Response Number 209

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

I think it's a good idea in principle.

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

The scale of the business.
The use of computerised accounting by the business (for sure, only micro businesses should be exempt).
Non-trading / dormant businesses should still be required, therefore prompting these businesses to de-register for VAT.

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?

I have been told by a former colleague that in Hungary, every transaction has to be reported online to their Revenue service in real time, before the invoice is issued. Business transactions have to include VAT registration details of both parties. I think this is similar in Serbia.
This is a good idea. It imposes a strict obligation for highly available systems for software vendors and Revenue, but so be it.

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?

All transactions, even to consumers, should be reported to a real time VAT system.

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?

Ideally, Revenue could offer a very bare-bones invoicing system that micro retailers and B2B sellers could use to generate invoicing (while simultaneously posting details to Revenue). This would enable Revenue to avoid excluding any seller that is VAT registered.