Response Number 229

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

Premature and Ill-Judged.

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

Its potential negative or restrictive impacts on real world cash flow management practices which are nor common to all businesses.

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?

Serious concerns. Revenue priority is tax compliance. Business priority is often survival and managing cash flow. Often those priorities will be in competition.

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?

Should never be mandatory.

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?

VAT return is not a priority except when its due.