Response Number 742

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

The proposal makes sense. Implementation will regularize and streamline the process. Our concern is how the implementation will happen for small businesses, particularly for those of us in the agricultural sector.

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

Small businesses that currently operate using paper based and often handwritten invoices are not ideally placed to easily adopt an e-invoicing system. Further information as to how this would work for one farmer selling bales of hay to another farmer is required.

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?

Not applicable

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

We would need to know what information would need to be supplied to a vendor or buyer to enable eInvoicing. Is a VAT number sufficient? Where will the information be held, how will an eInvoice be transmitted. Does this remove the obligation for a VAT return? Will provision be made for submitting details of transactions between B2B parties where one is not registered for VAT?

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?

Training will be required for Accountants and individuals. Assistance with the purchase of software/hardware should be offered during the initial phase of the cut over. Provision for capturing transactions from non-VAT registered venders will be required.

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?

Any new system that relies on eInvoices needs to have a front end mechanism to search the database of invoices logged to the business. Search, sort and download functionality will be needed as well as a way to add new entries either manually or by OCR functionality to scan a paper invoice.