

Country-by-Country Report, Tax Year 2019



The Country-by-Country Report is used by U.S. multinational enterprise (MNE) groups to report certain information on a country-by-country basis. MNE groups report this information on Form 8975 and Form 8975, Schedule A. The IRS Statistics of Income Division (SOI) produced sample-based annual aggregate statistics from Form 8975 tax filings for ultimate parent entities that filed Forms 1120 or 1065 with accounting periods ending between July 2019 and June 2020.

Tax Jurisdiction Information by Major Geographic Region, Tax Years 2018 and 2019

{Money amounts in thousands of dollars}

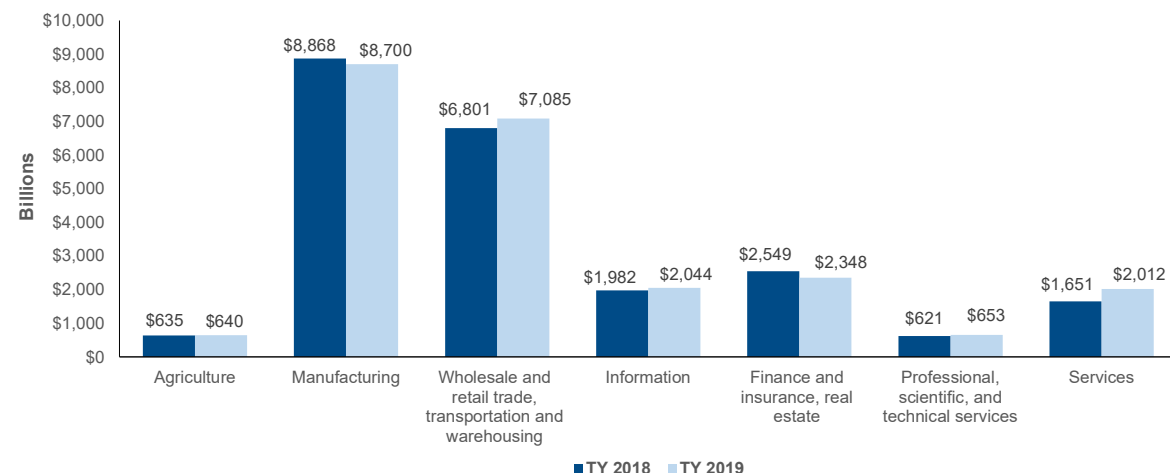
Geographic region	Number of reporting MNE groups		Number of constituents		Total revenues		Profit before income tax		Accumulated earnings	
	TY 2018	TY 2019	TY 2018	TY 2019	TY 2018	TY 2019	TY 2018	TY 2019	TY 2018	TY 2019
Total	1,641	1,698	197,061	203,275	\$23,106,463,808	\$23,481,458,518	\$2,604,251,545	\$2,229,047,301	\$12,129,738,168	\$13,644,307,706
United States operations	1,568	1,627	71,045	73,975	\$14,742,067,553	\$15,176,358,871	\$1,488,466,473	\$1,295,596,596	\$8,212,734,719	\$9,565,197,540
European operations	1,375	1,415	54,763	56,003	\$3,781,314,563	\$3,816,569,404	\$390,188,891	\$354,094,135	\$2,035,151,114	\$2,299,602,735
Americas operations	1,495	1,553	23,810	23,620	\$1,440,784,045	\$1,400,425,597	\$280,221,783	\$209,094,463	\$667,416,076	\$441,504,593
Asia & Oceania operations	1,333	1,388	29,931	31,002	\$2,255,565,714	\$2,188,125,196	\$233,836,462	\$193,739,313	\$578,886,835	\$612,927,189
Africa operations	605	618	3,580	3,684	\$81,082,911	\$81,476,290	\$13,072,324	\$11,553,267	\$19,653,136	\$30,696,741

NOTE: Details may not add to totals due to rounding, filing by multinational enterprise groups of information for more than one tax jurisdiction, and excluding stateless and other country tax jurisdiction data.
SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Years 2018 and 2019, April 2022.

Highlights of the Data, Tax Year 2019

- The Tax Year (TY) 2019 Form 8975 study contained 1,698 Country-by-Country reports.
- There were 203,275 constituent entities reported for TY 2019.
- For TY 2019, some 140 economies (tax jurisdictions) were included.
- U.S. MNE groups reported \$23.5 trillion in total revenue; \$15.2 trillion of total revenue captured in the U.S., and \$7.5 trillion captured in foreign jurisdictions (Europe, Americas, Asia and Oceania, and Africa).
- A total of \$2.2 trillion was reported for the profit before income tax; 58 percent (\$1.3 trillion) of the total profit before income tax was attributed to U.S. operations, while \$768 billion was earned in foreign jurisdictions.
- Approximately 80 percent (\$617 billion) of the U.S. MNE's total foreign profits before income tax was earned in 15 countries: Netherlands, United Kingdom, Singapore, Cayman Islands, Switzerland, Ireland, Puerto Rico, Bermuda, China, Japan, Canada, Mexico, Germany, Hong Kong, Australia.
- In TY 2019, U.S. MNE groups reported \$3.4 trillion in total foreign accumulated earnings.
- Based on total revenue, manufacturing was the primary industry of U.S. MNE groups (37 percent of total revenue). MNEs in the wholesale and retail trade and the transportation and warehousing industries accounted for a combined 30 percent of total revenue.

Total Revenues of Multinational Enterprise Groups Designated by Major Industry Group, Tax Years 2018 and 2019



SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Years 2018 and 2019, April 2022.

