Response Number 807

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

• Main concern is the reporting burden as real time reporting of payroll is not an issue as its only once a month for our company. However VAT is different due to large volume of daily transactions
• What impact if any will this have on VIES reporting on a quarterly basis
• Will the refund / collection of VAT remain unchanged from the current bi monthly pattern
• What fines will be in place for failure to adhere to the process
• Will there be a test environment available to VAT registered individuals in order to better understand how this will work once the system is designed. This is not something that Revenue has made available for Enhanced Expense Reporting which is a significant change for employers.
• Will there be consultation with the main finance system providers on possible integration with ROS

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

• Reporting burden
• Integration of finance systems with ROS
• Time line to report
• Fines for failure to adhere to timelines
• Payment / refund timelines

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?

How will the process work for any domestic suppliers who will be unable to produce e-invoices
Same question on the AR side for EU / UK / ROW based customers and suppliers who may be submitting e-invoices and those who are unable to produce / receive e-invoices
How long will the implementation process be for companies as this will take some time to work through with ERP system providers as well as customers & suppliers

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?

Adequate training provided to companies
Test environment made available to test integration with ERP system and submission of reports by finance / tax teams
Significant implementatio period to allow finance teams time to address issues with customers / suppliers / ERP systems / ROS

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?

Given the volume of transactions that our company has with B2B suppliers (in Europe in particular) we would welcome consultation on possible integrations between ROS & the main finance system providers to assist with reporting and what prompts would automatically happen on a daily basis for the real time reporting of transactions.