Nexia

Electronic Invoicing in Europe

A Nexia network survey

19 countries, August–September 2026

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FOREWORD

Across Europe, electronic invoicing has moved from a compliance footnote to a broad-level priority. The EU's VAT in the Digital Age reform sets a common horizon for every business trading across borders, but the path each country is taking to get there differs in timing, scope and technical detail. This publication draws on the first-hand experience of Nexia member firms in 19 countries to help finance leaders cut through that complexity and plan with confidence. We are proud of the reach of our network and of the practical, on-the-ground insight our colleagues have contributed to this report.

02

EXECUTIVE SUMMARY
5 THINGS TO KNOW

- Nineteen Nexia member firms across 19 European countries took part in this survey, conducted between May and September 2026 and coordinated by Nexia S&A.
- Every contributing country ultimately converges on the same EU horizon: mandatory structured e-invoicing for intra-EU B2B transactions from 1 July 2030 under the VAT in the Digital Age (ViDA) reform, with full alignment of national systems required by 2035 - but several countries (e.g. Belgium, France, Italy, Poland, Romania, Turkey) already have, or are phasing in, domestic mandates well ahead of that date, and the Netherlands announced in September 2026 a domestic mandates well ahead of that date, and the Netherlands announced in September 2026 a domestic B2B mandate aligned with the 2030 date.
- Ten of the 19 responses explicitly reference the EN 16931 European standard, and seven explicitly reference the Peppol network as their transmission channel - the two form a recurring technical backbone, alongside country-specific platforms.
- Where contributors rated their tax authority's involvement and responsiveness on a scale of 1 to 5, the average score was 3.25/5 (12 of 19 firms gave a numeric rating), ranging from 1/5 (The Netherlands) to 5/5 (Italy).
- On whether e-invoicing has already reduced VAT errors or disputes in practice, opinions are split: 7 firms said yes, 6 said no, and 6 said the question was not yet applicable or did not answer - a reminder that measurable benefits still depend heavily on how long a mandate has been in force locally.

TAKEAWAY

ViDA confirms that the shift to structured e-invoicing and digital reporting is part of a durable, structural transformation of the VAT compliance function across the Union. Organisations that build a robust architecture from the outset — grounded in data quality, sound VAT parameterisation, cross-flow reconciliation and adaptable procedures — will be best positioned to meet the successive EU deadlines through 2030 and beyond.

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CONTEXT AND METHODOLOGY

This report is based on a common questionnaire of 16 questions, circulated by Robert Hazelton (Nexia) to Nexia member firms across Europe and coordinated on the continental side by Nexia S&A (Edouard Frizon). Responses were collected between 7 May and 16 June 2026, then reviewed and updated by the contributing firms in August–September 2026. Nineteen firms responded, covering Austria, Belgium, the Czech Republic, Denmark, Finland, France, Germany, Greece, Ireland, Italy, the Netherlands, Poland, Portugal, Romania, Sweden, Switzerland, Turkey, Ukraine and the United Kingdom. The questionnaire covers three areas: the regulatory framework in force or announced in each country (deadlines, scope, formats, penalties); the operational and financial impact already observed by contributing firms and their clients; and the quality of the relationship with local tax authorities. The common reference point across all responses is the EU's VAT in the Digital Age (ViDA) reform, summarised below.

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VIDA AT A GLANCE

The regulatory detail in Part 1 refers constantly to ViDA. This short overview, drawn from Nexia S&A's internal legal one-pager on the Directive, summarises the framework before the country-by-country picture.

- Legal basis: the Council Directive on VAT in the Digital Age (ViDA) was adopted on 11 March 2025 and entered into force on 14 April 2025.
- Key milestone: 1 July 2030 — entry into application of the harmonised EU digital reporting regime and the associated structured e-invoicing obligation for intra-Community B2B transactions.
- Three pillars: the platform economy (deemed-supplier VAT liability for certain platforms), single VAT registration (extended One-Stop-Shop, generalised reverse charge), and Digital Reporting Requirements — structured e-invoicing and near real-time digital reporting for intra-Community transactions.
- End of the derogation procedure: Member States now have unilateral discretion to mandate domestic B2B e-invoicing without prior EU approval — the direct explanation for the patchwork of national deadlines documented in Part 1.
- Format: the EN 16931 semantic standard (Directive 2014/55/EU) underpins the reform; it was formally revised at EU level in February 2026.
- Reporting deadline: structured transactional data must be transmitted within 10 days of the chargeable event (5 days for self-billing, 10 days for advance payments), replacing existing EC Sales Lists for in-scope transactions.
- Transmission model: ViDA does not require a centralised platform — invoices can be issued and transmitted directly to counterparties (e.g. by email); interoperability across borders is expected to rely in practice on networks such as Peppol.
- Central VIES: a new centralised EU database will consolidate DRR data, VAT identification data and cross-border administrative cooperation information; the legacy VIES system will be progressively phased out from July 2032.

Source: Council Directive on VAT in the Digital Age (ViDA), adopted 11 March 2025 — Nexia S&A legal one-pager.

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01

Where Europe stands: a comparative regulatory picture

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The 19 responses show a genuinely uneven landscape. Some countries already require structured B2B e-invoicing today; others are only committed, at this stage, to the EU-wide 2030 deadline. The tables below group the raw responses to make that picture comparable across countries, without altering their content.

01.1. DEADLINES AND TIMELINE

country by country

Country	Deadlines & timeline (as reported)
Austria 	Austria currently has no general B2B e-invoicing mandate; therefore, no statutory deadlines or distinction between sending and receiving obligations exist at present. In the public sector (B2G), e-invoicing has been mandatory for several years, with both issuance and acceptance already required. At EU level, the VAT in the Digital Age (ViDA) reform will introduce mandatory structured e-invoicing for intra-EU B2B transactions as of 1 July 2030. This obligation will apply simultaneously to sending and receiving of invoices.
Belgium 	As of January 1, 2026, all Belgian established VAT-registered businesses (except for a limited number of exempt categories) must in principle use structured electronic invoices when trading with one another for supply of goods and services located in Belgium. Sending a PDF invoice via email or a platform is no longer sufficient. There are no differences in the dates between sending and receiving.
Czech Republic 	B2B transactions - 2030 for intracommon transactions, 2035 domestic transactions, no diferrences set so far between sending and receiving.
Denmark 	No Difference.
Finland 	Electronic invoicing is mandatory for all Business-to-Government (B2G) transactions in Finland. Since 1 April 2019, all central government bodies have been required to receive and process eInvoices compliant with the European Standard (EN 16931), in line with the eInvoicing Act 241/2019 and the European Directive 2014/55/EU. There is no B2B or B2C mandate. However, under the eInvoicing Act 241/2019, companies with an annual turnover exceeding EUR 10,000 are entitled to request EN-compliant eInvoices from their suppliers. This is already in force. By 2028, the Finnish government plans to begin preparations for implementing electronic invoicing for intra-EU transactions.

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Part 1

Where Europe stands:
a comparative regulatory picture

Country	Deadlines & timeline (as reported)
France	Receipt (all liable entities): obligation to receive electronic invoices from 1 September 2026 (all sizes). Domestic B2B issuance: Large enterprises & mid-sized companies: 1 September 2026. SMEs / micro-enterprises: 1 September 2027. e-reporting (B2C & international B2B): rollout to follow the same timetable as the issuance requirement (large enterprises/mid-sized enterprises: 09/2026; SMEs/very small enterprises: 09/2027). B2G: the requirement for electronic invoicing to the public sector is already in force via Chorus Pro.
Germany	From Jan 1, 2025: All businesses must be able to receive e-invoices From Jan 1, 2027: Mandatory sending of e-invoices for companies with > €800,000 turnover. From Jan 1, 2028: Mandatory sending of e-invoices for all businesses Key difference: Receiving obligation starts earlier (2025) than sending (2027–2028).
Greece	04.05.2026 FIRST PHASE 01.10.2026 SECOND PHASE Depending on Revenue thresholds for juridical persons during FY 2023 (both sending and receiving).
Ireland	Ireland has a phased implementation of mandatory VAT eInvoicing and real-time reporting aligned with the EU ViDA Directive, commencing from 1 November 2028. From that date, VAT-registered large corporates (i.e. those managed by Revenue's Large Corporates Division and established or with a fixed establishment in Ireland) will be required to issue structured eInvoices for domestic B2B transactions and report invoice data to Revenue on a real-time basis, while all Irish businesses will be required to be capable of receiving structured eInvoices. From November 2029 to all VAT-registered businesses that engage in intra-EU B2B trade will be required to operate eInvoicing, and from 1 July 2030 mandatory eInvoicing and digital reporting will apply to all intra-EU cross-border B2B transactions under ViDA.
Italy	Electronic invoicing in Italy has been mandatory since 1 January 2019 for transactions between VAT-registered entities resident or established in Italy, whether in B2B (between businesses and professionals) or B2C (with end consumers) transactions. All invoices must be processed through the Revenue Agency's Exchange System (SdI).

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Country	Deadlines & timeline (as reported)
The Netherlands	Dutch implementing legislation is only partly in place. The bill Wet implementatie Richtlijn btw in het digitale tijdperk - enkele btw-registratie was submitted to parliament on 26 March 2026 and is still pending. On 11 September 2026, the State Secretary for Finance sent an outline letter to the House of Representatives confirming that e-invoicing and digital reporting will be extended to domestic B2B transactions. A separate bill will follow: public consultation in autumn 2026, submission to parliament before the 2027 summer recess, with adoption targeted before 1 July 2028. - B2G (already in force): e-invoicing to central government is mandatory since 1 January 2017 for new procurement contracts; all contracting authorities must be able to receive and process EN 16931-compliant invoices (Directive 2014/55/EU; 18 April 2019 / 18 April 2020). - Mandatory e-invoicing (from 1 July 2030): structured e-invoicing for both domestic B2B and intra-EU B2B transactions, together with near real-time, invoice-by-invoice digital reporting of EU transactions - intra-Community supplies and acquisitions of goods, reverse-charge services and transfers of own goods. Cross-border invoices must be issued within 10 days of the supply and customer acceptance is no longer required. National systems must be fully aligned by 1 January 2035. - Domestic digital reporting (from 1 July 2031): near real-time, invoice-level reporting is extended to domestic B2B transactions. - Single VAT registration (phased): extension of the One Stop Shop (OSS) from 1 January 2027, with further extensions from 1 July 2028, including a new scheme for transfers of own goods. From 1 July 2028 a mandatory reverse charge applies for non-established suppliers without a Dutch VAT number, and the call-off stock simplification ends (run-off until 30 June 2029). - Platform economy (from 1 July 2028): the deemed-supplier rule for short-term accommodation rental and road passenger transport. Member States may defer this to 1 January 2030; the Netherlands has consulted on applying it already from 1 July 2028. - Exemptions: there is no separate threshold for micro-enterprises; businesses under the Dutch Small Businesses Scheme (KOR) remain exempt from the domestic obligation. Existing exemptions (exempt supplies, travel agencies, second-hand goods dealers and simplified invoices) remain in place for the time being.
Poland	Implementation dates for the e-Invoicing System in Poland: - starting February 1, 2026, for businesses whose sales (including tax) exceeded PLN 200 million in 2024, - starting April 1, 2026, for all other businesses, - from January 1, 2027, for the smallest businesses with total monthly sales of up to PLN 10,000.

