Response Number 639

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

That for a small business, with a limited number of invoices annually, that it will disproportionately impact on administration and costs.

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

Thresholds for businesses under which it does not apply, or the facility to operate the system wholly within ROS. Software companies involved in the modernisation of PAYE reporting are now increasing costs without additional functionality and are beginning to operate in a monopolistic manner.

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?

Completely unnecessary for our scale of business and operations. We will have one requirement for B2B and B2G transactions and another for B2C transactions. For most of our VAT transactions the VAT element is less than €500. The cost of collecting and processing VAT is already disproportionate for those with smaller invoices, i.e. the cost of handling the VAT is the same on an invoice for €500 as €5,000,000!

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?

Make the necessary software available for free to all VAT registered 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 current VAT3 form meets our needs as a small business.