



3 May 2022

Public Consultation – VAT in the Digital Age

Following the publication of the European Commission's public consultation on VAT in the Digital Age, we want to highlight the following:

- We strongly support the European Commission's initiative to improve the VAT system in the EU through the use of digital tools. While digitalisation itself cannot address the complexity of the current VAT rules in full, a strengthened and more harmonised use of digital applications can be a tool to simplify VAT compliance for taxpayers, generate more cross-border trade and additional VAT revenue, and act as a stronger defence against VAT fraud.
- The One-Stop-Shop (OSS) has shown itself to be the way forward for a more complete and simplified EU VAT system. While a 'broadening' of the OSS towards, as a minimum, all B2C transactions is beneficial and necessary, the European Commission should also consider at a later stage how to 'deepen' the OSS, by e.g. improving it with a VAT deduction mechanism.
- We support the introduction of a fully harmonised intra-EU DRR, as it can lead to a simpler VAT system and a stronger fight against VAT fraud. However, such a system should be introduced gradually, with a focus on cross-border transactions and large businesses first and, if successful, gradually expanded towards smaller companies. To ensure effectiveness, the data provided should be actively monitored by tax authorities to both fight VAT fraud and to lower the administrative burden for businesses (e.g. faster VAT refunds, removal of recapitulative statements, a more targeted approach to VAT audits,...).

In addition to our responses to the questionnaire, we want to provide additional comments to this subject:

1. Digital Reporting Requirements (DRRs)

Design of EU DRR: Several helpful options are considered in the public consultation, ranging from a non-binding resolution to a full intra-EU DRR. We recognise the ambition of the latter proposal and the uncertainty surrounding its adoption at Council level but with the VAT system becoming ever more complicated by the day through uncoordinated national DRRs, businesses risk being faced in the EU with 27 different DRRs soon. If there is no action taken at EU level, it will not only lead to further complications of intra-EU trade for honest businesses of all sizes but is also likely to complicate the system as a whole, making reporting by businesses more prone to mistakes and generating more opportunities for fraudsters to hide themselves.

Therefore, we would welcome and support the European Commission taking forward a harmonised intra-EU DRR. An EU-wide system can simplify compliance for businesses,



encourage trade across the EU and be a strong tool against VAT fraud, all leading to higher tax revenue.

While a full intra-EU DRR, both on domestic and cross-border transactions, would remain the ultimate objective in the long term, we would understand it if the Commission proposed a 'gradual' intra-EU DRR system in order to adapt to the different realities in the Member States. In some Member States, domestic companies may not be subject to DRRs at all at the moment, while large MNEs can already be faced with numerous different DRR systems. Therefore, we would encourage the EU to implement an EU-wide DRR on cross-border transactions for large businesses first and, if successful, gradually expand this towards smaller companies. Such an EU-wide system will require considerable IT investments by businesses and tax authorities, and it is important that sufficient preparation time and guidance is provided.

Regarding a potential future initiative for an EU DRR on domestic transactions, it should be made clear that when the EU DRR on cross-border transactions system is in place that a Member State who wants to cover domestic transactions too can do so but only if it follows an agreed EU standard (or a range of EU standards). At the same time, those Member States with already a pre-existing DRR in place should be offered a transition period to ensure their domestic system becomes interoperable with the EU standard.

Limitations: While an intra-EU DRR can be a major simplification for EU businesses, it remains nevertheless the case that the current VAT legislation contains demarcation issues that are not necessarily codable and not suitable for an automated system. Several transactions are interpreted differently due to lack of harmonisation and different wordings in the Member States. An intra-EU DRR will still face the different VAT treatment of goods and services, exceptions and special regulations, different interpretations of definitions (for example regarding mediation, and multiple and composite supplies). Another example are the margin schemes which often cannot be handled within ERP, which makes it difficult to apply and manage a DRR.

Flexibility: Companies interact with multiple ERP and IT systems and must have the possibility to produce, calculate, and check the data in their own systems and then convert the data to the reporting environment. To ensure flexibility, we would like to stress that the number of standards should not necessarily be limited to one, especially with regards to domestic transactions where multiple systems are already in place in the Member States. In certain cases, it would be preferable for companies to have the ability to choose between a few different standards, whichever best suit their situation.

Feasibility: While we support an intra-EU DRR, we do have concerns about the feasibility of such a system on an EU-wide level. With data being sent in real-time/daily/weekly/..., such a system will generate an astounding amount of information, which will be very costly for businesses to report, whereby the costs could outweigh the benefits to businesses. Therefore we want to underline that such a system should not end up as a pure 'data collection' exercise. The data provided should be actively scrutinised by the tax authority to catch the fraudsters, and also help businesses in correcting errors quickly. This will require, in some Member States more than others, significant spending on employees and on digital skills and IT equipment within tax authorities if we want the data to be effectively used. Similarly, updating IT systems will



take a considerable amount of time with both businesses and tax authorities. Before adopting an intra-EU DRR system, we believe it is crucial that Member States make this feasibility assessment first and see in what way the tax authority can effectively cope with and contribute to the data analysis under this system. We underline again that such an EU DRR system will require sufficient preparation time for tax authorities and businesses.