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Part 1

Where Europe stands:
a comparative regulatory picture

Country	Deadlines & timeline (as reported)
Portugal	In the public procurement/B2G sphere, Portuguese contracting authorities have been required to receive and process structured electronic invoices under the phased implementation of the Portuguese e-invoicing framework. As regards suppliers, the transitional period for entities other than micro, small and medium-sized enterprises and public entities acting as co-contractors has already expired. Under the 2026 State Budget, the transitional regime applicable to micro, small and medium-sized enterprises and public entities acting as co-contractors was extended until 31 December 2026. Consequently, absent a further legislative extension, the structured e-invoicing requirement will apply to those entities from 1 January 2027. Portugal does not currently impose a general mandatory structured e-invoicing regime for domestic B2B or B2C transactions. As a transitional tax measure, invoices issued in PDF format continue to be accepted and treated as electronic invoices for the purposes of Portuguese tax legislation until 31 December 2026. This transitional rule should be distinguished from the structured e-invoicing requirements applicable in public procurement.
Romania	E- invoicing is already implemented and mandatory since 2024.
Sweden	2030 Regarding public sector rules about e-invoicing are in place.
Switzerland	No deadlines.
Turkey	In Turkey, the transition to e-invoicing is not a one-time reform but an ongoing, phased process. Deadlines are updated annually based on companies' annual gross sales revenue thresholds (3 Million TL in recent years) and their specific sectors. Once a business is mandated to join the e-invoicing system, there is no difference between the dates for sending and receiving; both obligations start simultaneously on the same day.
Ukraine	Not applicable for Ukraine so far. E-invoicing reform has not been launched in Ukraine as of now. However, there are relevant discussions of its perspectives at the governmental level. In Ukraine, since 2015, it has been mandatory to submit sales and services invoice data to the tax authority Unified Register of Tax Invoices (URTI) if the issuing taxpayer exceeds UAH 1 million revenue annually (this is about VAT invoices as opposed to invoices itself). Additionally, since January 1, 2023, mandatory SAF-T reporting has been implemented for small and medium-sized entities, with a reporting obligation for large enterprises already present since January 1, 2022.
United Kingdom	Mandatory from 2029 - likely from 1 April 2029 but to be confirmed. No differences in implementation dates for sending and receiving at this stage.

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01.2. MANDATORY FORMATS AND TRANSMISSION CHANNELS

country by country

Peppol and the EN 16931 standard recur across a majority of responses, but several countries operate their own national platform or format on top of, or instead of, this common backbone (e.g. France's Approved Platforms and Public Portal, Italy's Sistema di Interscambio, Turkey's e-Fatura, Poland's KSeF).

Country	Mandatory formats & transmission channels (as reported)
Austria	E-invoicing has been mandatory for suppliers to Austrian federal authorities only since 2014, fully aligned with EU requirements since 18 April 2020. Suppliers must issue (send) structured e-invoices. Public authorities must accept and process them (EN 16931 standard).
Belgium	The authorities prefer the use of the Peppol network (XML in Peppol BIS format). To gain access, you must designate an access point (this could be your accounting software or another third party). If you do not wish to use Peppol and have the customer's consent, you may also use other formats that comply with European standards.
Czech Republic	So far not applicable, for voluntary e-invoicing, so-far pdf is mainly used or edf format in accordance to ISO 16931.
Denmark	Both physical invoices and electronic invoices are permitted in Denmark.
Finland	The European standard EN 16931 has been adopted by contracting authorities. The most frequently syntax used when exchanging eInvoicing is XML. The operators have the possibility to either use format defined by the European standard such as UBL 2.1 and Cross-Industry Invoice (CII) or national formats such as Finvoice 3.0 and TEAPPSXML 3.0 (provided their compliance with the European Standard) or Peppol BIS Billing 3.0. These formats ensure that invoices are machine-readable, interoperable, and accepted by public procurement platforms. Mandatory fields such as invoice number and date must be completed in accordance with VAT invoice requirements. European standard codes must be included unless otherwise agreed bilaterally between trading partners. Consolidated eInvoices are not permitted. eInvoices are centrally processed by the Finnish Government Shared Services Centre for Finance and HR. Public authorities receive eInvoices through a network of eInvoice operators or via two free platforms provided by the Finnish Government Shared Services Centre for Finance and HR, including the Handi service and the Basware Supplier Portal.
France	- Invoice transmission via an Approved Platform (PA) registered with the tax authorities; the PPF (Public Portal) is refocused on managing the national directory of recipients and the collection/transmission of data to the authorities (hub), without direct business-to-business exchange. - Invoice formats (EN 16931 common framework): Factur-X, UBL. - Obligation to choose an AP: all businesses must designate an approved platform before the legislation comes into force (official list published by the DGFiP).

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Part 1

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Country	Mandatory formats & transmission channels (as reported)
Germany	Formats: EN 16931 compliant e-invoices (mainly XRechnung and ZUGFeRD/ Factur-X). Transmission: No fixed channel required (e.g. email, PEPPOL, EDI allowed) Must always be fully electronic and structured.
Greece	Through a certified third party provider (certified by the Greek State).
Ireland	In line with EN 16931.
Italy	In Italy, in order to be valid for tax purposes, an electronic invoice must: 1. be issued in XML format; 2. be transmitted via the Revenue Agency's Exchange System (SdI).
The Netherlands	No B2B format is prescribed today, as no B2B mandate is yet in force. The general legal framework is Art. 35a and 35b of the Wet op de omzetbelasting 1968: an electronic invoice is equivalent to a paper invoice provided authenticity of origin, integrity of content and legibility are ensured; electronic invoicing is currently subject to acceptance by the customer. Formats (B2G, and used voluntarily in B2B): - EN 16931 - the European semantic standard; permitted syntaxes are UBL 2.1 and UN/CEFACT CII. - NLCIUS - the Dutch Core Invoice Usage Specification (national CIUS of EN 16931), implemented in UBL syntax as SI-UBL 2.0. - SETU (HR-XML) - sector-specific, for staffing and temporary labour invoices. - UBL-OHNL - legacy format, being phased out; no longer recommended for new implementations. Transmission channels: - Peppol network (via a certified Peppol access point), using Peppol BIS Billing 3.0. - Digipoort - the government gateway for invoicing to central government. - E-mail or supplier portals remain permitted in B2B until the mandate applies. From 1 July 2030, only the European standard EN 16931 will be accepted for in-scope domestic and intra-EU B2B transactions; no alternative invoice formats will be permitted. The government is considering the Peppol network as the national infrastructure; this will be investigated in the coming months.
Poland	Poland has a National e-Invoice System (Krajowy System e-Faktur). It is a platform for issuing, sending, receiving, and storing invoices. The National e-Invoice System allows users to issue, upload, and send invoices online, as well as grant and revoke access rights to the System. Our customers can also log in to the System using accounting software that is integrated with the System. This eliminates the need to log in to the System each time.

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Country	Mandatory formats & transmission channels (as reported)
Portugal	For electronic invoices issued in the context of Portuguese public contracts, the applicable model follows the relevant European electronic invoicing standard, EN 16931. In Portugal, the technical implementation is supported by CIUS-PT. Portaria n.o 289/2019 regulates the complementary aspects of electronic invoicing under Article 299-B(5) of the Portuguese Public Contracts Code and establishes the governance framework assigned to eSPap, including the applicable technical and interoperability requirements. FE-AP (Fatura Eletronica na Administracao Publica) is the electronic invoicing solution provided by eSPap for the receipt and processing of electronic invoices by public entities. Use of the eSPap system is mandatory for services of the direct State administration and public institutes. Other public-sector entities may adhere to the FE-AP solution voluntarily, subject to the applicable interoperability and technical requirements. For private-sector transactions, Portugal does not currently prescribe a general mandatory structured e-invoice format such as CIUS-PT, UBL, CII or Peppol. Under Portuguese tax legislation, invoices and other fiscally relevant documents may be issued electronically subject to acceptance by the recipient. Authenticity of origin and integrity of content are deemed to be ensured, in particular, through a qualified electronic signature, a qualified electronic seal or an EDI system based on the European Model EDI Agreement. So for B2B/B2C, the mandatory obligations are mainly tax digitisation/ reporting, not mandatory e-invoice exchange.
Romania	Electronic invoices in Romania must be issued and submitted to the national RO e-Factura platform in a structured XML format. This XML must strictly comply with the European EN 16931 standard and the local RO_CIUS (Core Invoice Usage Specification) rules.
Sweden	Recomendation is Peppol Bis Billing 3.
Switzerland	The federal government recommends structured formats such as swissDIGIN, ZUGFeRD CH, Swiss Invoice, and Peppol BIS UBL. The Peppol network is primarily used for sending documents.
Turkey	The mandatory e-invoice format in Turkey is UBL-TR, an XML-based standard customized by the Turkish Revenue Administration (GİB). Regarding transmission channels, businesses must choose one of the following three methods: GİB Portal, Private Integrators and Direct Integration.
Ukraine	Not applicable for Ukraine.
United Kingdom	No mandatory requirements specified as yet - process is still under consultation.

