Response Number 88

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

This would be good to avoid corruption but it would have to be a workable solution that does not put a heavy workload on traders.

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

VAT cash accounting. When the VAT needs to be paid as payment for Invoices are often not received for two to three months after invoice date.

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?

We are not subject to this

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

It would be very important when moving to eInvoicing that this does not put a major Financial load (by virtue to enforcing the use of IT systems) on smaller businesses especially those that do not have an IT system. When trading with countries outside the EU who do not issue eInvoices an option for processing these must be in place.

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?

We do not engage in eInvoicing at present

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

Again, Small Sole Traders must be taken into account otherwise it could lead to unfair competition.

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?

For the Deferred VAT reporting it should be made clear that box PA1 is the full value of the imports under Deferred VAT.