Response Number 1085

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

I think it is not a good idea. It is too reliant on everyone having modern technology - not everyone has such systems. Many companies still handwrite their invoices and then a book-keeper enters them perhaps monthly or less often.

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

As mentioned above, not everyone has 'in-house' accounts. Many companies rely on a book-keeper to attend perhaps monthly or even bit-monthly when returns are due.

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 is putting pressure and expense on small companies who perhaps don't have an accounts package or in house accounts. And they may have so little invoicing that it is not in their interest to invest in a package.

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 entirely sure I understand this question, but we invoice for UKR payments. The pro-forma invoice is sent in order to request a PO number. Once the PO number is received the invoice is resubmitted with said PO number. So is this eInvoicing? If it is then it took a long time to get everyone on the same page so to speak and there were a lot of emails back and forth before we even got to this stage.

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

Rather than have it being 'mandatory' perhaps give companies the option to sign up to it, but not make it compulsory to do so. I am sure there are some larger companies who would find it very beneficial, but if it means expense and time for smaller companies then that's very unfair.

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?

I actually think the VAT 3 return is fine but if larger companies can suggest improvements then perhaps there can be an alternative run alongside the current report.