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01.3. PENALTY REGIMES

country by country

Country	Penalty regime (as reported)
Austria 	The invoice is rejected and the seller therefore receives no payment, otherwise, no penalties have been imposed (applies to invoices as suppliers to Austrian federal Authorities).
Belgium 	The government has drawn up a system of penalties to enforce compliance via the Peppol network. Below is a brief overview of the penalty system based on current legislation. **Fines for non-compliance** Anyone who, from 1 January 2026, is unable to send or receive (correct) e-invoices via the Peppol network risks administrative fines. These fines are not proportional and can be substantial: First offence: €1,500 Second offence: €3,000 Third and subsequent offences: €5,000 Important: These fines are calculated per infringement/quarter. **Nature of the infringements** The sanctions apply in the following situations: - Inability to receive: Not having the technical means to receive a structured e-invoice via Peppol; - Inability to send: The inability to issue an e-invoice via Peppol; - PDF is not an e-invoice: Persistently sending PDF invoices via email instead of structured e-invoices; - Incomplete transition: Failure to activate the Peppol network. **Other risks and consequences** In addition to direct administrative fines, there are other significant risks: - Loss of VAT deduction: An invoice that does not comply with the new e-invoicing requirements is considered invalid. This may result in the denial of input tax deduction; - Payment disputes: Non-compliant invoices can lead to commercial disputes and delays in payments by customers.
Czech Republic 	No penalty regime regarding e-invoicing.
Denmark 	In the worst case, management may be held liable if VAT is repeatedly reported incorrectly. Additionally, this would also be reflected in the auditor's opinion in the annual report.
Finland 	I am not aware of any current e-invoicing-related penalties.

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Country	Penalty regime (as reported)
France	- Failure to comply with e-invoicing (non-electronic invoice / outside the PA / non-compliant): €50 per invoice, capped at €15,000 per year; 'first offence' tolerance if rectified within 30 days. - Failure to e-report (transaction/payment): €500 per missing transmission, capped at €15,000 per year (increased from €250). - Failure to designate a designated person (DP) for receipt (as of 1 September 2026): 3-month formal notice → €500, then €1,000 if the situation persists. - Failure to submit data (invoices/e-reporting): fine of €15 per invoice, capped at €45,000; former Article 1788-D of the General Tax Code: €750 per submission, capped at €45,000. - Withdrawal of registration in the event of repeated breaches
Germany	In Germany, penalties mainly apply for late filing, late payment, incorrect VAT reporting, and non-compliant invoices (including e-invoicing rules). Fines can be charged per invoice or per tax return, and can include fixed penalties, percentage-based fines, and interest on late payments. In serious cases (e.g. fraud or intentional non-compliance), criminal tax proceedings and high surcharges may apply. Non-compliant invoices can also lead to denial of VAT deduction and additional back taxes with interest.
Greece	Invoices without VAT / € 1.000,00 per tax audit as administrative fine. Invoices with VAT / min € 500,00 per tax audit as administrative fine or 50% of VAT on the non-issued invoice value with € 500,00 euro to be the minimum. Future non-compliance lead to percentages being doubled.
Ireland	Not yet specified.
Italy	The penalty regime relating to electronic invoicing in Italy is in addition to the VAT penalties already provided for in Presidential Decree No 633 of 1972. Electronic invoicing is mandatory for VAT purposes, therefore: an invoice that has not been submitted to the SdI is not considered to have been issued for tax purposes. As regards VAT, if an invoice is not issued or is not submitted to the SdI, the penalty ranges from 90% to 180% of the relevant tax. Formal violations are less serious and carry reduced or fixed penalties.

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Part 1

Where Europe stands:
a comparative regulatory picture

Country	Penalty regime (as reported)
The Netherlands	The Netherlands has no e-invoicing-specific penalty regime, as no e-invoicing mandate is in force yet. General VAT penalties apply under the Algemene wet inzake rijksbelastingen (AWR), with policy rules in the Besluit Bestuurlijke Boeten Belastingdienst (BBBB). Default penalty (verzuimboete) - no culpability required: - Late or non-filing of a VAT return (Art. 67b(1) AWR): statutory maximum EUR 136; standard penalty applied EUR 68 (BBBB para. 22). - Late or non-payment of VAT (Art. 67c AWR): 3% of the amount paid late, minimum EUR 50, statutory maximum EUR 5,514 (BBBB para. 23). Culpability penalty (vergrijpboete) - Art. 67f AWR: maximum 100% of the VAT not or underpaid. Standard rates are 25% for gross negligence (grove schuld) and 50% for intent (opzet); 100% only in aggravating circumstances (BBBB para. 25/28). Serious cases may also be prosecuted criminally (Art. 68/69 AWR). Whether the mandate announced for 2030 will come with a dedicated sanction regime is not yet known.
Poland	In 2026, the Ministry of Finance will not impose penalties in Poland for failure to join the System. According to the regulations, the maximum administrative penalties will be: - Up to 100% of the VAT amount shown on the invoice (if the document is issued without using the system); - Up to 18.7% of the total amount due (for invoices without VAT shown, e.g., for exempt taxpayers); - Penalties for failing to meet deadlines for submitting documents in emergency or offline mode.
Portugal	Portugal does not provide for a single, standalone 'e-invoicing penalty'. The applicable sanction depends on the specific obligation breached, including invoice issuance, communication of invoice data to the Portuguese Tax Authorities, certified invoicing software and other invoicing or reporting requirements. The fine ranges indicated below correspond to the statutory ranges provided for each infringement. Pursuant to Article 26(4) of the RGIT, the statutory minimum and maximum limits are doubled where the fine is imposed on a legal person, company or other equivalent entity, without prejudice to the general limits and to any applicable reduction or waiver mechanisms. These amounts can essentially be retained, but I suggest adding the corresponding articles: - late/non-communication of invoice data: 200 EUR-10,000 EUR (Article 117(9) RGIT); - omissions/inaccuracies in declarations, communications or other fiscally relevant documents: 375 EUR-22,500 EUR (Article 119(1) RGIT); - failure or late issuance of invoices: 150 EUR-3,750 EUR (Article 123(1) RGIT); - failure to use certified invoicing software where legally required: 1,500 EUR-18,750 EUR (Article 128(2) RGIT).

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Country	Penalty regime (as reported)
Romania	Invoices have to be submitted in 5 working days to the tax authority. Fines for failing to submit invoices within the legal deadline (5 calendar days from the issue date) are tiered by company size:Large Taxpayers: 5,000 to 10,000 RONMedium Taxpayers: 2,500 to 5,000 RON Small Enterprises & Individuals: 1,000 to 2,500 RON. Core Business ConsequencesNo VAT Deduction: If an invoice is not registered in the RO e-Factura system, it is considered invalid for tax purposes. Buyers cannot deduct VAT or register it as a deductible business expense.Transaction Penalties: Issuing and receiving invoices outside the mandatory e-Factura system can trigger a penalty of (15%) of the total invoice value.
Sweden	Since the seller dont get paid (when invoicing to public sector) this is solved that way, so no penalties.
Switzerland	N/A
Turkey	In Turkey, non-compliance with e-invoicing mandates is subject to a «Special Irregularity Penalty» under the Tax Procedure Law (VUK). The main penalty rules are: - **Wrong Format or Non-Issuance:** If a paper invoice is issued instead of a mandatory e-invoice, or if no invoice is issued at all, a penalty of 10% of the invoice amount is applied; - **Late Issuance:** Failing to issue the invoice within the legal 7-day period following the delivery of goods/services means the invoice is considered legally «null» (never issued), triggering the same 10% penalty; - **Caps and Limits:** This 10% penalty is subject to a minimum penalty amount per document and a maximum total penalty cap per calendar year, both of which are updated annually by the Ministry of Finance.
Ukraine	Not applicable for Ukraine.
United Kingdom	Penalties for non-compliance with electronic invoicing have not been announced by the UK tax authority at this time.

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02

What the reform changes for businesses

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Several contributing firms noted that the reform has not yet been implemented locally, or that it is too early to observe structural effects - this is itself a meaningful finding: measurable business impact tends to follow implementation by some margin, not precede it. Where firms did report an impact, three themes recur: process automation, a changing role for finance teams, and - less consistently - faster payment cycles.

02.1. REDUCTION IN VAT ERRORS AND DISPUTES

A split picture

Reduction in VAT errors/disputes	Number of firms	Countries
Yes	7	Denmark, Germany, Greece, Italy, Portugal, Romania, Turkey
No	6	Austria, Belgium, Czech Republic, Finland, Ireland, Poland
Not stated / N/A	6	France, The Netherlands, Sweden, Switzerland, Ukraine, United Kingdom

The even split between 'yes' and 'no' responses suggests that measurable VAT-error reduction is more a function of how long a mandate has been running than of the mandate's design - a hypothesis worth testing directly with contributing firms rather than asserting in the final publication.

02.2. AUTOMATION, FINANCE FUNCTION CHANGES AND PAYMENT CYCLES

selected responses

The excerpts below are drawn directly from the survey and illustrate the range of experience reported; they are not exhaustive and should be read alongside the full 19 fact sheets in Part 4.

02.2.1. Belgium

Automation opportunities seized

The mandatory switch to e-invoicing via Peppol (effective from 1 January 2026 for all B2B transactions in Belgium) is being used by businesses to varying degrees to modernize and improve efficiency of their accounts payable and accounts receivable flows. Although the need for automation is recognised, the level of implementation is currently uneven.

Structural changes in finance functions

Here are the most significant structural changes observed to date:

1. From manual data entry to automated processing: Elimination of manual data entry (traditional paper or PDF invoices are phased out). Structured e-invoices (XML/UBL) are exchanged directly between accounting software. Consequently, real-time processing is possible: invoices are posted immediately upon receipt, ensuring greater accuracy and the elimination of manual errors. There is also a shift in staff roles: they no longer focus on entering invoice data, but on exception management.
2. Acceleration of Accounts Payable (AP) & Receivable (AR) cycles. Faster payment cycles: Thanks to automated processing and approval, supplier invoices are processed more quickly, which improves cash flow and fosters better supplier relationships.
3. Greater integration between IT, Procurement/Sales and Finance: The invoice is no longer an isolated document, but a digital process that is closely linked to purchase orders and delivery notes, resulting in a fully automated matching system.
4. Improved Compliance and Reporting: As invoices are processed directly into the accounts, VAT returns can be prepared more quickly and accurately, reducing the risk of faults and penalties. There is also a greater transparency: Finance departments have immediate insight into expenditure, which aids better forecasting and faster month-end closings.

