in Hong Kong will qualify for the enhanced tax deductions, even if the whole R&D project is not entirely undertaken in Hong Kong;

(iii) a share of the R&D expenditure by an enterprise which has undertaken part of or all the underlying R&D activities under a cost contribution agreement (CCA) of a group may be accepted as "in-house" R&D expenditure incurred by the enterprise;

(iv) rights generated by one company from its R&D activities can be held by another company as a nominee without affecting the claims for the normal or enhanced tax deductions;

(v) a special purpose vehicle (SPV) of a group, which undertakes R&D activities and beneficially owns any rights so generated, will be eligible for the normal or enhanced tax deductions if it aims to charge royalties to other group companies for the use of the rights;

(vi) subcontracting fees paid to an overseas associate would be regarded as in-house R&D expenditure if such fees are not more than 20% of the relevant R&D expenditure and do not exceed HK$2 million; and

(vii) what constitutes expenditure in relation to employees and consumable items eligible for the enhanced tax deductions.

In addition, DIPN 55 also specifies what kind of detailed R&D records are required of taxpayers to substantiate their claims for deduction of R&D expenditure, while noting that some flexibility may be exercised as regards small enterprises.

Many issues of the new law discussed in DIPN 55 are complicated. Clients who wish to explore how they can benefit from the new law, and the assessing practice stated in DIPN 55, can contact their tax executives.

Overview of the new law

The new law stipulates that R&D expenditure is classified into either "Type A expenditure" or "Type B expenditure". While Type A expenditure qualifies for the 100% normal tax deduction, Type B expenditure qualifies for enhanced tax deductions: the first HK$2 million being eligible for a 300% deduction and the remainder, not subject to any cap, deductible at 200%.

Type B expenditure refers to (i) a payment to a "designated local research institution" (DLRI)[1] for subcontracted out qualifying R&D activities; and (ii) expenditure in respect of employees and consumable items incurred for in-house qualifying R&D activities.

Type A expenditure is: (i) R&D expenditure on an R&D activity[2]; or (ii) non-Type B expenditure incurred on a qualifying R&D activity, including payments made to an "R&D institution"[3] that is not a DLRI.

The new law applies to R&D expenditure incurred by a taxpayer on or after 1 April 2018.

For a more detailed discussion of the new law, please refer to our prior Hong Kong Tax alerts[4].

The table below summarizes the key features of the new law.

			Expenditure or payment involved	Type of expenditure
"R&D activities"	"Qualifying R&D activities" (wholly undertaken and carried on in Hong Kong)	In-house	Staff costs and consumables	Type B expenditure
			Other R&D expenditure (including capital expenditure on plant and machinery)	Type A expenditure
		Outsourced	Undertaken by a DLRI	Type B expenditure
	Other "R&D activities" (undertaken in or outside Hong Kong)	In-house	R&D expenditure (including capital expenditure on plant and machinery)	Type A expenditure
		Outsourced	Undertaken by an "R&D institution"	Type A expenditure

Departmental Interpretation and Practice Note No. 55 (DIPN 55)

Qualifying R&D activities eligible for the enhanced tax deductions

Under the new law, a "qualifying R&D activity" is defined to mean (i) an R&D activity in the fields of natural or applied science to extend knowledge; (ii) an original and planned investigation carried on with the prospect of gaining new scientific or technical knowledge and understanding; or (iii) the application of research findings or other knowledge to a plan or design for producing or introducing new or substantially improved materials, devices, products, processes, systems or services before they are commercially produced or used.

