
Tax Advisory

New developments in the SII (Immediate Supply of Information on VAT)

Marzo 2017

Exemption for taxable persons registered with the REDEME from the requirement to file invoicing registers for the first half of 2017.

Royal Decree 596/2016, approved on 2 December 2016, introduces significant modifications to the processing of VAT for 2017.

As from 1 July 2017, Large Companies (volume of transactions greater than 6 million euros), entities registered with the monthly refund register (REDEME) and VAT groups, as well as any taxpayer on a voluntary basis, will be required to furnish their invoicing information electronically (Immediate Supply of Information - SII).

The general deadline for providing the information is 4 days following issuance of the invoice (issued invoices) and four days following registration of the invoice (received invoices). However, said deadline is extended to 8 days for 2017. Furthermore, a transitional system is established for invoices corresponding to the first half of 2017, which may be furnished during the second half of 2017.

As of today, the Ministerial Order regulating how the information should be provided has not yet been published. However, certain companies (Repsol, Indra, Meliá, Cortefiel, Peugeot-Citroën, Orange, Mahou, etc.) are operating with the SII in the test stage in order to perfect provision of the information. In addition, in order to avoid any problems and/or duplications with the implementation of the SII, on 6 February, Hacienda submitted the Draft Order regulating the details of the SII to public consultation.

In this public consultation, those registered with the REDEME passed on their most important concerns: duplication in the provision of information corresponding to the first half of 2017. As a requirement for obtaining monthly VAT refunds, these companies had to submit both Form 303 (VAT return) and Form 340 (Informative return – VAT record books) and, in accordance with the aforementioned Royal Decree, they will have to continue doing so until 1 July 2017.

Sources from the Tax Administration have indicated that in order to meet the demands of the groups registered with the REDEME, it will exempt them from the requirement to provide information relating to invoices issued and/or registered between January and June 2017 provided said information is provided by means of Form 340.

In conclusion, pending official confirmation by means of the Ministerial Order implementing the SII, taxable persons registered with the REDEME will not be required to provide the invoicing registers corresponding to the first half of 2017 through the SII.