Response Number 123

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

Generally in favour, provided that the change does not require me to pay for accounting software to comply with the new rules.

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

Small businesses that file VAT based on date-of-invoice for simplicity (rather than date of payment) should not be penalised for later filing if a customer does not pay on time.
For similar reasons, whatever method adopted should not shorten the period currently provided to pay outstanding 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?

(not applicable)

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

Clarify the effect of this move on dealing with small business entities whose turnover is below the VAT reporting threshold, or those who operate primarily on cash-accounting basis.

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 applicable)

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

Do not require businesses to pay third-party software suppliers just to comply with the law. Whatever process is employed should be usable without charge.

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?

VAT3 is generally okay, but the RTD form is needlessly complicated. This should be simplified; perhaps the necessary information can be supplied as part of the more regular returns, so that there's no need for a full review at year end (although I appreciate that the RTD functions as a cross-check to detect inaccuracies in filing)