Response Number 232

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

I think it's correct.

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

Many things: Stable internet conenction. Invoicing system provided by Revenue for everyone to use, if the taxpayer doesn't want to engage with a third party one. Redefine the invoice numeration system, setting the same rules for all taxpayers.

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?

It sounds good. But there has to be a possibility of doing mannual invoicing when systems are down. Also I am concerned about deleting/amending a wrong invoice and how will that affect the reporting.

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?

Allow taxpayers issue mannual invoices when systems are down or no internet connection is available. There has to be an eInvoicing system provided by Revenue for everyone to use, in case the taxpayer doesn't want to engage with a third party one. Redefine the invoice numeration system, setting the same rules for all taxpayers, for instance: first 4 digits for the branch and 8 more digits for the invoice number, for instance 0001-00000023. And this has to be followed by all taxpayers for consistency sake.

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?

Taxpayers should have an online system on ROS to check what's already been reported through eInvoices. And should also have the possibility to add more information on top of it in order to complete the VAT return.