



## **EU VAT “Quick Fixes” – What can be fixed?**

Helping you prepare for Quick Fixes  
implementation for 1 January 2020

Entry package



# Contents

The four “Quick Fixes”	2
Taking action	4
How can we help?	4
Easy-access “Quick Fixes” workshop	5

## The four “Quick Fixes”



### EU cross-border call-off stock supplies

#### Background of the four Quick Fixes

The EU VAT regime applicable to cross border supplies of goods is complex and insecure. As progress towards a definitive VAT regime does appears difficult, tailored changes are needed to make the existing system simpler and more robust.

The **Quick Fixes** aim to address particular painpoints.

Movements of own goods often trigger for a business to set up VAT numbers abroad. National solutions exist for call off stock but are hard to apply for international businesses.



### EU cross-border chain transactions

In a cross border supply chain, the definition of which supply can be zero rated often gives rise to discussions between taxpayers and with tax authorities. A holistic approach is hard to capture in operational systems used for daily tax decisions.



### Mandatory **VAT ID** number verification for EU supplies

Loopholes exist whereby tax authorities are unable to challenge the VAT exemption for supplies where the lack of a VAT identification number of the buyer or of cross border reporting makes it difficult to track cross border goods flows, thus facilitating VAT fraud.



### Documentary evidence of **proof of EU transport**

Evidence required to exempt intra-Community supplies can consist of a wide range of documents, with no common rules on what is necessary or sufficient. It is particularly challenging to agree on documentation where the transport is made by the customer. Only a few countries have developed specific transport documentation rules.

### Solutions offered by the four Quick Fixes

The European Council adopted four **quick fixes** to **simplify** the current VAT system for B2B intra-Community transactions and to combat fraud and abuse.

#### Entry into force: 1/1/2020

Uniform simplification opportunity where a supplier transfers stock to a warehouse at the disposal of a known customer in another Member State

Legal certainty enhanced by setting out a default rule for the allocation of transport for intra-Community supplies

To benefit from the VAT exemption on intra-Community supplies, the availability of the VAT identification number of the customer will become a substantial requirement

Reduced set of documentary evidence needed to prove the transport of goods to support the VAT exemption for intra-Community supplies



Impact on all intra-EU supplies of goods

## Taking action

**Companies involved in cross-border supplies of goods should consider the possible impact of these “Quick Fixes”** on their business, in order to mitigate VAT risks (e.g. additional VAT liabilities, registration and reporting obligations) and seize the opportunities (e.g. standardisation and enhancement of internal controls).

**Different stakeholders** will be affected and it is important to include all stakeholders in discussions about the “Quick Fixes” impact on your business.

## How can we help?

The **“Quick Fixes” entry package** consists of an accessible entry-level **workshop for all stakeholders**. Facilitated by a team of Deloitte VAT experts, the workshops are for companies that would like to know about the impact that the “Quick Fixes” will have on their business and/or system setup.

### Stakeholders



Logistics



AP



Sales



Legal



IT



Tax

## Easy-access “Quick Fixes” workshop

A half-day (three hours) on-site workshop, which includes:

- ✓ A general update and explanation of the four “Quick Fixes”
- ✓ A mapping and discussion of company-specific flows, and how these are affected by the “Quick Fixes” - involving all relevant stakeholders (AP, Sales, Logistics, Legal, IT)
- ✓ Determining which “Quick Fixes” will impact your current supply chain and include these in a concrete action plan (“**Must Have**”)
- ✓ Determining which benefits can be derived from the “Quick Fixes” (“**Nice To Have**”)



## “Quick Fixes” entry package

- ✓ Newsletter subscription for (technical) updates
- ✓ Three-hour on-site workshop
- ✓ Content and programme tailored to your business
- ✓ Accessible to all stakeholders
- ✓ Delivery of a concrete plan that includes the “**Must Do**” and “**Nice To Have**” actions

**EUR 1,500**  
**(excl. expenses**  
**and VAT)**

# Deloitte.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as “Deloitte Global”) does not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) for a more detailed description of DTTL and its member firms.

Deloitte provides audit, tax and legal, consulting, and financial advisory services to public and private clients spanning multiple industries. With a globally connected network of member firms in more than 150 countries, Deloitte brings world-class capabilities and high-quality service to clients, delivering the insights they need to address their most complex business challenges. Deloitte has in the region of 225,000 professionals, all committed to becoming the standard of excellence.

This publication contains general information only, and none of Deloitte Touche Tohmatsu Limited, its member firms, or their related entities (collectively, the “Deloitte Network”) is, by means of this publication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser. No entity in the Deloitte Network shall be responsible for any loss whatsoever sustained by any person who relies on this publication.

© September 2019 Deloitte Belgium Tax and Legal

# Laga

A top legal practice in Belgium, Laga is a full service business law firm, highly recommended by the most authoritative legal guides. Laga comprises approximately 140 qualified lawyers, based in Brussels (Zaventem and Woluwé), Antwerp, Ghent and Kortrijk. Laga offers expert advice in the fields of banking & finance, commercial, corporate/M&A, employment, IT/IP, public/ administrative, insolvency and reorganisations, real estate, tax law, tax and legal services for high-net-worth families and individuals (Greenille by Laga), and litigation. Where appropriate to ensure a seamless and comprehensive high-quality service, Laga lawyers work closely with financial, assurance and advisory, tax and consulting specialists, and with select EU and US law firms.

Laga provides thorough and practical solutions tailored to the needs of clients ranging from multinational companies, national large and medium-sized enterprises, financial institutions, and private clients to government bodies.

Laga CVBA is part of a privileged multidisciplinary cost-sharing association with Deloitte Belastingconsulenten CVBA.

© September 2019 Laga