Response Number 347

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

This is a positive initiative as businesses are trying to go digital. Any change to RTR in the area of VAT should be done in conjunction with reducing the compliance burden for vat registered entities in the area of the vat return preparation and review process and in particular the exception reporting area of the return process.

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

1. Business process changes required to distinguish between B2B/B2G customers and B2C transactions?
2. Consider also RTR of B2C transactions so the VAT registered entity could file all their VAT under RTR resulting in their VAT statement being prepared in RT and then only to be checked against the internal VAT GL's in the ERP system.
3. Master data clean up - many vendors don't give the correct name/vat number for their business or may give the vat number of another company in their group. IN large companies this is a significant exercise. penalties should be on the purchaser to give the correct details to the vendor.
4. Building in simplification of irrecoverable VAT for fully recoverable businesses
5. A standardised list of VAT codes should be considered against which RTR transactions would be mapped from the VAT registered company's ERP transaction so that the ARTD is also built up as we report.

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?

No

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

No. again could B2C not also come in under this so that all VAT is reported under RTR doing away with the the requirement to file separately for B2C?

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?

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

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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