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5. Change in the nature of financial work: Technological skills are becoming more important: knowledge of systems, Peppol configurations, and digital validation rules is becoming crucial. Focus on control: The remit is shifting from 'posting' to validating the 'digital audit trail' and verifying the reliability of automated processes. In short, the finance department is evolving from a transactional centre (processing paperwork) to a strategic centre (data analysis and compliance).

02.2.2. Italy

Automation opportunities seized
The reform has helped to speed up the recording of purchase invoices.

Structural changes in finance functions
1) Automation of accounting processes
2) Centralisation of data and real-time visibility
3) Reduction in the time taken to record invoices and VAT data

02.2.3. Turkey

Automation opportunities seized
Large companies seized the opportunity by automating invoice approval and accounting workflows, freeing up teams for data analysis and tax compliance. However, SMEs mostly focused solely on meeting the minimum legal requirements.

Structural changes in finance functions
Manual data entry decreased significantly, shifting staff roles from operational entry to data control and auditing. Physical archiving departments shrank or closed, and IT and finance teams started working much more closely together.

02.2.4. Ukraine

Automation opportunities seized
Our Clients are effectively implementing automation of the entire procurement and sales chain. E.g., we are exchanging agreements, invoices, acceptance statement with our Clients in specialized services for electronic document management and use of digital signatures, like Vchasno, MEDoc, etc. However, this is not being regulated at the legislative level.

Structural changes in finance functions
Not applicable for Ukraine.

02.2.5. Portugal

Automation opportunities seized
To a moderate but uneven extent.

In Portugal, many companies initially approached the reform as a compliance project, especially because the mandatory structured e-invoicing obligation is mainly focused on B2G/public procurement, while ordinary B2B and B2C flows are still not subject to a general mandatory structured e-invoicing regime. Public contracting authorities must be able to



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receive and process e-invoices compliant with the European e-invoicing standard for relevant public procurement contracts.

However, some clients have used the reform as a broader opportunity to modernise their finance, procurement and sales processes.

Structural changes in finance functions

The adoption of electronic invoicing has generally led to a more centralised, process-driven organisation of accounting and finance functions, although the depth of change varies significantly by company.

In practice, the most mature organisations have used e-invoicing as a lever for broader finance transformation. Less mature organisations have tended to make only the minimum changes needed for B2G compliance and AT reporting, leaving procurement, accounts payable and collections processes largely unchanged.



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03

The relationship with tax authorities

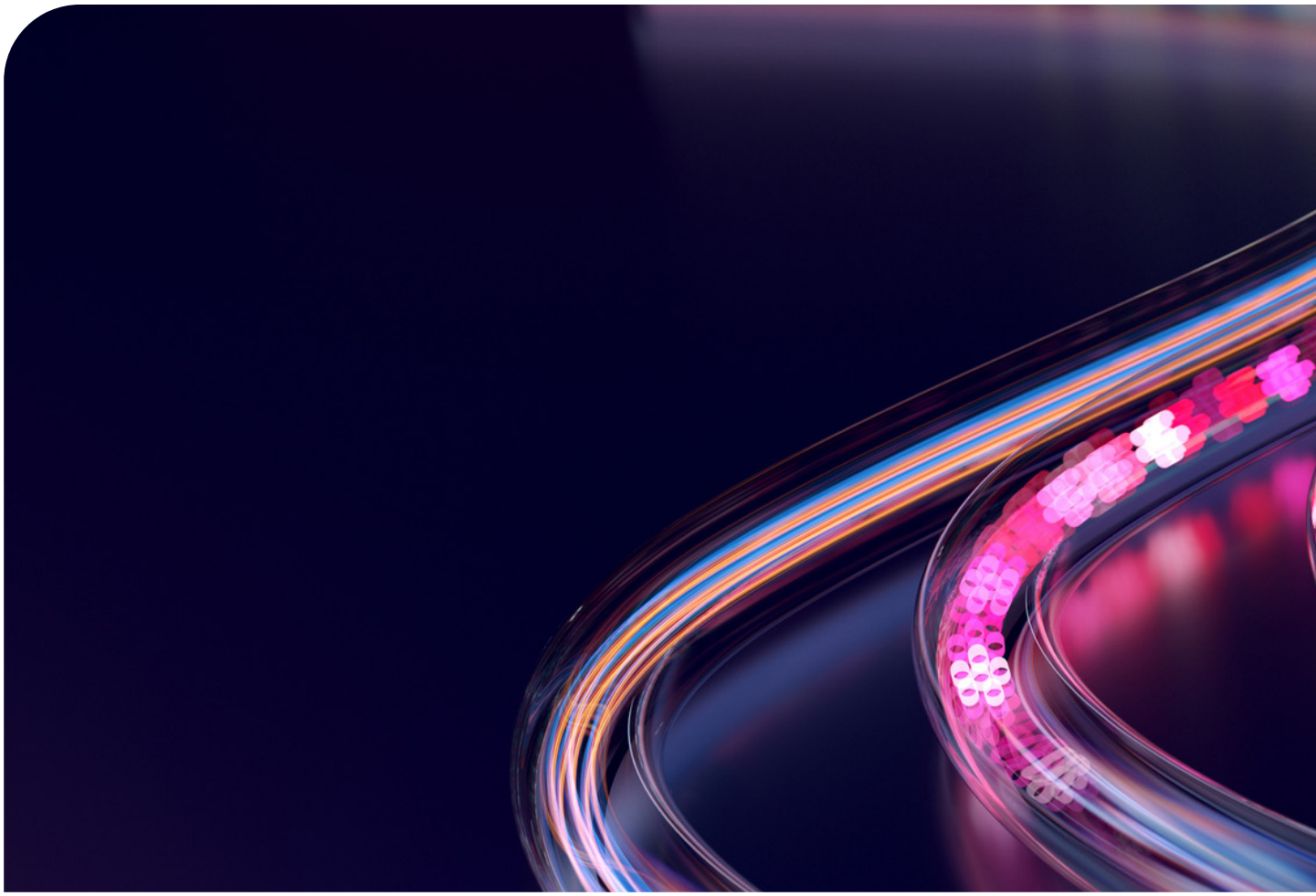
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Twelve of the 19 contributing firms rated their tax authority's involvement and responsiveness on a 1-to-5 scale (platforms/APIs provided, smooth approval of service providers, incident support, clarity of guidance). The average rating is 3.25/5, with a wide spread - from 1/5 in the Netherlands to 5/5 in Italy - which points to real differences in how well-prepared national administrations are, rather than a uniform European experience.

Country	Rating given	Tax audits & data reconciliation - as reported
Austria	2/5	The ViDA regulations have not yet been implemented in Austria.
Belgium	4/5	Given that this has only recently been introduced, we are not yet aware of any tax audits. The years that are currently being audited are generally 2023 and subsequent years. 2026 is not usually audited yet.
Czech Republic	3/5	NA, no standardised e-invoicing so far.
Denmark	3/5	The tax authorities have not visited us yet.
Finland	Not stated	Currently there is no real-time VAT reporting system in Finland.
France	Not stated	The reform has not yet been implemented.
Germany	4/5	Guidelines are generally clear, and digital tools/APIs are available. However, support and handling of technical incidents can sometimes be slow or inconsistent.
Greece	3/5	Yes through the MyData platform, which is the official dataroom containing all revenue and expenses issued to one juridical person.
Ireland	Not stated	N/A
Italy	5/5	The Revenue Agency does not reconstruct the company's accounts in full, but carries out partial reconciliations and automatic cross-checks, including: 1) Cross-checking of invoices issued against receipts (SdI); 2) VAT consistency (periodic returns); 3) Consistency with tax returns.

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Country	Rating given	Tax audits & data reconciliation - as reported
The Netherlands	1/5	Not yet applicable for B2B. The tax authorities have not issued dedicated e-invoicing guidance and no ViDA-related B2B functionality is live in their systems. ViDA-related system changes are scheduled from 2027 onwards (OSS extension per 1 January 2027). The policy direction was set out on 11 September 2026 (domestic B2B mandate from 2030), and a public consultation, regulatory burden assessment and SME test are expected in autumn 2026. For B2G, the Netherlands has a mature Peppol and Digipoort infrastructure that has been in operation since 2017.
Poland	4/5	Tax authorities have access to e-invoices. However, we do not have information on how the authorities use the data from e-invoices or how they select entities for tax audits.
Portugal	Not stated	The Portuguese authorities' have been involved, but the practical experience has been mixed. The framework is generally available and documented, but guidance can be dispersed, implementation questions are often fact-specific, and companies may need additional support when dealing with platform onboarding, invoice rejections, entity-specific transmission channels and ERP integration issues.



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Country	Rating given	Tax audits & data reconciliation - as reported
Romania	3/5	Depends on the tax audit but at this moment they are using only in a very low proportion the data from the e-invoicing system and prefer requesting printed invoices.
Sweden	Not stated	N/A
Switzerland	Not stated	N/A
Turkey	4/5	Yes, there is full integration. GİB automatically cross-checks e-Invoice data with businesses' e-Ledger (electronic accounting records) and VAT returns using algorithms. Discrepancies are flagged by automated "Risk Analysis" systems, which directly trigger tax audits or requests for explanation.
Ukraine	Not stated	Not applicable for Ukraine.
United Kingdom	3/5	Not applicable in the UK at this time.



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04

Country fact sheets

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Each fact sheet below follows the same template and reproduces the contributing firm's own responses on the ten fields most relevant to a business reader, condensed from the full 16-question survey. Wording is kept as close as possible to the original response for factual accuracy; nothing has been added.