Privacy: A DRR also raises concerns about privacy and business integrity. There should be clear rules in place about who has access to the data and how long the data need to be kept, when and where data could/should be used, and potential rectification of data. The data required should not extend beyond what is needed for tax analysis and should not be used for purposes other than taxation.

E-Invoicing: We believe that e-invoicing could be a way forward for the intra-EU DRR system, provided that a significant harmonisation and simplification of e-invoices takes place first. There remain today many differences regarding e-invoices' content (e.g. acceptance of PDFs, QR-codes, ...) and the required storage period across Member States. In line with our views on DRR above, an initiative based on e-invoicing should also be gradual, focusing on large businesses first (where the use of e-invoicing is already well-established), with the option for SMEs to join in.

However, e-invoicing, whilst beneficial, remains no more than a digital replication of analogue recordkeeping methods. More ambitious developments are taking place in the field of blockchain which may provide for a more long-term, simpler and more secure solution.

Administrative obligations, simplifications, and audits: The exchange of greater amount of data under an EU DRR system should go hand in hand with a reduction of administrative obligations in other areas. At first, the recapitulative statements should be removed. Moreover, we believe that a system of faster and automatic VAT refunds could be set-up. In addition, it would be appropriate to revise the Intra-Stat reporting obligations, whose data should already be documented by an EU DRR.

Whilst we do not believe it is preferable to have a DRR based on 'clearance', however, if this would be chosen as the basis for the EU system, it would raise questions about the necessity of VAT audits and whether these would not be rendered obsolete under an EU-DRR with clearance system. There will be a need to reconsider in a holistic way how tax audits are exercised in the field of VAT, taking into consideration that tax administrations will access in real-time a tremendous and unprecedented amount of information to tackle fraud. This should entail alleviating some of the burden on honest taxpayers. In particular, the Commission should explore how the use of mandatory electronic invoicing could lead to relief in terms of the reliable audit trail requirements. Tax audits should also become much more targeted. Finally, the case law around tax fraud (in particular the carousel schemes) which relies on "reason to know" criteria should be revisited as it is often detrimental for honest taxpayers which accidentally find themselves in a fraudulent set-up.

While an automatic pre-filled VAT return may be beneficial for smaller businesses, we do note that businesses with many cross-border transactions, more complex value



chains, etc, would still need to significantly update and correct the VAT return, regardless of it being pre-filled, thus heavily undermining the simplification potential of such a measure for larger companies.

2. VAT and the Platform Economy

Approach: Platform work is a positive development for business, consumers and individuals, providing new innovative business models and opportunities for entrepreneurship, more consumer choice and additional possibilities for labour market integration. Any action at EU level in this domain should first and foremost support the potential these services represent in terms of economic development, with a positive appreciation of the growing aspiration for entrepreneurship, diverse work opportunities and freedom of choice in our societies and at work.

We also stress the diversity of platform work, which is part of its attractiveness for individuals and growth potential. We encourage the Commission to take a broad view on the notion of ‘platforms’ and not exclusively focus on the major well-known players of today, but rather take into account the many transactions that are already handled today through a diverse range of platforms. Whilst not ideal, it remains preferable to have VAT rules adapted to each of the sectors in the platform economy in place rather than a one-size-fits all system for now.

Whilst not going into the status of platform workers in this public consultation (and related topics such as social security, pension rights, etc), new VAT rules for the platform economy would need to be closely aligned with any (forthcoming) Commission legislation on platform economy in other areas. We want to underline that this is not just a question of defining the nature of the supply/status of supplier/...but also administrative challenges: many of the providers of the sharing economy may not always be familiar with their VAT obligations or with simplification mechanisms available (e.g. refund of input VAT).

At the same time, if a platform worker would be considered a taxable person, it needs to be taken into account how a simple, administrative mechanism can be foreseen for the platform provider to ensure that it can track the user’s activity on the platform.

Intermediation: Another concern is the number of definitions of intermediation in the current VAT Directive. One of the main reasons for the differential treatment of platforms in the EU is that there are six different types of definitions of intermediate in the VAT Directive. In the platform economy, the definition of intermediate is however key. As of today, there are no clear guidelines or definitions regarding intermediation which brings uncertainty as well as double- or non-taxation. To find and define the “deemed supplier” in a cross-border transaction, there needs to be a clarification of the intermediary, to avoid mistakes or uncertainties.



