Response Number 1053

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

I think it will greatly improve compliance and transparency. However, it is likely that a large numbers of entities will have to upgrade their systems and processes to comply.

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

1. There should be an adequate amount of time allowed for implementation after the details of the changes have been announced. By this I mean that practitioners should be given technical specifications and the practical details so that they can implement the necessary changes to both business flows and ERP's. The publication of the DAC 7 guidelines in June 2023 after the reporting period began in January 2023 really hindered the implementation of an already onerous reporting obligation.
2. Consideration should be given to the negative impact on not just small businesses but also entities with limited Irish business of having to comply. Will entities be able to file themselves or will they have to use a third party to file or prepare documents. In the past I have been involved in discussions where we discontinued operations in certain jurisdictions because of the cost associated with basic VAT compliance.

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?

N/A

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

That any 'anomalies' are covered in guidelines so that it is clear how these are to be reported. For example - an Irish entity is entitled to reverse charge a supply of service into the EU where the recipient is receiving the service for a 'business' purposes even if they do not have a VAT number but it is clear from the nature of the service that it is not for private use. Historically this created an issue when reporting VIES but I understand it was still correct from an VAT position. So there should be a method to report these invoices under the new provisions.

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?

N/A

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

I would hope that as VIES gets replaced that we would no longer receive letters in relation to VIES queries and discrepancies and the notification would come through ROS so that it is easier for organizations to track. Also, when a Taxpayer receives an email stating that they have an ROS notification that it should state which company the notification relates to as Taxpayers may be filing for a number of entities and then they must log on to each ROS account to see which one has an notification!! Ensuring that ROS/the reporting platform is easy to use and that there is a functionality to update the prior filled information without having to delete the whole return as i understand that was an issue on ROS for some of the returns.

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?

N/A