Response Number 677

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

It should be limited to companies who are trading across EU Border and / or have a turnover of more than €10 million

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

The impact of such proposala for small business should be considered and they should be subject be subject to a business scale / economic value test considerations. Small businesses in Ireland are being strangled out of existence by the ever increasing regulatory and reporting burden continually being added to by Government, for very little apparent benefit and no consideration to the cost and time impact these changes have on those small businesses. Regulations and rules which may be appropriate for multi-nationals companys are rarely beneficial, make sense, easy to implement or cost effective for small businesses.

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?

No

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

Not enough specifics in the consultation document as to how it is envisaged this night work in practice or how it would integrate with existing systems being used by businesses.

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?

It should be trialled and rolled out for large companies and those trading cross border.

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?

Happy with the current prompts, but if it is going to be changed, simple and intuitive are key. Small business owners are not accountants or CFOs.