04.1. AUSTRIA

Contributor: Peter Kopp - CONSULTATIO

Deadlines & timeline

Austria currently has no general B2B e-invoicing mandate; therefore, no statutory deadlines or distinction between sending and receiving obligations exist at present.
In the public sector (B2G), e-invoicing has been mandatory for several years, with both issuance and acceptance already required.
At EU level, the VAT in the Digital Age (ViDA) reform will introduce mandatory structured e-invoicing for intra-EU B2B transactions as of 1 July 2030. This obligation will apply simultaneously to sending and receiving of invoices.

Scope & application

Austria is expected to introduce a phased domestic implementation before 2030. However, no final legislation or official dates have been adopted yet.

Mandatory formats & transmission channels

E-invoicing has been mandatory for suppliers to Austrian federal authorities only since 2014, fully aligned with EU requirements since 18 April 2020.
Suppliers must issue (send) structured e-invoices.
To do so, they must register via the
"Unternehmensserviceportal (USP)".
Public authorities must accept and process them (EN 16931 standard).

Penalty regime

The invoice is rejected and the seller therefore receives no payment, otherwise, no penalties have been imposed (applies to invoices as suppliers to Austrian federal Authorities).

Tax authority responsiveness (self-rated)

2/5

Automation & efficiency gains reported

N/A.

Impact on payment cycles / DSO

E-invoices reach the recipient immediately and are processed and therefore paid more quickly.

Reduction in VAT errors/disputes

No.

Difficulties reported

N/A.

Announced future developments

Austria has not yet announced a domestic B2B or B2C e-invoicing mandate or implementation timeline. The current framework remains limited to B2G transactions, where structured e-invoicing has been mandatory for several years.

The country is already fully aligned with the European EN 16931 standard in the public sector, using eblnterface and Peppol formats, and continues to enhance interoperability through increased Peppol adoption.

Future developments will primarily be driven by the EU "VAT in the Digital Age" (ViDA) reform. This introduces mandatory structured e-invoicing and digital reporting for intra-EU B2B transactions from 1 July 2030, with full alignment of national systems required by 2035.

While Member States are allowed to introduce domestic e-invoicing mandates earlier, Austria has not yet announced such measures and is currently following a monitoring and alignment strategy.



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Part 4

Country fact sheets

04.2. BELGIUM

Contributor: Katrien Huysse - VGD

Deadlines & timeline

As of January 1, 2026, all Belgian established VAT-registered businesses (except for a limited number of exempt categories) must in principle use structured electronic invoices when trading with one another for supply of goods and services located in Belgium. Sending a PDF invoice via email or a platform is no longer sufficient. There are no differences in the dates between sending and receiving.

Scope & application

The requirement for structured electronic invoicing will almost always apply to transactions between a Belgian VAT-registered supplier and a Belgian VAT-registered customer. This obligation also applies if you make use of the exemption scheme for small businesses (if your business's annual turnover does not exceed €25,000) and also if you are covered by the special agricultural scheme (at least for receiving B2B invoices).

There are a few limited exceptions to this principle:

- There is no obligation to issue structured electronic invoices for:
  - bankrupt VAT-registered persons;
  - businesses that carry out only transactions exempted under Article 44 of the VAT Code (only performing fully exempt transactions without any right of deduction);
  - VAT-registered persons not established in Belgium without a fixed establishment, even if they are registered for VAT in Belgium;
  - flat-rate VAT taxpayers (Article 56 of the VAT Code, to be phased out by 1 January 2028 at the latest).

- There is no obligation to be able to receive structured electronic invoices for:
  - businesses that carry out only transactions exempted under Article 44 of the VAT Code (only performing fully exempt transactions without any right of deduction);
  - VAT-registered persons not established in Belgium without a fixed establishment, even if they are registered for VAT in Belgium.

- There is no obligation to send or receive structured electronic invoices if the transaction is exempt under Article 44 of the VAT Code.

The mandatory B2B electronic invoicing obligation as of 1 January 2026 does not apply to B2C and B2G transactions. For B2G transactions specific regulations are applicable.

Mandatory formats & transmission channels

The authorities prefer the use of the Peppol network (XML in Peppol BIS format). To gain access, you must designate an access point (this could be your accounting software or another third party).

If you do not wish to use Peppol and have the customer's consent, you may also use other formats that comply with European standards.

Penalty regime

The government has drawn up a system of penalties to enforce compliance via the Peppol network. Below is a brief overview of the penalty system based on current legislation.

Fines for non-compliance

Anyone who, from 1 January 2026, is unable to send or receive (correct) e-invoices via the Peppol network risks administrative fines. These fines are not proportional and can be substantial:

- First offence: €1,500
- Second offence: €3,000
- Third and subsequent offences: €5,000

IMPORTANT: These fines are calculated per infringement/quarter.

Nature of the infringements

The sanctions apply in the following situations:

- Inability to receive: Not having the technical means to receive a structured e-invoice via Peppol;
- Inability to send: The inability to issue an e-invoice via Peppol;
- PDF is not an e-invoice: Persistently sending PDF invoices via email instead of structured e-invoices;
- Incomplete transition: Failure to activate the Peppol network.

Other risks and consequences

In addition to direct administrative fines, there are other significant risks:

- Loss of VAT deduction: An invoice that does not comply with the new e-invoicing requirements is considered invalid. This may result in the denial of input tax deduction;
- Payment disputes: Non-compliant invoices can lead to commercial disputes and delays in payments by customers.

Tax authority responsiveness (self-rated)

4/5

Automation & efficiency gains reported

The mandatory switch to e-invoicing via Peppol (effective from 1 January 2026 for all B2B transactions in Belgium) is being used by businesses to varying degrees to modernize their supply and sales chains. Although the need for automation is recognised, the level of implementation is currently uneven.

Impact on payment cycles / DSO

The shift towards structured electronic invoices speeds up administrative processing and, in some cases, significantly reduces the time taken to make payments.

Reduction in VAT errors/disputes

No.

Difficulties reported

The implementation of mandatory B2B e-invoicing via Peppol from 1 January 2026 presents a number of structural and technical challenges in practice. Experience following the deadline shows that both businesses and accountancy firms are facing a 'steep learning curve' with recurring issues such as:

1. Technical rejections and validation errors (Peppol) :

The strict rules of the Peppol network often lead to invoices being rejected. Structural errors in XML: Invoices are rejected

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because they do not comply with the mandatory structured EN 16931 standards.
"Disappearing" invoices: Invoices that are sent but do not reach the recipient's Access Point, often due to incorrect registration of the customer on the Peppol network.
Master Data Mismatch: Incorrect or outdated company details (e.g. company registration number) in the master data lead to automatic rejection.
MLR errors: The Message Level Response (MLR) provides technical acknowledgements of receipt, but error messages within it are often abrupt technical codes rather than clear instructions.

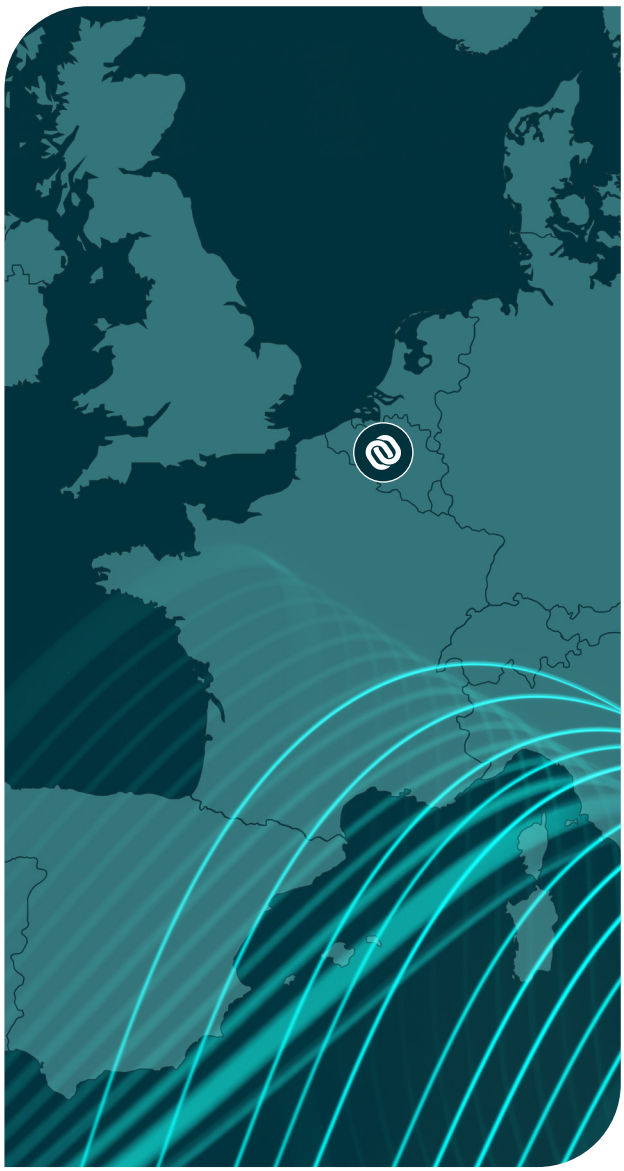
2. Inconsistencies in the VAT return and records:
Automation sometimes causes processing errors, resulting in discrepancies in the VAT return;
Incorrect Peppol codes: The use of incorrect codes (e.g. for reverse-charged VAT, intra-Community supplies or exemptions) leads to incorrect VAT calculations;
Duplicate entries: Due to software errors or miscommunication between the Peppol network and the accounting software, invoices are sometimes posted twice;
Conversion errors: When converting PDF invoices to structured XML via OCR (optical character recognition), interpretation errors occur, particularly with complex invoices.
Processing of attachments: Correctly linking attachments (PDFs, order forms) to the XML invoice does not always go smoothly.

3. Impact on cash flow:
Although e-invoicing ultimately leads to faster payments, the transition period causes start-up problems.
Lack of awareness among suppliers: If a supplier does not yet send invoices via Peppol, the invoice must be processed manually, leading to payment delays.
Confusion regarding status: As the 'traditional' paper or PDF workflow disappears, there is sometimes uncertainty as to whether an invoice has been approved or not, which delays payment.