3. One-Stop-Shop (OSS) and Import One-Stop-Shop (IOSS)

Broadening the OSS: The OSS has been a significant force in simplifying the EU VAT system by minimising the need for businesses to have multiple VAT registrations. Through its gradual expansion from limited number of services to all B2C services and distance sales of goods, the OSS covers today a wide range of modern day B2C transactions and should be regarded as one of the key elements of the EU VAT system and an example of the strength of EU-cooperation between tax authorities. While we acknowledge that the introduction and expansions of the OSS did give rise to certain teething issues, we do firmly believe that the positives of the OSS outweigh the negatives by far, and we encourage the Commission to take the OSS further forward. We also refer to the promising data the Commission released on the uptake of the IOSS¹, and hope that similar publications, including on the OSS, will be made in the future to assess the progress, in particular in relation to the uptake of the e-commerce package, and the additional revenue raised.

To underline the importance of the OSS, we want to stress again that a VAT registration is itself a costly procedure, requiring numerous documentary requirements in coordination with the local tax authority, sometimes in a language which the business owner does not necessarily speak. Because of the VAT registration, businesses may also be asked to designate a fiscal representative. The business may also face different national VAT laws (e.g. different penalty regimes) and could be required to follow different accounting periods. They may also be subject to audit enquiries from multiple Member States. According to a European Commission survey, foreign VAT registration was considered as one of the most burdensome VAT obligations for businesses². Because of the difficulties businesses can face in registering in another Member State, the European Commission notes that ‘it is quite common for businesses in such situations to outsource these tasks and to use external advisors, especially for large enterprises’³. “These costs press relatively heavier on small enterprises (...) distort[ing] both the pattern of trade and the size structure of industry by favouring larger firms, for whom the fixed compliance costs and burdens are smaller in proportion of total costs and revenues”, the Commission argues⁴. Under the current rules, we recognise that some businesses may be incentivised to avoid VAT registrations in other Member States and may go at lengths to achieve this, e.g. by making their supply chain more inefficient or even refusing to make a sale in a country at all.

It is therefore necessary that the Commission continues to propose avenues to expand the OSS. This will mean a positive step forward for the VAT system as a whole and further integration of the Single Market. Given the previous expansions of the OSS, we believe it to be logical and essential that, as a minimum, the OSS continues to expand

¹ https://ec.europa.eu/taxation_customs/news/new-vat-rules-online-purchases-brought-eu19-billion-revenues-member-states-their-first-six-months-2022-03-15_en

² European Commission, Directorate-General for Taxation and Customs Union, impact assessment, amending Directive 2006/112/EC on the common system of value added tax as regards the special scheme for small enterprises

³ European Commission, Directorate-General for Taxation and Customs Union, *impact assessment: modernising VAT for cross-border e-commerce*, 2016

⁴ Ibid.



towards remaining areas of B2C transactions (e.g. Article 36, 37, 39 of VAT directive, vendors at trade fairs, ...).

An OSS extension towards electric vehicle charging can also be a tool to contribute to the Green Deal in general. We would like to underline that, when extending the OSS to this area, it will be important to overcome differences between Member States regarding the classification of electric vehicle charging (concerning which there is no binding common EU view⁵). We hope the extension of the OSS towards this area will not be held up by this debate.

We want to highlight in particular the case concerning the cross-border transfer of own goods. In a globalised economy, and a more integrated Single Market, the value chains and market jurisdictions of EU businesses have become more complex and more international, and EU businesses are thus likely to face more often situations where their own goods are transferred cross-border. Given the significant costs of an additional VAT registration, businesses may be incentivised to avoid the registration by choosing not to store their goods in a warehouse in another EU Member State. Smaller businesses in particular may rather choose to transport each good individually from the Member State of establishment to the Member State of consumption, making deliveries less fast, less efficient and bringing higher transport/emissions cost. Registration issues regarding the transfer of own goods are not just related to matters of storage, but also e.g. the long-term rental of goods to a customer (taxable person or non-taxable person) in another Member State.

Similarly, under current VAT legislation (Article 17 & 21 of the VAT directive), when a company sends goods for a last production step to another EU Member State before exporting them outside the EU, it will by default require additional VAT registration in the Member State of this last production step. Given the costs of an additional VAT registration, businesses may be incentivised to first return the finished products back to the Member State where the goods originated from, and then subsequently export them outside the EU. Such detours give rise to inefficiencies in EU value chains, resulting in additional costs, and multiple transportation costs which may in turn give rise to a higher burden on the environment.

Deepening the OSS: A OSS that covers all B2C transactions does raise questions about its role and ambition as a 'central hub' within the EU VAT system. A degree of simplification of VAT compliance has certainly been achieved with the OSS, but there remains scope for more and we encourage the European Commission and Member States to explore ways to 'deepen' the OSS. In particular, we believe that the OSS should be brought closer towards the input VAT refund portal and the penalties & sanctions regime. Such changes would make the OSS more user-friendly and accessible and lead to further registrations within the OSS, without necessarily needing to impose a mandatory OSS registration requirement.

