Response Number 723

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

It may not have any benefits to for either entity. It is possible that for some businesses it may improve security.

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

The business may find it difficult to be up to date with the new system, it is not a great idea to make many changes.

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?

N/A - see next page.

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

N/A -

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?

It is very likely that it would work for certain businesses and entities and be a complete failure/irrelevant in others.

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 current email system works fine. Have had some difficulties with hacking or other phishing attempts (too many to count or report). The fact that there is an extra security certificate for ROS is helpful, it may be the case that with any reporting update that further second factor security would be necessary.