1. "Designated local research institution" refers to: (a) any university or college located in Hong Kong; or (b) any other local institution that undertakes qualifying R&D activities in Hong Kong, that is designated by the Commissioner for Innovation and Technology as a "designated local research institution". The list of DLRI can be accessed from this link: https://www.itc.gov.hk/en/dlri/list.htm
2. In addition to the three items of a "qualifying R&D activity" noted below, an "R&D activity" also includes a systematic, investigative or experimental activity carried on for the purposes of any feasibility study or in relation to any market, business or management research, regardless of whether such activities are undertaken in or outside Hong Kong.
3. "R&D institution" is defined to mean: (i) a designated local research institution; and (ii) any university or college that is not a designated local research institution.
4. Hong Kong Tax alerts issued on 8 May 2018 (2018 Issue No. 11) and 24 October 2018 (2018 Issue No. 13)

Meaning of advance in science or technology

DIPN 55 indicates that underpinning the definition of a "qualifying R&D activity" is whether an R&D project strives to make an advance in a relevant field of science or technology (the term "science or technology" excluding arts, humanities and social sciences, including economics).

An advance in science or technology means an advance in the overall knowledge or capability in a field of science or technology (not a company's own state of knowledge or capability alone).

In this context, the overall knowledge or capability in a field of science or technology means the knowledge or capability in the field which is publicly available or readily deducible from the publicly available knowledge or capability by a competent professional in the field. Only work which seeks an advance relative to such overall knowledge or capability in a field of science or technology is a "qualifying R&D activity". This would be the case even though such work may ultimately not achieve or fully realize its original goals.

In many instances, scientific or technological uncertainty exists when knowledge of whether something is scientifically possible or technically feasible, or how to achieve it in practice, is not readily available or deducible by a competent professional in the field. In such instances, resolving the scientific or technological uncertainties involved would generally qualify as an advance in science or technology. In contrast, uncertainties that can easily be resolved by a competent professional working in the field are not scientific or technological uncertainties.

For example, in electronic devices, the characteristics of individual components or chips are fixed, but there can be uncertainty about the best way to combine those components to achieve an overall effect. Resolving such an uncertainty would generally qualify as an advance in science or technology. However, assembling different components (or software sub-programs) to achieve an established pattern, or following routine methods for doing so, involves little or no scientific uncertainty, and therefore would unlikely qualify.

Specifically, Example 1 of DIPN 55 indicates that where two non-associated enterprises undertake two separate qualifying R&D projects of the same nature, both enterprises would be eligible for the normal or enhanced tax deductions. This would be the case even if one of the enterprises involved succeeded in achieving a technology breakthrough much earlier.

Meaning of "substantially improved"

The (iii) item in the definition of a "qualifying R&D activity" noted above involves the application of research findings or other knowledge for producing or introducing new or "substantially improved" materials, devices, products, processes or services.

In this regard, DIPN 55 states that the phrase "substantially improved" has a reasonably high threshold which involves changing or adapting the scientific or technological characteristics of something to the point where it is "better" than the original. The improvement should be more than a minor or routine upgrading. The question of what scale of advance would constitute a substantial improvement will differ between fields of science and technology and will depend on what a competent professional working in the field would regard as a genuine and non-trivial improvement.

Only activities directly contribute to achieving an advance in science or technology would be regarded as "qualifying R&D activities"

DIPN 55 states that a "qualifying R&D activity" begins when work to resolve the scientific or technological uncertainty starts (including planning for resolving the uncertainty), and ends when that uncertainty is resolved or work to resolve it ceases. Generally, a "qualifying R&D activity" ends when knowledge is codified in a form usable by a competent professional working in the field, or when a prototype or pilot plant with all the functional characteristics of the final material, device, product, process, system or service is produced.

All other activities that do not fall between the start and end points would not be "qualifying R&D activities".

Qualifying expenditure on a qualifying R&D activity undertaken in Hong Kong qualifies for the enhanced tax deductions, even though the whole R&D project is not entirely undertaken in Hong Kong

In addition to satisfying the definition of a "qualifying R&D activity" as discussed above, the new law also requires that a "qualifying R&D activity" must be wholly undertaken and carried on in Hong Kong.

In this regard, DIPN 55 states that the requirement "wholly undertaken and carried on in Hong Kong" does not mean that all the activities pertaining to an R&D project must be carried on in Hong Kong. If some of the activities of an R&D project are carried on outside Hong Kong, enhanced tax deductions can still be claimed for R&D expenditure incurred on those activities which are carried on in Hong Kong if they fall within the definition of a "qualifying R&D activity".

