Response Number 252

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

Provided the process is documented and shared before implemented, and software providers and company's can have visibility of these process to provide additional feedback, I think this will bring significant value to larger companies, but potentially significant cost to small ones unnecessarily

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

In order for this change to bring value to businesses, the level of automation, error checking and validation needs to be proactive, simple, and timely.
There needs to be an API which software providers can use, and ideally software providers need to be mandated (under legislation) to ensure their solution is fully compliant and required to have this integration fully automated and integrated into their solution.
This will remove significant cost from individual business, and mean there will be one standard solution which every company, on that solution can avail of, without significant cost to any business.
This also means that Revenue are guaranteed to get the data required, in the format required.

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?

.

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

Would this not just cater for large industry, and damage small business, which forms a large section of the economy

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?

eInvoicing while implemented is not being used as not many industries outside government bodies are mandated to implement. Also eInvoicing introduced its own EDI framework, rather than selecting an existing one, which had result making the solution more complex than was needed, reduced take-up as companies have already implemented EDI using one of the main (existing) another format.
Don't try to re-invent the wheel.
Look at the process end to end, not just from a revenue perspective, prove an API, and finally mandate software providers that to be compliant with Irish Revenue they must provide the automated integration using this new electronic interface. this will mean consistent reliable and accurate data, reduce the cost t industry, as there software will need to have this to be compliant.
If done any other way will result in significant cost to business, at a time when cost are already getting out of control.

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

There are too many.
For a start "THEY" should never have created a NEW EDI framework, which is what has happen PEPPOL. It should have been setup to use the main EDI frameworks, which could have integrated seamlessly, and

would have resulted in significantly greater take up, as the cost would have been low, and for suppliers they would have been on the portal from the start.
There was little of no consideration to the impact of individual business having to implement and the cost to implement.
As there are very few suppliers on the PEPPOL portal eInvoicing, there has been little for no benefit in reality to implementing, it was purely a cost to implement, which has result in poor implementation, to meet the minimum requirements, missing out on the level of automation possible if implemented properly.
I would engage with Office of Government Procurement, to ensure as a requirement all suppliers must be on PEPPOL.
I could keep going

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?

Create a simple interface which small businesses can input the information required, if they don't have a software solution to manage there accounts.
As an owner of a small business, I would question the start of above "Revenue are cognisant hat small businesses may have different perspectives", my experience is that small business are an inconvenience to revenue