Penalties & sanctions: We encourage the European Commission to explore how penalties & sanctions can be brought closer to the OSS. In the case of a late payment through the OSS, the taxpayer may potentially be subject to different sanction and

⁵ <https://www.vatupdate.com/wp-content/uploads/2022/01/WP-1018-Guidelines-118th-meeting.pdf>



interest regimes in up to 27 Member States. While one penalty regime across the EU OSS would be the most straightforward solution, we understand the political difficulties in designing this. Whilst respecting national sovereignty in how Member States impose penalties on late tax returns, it would be helpful if the OSS makes clear what penalty can be expected in each Member State if a taxpayer does not file its OSS return in time. Without centralised information on the different regimes available, SMEs in particular may find it incredibly difficult to comply with, respond to or appeal to tax authorities (in time) in the different Member States of consumption.

Mandatory registration & €150 threshold removal: Regarding the optional nature of the IOSS and OSS, we believe that a greater uptake is required and encourage tax authorities to continue alongside business federations and other stakeholders to promote the use of the OSS and IOSS. We can understand that a gradual move towards mandatory registration within the OSS may be an objective in the long term, but such a change should be conditional first on a broad ‘deepening’ of the OSS (e.g. a VAT deduction mechanism), making sure that the OSS runs better and becomes more attractive. We want to refer to the report by the European Court of Auditors⁶ which also highlighted the limited number of joint audits taking place in the OSS because of a lack of cooperation between Member States.

We believe it would be advantageous to have the €150 threshold removed. This would provide further simplification to the VAT/E-Commerce package and avoid unwelcome surprises for both consumers and suppliers when orders under the €150 threshold are merged into a single shipment, with a consequent VAT charge at the customs agent. Postal operators would also see their activity considerably simplified at the time of customs clearance. A removal of the €150 threshold would also better ensure a level playing field so that businesses cannot undervalue their goods. Such a removal would however need to be well-coordinated with customs authorities.

Fiscal representatives: In terms of a potential mandatory requirement of the IOSS, we note that (most) non-EU businesses are currently being required to give details of a fiscal representative in the EU before they can register to the IOSS. The cost of this can be substantial, particularly for smaller businesses or those with limited import business into Europe and it also adds cost and complexity across the EU, as some non-EU businesses choose not to use the IOSS, with Member States then having to apply standard customs/VAT checks to every item imported.

Non-EU businesses who are established in a country with which the EU has concluded a VAT mutual assistance agreement are relieved from the requirement to have a fiscal representative. However, at the moment, the EU has only concluded such a VAT mutual assistance agreement with Norway. We hope that similar agreements can be agreed with other countries, where appropriate.

VAT/E-Commerce package: We recognise that the implementation of the VAT/E-commerce package has led to instances of double taxation in the IOSS and we welcome the quick reaction by the Commission to address this issue, but we do underline that the

⁶ Special Report no 12/2019: E-commerce: many of the challenges of collecting VAT and customs duties remain to be resolved <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=50415>



temporary quick-fix provided by the Commission, whilst helpful, does not tackle the root cause of the problem. In particular, national customs need to enable their IT systems to handle IOSS numbers for all customs declaration types, including H1 customs declarations.

VAT in the Digital Age

Fields marked with * are mandatory.

VAT in the Digital Age

Introduction

Value added tax (VAT) has become an increasingly important source of revenues for EU Member States and is also an important EU own resource. The current EU VAT system, however, has become increasingly complex and burdensome for businesses and is subject to fraud. This partly stems from the fact that it needs to be improved in order to keep pace with the challenges and opportunities of new technologies.

For this reason, the VAT system is at the centre of an ongoing reflection to understand how to:

1. make it easier for business to comply with;
2. make it more fraud-proof; and
3. adapt its structure in order to benefit from the latest digital and technological developments.

Against this background, the European Commission has committed itself to adapting the EU VAT framework to the digital sphere. Specific initiatives include:

1. modernising VAT reporting obligations and considering the possibility of further extending e-invoicing;
2. adapting the VAT treatment of the “platform economy” so that it fits the new developments in this area; and
3. facilitating VAT registration and compliance, including a revision of the existing rules requiring the registration of non-established taxpayers, the [One-Stop-Shop](#) (OSS) and the [Import One-Stop-Shop](#) (IOSS). The single VAT registration in the EU is an ongoing process linked to the [changes introduced on 1 July 2021](#) for e-commerce, thus needing an evaluation.

All three elements will reduce the administrative burdens for businesses in complying with their VAT obligations and help Member States fight fraud. The time needed for Member States and businesses to implement any IT system will be carefully assessed, notably in relation to digital reporting requirements which might require a longer implementation period. The full implementation of digital reporting requirements might therefore run until 2030 but will depend on the level of centralisation of the IT infrastructure to be built.

This Public Consultation aims at reaching out to citizens, companies, self-employed persons, business federations, VAT experts, providers of IT and tax compliance services, academic institutions and public entities to collect views and information on the current situation and possible policy changes. Your contribution will thus contribute to the economic and legal analysis underpinning possible changes to the EU VAT framework.

