Response Number 108

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

I would not be in favour of adding to my administrative or compliance burden. I am a very small business, with very few transactions, currently reporting six-monthly. I complete my returns myself at zero cost. I do not wish to incur the cost of a software package to enable this. I am aware of the "Making Tax Digital" programme in the UK, which requires software to comply with reporting obligations. This creates a burden on smaller businesses some of which are not online and don't use computerised accounting packages. The only online solutions cost £3.50 per return to submit. Not fair. If a system is implemented for bigger companies, so be it, but the existing system should remain available for small businesses. OR, increase the VAT registration threshold so that it is only relevant for bigger businesses (to €200,000 turnover or greater).

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

Simplicity for non-digital businesses and maintain the ability of non-professional preparers to comply with tax obligations without incurring costs.

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 aware of the UK VAT system and it is not very fair on smaller and older business owners.

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

It will exclude many people from setting up and continuing to run businesses. Tax compliance should not be an impediment to entrepreneurship. For example, what about cash businesses which don't issue invoices at the point of sale, but report takings collectively?

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?

not relevant to me

Q.6 What suggestions would you offer in Ireland’s arrangements for a mandatory B2B and B2G eInvoicing programme?

Not relevant to me

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?

Businesses are so different that it is difficult to imagine a system that would suit all businesses. I would propose a dual system if this is seen as suitable for larger businesses.