4. Coordination of tax returns and office processes Inactive clients:
Many businesses have started the registration process too late, meaning accountants will have to process a significant backlog in the first few months of 2026.
Liability for errors: There is debate over who is liable if an invoice does not meet Peppol standards: the business owner, the software supplier or the accountancy firm.
Changes to ERP systems: Connecting outdated or bespoke ERP systems to the Peppol network presents significant technical challenges.

Announced future developments

The introduction of near real-time reporting is currently foreseen for 2028 and will apply to transactions between Belgian VAT-registered businesses, as well as to transactions falling within the scope of the registered cash register system. While the exact framework and practical implementation are still being developed, the Belgian government remains committed to the announced timeline. In early 2026, the Minister of Finance confirmed that discussions on e-reporting were continuing within the parliamentary committee, reaffirming the government's intention to move forward with this important digitalisation initiative.



For businesses, this marks another major step in the digitalisation of VAT compliance. Companies will be required to transmit detailed transactional data to the tax authorities electronically and on a recurring basis. As a result, businesses should already start assessing whether their systems, processes and data flows are capable of supporting these new reporting requirements.

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Part 4

Country fact sheets

04.3. CZECH REPUBLIC

Contributor: Michal Kupsa - NEXIA AP a.s.

Deadlines & timeline
B2B transactions - 2030 for intracommon transactions, 2035 domestic transactions, no diferrences set so far between sending and receiving.

Scope & application
See above.

Mandatory formats & transmission channels
So far not applicable, for voluntary e-invoicing, so-far pdf is mainly used or edf format in accordance to ISO 16931.

Penalty regime
No penalty regime regarding e-invoicing.

Tax authority responsiveness (self-rated)
3/5

Automation & efficiency gains reported
Electronic invoicing is implemented by companies independently to EU strandardisation, government agencies and public sector institutions are required to implement electronic document flow independently to ER regulation but based on EU refulations.

Impact on payment cycles / DSO
Nothing significant.

Reduction in VAT errors/disputes
No.

Difficulties reported
Since no standardised e-invoicing so far, cannot answer.

Announced future developments
Implementation Timeline: The obligation to issue electronic invoices for intracommon B2B transactions is set to take effect in 2030, while for domestic transactions, it will be until January 2035.

Standardization: Electronic invoices will be structured according to the EN 16931 standard, which will replace the traditional PDF format with a more electronic format.

Reporting System: A real-time reporting system will be introduced for intracommon transactions, requiring the invoice to be issued within 10 days and submitted to the tax authority immediately.

Electronic Document Format: The electronic invoice will not be a traditional PDF sent via email but will be in an XML format, which will be sent through a dedicated network or platform.

04.4. DENMARK

Contributor: Huy Quang Dao - CHRISTENSEN KJÆRULFF STATSAUTORISERET REVISIONSAKTIESELSKAB

Deadlines & timeline
No Difference.

Scope & application
The majority of our invoicing is to local customers in Denmark.

Mandatory formats & transmission channels
Both physical invoices and electronic invoices are permitted in Denmark.

Penalty regime
In the worst case, management may be held liable if VAT is repeatedly reported incorrectly. Additionally, this would also be reflected in the auditor's opinion in the annual report.

Tax authority responsiveness (self-rated)
3/5

Automation & efficiency gains reported
All of our clients are accustomed to electronic invoicing here in Denmark.

Impact on payment cycles / DSO
No.

Reduction in VAT errors/disputes
Yes.

Difficulties reported
Correct email address.

Announced future developments
Not answered / not applicable.

04.5. FINLAND

Contributor: Pietari Vertanen - Nexia Oy

Deadlines & timeline
Electronic invoicing is mandatory for all Business-to-Government (B2G) transactions in Finland. Since 1 April 2019, all central government bodies have been required to receive and process eInvoices compliant with the European Standard (EN 16931), in line with the eInvoicing Act 241/2019 and the European Directive 2014/55/EU. There is no B2B or B2C mandate.

However, under the eInvoicing Act 241/2019, companies with an annual turnover exceeding EUR 10,000 are entitled to request EN-compliant eInvoices from their suppliers. This is already in force.

By 2028, the Finnish government plans to begin preparations for implementing electronic invoicing for intra-EU transactions.

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Scope & application
See the answer above.

Mandatory formats & transmission channels
The European standard EN 16931 has been adopted by contracting authorities. The most frequently syntax used when exchanging eInvoicing is XML. The operators have the possibility to either use format defined by the European standard such as UBL 2.1 and Cross-Industry Invoice (CII) or national formats such as Finvoice 3.0 and TEAPPSXML 3.0 (provided their compliance with the European Standard) or Peppol BIS Billing 3.0.

These formats ensure that invoices are machine-readable, interoperable, and accepted by public procurement platforms.

Mandatory fields such as invoice number and date must be completed in accordance with VAT invoice requirements. European standard codes must be included unless otherwise agreed bilaterally between trading partners. Consolidated eInvoices are not permitted.

eInvoices are centrally processed by the Finnish Government Shared Services Centre for Finance and HR. Public authorities receive eInvoices through a network of eInvoice operators or via two free platforms provided by the Finnish Government Shared Services Centre for Finance and HR, including the Handi service and the Basware Supplier Portal.

Penalty regime
I am not aware of any current e-invoicing-related penalties.

Tax authority responsiveness (self-rated)
Not answered / not applicable.

Automation & efficiency gains reported
-

Impact on payment cycles / DSO
-

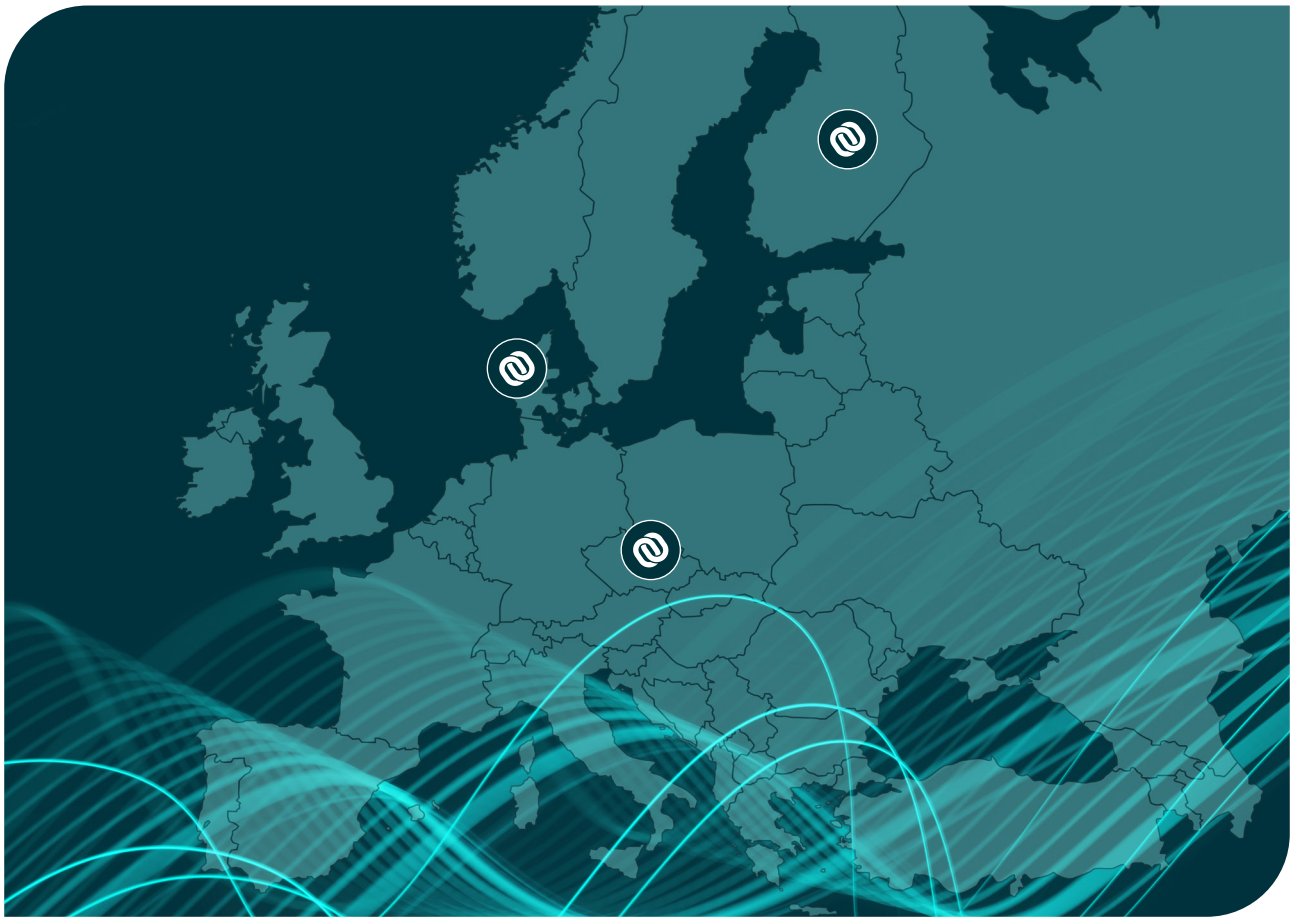
Reduction in VAT errors/disputes
No

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Difficulties reported
-

Announced future developments
By 2028, the Finnish government plans to begin preparations for implementing electronic invoicing for intra-EU transactions.

Please note that e-invoicing is, in many respects, an established practice in Finland. However, invoicing is governed more by, for example, the invoicing requirements in VAT legislation, accounting legislation, and general invoicing practices than by the requirements of the EU directive in question. Therefore, we are not in-depth experts on that directive.



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Part 4

Country fact sheets

04.6. FRANCE

Contributor: Edouard FRIZON - Nexia S&A

Deadlines & timeline

- Receipt (all liable entities): obligation to receive electronic invoices from 1 September 2026 (all sizes).
- Domestic B2B issuance: Large enterprises & mid-sized companies: 1 September 2026. SMEs / micro-enterprises: 1 September 2027.
- e-reporting (B2C & international B2B): rollout to follow the same timetable as the issuance requirement (large enterprises/mid-sized enterprises: 09/2026; SMEs/very small enterprises: 09/2027).
- B2G: the requirement for electronic invoicing to the public sector is already in force via Chorus Pro.