Costs shared under a CCA by a Hong Kong group enterprise which has actively participated in the underlying R&D activities of the group may be regarded as in-house R&D expenditure

DIPN 55 states that where a Hong Kong group enterprise has undertaken part of or all the underlying pooled R&D activities of the group under a CCA, the costs shared by the Hong Kong enterprise under the CCA may be accepted as in-house R&D expenditure incurred by the enterprise if certain conditions are satisfied.

Essentially, the specified conditions require the enterprise to (i) possess the capacity, knowledge and expertise to control the development, enhancement, maintenance, protection and exploitation (i.e., the DEMPE) functions when playing a significant role in carrying out the underlying R&D activities, i.e., the enterprise should have its own R&D personnel who have the capability to establish research programmes, monitor progress, decide to terminate or change course, design projects, perform budgeting, etc.; (ii) co-own any rights generated from the R&D activities with other CCA participants; and (iii) share costs which are proportionate to the overall expected benefits derived from the useful life of any rights generated from the R&D activities by the respective CCA participants.

In relation to the condition specified in (iii) above, DIPN 55 states that any charge-in or charge-out balancing adjustments made under the CCA must be added to or netted-off against the R&D costs incurred by the enterprise. It is after making these adjustments that the tax deductions for the in-house R&D expenditure incurred by the enterprise for a year is to be ascertained.

Where the R&D activities under a CCA are carried on partly in Hong Kong and partly outside Hong Kong, DIPN 55 states that only the contributions borne by the enterprise for that part of the R&D activities carried on in Hong Kong can qualify for the enhanced tax deductions. The share of contributions attributable to the part of the R&D activities carried on outside Hong Kong may nonetheless rank for the 100% normal tax deduction.

In cases where the enterprise participates in an already active CCA and obtains an interest in any results of the prior CCA activities by making a "buy-in payment", DIPN 55 states that such payment represents a consideration for the acquisition of rights generated from an R&D activity and, thus, is not deductible under the new law. Conversely, if the enterprise receives a "buy-out payment" upon leaving a CCA and disposes of its interest under the CCA, the payment received would be deemed taxable to the extent the relevant R&D expenditure has been previously allowed for tax deduction.

Rights generated from R&D activities of a company can be held by another company as a nominee

The new law denies deduction for R&D expenditure incurred by an enterprise under section 16B of the IRO if any rights generated from an R&D activity are not, or will not be, fully vested in the enterprise.

In this regard, DIPN 55 recognizes that it is not uncommon to use SPVs to hold intellectual property rights generated from R&D activities. If an SPV company is only holding the rights as a nominee for the enterprise performing an R&D activity, the rights generated from the R&D activity would be regarded as fully vested in the enterprise. As such, the enterprise, being the "economic owner" of the rights, would be able to claim the normal or enhanced tax deductions for the R&D expenditure incurred, even though the rights are held by a separate SPV company as a nominee (Example 5 of DIPN 55 refers).

SPV can undertake R&D activities and charge other group companies royalties for the use of any rights so generated and claim tax deduction for R&D expenditure incurred

The new law also denies deduction for R&D expenditure incurred under 16B of the IRO where an R&D activity is undertaken by a person for another person. The reason behind this is that the R&D expenditure incurred would not be at risk since the person undertaking the R&D activity would get compensated regardless of the outcome of the R&D activity. Accordingly, if an enterprise makes a payment to a DLRI for a qualifying R&D activity related to its trade, profession or business, only the enterprise can claim enhanced deduction of the payment under section 16B of the IRO. The DLRI cannot claim enhanced deduction of its R&D expenditures incurred on the qualifying R&D activity undertaken for the enterprise. Instead, such expenditures should be deducted by the DLRI in accordance with the normal deduction rules under section 16(1) of the IRO.

