STATE BUDGET 2022 PROPOSAL FOR PORTUGAL NON-RESIDENT REGISTERS VAT KEY TAKEAWAYS

REPORTING OF INVOICES - SAF-T (PT) BY NON-RESIDENT REGISTERS

- This obligation is introduced for VAT registers issuing invoices with PT VAT
- Reporting is monthy, up to day 5 of the month following date of issue
- Invoices will be reported by SAF-T (PT) file, generated by the certified invoicing programme
- Absence of invoices is also to be reported

Our comments: the reporting of invoices by SAF-T (PT) to be made by non-resident entities does not come as a surprise, following the entry into force, in 1.07.2021, for the same entities, of the obligation to issue invoices with Portuguese VAT from certified software. However, general public perception is that this measure represents an entry to market obstacle and an added layer of compliance for the Portuguese market (the majority of EU Member States do not apply this obligation). The 5-day deadline is also not reasonable and should be extended

NEW DEADLINES TO REPORT VAT RETURNS

Return	Deadline for submission	Deadline for payment	
Monthly period	Day 20 of the 2 nd month following tax period	Day 25 of the 2 nd month following tax period	
Quarterly period	Day 20 of the 2 nd month following tax period	Day 25 of the 2 nd month following tax period	

Our comments: the new VAT Calendar is in line with the calendar extensions implemented during COVID-19



The Proposal was presented to National Parliament on 11.10.2021

Final vote is scheduled for November 2021

Changes are expected to enter into force as of 1.01.2022

