

So where were HMRC when the Italians were nailing Apple..

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As [the BBC have reported](#):

Apple's Italian subsidiary has agreed to pay €318m (£235m; \$348m) following an investigation into tax fraud allegations, Italy's tax office says.

Italy's tax authorities say the company failed to pay €880m in tax between 2008 and 2013, according to La Repubblica.

The settlement follows an investigation by prosecutors in Milan.

The US tech giant has not commented on the deal.

Several thoughts inevitably follow.

First, if the Italians have succeeded why haven't HMRC even tried?

Second, what use is the General Anti-Abuse Rule if it could not be used against such abuse (so far it has not been used at all)?

Third, why the Diverted Profits Tax if cases could be brought in any event?

Fourth, have HMRC now asked for full details so they can replicate the case?

Fifth, when will we clear out the business heavy top echelons of HMRC so that an appetite for such cases is created in this country?

I don't expect any answers will be forthcoming from HMRC, but we are owed them.