Nonetheless, Example 6 of DIPN 55 indicates that an SPV can be formed to undertake R&D activities and beneficially own any rights generated from the R&D activities, and then charge royalties to other group companies for the use of the rights so generated. Under such circumstances the IRD would treat the SPV as the "economic owner" of the rights and, therefore, the SPV would not be regarded as merely undertaking the R&D activities for other persons or group companies. As such, the SPV would be able to claim the normal or enhanced tax deductions for R&D expenditure incurred under the new law.

Commercial considerations aside, a tax disadvantage of the SPV arrangement in Example 6 is that any R&D expenditure incurred and claimed for a tax deduction before any rights, and hence chargeable royalties are generated, would only create a utilized tax loss situation. By comparison, if the R&D activities are undertaken by a profitable operating company, the normal or enhanced tax deductions for R&D expenditure incurred can immediately be used to offset against the profits of the operating company.

Extra-statutory concession on relatively insignificant subcontracting fees paid to an overseas associate

Under the new law, subcontracting fees paid to any person for R&D activities would not be regarded in-house but outsourced R&D activities. As such, if the person is not an "R&D institution" or a DLRI as defined, no tax deduction can be claimed under section 16B of the IRO.

Recognizing that some taxpayers may not have the full capability to wholly undertake an R&D project in Hong Kong, DIPN 55 provides an extra-statutory concession.

Under the concession, where the subcontracting fees paid to an overseas associate for R&D services are not more than 20% of the total costs of the R&D project, and the subcontracting fees in aggregate are not more than HK$2 million, the subcontracting fees would be regarded as an in-house Type A expenditure eligible for the 100% normal tax deduction.

Type B expenditure eligible for the enhanced tax deductions

Costs of employees directly or actively engaged in a qualifying R&D

Under the new law, only expenditure incurred (i) in relation to an employee who is engaged directly and actively in a qualifying R&D activity; or (ii) on a consumable item that is used directly in a qualifying R&D activity, related to the trade, profession or business of an enterprise, qualifies as Type B expenditure.

In this context, DIPN 55 clarifies that in addition to an individual that has a contract of employment with an enterprise, the following individuals would generally be accepted as being employees of the enterprise if the employer and employee relationship subsists (i.e., the individual is subject to the supervision, direction or control by the enterprise):

- secondees or expatriates sponsored by the enterprise;
- expert consultants under a temporary employment contract with the enterprise; and
- part-time R&D staff;

but does not include independent freelancers or staff supplied by companies specialized in providing R&D personnel.

Where a director occupies a dual role in being both a director and an employee directly and actively engaged in a qualifying R&D activity, DIPN 55 indicates that some apportionment of the relevant remuneration may be required.

In the absence of tax abuses and subject to transfer pricing rules, DIPN 55 states that the portion of the remuneration of the director which represents an arm's-length compensation for their research services can be regarded as expenditures in relation to an employee qualifying as Type B expenditure eligible for the enhanced tax deductions.

DIPN 55 further clarifies that in addition to salary, wages and retirement benefits, employee costs eligible for the enhanced tax deductions also include any other benefit that constitutes a cash outlay paid by the employer. Such cash outlays include staff quarters expenses, medical insurances, training and certification costs in areas of specialization relevant to a qualifying R&D activity, as well as airfare and living allowances incurred to sponsor an employee to attend relevant overseas training. However, stock-based compensation like share options and share awards would be excluded if it does not constitute a cash outlay paid by the employer.

Consumable items directly used in a qualifying R&D activity

The term "consumable item" is defined under the new law to mean any material or item, including any fuel, power and water that, when used, is consumed or transformed in such a way that it is no longer usable in its original form. Examples of consumable items given by DIPN 55 include:

- A laboratory chemical which is used up or converted into an unusable product in an R&D process; and
- An electronic component that is integrated into a prototype and is no longer available for use for another purpose;

but does not include software as it is not consumed or transformed. Nonetheless, such an expenditure is wholly deductible under section 16G of the IRO in the year of acquisition.

