Response Number 573

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

I am concerned of the extra admin burden and resulting cost this may put on businesses already under pressure for continuously rising costs of business and staff recruitment and retention. Also, delays in receipt of invoices for input VAT may create cashflow issues for smaller businesses.

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

Consider admin burden on businesses as mentioned above.

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

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

The heightened risk of cyber crime needs to be considered here. Not all transactions are invoiced separately, companies regularly combine multiple transactions into weekly/monthly invoices to manage the admin/data burden.

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?

Allow sufficient lead time for businesses to put the required resources in place. Prehaps implementing this on a phased basis starting with larger businesses and working down to smaller businesses over a period.

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?

N/A