Fields marked with an asterisk (*) are mandatory.

About you

* Language of my contribution

English

* You are replying

in your professional capacity or on behalf of an organisation

* I am giving my contribution as

Business organisation/federation

* Organisation name

255 character(s) maximum

BusinessEurope

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making

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* Where is your organisation located (main headquarters in the case of organisations carrying out activities in several countries)?

Belgium

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default are based on the type of respondent selected

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Anonymous

The type of respondent that you responded to this consultation as, your country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published

I agree with the [personal data protection provisions](#)

Part 1 – Digital Reporting Requirements

“Digital Reporting Requirements” (DRRs) represent any obligation for VAT traders to report transactional data (transaction-by-transaction) other than the obligation to submit a VAT return. DRRs include:

- various types of **reporting requirements** (e.g. VAT listing, Standard Audit File/SAF-T, real-time reporting); and
- the obligation for taxable persons to issue e-invoices in transactions with other businesses and/or consumers, i.e. **mandatory e-invoicing requirements**.

The EU Member States, pressed by the magnitude and importance of losing revenue when they need it the most to support the economy and to recover after the COVID-pandemic, are introducing different DRRs. The **recapitulative statements**, also known as ‘EC sales listing’ or ‘VIES listing’, are statements that must be submitted by VAT traders engaging in intra-EU transactions.

Please express your agreement or disagreement with the following statements concerning the current situation

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Don't know
* The wide discretion left to Member States and the lack of EU guidance result in a fragmented regulatory framework for DRRs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The fragmentation of the regulatory framework for DRRs generates unnecessary costs for EU companies operating cross-border	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>* The fact that DRRs are optional for Member States has a negative impact on the fight against intra-EU VAT fraud*</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* The fact that DRRs are optional for Member States has a negative impact on the fight against domestic VAT fraud</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* intra-EU VAT fraud, including missing trader intra community (MTIC) or carousel fraud abuses the VAT rules applicable to intracommunity trade which allow for purchases in another Member State to be made VAT-free. MTIC consists in the missing trader disappearing with the VAT that has been charged on a subsequent sale

Please express your agreement or disagreement with the following statements concerning the current situation. The recapitulative statements for intra-Community transactions (EC sales listing):

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Don't know
* Are an effective tool to fight intra-EU VAT fraud	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Have a similar effectiveness in fighting intra-EU VAT fraud as existing reporting requirements for domestic transactions and available data collection technologies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Would be more effective to fight intra-EU VAT fraud if the data is collected on a transaction-by-transaction basis and closer to the moment of transaction rather than per customer	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Is EU action necessary to ensure a more widespread adoption of digital reporting and e-invoicing requirements?

- To a large extent
- To a limited extent
- Not at all
- It would be contra productive
- Don't know

Should EU promote uniform digital reporting requirements for domestic transactions or rather leave Member States free to adapt reporting / e-invoicing requirements to their local needs?

[Please use the slider to select a value between 1 (Member States deciding individually) and 10 (promoted at EU level)]

Please rate the importance of the following objectives of a possible EU initiative in the field of DRRs

[One answer per line]

	Very important	Important	Not so important	Not important	Don't know
* Foster the adoption of digital reporting requirements that optimise the use of digital technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the fragmentation of digital reporting requirements to the largest extent possible	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What do you think about the following possible interventions aimed at reducing fragmentation of domestic digital reporting and improving the reporting of intra-EU transactions?

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Don't know
* The European Commission publishes a <u>non-binding</u> recommendation providing a common design for reporting obligations across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States no longer having to ask for an explicit derogation for introducing mandatory e-invoicing for B2B transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Requiring taxpayers to record data about their VAT transactions in a standard digital format, which tax authorities can access upon request	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The introduction of an EU DRR for intra-EU transactions and harmonisation of existing systems for domestic transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The introduction of an EU DRR for both intra-EU and domestic transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* For the exchanges of information on intra-EU transactions between Member States, different IT systems can be envisaged: from a decentralised model (a VIES-like system), with possible additional features, to a centralised system where information is stored at a central level. What is your preference?

Decentralised with additional features

How do you rate the risks in terms of data protection?

[One answer per line]

	Very high risk	High risk	Average risk	Low risk	Very low risk	Don't know
* Decentralised model (a VIES-like system)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Decentralised model (a VIES-like system), with possible additional features	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Centralised system where information is stored at a central level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How do you rate the difficulties in terms of interoperability with national systems?

[One answer per line]

	Very difficult	Difficult	Neither difficult nor easy	Easy	Very easy	Don't know
* Decentralised model (a VIES-like system)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Decentralised model (a VIES-like system), with possible additional features	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Centralised system where information is stored at a central level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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* In your country, digital reporting requirements/e-invoicing are:

- In place
- Planned
- Neither in place nor planned
- Don't know

Would you like to add any comments or suggestions on reporting / e-invoicing requirements?

