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HMRC internal manual

Corporate Intangibles Research and Development Manual

From: [HM Revenue & Customs](#)
([/government/organisations/hm-revenue-customs](#))

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CIRD20070 - Reinvestment relief: general matters and conditions to be satisfied: on realisation: exclusion of deemed realisations

CTA09/S763

Deemed disposal and deemed realisation

Taxable credits arising on the deemed realisation of an asset (for example on the emigration of a company - see [CIRD47030](#))

(<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird47030>) are outside the scope of reinvestment relief. This exclusion is subject to exceptions where the deemed realisation arises in connection with 'degrouching' (see [CIRD20460](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20460) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20460>) onwards).

CG on existing assets ([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>)) arising on a deemed disposal are similarly outside the scope of reinvestment relief. But again there are exceptions where the deemed disposal arises in connection with degrouching (see [CIRD20480](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20480) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20480>)).

Actual disposal or realisation but special tax rule determines proceeds

Occasions where there is a deemed realisation or disposal of an asset need to be distinguished from those where there is an actual realisation or disposal but the amount receivable for CT purposes is some figure, normally market value, which is different from the actual amounts.

The only restriction on reinvestment relief in these circumstances is that 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>), on the part realisation of a chargeable intangible asset to a related party.

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