Scope & application

E-invoicing: domestic B2B transactions between taxable persons established in France, for transactions located in France in accordance with French invoicing rules

e-reporting (data reporting):

- B2C (sales to non-taxable persons in France),
- International B2B (with taxable persons not established in France, exports, intra-Community supplies/acquisitions...),
- Payment data where VAT is payable on receipt of payment.

Exclusions: exempt transactions exempt from invoicing (e.g. healthcare, education) – excluding e-invoicing and e-reporting

Mandatory formats & transmission channels

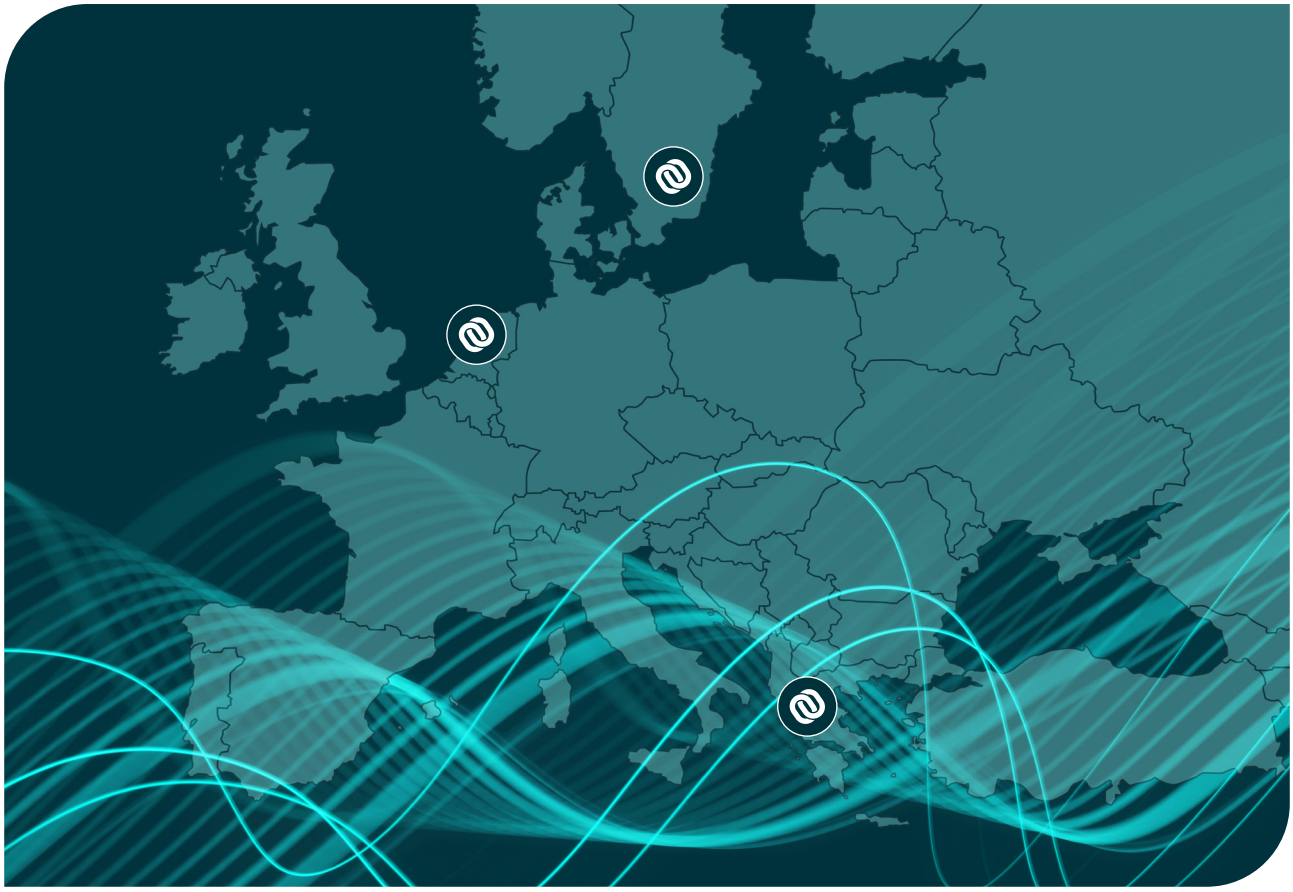
- Invoice transmission via an Approved Platform (PA) registered with the tax authorities; the PPF (Public Portal) is refocused on managing the national directory of recipients and the collection/transmission of data to the authorities (hub), without direct business-to-business exchange.
- Invoice formats (EN 16931 common framework): Factur-X, UBL,
- Obligation to choose an AP: all businesses must designate an approved platform before the legislation comes into force (official list published by the DGFiP).

Penalty regime

- Failure to comply with e-invoicing (non-electronic invoice / outside the PA / non-compliant): €50 per invoice, capped at €15,000 per year; 'first offence' tolerance if rectified within 30 days.
- Failure to e-report (transaction/payment): €500 per missing transmission, capped at €15,000 per year (increased from €250).
- Failure to designate a designated person (DP) for receipt (as of 1 September 2026): 3-month formal notice → €500, then €1,000 if the situation persists.
- Failure to submit data (invoices/e-reporting): fine of €15 per invoice, capped at €45,000; former Article 1788-D of the General Tax Code: €750 per submission, capped at €45,000.
- Withdrawal of registration in the event of repeated breaches.

Tax authority responsiveness (self-rated)

Not answered / not applicable.



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Automation & efficiency gains reported
The reform has not yet been implemented.

Impact on payment cycles / DSO
The reform has not yet been implemented.

Reduction in VAT errors/disputes
Not answered / not applicable.

Difficulties reported
The reform has not yet been implemented.

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Announced future developments
Technical convergence: France is already aligning with EN 16931 (Factur-X/UBL/CII); the French standards were updated in 2026 to prepare for ViDA adaptation.

04.7. GERMANY
Contributor: Evelina Polumiieva - Nexia GmbH

Deadlines & timeline
From Jan 1, 2025: All businesses must be able to receive e-invoices

From Jan 1, 2027: Mandatory sending of e-invoices for companies with > €800,000 turnover

From Jan 1, 2028: Mandatory sending of e-invoices for all businesses

Key difference: Receiving obligation starts earlier (2025) than sending (2027–2028)

Scope & application
The German e-invoicing reform applies mainly to domestic B2B transactions.
B2C, intra-EU, and export transactions are not included.
It does not differ by industry (no sector-specific rules for energy, healthcare, etc.).
B2G invoicing is already regulated separately under existing rules.

Mandatory formats & transmission channels
Formats: EN 16931 compliant e-invoices (mainly XRechnung and ZUGFeRD/Factur-X).
Transmission: No fixed channel required (e.g. email, PEPPOL, EDI allowed).
Must always be fully electronic and structured.

Penalty regime
In Germany, penalties mainly apply for late filing, late payment, incorrect VAT reporting, and non-compliant invoices (including e-invoicing rules).
Fines can be charged per invoice or per tax return, and can include fixed penalties, percentage-based fines, and interest on late payments.
In serious cases (e.g. fraud or intentional non-compliance), criminal tax proceedings and high surcharges may apply.
Non-compliant invoices can also lead to denial of VAT deduction and additional back taxes with interest.

Tax authority responsiveness (self-rated)
4/5

Automation & efficiency gains reported
Information not currently available.

Impact on payment cycles / DSO
Yes. Payments are a bit faster now because invoices are processed more quickly and with fewer errors. We also see a small reduction in DSO, but the impact is gradual and depends on how digital the companies are.

Reduction in VAT errors/disputes
Yes.

Difficulties reported
Information not currently available.

Announced future developments
In Germany, the current timeline (2025–2028) has not changed. E-invoicing is still being introduced step by step for B2B. It follows the EU standard EN 16931, and Germany is preparing for EU changes (ViDA), but there are no big new expansions like B2C yet.

04.8. GREECE
Contributor: Spyridon Michopoulos - DINAMIKI LTD

Deadlines & timeline
04.05.2026 FIRST PHASE
01.10.2026 SECOND PHASE

Depending on Revenue thresholds for juridical persons during FY 2023 (both sending and receiving)

Scope & application
B2G (implemented since 2024)
B2B GREECE
B2B THIRD COUNTRIES / NON EU
B2B EU CUSTOMERS (Excluded only if only transaction with EU customers, in case even 1 customer of the above, all B2B invoices to EU customers must comply with e-invoicing provisions).

Mandatory formats & transmission channels
Through a certified third party provider (certified by the Greek State).

Penalty regime
Invoices without VAT / € 1.000,00 per tax audit as administrative fine.
Invoices with VAT / min € 500,00 per tax audit as administrative fine or 50% of VAT on the non-issued invoice value with € 500,00 euro to be the minimum.
Future non-compliance lead to percentages being doubled.

Tax authority responsiveness (self-rated)
3/5

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Part 4

Country fact sheets

Automation & efficiency gains reported
No, the majority of our clients were able to cope with this reform significantly faster than others, due to the majority of them already having e-invoicing implemented. This reform has put extra workload to teams and specialized teams have been created to support this measure.
Impact on payment cycles / DSO.
No it has remained stable/unchanged.

Reduction in VAT errors/disputes
Yes.

Difficulties reported
Technical issues when implementing the measure on non Greek-approved ERPs / transsmition failures and inconsistencies.

Announced future developments
No available information from Greek State at this point.

04.9. IRELAND
Contributor: Peter Boyle - Saffery

Deadlines & timeline
Ireland has a phased implementation of mandatory VAT eInvoicing and real-time reporting aligned with the EU ViDA Directive, commencing from 1 November 2028. From that date, VAT-registered large corporates (i.e. those managed by Revenue's Large Corporates Division and established or with a fixed establishment in Ireland) will be required to issue structured eInvoices for domestic B2B transactions and report invoice data to Revenue on a real-time basis, while all Irish businesses will be required to be capable of receiving structured eInvoices. From November 2029 to all VAT-registered businesses that engage in intra-EU B2B trade will be required to operate eInvoicing, and from 1 July 2030 mandatory eInvoicing and digital reporting will apply to all intra-EU cross-border B2B transactions under ViDA.