Payments to a DLRI generally eligible for the enhanced tax deductions irrespective of DLRI's spending pattern

DIPN 55 indicates that, subject to certain anti-avoidance provisions, an enterprise which makes a payment to a DLRI for a qualifying R&D activity wholly undertaken by the DLRI in Hong Kong would be eligible for the enhanced tax deductions. This would be the case even if the DLRI had incurred expenditure for the qualifying R&D activity, which if incurred by the enterprise itself would be Type A expenditure.

Nonetheless, DIPN 55 states that the payments made to a DLRI for an otherwise qualifying R&D activity (if undertaken wholly in Hong Kong) carried on by the DLRI outside Hong Kong would not be eligible for the enhanced tax deductions. Instead, in such a situation, the payments would only be eligible for the 100% normal tax deduction. Similarly, where a DLRI further subcontracts part of a qualifying R&D project to a research institution outside Hong Kong, only the part of the payment that is paid for the qualifying R&D activities carried on in Hong Kong is eligible for the enhanced tax deductions. The remaining payment would only be allowed for the 100% normal tax deduction.

Service fees received from the Government would generally not be regarded as grants or subsidies to be netted-off from the R&D expenditure incurred

The new law denies deduction for R&D expenditure where the R&D expenditure is to be met directly or indirectly by any government, public or local authority, or another person.

Example 14 of DIPN 55 indicates that no part of the fees received by a taxpayer from the Government for constructing a green building would need to be netted-off from the R&D expenditure incurred by the taxpayer for a qualifying R&D activity that the taxpayer needs to undertake to construct the building. As such, the taxpayer would be able to claim the normal or enhanced tax deductions based on the relevant gross R&D expenditure incurred.

Similarly, Example 15 of DIPN 55 indicates that a DLRI, commissioned by the Government for a fee to carry on a qualifying R&D activity whereby any rights generated from the qualifying R&D activity would be co-owned on a 50:50 basis by the two parties, would be able to claim the normal or enhanced tax deductions based on 50% of the gross R&D expenditure incurred. The other 50% of the gross R&D expenditure attributable to the rendering of the services to the Government would normally be deductible under section 16(1) of the IRO, i.e., not eligible for any enhanced tax deductions under section 16B of the IRO.

These two examples indicate that, subject to the exact contractual terms of a case, fees received for services rendered would not generally be regarded as being received with a view to meeting directly or indirectly any relevant R&D expenditure that a taxpayer may need to incur in order to perform the relevant services.

IRD enquiry approach to claims made for tax deduction of R&D expenditure

DIPN 55 indicates that the Assessor handling a claim for tax deduction of R&D expenditure would generally ask the following questions and expect enterprises to provide pertinent answers in plain language:

(a) what was the advance in science or technology that was being sought;

(b) what the R&D project was, and if relevant, what the larger commercial project was;

(c) the particular scientific or technological uncertainties that needed to be resolved to seek the advance;

(d) in what way does the project go beyond what was the current state of knowledge;

(e) why the knowledge or capability sought was not readily deducible by a competent professional in the field;

(f) when the particular uncertainties were overcome;

(g) what activities within the project fall within the statutory definition of "R&D" activity" or "qualifying R&D activity" for tax purposes.

Around the above framework of enquiry, DIPN 55 also indicates that the Assessor would be sympathetic and supportive when making specific enquiries into claims for deduction of R&D expenditure made by enterprises, and when dealing with queries made by enterprises about their claims.

DIPN 55 also recognises that for small startup enterprises, the cash flow resulting from the claims for the tax deductions of R&D expenditure can make an important difference to such enterprises. As such, the IRD has indicated that claims for the enhanced tax deductions by small startup enterprises would be dealt with quickly. Where an enquiry has been opened without accepting the claim in full, the Assessor would keep under review whether it is possible to accept a claim at least partially.

Conclusion

We welcome the detailed explanation and guidance on the new law provided in DIPN 55 and the stated assessing practice of the IRD in relation to claims made under the new law.

Many issues of the new law discussed in DIPN 55 are nonetheless complicated. Clients who wish to explore how they can benefit from the new law, and the assessing practice stated in DIPN 55, can contact their tax executives.

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