Response Number 169

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

I welcome it, but am cautious about the increased risk of error with 'real-time' reporting, without adequate time to review for consistency. The ability to retrospectively correct or even correct multiple times will be important, at least in the initial implementation.

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

As above, the ability to correct multiple times, when errors are identified, or treatment changes based on further reviews or analysis. Cut-off, particularly when VAT rules change is also a concern.

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?

VAT reporting is carried out in Italy but this is not best practice, I would not advise adopting a similar model.

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

At the risk of repeating myself, the ability to correct any VAT errors promptly and repeatedly, in the event that a VAT invoice is issued incorrectly and reported before the error is identified.

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 applicable

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

Plenty of consultation (such as this), a gradual lead-in time with plenty of testing, a year long dual run of existing reporting and new reporting to ensure consistency, before a hard switchover after one year.

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?

Links to clear VAT advice (in simple, non legal terms) from previous rulings would be very helpful.