Part 2 – The VAT Treatment of the Platform Economy

‘Platform economy’ is the term used in this questionnaire to describe a multi-sided model of transactions, where there are at least three parties involved. The role of the **‘online/digital platform’** * is to facilitate the connection between two distinct but interdependent sets of users (firms or individuals) who interact typically via electronic means. One of the parties to the platforms (**‘provider’**) offers access to assets, resources, time and/or skills, goods and/or services to the other party (**‘consumer’**), in return for monetary or non-monetary consideration. A platform usually charges a fee for the facilitation of the transaction. It does not possess any of the assets on offer nor usually provides the services via its own staff.

*online/digital platforms may be defined differently in other legislation.

The current VAT system is unaligned with the new realities, such as the challenges of the platform economy in tackling distortions of competition between traditional and online economic transactions. Thus, VAT equality and neutrality could be at risk if the VAT provisions are not adapted to the digital age. The VAT on e-commerce package adopted specific rules for goods sold via a platform, but no similar rules for services exist.

* How often do you buy goods or services via platforms?

- several times per month
- once or twice per year
- I don't buy goods or services via platforms

* How often do you offer goods or services via platforms?

- several times per week
- several times per month
- once or twice per year
- I don't offer goods or services via platforms

* Currently, in the EU VAT Directive, there are no specific provisions dealing with the treatment of services supplied via platforms. Does the lack of specific VAT provisions create problems for platforms and their users?

- Yes, it creates major problems

- Yes, it creates moderate problems
- Yes, it creates minor problems
- No, it does not
- Don't know

* Have you experienced specific problems concerning the VAT treatment of services supplied via platforms?

- YES
- NO

What was the problem? Please describe

Please indicate the relevance of these issues for each of the following sectors:

[Optional question, multiple answers possible (0 to 5) per each row]

	Transport services	Accommodation	Finance	Professional and household services	Advertising/ exchange of information
Defining whether/when providers/consumers would qualify as VAT taxable persons	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Assessment of the consumer's VAT status which could define the place of supply in cross-border transactions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Defining whether the platform's services should be classified as intermediation or electronically supplied services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Problem in determining the status of the service - whether it is taxable or exempt and if taxed, at what rate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

* Do you experience distortions to cross-border competition with other firms offering the same services, due to differences in VAT treatment between EU Member States?

- Yes, there are major distortions to competition
- Yes, there are moderate distortions to competition
- Yes, there are minor distortions to competition
- No, it does not
- Don't know

* Do you experience distortions of competition with other domestic firms offering the same services via 'non-platform' means due to the uneven treatment of similar services/providers in your Member State?

- Yes, it creates very uneven treatment
- Yes, it creates uneven treatment
- No, it does not
- Don't know

* To what extent is the current VAT treatment an important driver of or obstacle to the digital platform business model?

- Strong driver
- Moderate driver
- None
- Moderate obstacle
- Significant obstacle
- Do not know

* Do you think that VAT evasion and avoidance represent a specific problem for the platform economy?

- Yes, for platforms offering both goods and services
- Yes, mostly for platforms offering goods
- Yes, mostly for platforms offering services
- No
- Do not know

* To what extent do you perceive that changes to the VAT Directive and Implementing Regulation are necessary to ensure the proper VAT treatment of the platform economy?

- To a very large extent
- To a large extent
- To some extent
- To a limited extent
- Not at all
- Do not know

Please rate the importance of the following objectives for potential EU initiatives on:

	Very important	Important	Not so important	Not important	Do not know
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* Reducing costs for economic operators	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring a level-playing field between traditional and platform economy (uniform treatment)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring the harmonized treatment of the platform economy across Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring a broad tax base	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring tax compliance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Simplicity of application	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent would you agree with the necessity of the following possible interventions at EU level in the area of VAT treatment of the platform economy?

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Do not know
* Clarification of the nature of the services provided by the platform	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Rebuttable presumption on the status of platform providers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Streamlining of record-keeping obligations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Deemed supplier regime for digital platforms for supply of <u>certain accommodation and transport services</u> (residence renting, ride on demand and home delivery services)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Deemed supplier regime for digital platforms for supply of <u>all accommodation and transport services</u>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Deemed supplier regime for digital platforms for <u>all services</u> for monetary consideration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Note. Under a deemed supplier regime, the platform would be liable to charge and collect the VAT where the provider is a private person, or they are otherwise not required to account for the VAT themselves

Do you see any practical difficulties (for businesses or the public budget) due to the following legislative interventions at the EU level?

	Difficulties (please describe): [leave blank if "none" or "don't know"]
Clarification of the nature of the services provided by the platform	
Rebuttable presumption on the status of the service provider using a platform	
Streamlining of record-keeping obligations	
Deemed supplier role for digital platforms	

In your opinion, how significant would the impact of the deemed supplier model be on the equal treatment of the traditional and platform economies in the following cases:

	Major positive impacts	Moderate positive impacts	Small or no impacts	Moderate negative impacts	Major negative impacts	Do not know
* Supply of certain accommodation and transport services (residence renting, ride on demand and home delivery services)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Supply of all accommodation and transport services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* All services for monetary consideration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Would you like to add any comments or suggestions on the VAT treatment of the platform economy?

