Response Number 177

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

I think it's a great initiative given the success of the PAYE Modernisation real-time reporting rolled out back in 2019.

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

Linking into systems - clearly many of the main off-the-shelf packages will be well catered for, however our company uses a bespoke (MS-based) system and will need to develop link for real-time VAT reporting.

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?

Only other country currently subject to is in UK/NI via HMRC however they do not currently operate real time VAT reporting system. They do have a template upload facility for VAT returns however it is very much an XLS which is manually amended and uploaded to website.

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

I think it's a very good idea and fully support same. Our business is involved in importing and exporting feed products intra-EU - the main challenge I would anticipate re: eInvoicing is imports/exports between our company in ROI and customers/suppliers based in NI mainly due to volumes being delivered (i.e. split into ~30 Metric Tonne loads) whereas imports/exports between ROI and other countries via vessels is far more straightforward.

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 have been issuing eInvoicing for +10 years via email and also via customer web portal. The majority of our own suppliers also do same.

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

Secure Information Transfer - unfortunately, we have seen many incidents (increasing recently) of invoices/bank details being amended fraudulently.

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?

Consolidation of filing requirements, i.e. VAT3 Returns, RTD Returns, Intrastat returns all need to be filed separately while requesting similar/same information - this should be streamlined in that information is only being provided in a single filing (where possible) - the duplication of returns/filings seems unnecessary and is burdensome for both smalller and larger entities alike.