

# 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*

Technology Industries of Finland

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

39705603497-38

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

Finland

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

\* **Contribution publication privacy settings**

Note that, whatever the option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N° 1049/2001

**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 <b>intra-EU VAT fraud</b>*</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 <b>domestic VAT fraud</b></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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The introduction of an EU DRR for both intra-EU and domestic transactions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Decentralised model (a VIES-like system), with possible additional features	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Centralised system where information is stored at a central level	<input type="radio"/>	<input checked="" type="radio"/>				
---	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------	----------------------------------

\* In your country, digital reporting requirements/e-invoicing are:

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

In your experience, which of the following effects (and their intensity) did you observe after the introduction of digital reporting / e-invoicing requirements in your Member State?

[One answer per line]

	Strong	Moderate	Minor	Not observed	Too early to tell / don't know
* Significant costs of compliance for domestic operators	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Significant costs of compliance for operators operating cross-border	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Insufficient time allowed to implement changes in IT systems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of support from tax authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Too frequent changes to requirements	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limited time to handle error and warning messages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Risks to the confidentiality of transactions / invoice data	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

To comply with digital reporting / e-invoicing requirements is:

- Very difficult
- Difficult
- Neither difficult nor easy
- Easy
- Very easy
- Too early to tell / don't know

To which extent the following outcomes have materialised after the introduction of digital reporting / e-invoicing requirements

[One answer per line]

	Major benefit	Moderate benefit	Minor benefit	Not a benefit	Too early to tell / don't know
Promotion of the use of structured e-invoices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quicker invoicing process	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business automation gains	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quicker audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fewer audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fewer requests for information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Pre-filling of VAT returns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Removal of other VAT obligations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Quicker VAT reimbursement time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

(Please note, that the above mentioned evaluation of the effects materialised, is done based on experiences after introduction of e-invoicing. Digital reporting is being planned and it is too early to evaluate the outcome.)

We strongly support measures to make tax reporting simple, predictable, digitalised and easy. Digital reporting should be a harmonised, well-functioning, similar tax reporting model within the EU, lowering the amount of administrative costs and work for companies and tax administrations. Also E-invoicing should be enhanced. In our opinion e-invoicing means a structured digital invoice. We do not consider an invoice sent by email in PDF-format to be e-invoicing. We also strongly support measures to combat tax fraud and actions to address non-compliance. These goals should be considered together. Measures designed to reduce VAT fraud and VAT gap, such as DRRs, must be as consistent as possible across jurisdictions. But it should also be considered that companies want to and try to be compliant. Legislation must be designed in such a way that it causes minimal business disruption and it is possible for the companies to be compliant.

However, the trend is that many Member States are creating their own, individual DRRs. This fragmented legislative situation is incredibly burdensome for businesses to comply. TIF therefore prefers harmonisation of DRR standards around the EU. The schedule for the EU to act is tight. The more the legislation takes time to be adopted, the more Member States create their own DRRs. For our Members, consistency across the EU and globally is the most important goal. TIF is of the opinion that electronic invoicing the best way forward, also providing benefits for businesses. Implementation of a harmonised e-invoicing model would therefore be a long-term solution that minimises costs for EU taxpayers whilst ensuring the EU aligns its DRR with global models.

In order to be sustainable, we expect the harmonised DRR standards to support the transition to real-time economy. Please find our additional comments on real-time economy in a separate document linked to this submission.

Should e-invoicing be mandatory?

Mandatory binding legislation is required to make clear, harmonised rules and to set a binding timetable, to enable efficient changes towards digital reporting. TIF would however encourage the use of non-mandatory means before the mandatory legislation is in place. For example boosting digitalisation by financially supporting companies (especially SMEs), giving guidance and benefits, making technical details clear, build functional APIs (Application programming interface) and to build e-invoicing infrastructure in all Member States.

In Finland already approximately 90 % of total B2B-invoice volumes are e-invoices, without being legally mandatory. Finnish public sector and big companies require the use of e-invoices, thus making the transition fast in practice. Also, in other EU countries the public sector should demand the use of e-invoices. The public sector should act as an example in how to use e-invoicing. Using e-invoices could be incentivised for companies. E.g. by providing more report filing time, if the company uses e-invoices.

Please note, that e-invoicing must not be linked to a clearance-model (such as in Italy). We are strictly against any clearance-type model, which would require all invoicing to be cleared by the tax administration. Our members have experienced vast difficulties in e.g. automation of invoicing when a clearance-model is used. In addition, they have been forced to alter their reporting software for these countries, creating excessive additional costs.

- Changes must be agreed and defined clearly. Big accounting software providers have little incentive to make big updates to their software before they know the requirements are final. Therefore the planned application schedule of 2030 is agreeable, but the legislation must be ready and agreed well before that.
- After agreeing there must be a long testing and implementation period. This will allow the companies to combine the changes to possible other software and system updates, thus lowering the total costs. In addition, a long testing period will minimize the risk of system and reporting errors.
- VAT reporting model must be as harmonised as possible, with no or little room for unilateral adjustments, so that the company will save in compliance costs in the future (as the reporting model is similar in all EU countries).

## 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
Defining whether/when providers/consumers would qualify as VAT taxable persons	<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"/>
Defining whether the platform's services should be classified as intermediation or electronically supplied services	<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"/>

\* 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

* Reducing costs for economic operators	<input type="radio"/>	<input checked="" 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 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 <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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The OSS is improving VAT compliance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The OSS is particularly helpful for SMEs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is easy to use the OSS	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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"/>
---	----------------------------------	-----------------------	-----------------------	-----------------------	-----------------------

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS is improving VAT compliance	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The IOSS is particularly helpful for SMEs	<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 VAT rules in the EU	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To stop relocating businesses outside the EU to benefit from VAT savings	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Whether the business has an EU place of establishment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The desire of the business to be compliant	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The customer experience	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 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 above an EU turnover threshold (e.g: €10,000)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Making the IOSS mandatory for the marketplaces (deemed supplier) only	<input checked="" type="radio"/>	<input type="radio"/>	<input 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]

70a4673c-faa6-471c-bc57-96ba9b43d5df

/Technology\_Industries\_of\_Finland\_Annex\_to\_Consultation\_EC\_VITDA\_5\_May\_2022\_additional\_views.pdf

## **Contact**

Cristian.LARGEANU@ec.europa.eu