Part 3 – Single VAT Registration in the EU and IOSS

There are situations in which businesses engaged in certain transactions may have to declare (and sometimes pay) VAT in another Member State. In such situations, they have to **register and declare VAT in a Member State in which they are not established**, which can be a lengthy and burdensome process. The concept of a single place of VAT registration aims to minimise the occurrence of such situations.

This issue was partly addressed with the introduction of two new mechanisms on 1 July 2021. For taxable persons supplying cross-border business-to-consumer (B2C) goods or services where VAT is due in the Member State of the customer, the [One-Stop Shop](#) (OSS) allows suppliers to complete a single OSS declaration for all pan-EU supplies. This avoids the need for these suppliers to register in the Member State(s) of their customers.

A further innovation was the introduction of the [Import One-Stop Shop](#) (IOSS). Simply, this allows suppliers selling goods of a low value from a third country or territory to a consumer in a Member State, to collect VAT on those sales of imported goods from the customer when the goods are ordered and to declare and pay that VAT via the IOSS. This avoids the potential VAT registration obligation of the supplier /deemed supplier in each Member State of destination of the goods.

Both mechanisms thereby aim to reduce administrative burdens and compliance costs for taxable persons. They also aim to improve VAT compliance (by making it easier and less expensive) and to improve the functioning of the EU Single Market (by making it less likely that taxable persons will avoid certain transactions or markets due to VAT registration obligations). However, despite the recent changes, there remain several types of transaction that oblige taxable persons to obtain and hold more than one VAT registration (such as when a business transfers its own goods across borders).

The following questions focus on your views and experiences of the OSS and IOSS, as well as on the remaining problems and several policy options that could improve the situation in the future.

How important are the following objectives for you / your organisation?

[One answer per line]

	Very important	Important	Not so important	Not important	Do not know
* Minimising the need for taxable persons to hold multiple VAT registrations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Simplifying and facilitating VAT compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reducing fraud and maximising VAT revenue	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Modernising the VAT rules linked to VAT registration obligations for distance sales of goods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, has the launch of the **OSS** led to progress towards the following objectives?

[One answer per line]

	Significant progress	Moderate progress	Minor progress	No progress	Do not know
* Minimising the need for taxable persons to hold multiple VAT registrations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Modernising the VAT rules linked to VAT registration obligations for distance sales of goods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Simplifying and facilitating VAT compliance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reducing fraud and maximising VAT revenue	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, has the launch of the **IOSS** led to progress towards the following objectives?

[One answer per line]

	Significant progress	Moderate progress	Minor progress	No progress	Do not know
* Minimising the need for taxable persons to hold multiple VAT registrations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Modernising the VAT rules linked to VAT registration obligations for distance sales of goods	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Simplifying and facilitating VAT compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reducing fraud and maximising VAT revenue	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, how consistent is the **OSS** with EU policies, requirements and regulations in the following fields?

[One answer per line]

	Very consistent	Mostly consistent	Partly consistent	Not very consistent	Do not know
* The SME Strategy for a sustainable Europe	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The European digital single market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU Administrative cooperation in the field of indirect taxation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The Union Customs Code	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, how consistent is the **IOSS** with EU policies, requirements and regulations in the following fields?

[One answer per line]

	Very consistent	Mostly consistent	Partly consistent	Not very consistent	Do not know
* The SME Strategy for a sustainable Europe	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The European digital single market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU Administrative cooperation in the field of indirect taxation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The Union Customs Code	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Do you have direct experience with either of these mechanisms?

- OSS
- IOSS
- Both
- Neither

Please express your agreement or disagreement with the following statements concerning the **OSS**?

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Do not know
* The OSS has been implemented smoothly	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Because of the OSS, many businesses no longer need to maintain VAT registrations that they previously had in other Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The OSS is allowing businesses to pursue new customers and / or markets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The OSS is improving VAT compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The OSS is particularly helpful for SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is easy to use the OSS	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The OSS helps to reduce discrepancies in the application of VAT rules in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, how important are the following factors in determining whether businesses use the **OSS** or not (taking into account that it is optional)?

[One answer per line]

	Very important	Important	Not so important	Not important	Do not know
* The size of the business	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The sector/market where the business operates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The type of transactions in which it engages (i.e. the extent to which these are covered by the OSS)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Whether the business is a deemed supplier	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The Member State(s) in which the business is already established	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The Member State(s) in which they would otherwise face VAT registration obligations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please express your agreement or disagreement with the following statements concerning the **IOSS**?

