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HMRC internal manual

Corporate Intangibles Research and Development Manual

From: [HM Revenue & Customs](#)
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Published 11 March 2016

Updated: 10 September 2025 - [See all updates](#)

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CIRD20480 - Reinvestment relief: groups of companies: relief against CG degrouping charge

CTA09/PART8/S899

This provision adapts the rules relating to reinvestment relief on the disposal of goodwill and intangible assets that are existing assets (see [CIRD20050 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20050\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20050)) to enable the relief to be given:

- on a CG degrouping charge arising on the deemed disposal of such assets under TCGA92/S179 (CG45400 onwards),
- where the event triggering the degrouping charge is on or after 1 April 2002.

The adaptations are as follows:

- the requirement that the old asset should have been a chargeable intangible asset throughout the period it was held ([CIRD20035](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20035) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20035>)) is replaced by the requirement that the asset should have been a 'chargeable asset' (CIRD20050) for CG purposes throughout the period it was held by the company referred to as 'company B' in section 179 (the departing company),
- the date of realisation of the old asset is to be taken as the time the capital gain accrues under S179 (CG45403 and CG45430),
- references to the proceeds of realisation are to be read as references to the consideration for which the asset is deemed to be disposed of and reacquired (that is market value),
- as for CG on real disposals the restriction described in [CIRD20080](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20080) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20080>) (part realisations involving a related party) does not apply.

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