Response Number 122

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

For a company with a very small number of VAT transactions in Ireland, the proposals seem to involve a disproportionate amount of change and investment. There should be a de minimis level below which the taxpayer is exempt.

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

The size of business involvement matters a great deal. As at 1 above, there should be a level at which a business is exempt from involvement. In addition, the levels of complexity relating to multiple currencies and multiple rates of VAT should be simplified.

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?

For a business with a large number of VAT transactions, the ability to download totals and some analysis to a VAT Return template is helpful - in the UK. Individual invoices are not being being uploaded to HMRC. Experience with RTI for PAYE in the UK shows that, far from being a help, the system has added to the administrative burden of PAYE.

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

Compulsory eInvoicing for a business with a very small number of VAT transactions in Ireland will involve a disproportionate amount of investment, learning and administration.

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?

Introduce a de minimis level at an early stage.

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?

The ability to complete VAT returns as they are completed now.