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Do not know
The IOSS has been implemented smoothly	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* For businesses that distance sell imported goods from outside the EU to EU customers, the IOSS is reducing administrative burdens (by removing the need to VAT register in the Member States of customers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS is making it easier for businesses to engage in new transactions which currently require them to register in other Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS is improving VAT compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS is simplifying the process of importation of low value consignments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS is particularly helpful for SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS helps to reduce discrepancies in the application of VAT rules in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is easy to use the IOSS	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS helps to reduce discrepancies in the application of Customs and VAT rules in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, what was the impact of the removal of the VAT exemption for very low value goods (not exceeding EUR 22)?

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Do not know

* To level the playing field between EU and non-EU businesses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To minimize the risk of undervaluation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To stop relocating businesses outside the EU to benefit from VAT savings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To increase the revenues of Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, how important are the following factors in determining whether businesses use the **IOSS** or not (taking into account that it is optional)?

[One answer per line]

	Very important	Important	Not so important	Not important	Do not know
* The size of the business	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The sector/market where the business operates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The types of transactions in which it engages (i.e. the extent to which these are covered by the IOSS)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Whether the business is a deemed supplier	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Whether the business has an EU place of establishment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The desire of the business to be compliant	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The customer experience	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other observations in relation to your OSS/IOSS experience?

Despite the introduction of the OSS and IOSS, several types of transaction still require taxable persons to obtain and maintain multiple VAT registrations. In your view, how important is each of these?

	3 –widespread among businesses and representing a significant share	2 – only prevalent in specific market segments and / or affect many business but only	1 – marginal in terms of both prevalence	Don't know

	of turnover for the businesses concerned	a small proportion of their turnover	and turnover significance	
* Transfer of own goods cross-border	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Chain transactions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* B2B2C transactions; namely an intra-community acquisition followed by a domestic sale to the final consumer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Domestic B2B supply of goods where the reverse charge does not apply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Domestic supplies of B2C goods made by non-established suppliers; such as the sale to consumers after goods have been transferred cross-border to be stored in fulfilment centres, or electric vehicle charging	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* B2C distance sales of goods imported by the supplier from a third country/territory with an intrinsic value exceeding EUR 150 or products subject to excise duties	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Export from a Member State where the exporter is not established, not under transit	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Domestic supply of B2B services where the reverse charge does not apply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Taking into account your experience of the OSS and IOSS do you think that the requirement for taxable persons to obtain and maintain multiple VAT registrations continues to be a problem?

- To a very large extent
- To a large extent
- To some extent
- To a limited extent
- Not at all
- Don't know

How big a priority do you think it should be for the European Commission to take further action to reduce the need for taxable persons to hold multiple VAT registrations?

- High priority

- Medium priority
- Low priority
- Don't know

Please express your agreement or disagreement with the following statements concerning the current situation?

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Do not know
* VAT registration requirements lead to high administrative and compliance costs for businesses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* By making it difficult for taxable persons to be compliant, VAT registration requirements contribute to high levels of fraud and non-compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Because they want to avoid VAT registration in multiple Member States, many taxable persons do not pursue certain markets or transactions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The European Commission is currently considering some policy options to further reduce the scope of situations where non-established businesses have to register for VAT. Please express your agreement or disagreement with these?

[One answer per line]

	Agree	Partly agree	Neither agree nor disagree	Partly disagree	Disagree	Do not know
* Extension of the OSS so that it covers all B2C supplies of goods and services by non-established suppliers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Extension of the OSS to enable intra-Community supplies and acquisitions of goods, thereby avoiding VAT registration when transferring own goods cross border	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Extension of the OSS to B2B supplies of goods and services, while leaving in place the current						

VAT refund mechanism for any deductible input VAT incurred outside a taxable person's Member State of establishment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Extension of the OSS to B2B supplies of goods and services, while also introducing a deduction mechanism into the OSS	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reverse charge* made available for all B2B supplies carried out by non-established suppliers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Removing the €150 threshold for the IOSS, so that it can be used to declare VAT for distance sales of goods of any value	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Making the IOSS mandatory for all distance sales of imported goods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Making the IOSS mandatory for all distance sales of imported goods above an EU turnover threshold (e.g: €10,000)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Making the IOSS mandatory for the marketplaces (deemed supplier) only	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The reverse charge mechanism transfers the responsibility to apply VAT to a transaction from the supplier to the buyer of a good or service, thereby removing the obligation for suppliers to VAT register in the Member State where the supply is made. Suppliers that incur local VAT on costs related to the service or goods supplied under the reverse charge may recover these amounts through an EU VAT reclaim

Do you have suggestions to make the IOSS more fraud-proof

Would you like to add any comments or suggestions on the single place of VAT registration or IOSS?

Additional views (optional)

Please upload your file(s)

[You may upload here an additional document on the subject of this consultation. All additional documents provided will be published on the Commission website]

d414d91d-6de3-4240-b490-b0f0702c52da/BusinessEurope-VATIntheDigitalAge-May.pdf

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