Response Number 1046

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

I am an accountant, and my first though is I deal with a lot of small businesses who really rely on us to know and follow the VAT process on their behalf. The idea that you would digitalize a VAT process should consider that a SMEs currently have a system of record keeping that has a fair degree of manual process.

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

I think the filing deadline is one issue. I would expect that if I have a client that is operating their own book-keeping they will need our input. We have found that the current deadline of 23rd of the month is a difficult deadline. While most of our customers can use software to issue sales invoices, they would not have the accounting knowledge to complete the bookkeeping process , with regards to bringing accounts to Trial Balance stage. I would like the process to remember that SMEs who run their own business and run their own finance function do not have the ability to complete all aspects of their finance function. So in other to allow a professional to be able to assist, the timeframe could maybe follow the HMRC model of the due date being the 7day of the second month after return date, rather than the 23rd day of the first month.

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?

My concern is more a question as to where you draw the line around definition of B2B. Some of our clients have a mix of B2B and business to customers (example construction industry) how will this work ? Same apples if have hardware shop, the customers are a mix of Business and non business , so how we decide who is falling under this scheme ?

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

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?

not sure at the moment on this,