Response Number 1049

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

This needs to be introduced in a phased format based on the size of the company issuing the invoices. This should start with Large companies (T/O of €50m and above) as these will have the systems and resource in place to be able to react to a change like this in a timely manner (although a clear lead in period of time of at least 12 months should be given). Once this has been done and early issues ironed out, consultation to rolling this out to Medium sized entities (€12m - €50m), then Small entities and finally Micro Entities. This will take time but needs to be properly administered, taking into account the burdens on SMEs already.

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

As above, the process should be trialed with Large companies. Once the Revenue are satisfied that all issues have been ironed out, they should explain the process to Medium sized companies and at this point look for feedback as to what is achievable. They should then do this at a later date with Small Companies and finally Micro-entities. Trying to do this all in one go with a "one size fits all" strategy would be ridiculous and unfair on SMEs.

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?

For ourselves as accountants it would not be that difficult as we have the expertise and a low volume of transactions with limited changes in the VAT rate. However I am concerned how our clients (mainly Small & Micro Entities) will cope with reporting this, in particular those that have small value / large volume sales with differing VAT rates and thousands of customers. I can only see the Administrative burden for them being excessive.

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?

N/A - aside from any relevant suggestions already outlined above.

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?

Outlined in other responses.