Response Number 1063

Q.1 What are your views on the proposal to introduce real-time reporting for B2B and B2G transactions?

It is a good idea and must happen eventually but importantly, like i-xbrl roll out if you introduce it for small businesses, it will be a significant burden as the majority of companies/sole trader sub €1m don't use accounting software and vat is done on paper or excel.

Q.2 What matters should be considered in planning for a transition to a new VAT Reporting system?

We are accountants in practice with circa [redacted] client, [redacted] of which are vat registered sme's. Circa [redacted] use accounting software [redacted] with sufficient accuracy to run their vat out of it. There will be absolute carnage if you force all vat registered traders to use software starting on one date.

Q.3 If your business is currently subject to a VAT reporting programme in another EU or non-EU country, can you please share best practice, recommendations or lessons learnt?

Brexit is an absolute mess for our client UK Supplier and shipping companies don't properly communicate, who is the import, what is customs what is excise, what vat was charged (if any) and what was proposed accounting used and under who's name. People order online and it turns up on the door with no accompanying paperwork and the sales team in the supplier have no idea what you are talking about when you ask them for these details. Piling E-reporting of vat returns on top of this will only exasperate the situation. Get the importers and shipping companies to tidy up their act first. Everything coming into the company should have clear paperwork detailing any tax, who paid it (i.e. who is entitled to the reclaim) and whether its postponed or not.

Q.4 Have you any observations, concerns or recommendations on a move to mandatory electronic invoicing for B2B & B2G domestic VAT transactions?

Start with large companies >50M turnover. Exclude SME's until all the bugs have been worked out from it and brexit issues have settled down. Alternatively only have SME's enter sales into the new system and entering purchases month to month is very time consuming

Q.5 Revenue is particularly interested in hearing views from businesses that are already engaged in eInvoicing Public Bodies within Ireland or engaged in B2B eInvoicing throughout Europe and beyond. How did you prepare and what challenges prevailed in your preparations for eInvoicing?

no experience in this

Q.6 What suggestions would you offer in Ireland's arrangements for a mandatory B2B and B2G eInvoicing programme?

Offer free accounting software or invoicing software (with accompanying app) intergrated into ros. If you force everybody to buy and learn something like sage there will be a huge back lash and non compliance from SME's.

Q.7 Revenue are cognisant that small businesses may have different perspectives and requirements to large businesses, so what information prompts would you find useful for businesses in completing the VAT return?

Get rid of the 'T' descriptions. Do the RTD monthly as part of the Vat3.