Response Number 883

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

As a book-keeper for multiple SME's, I would be concerned about the ability to process documents in the timeframes mentioned in the consultation document and the ability/cost involved in holding all the documents electronically for the time period required by Revenue.

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

Knowledge base for processing, is it beyond the understanding of a self taught, self employed person recording the info on an accounting package and managing e documents, storage etc. Time frame for processing.

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?

Understanding all the rules can be difficult. Any simplification in this area would be helpful. Intrastat codes can be a minefield. NI and UK rules can be complicated and can be confused easily.

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

Very difficult for the small business without using a book-keeper/accountants practice. It could put on an additional cost they can't afford. The format for the invoicing, unless done correctly could cause problems in reporting. When uploading the file to Revenue if everything is not done correctly the file will be rejected. If the file is rejected because the invoice received from a supplier is incorrect then the time involved to get it corrected and re-input could be excessive. The storage of documents electronically could be very costly and needs to be looked into. Would a hard copy also be needed to be kept? What happens if the internet is poor/non-existent or goes down?

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?

N/A

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

Digitalisation is helpful but also can be difficult to manage and keep up with. Computers/laptops are being overburdened easily without the amount of memory , updates etc needed to keep up. It can slow down processing at times. Should there be limits at which a business can opt out/opt in?

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?

A unification of vat codes within accounting packages that would transfer to Revenue and the codes should be instructed by Revenue as part of the digitisation plan. There are so many codes to be used for the different rules eg: Home resale/non resale, services or goods. EU to EU, EU to non-EU etc.
The option to keep hard copies and delete digital copies once file is sent to Revenue to cut down on

e-storage capacity.