Response Number 240

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

No views.

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

A clear lead in with sufficient time for businesses to develop the solutions required.

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?

We have VAT registrations in companies across 42 countries in EMEA region. Approx 6 have real time invoicing or are due to implement it shortly. These include TY, IT, PL, KSA, IL, RO.
Other countries have introduced near real time reporting (PT, ES, PL) which is also similar.
As an EU country, Ireland should be adopting common standards and giving businesses sufficient notice to develop the systems required to comply.
My experience is these requirements create additional time for compliance as questions are raised on all tax payers which require answering and additional dialogue between tax payers and between tax payers and tax office.
Real time reporting requires entire business process changes. (high quality data)
Near real time impacts on reporting teams. (lower quality data - manually managed)
The level of questions is the same.
From my experience, real time is a better outcome for both tax authorities and also tax compliant tax payers. There is one (heavier) lift but it works for all with good data.

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

No

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?

Company wide conversations are required. Extensive documentation is needed to satisfy all of the questions from all of the business on the impact to their business.

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

Make it a real time for large business (say above turnover of €1bn) and stagger the introduction for smaller businesses.

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 notes connected to RTD are not very helpful.. These need to be updated with examples of what should be included for business that trade outside of ireland and with non EU countries also.