Response Number 506

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

Given that the suggestion states 'REPORTING' as opposed to 'RECORDING' should be in 'REAL' time, it is difficult to understand what is envisaged. Is it the suggestion that every transaction is done by a business over an 'on-line live link' somewhat akin to a "SMART ESB METER" ? In PRE-FRAMING the Question as "Aligning the reporting and compliance requirements more closely with the normal operations and financial processes of the business" there is an implication that Reporting and Compliance are NOT ALREADY aligned with normal operations and financial processes of a business?? Then the short answer has to be that if Reporting is not Already aligned with with normal processes, then surely, it never will be ? Reporting, by it's nature has to be RETRO-SPECTIVE because it is based on what HAS Happenned: NOT Foprward-looking on What MIGHT Happen. It is fine if 'advanced forecasting' is correct. If the 'GUESS' is not correct, it becomes 'total effing chaos' first to guess in the beginning, then secondly to 'UNDO' what was wrong and then thirdly to RE-DO the corrections. THat will CAUSE MORE PROBLEMS THAN IT SOLVES .. like RTE 'reporting' the Budget proposals days before the Minister finalises them !!!

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

IF you first consider what is NOT working, then you stand some chance to identify what actually needs to be fixed. Kinda like " If you are not hungry, then you don't need to plan a meal" ?

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?

It's brilliant until you get a software glitch or a data outage.

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?

Show us the benefits and we will flock to adopt it. Make it compulsory and we will do whatever we can to resist it. It is in our DnA.

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?

WHAT CAN BE MORE SIMPLE THAN TOP UP WHAT WE TAKE IN AND TOT UP WHAT WE SPEND. THEN PAY UP THE DIFFERENCE IF WE TAKE IN MORE THAN WE SPEND OR CLAIM BACK THE EXCESS IF WE PAY OUT MORE THAN WE TAKE IN . IT REALLY DOES NOT GET MORE SIMPLE THAN THAT UNLESS SOME EEJET TRIES TO MAKE IT COMPLICATED ?