Response Number 765

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

I think it is a very positive, welcome and necessary development. I use the sage platform for bookkeeping and invoicing so I would look forward to the integration and the redundancy of the VIES reporting and hopefully the redundancy of the RTD return also.

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

1).The support of those not already using software solutions. 2).To build it in such a way that B2C can be easily added in the future to complete the system. 3). To make it mandatory for software providers to comply and build the system integrations, for example, I'm still the victim of IBAN discrimination by by accounting software provider and there is no punishment or incentive for them to comply.

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?

I am only subject to reporting domestic VAT

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

Not that I can think of, all my invoices are electronic at present (B2B & B2C)

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?

Once the einvoice is sent and the subset data shared within the following days, it would be good for a business to be able to see their real-time VAT liability for the given period and pay as little or as much as they like, to help their cash flow, but the balance must be reduced to zero by the deadline at the period end. Likewise, if they could see their VAT refund balance in real time, with the ability to let it build up, offset it, or request payment at any time.

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?

For my small business, it would be great to remove the need to report intra EU and non EU purchases, and the need to file the RTD return. The VAT 3 would then just deal with B2C which would then hopefully be included in the near future.