Scope & application
Currently limited to B2B VAT invoicing. All in-scope invoices must be issued in a structured electronic format compliant with the European standard EN 16931, and unstructured formats such as PDFs or scanned invoices do not meet the requirement. The rollout is described by reference to taxpayer category (e.g. large corporates) and transaction type B2B, and no sector-specific rules have been outlined in the information provided by Irish Revenue to date.

Mandatory formats & transmission channels
In line with EN 16931.

Penalty regime
Not yet specified.

Tax authority responsiveness (self-rated)
Not answered / not applicable.

Automation & efficiency gains reported
Not answered / not applicable.

Impact on payment cycles / DSO
Not answered / not applicable.

Reduction in VAT errors/disputes
No.

Difficulties reported
Not answered / not applicable.

Announced future developments
ViDA and EN16931.

04.10. ITALY
Contributor: Alessandro Brambilla - Hager&Partners

Deadlines & timeline
Electronic invoicing in Italy has been mandatory since 1 January 2019 for transactions between VAT-registered entities resident or established in Italy, whether in B2B (between businesses and professionals) or B2C (with end consumers) transactions. All invoices must be processed through the Revenue Agency's Exchange System (SdI).

Scope & application
There are no radical reforms currently being implemented in Italy.

Mandatory formats & transmission channels
In Italy, in order to be valid for tax purposes, an electronic invoice must:
1. be issued in XML format;
2. be transmitted via the Revenue Agency's Exchange System (SdI).

Penalty regime
The penalty regime relating to electronic invoicing in Italy is in addition to the VAT penalties already provided for in Presidential Decree No 633 of 1972.
Electronic invoicing is mandatory for VAT purposes, therefore: an invoice that has not been submitted to the SdI is not considered to have been issued for tax purposes.
As regards VAT, if an invoice is not issued or is not submitted to the SdI, the penalty ranges from 90% to 180% of the relevant tax.
Formal violations are less serious and carry reduced or fixed penalties.

Tax authority responsiveness (self-rated)
5/5

Automation & efficiency gains reported
The reform has helped to speed up the recording of purchase invoices.

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Impact on payment cycles / DSO

The impact on the payment cycle was indirect, thanks to:

1) invoices no longer being lost or disputed due to technical issues;
2) a reduction in administrative verification times;
3) greater standardisation of data → fewer requests for clarification.

Reduction in VAT errors/disputes

Yes

Difficulties reported

1) Integration with accounting software was not always immediate.
2) Rigidity of the SDI Interchange System (invoices rejected due to minimal errors).
3) Compliant digital archiving: the need for certified systems and confusion between "PDF archiving" and tax retention.

Announced future developments

There are no news of particular importance in the next months.



04.11. THE NETHERLANDS

Contributor: Michael Salman - Nexia DHW
Updated on the basis of the outline letter of 11 September 2026 from the Dutch State Secretary for Finance.

Deadlines & timeline

Dutch implementing legislation is partly pending; the single VAT registration bill was submitted to parliament on 26 March 2026. On 11 September 2026, the State Secretary for Finance announced that e-invoicing and digital reporting will be extended to domestic B2B transactions; the bill is expected before the 2027 summer recess.

- B2G (in force): mandatory for central government since 1 January 2017; all contracting authorities must be able to receive and process EN 16931-compliant invoices (Directive 2014/55/EU; 18 April 2019 / 2020).
- Mandatory e-invoicing (from 1 July 2030): structured e-invoices for domestic and intra-EU B2B transactions, with near real-time, invoice-by-invoice reporting of EU transactions (including acquisitions). Cross-border invoices must be issued within 10 days of the supply, without the need for customer acceptance. Full alignment of national systems by 1 January 2035.
- Domestic digital reporting (from 1 July 2031): near real-time, invoice-level reporting for domestic B2B transactions.
- Single VAT registration: OSS extension from 1 January 2027, with further extensions and a new transfer-of-own-goods scheme from 1 July 2028; mandatory reverse charge for non-established suppliers from 1 July 2028; call-off stock simplification ends 1 July 2028 (run-off to 30 June 2029).
- Platform economy (from 1 July 2028): digital platforms such as booking websites for short-term rentals and taxi services become liable for collecting and remitting VAT where the underlying provider does not charge VAT. Member States may defer to 1 January 2030; the Netherlands has consulted on the earlier date of 1 July 2028.

Scope & application

ViDA and the new national mandate affect Dutch businesses in several phases, not only from 2030:

- From 1 January 2027 and 1 July 2028: extension of the One Stop Shop and a mandatory reverse charge for non-established suppliers;
- From 1 July 2028: the platform deemed-supplier rule for short-term accommodation rental and road passenger transport;
- From 1 July 2030: mandatory structured e-invoicing for domestic B2B and intra-EU B2B transactions, with digital reporting of EU transactions, i.e. those currently reported in the ICP return (EC Sales List) - intra-Community supplies and acquisitions of goods, reverse-charge services and transfers of own goods;
- From 1 July 2031: near real-time digital reporting of domestic B2B transactions.

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There will be no separate threshold for micro-enterprises; businesses under the Small Businesses Scheme (KOR) remain exempt from the domestic obligation. Existing exemptions (exempt supplies, travel agencies, second-hand goods dealers and simplified invoices) remain in place for the time being. No B2C mandate has been announced. B2G e-invoicing has been mandatory since 2017. In practice, many Dutch businesses are already in scope of foreign mandates as a counterparty - Belgium, Germany, France, Poland, Italy and Romania - so preparation is a 2025-2027 issue rather than a 2030 issue.

Mandatory formats & transmission channels

No B2B format is prescribed today, as no B2B mandate is yet in force. The general framework is Art. 35a and 35b Wet op de omzetbelasting 1968 (invoice content; authenticity of origin, integrity of content and legibility; acceptance by the customer). Formats used in the Netherlands (mandatory for B2G, voluntary in B2B): EN 16931 as the European semantic standard, in UBL 2.1 or UN/CEFACT CII syntax; NLCIUS as the Dutch national implementation, in UBL syntax as SI-UBL 2.0; SETU (HR-XML) for staffing and temporary labour invoices; UBL-OHNL as a legacy format that is being phased out.

Transmission channels: the Peppol network via a certified access point, using Peppol BIS Billing 3.0; Digipoort for central government. From 1 July 2030, only EN 16931 will be accepted for in-scope domestic and intra-EU B2B transactions; no alternative formats will be permitted. The government is considering the Peppol network as infrastructure; this will be investigated in the coming months.

Penalty regime

The Netherlands has no e-invoicing-specific penalty regime, as no e-invoicing mandate is in force yet. General VAT penalties apply under the Algemene wet inzake rijksbelastingen (AWR), supplemented by the policy rules of the Besluit Bestuurlijke Boeten Belastingdienst (BBBB). Whether the mandate announced for 2030 will bring a dedicated sanction regime has not yet been announced.

Default penalty (verzuimboete) - imposed without any requirement of culpability, where a VAT return is not filed on time or VAT is not paid on time:

- Late filing of a VAT return (Art. 67b(1) AWR): statutory maximum EUR 136; the standard penalty applied by the inspector is EUR 68 (BBBB para. 22).
- Late payment of VAT (Art. 67c AWR): 3% of the amount paid late, subject to a minimum of EUR 50 and a statutory maximum of EUR 5,514 (BBBB para. 23).

Gross negligence or intentional misconduct penalty (vergrijpboete) - a more severe penalty may be imposed where a VAT return is deliberately or grossly negligently filed incorrectly or incompletely, or where VAT is deliberately not paid (Art. 67f AWR):

- The statutory maximum is 100% of the VAT not or underpaid.
- Standard rates are 25% of the VAT due for gross negligence (grove schuld) and 50% for intent (opzet); the 100% level is reserved for aggravating circumstances such as recidivism or fraud (BBBB para. 25/28).
- In serious cases, criminal prosecution under Art. 68/69 AWR is also possible.

Tax authority responsiveness (self-rated)

1/5

Rated low because there is no dedicated e-invoicing guidance, no national platform and no ViDA-related B2B functionality in the tax authorities' systems as yet. The policy direction was set out on 11 September 2026; a public consultation, regulatory burden assessment and SME test are expected in autumn 2026, and ViDA-related system changes start on 1 January 2027 (OSS extension). This rating relates to B2B readiness only; the Dutch B2G infrastructure (Peppol, Digipoort) has been operational since 2017.

Automation & efficiency gains reported

N/A. We looking forward learn on this case from other countries which already have applied it.

Impact on payment cycles / DSO

Nothing yet. Please see above.

Reduction in VAT errors/disputes

Not answered / not applicable.

Difficulties reported

Until recently, clients saw little urgency for a 2030 deadline. With the domestic B2B mandate announced in September 2026, the impact will be significant: ERP and invoicing systems, master data, VAT processes and contractual arrangements with suppliers and service providers will all be affected. Dutch businesses are also already affected by foreign mandates as a counterparty, so groups with EU establishments or EU suppliers need to act well before 2030.

Announced future developments

The bill Wet implementatie Richtlijn btw in het digitale tijdperk - enkele btw-registratie was submitted to the Dutch parliament on 26 March 2026 and is still in progress: written contributions were submitted on 13 May 2026 and the Finance Committee resumed its procedural handling on 9 September 2026.

The e-invoicing and digital reporting elements of ViDA will be implemented through a separate bill. In an outline letter to the House of Representatives dated 11 September 2026, the State Secretary for Finance confirmed that the Netherlands will extend e-invoicing and digital reporting to domestic B2B transactions (e-invoicing from 1 July 2030, domestic reporting from 1 July 2031). Only EN 16931 will be accepted, and the Peppol network is being considered as infrastructure. A regulatory burden assessment, an SME test and a public consultation are expected in autumn 2026; the bill will be submitted to parliament before the 2027 summer recess, with adoption targeted before 1 July 2028. Data security and privacy are stated as key requirements.

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04.12. POLAND

Contributor: Tomasz Kotoliński - Nexia Advicero Sp. z o.o.

Deadlines & timeline

Implementation dates for the e-Invoicing System in Poland:

- starting February 1, 2026, for businesses whose sales (including tax) exceeded PLN 200 million in 2024;
- starting April 1, 2026, for all other businesses;
- from January 1, 2027, for the smallest busineses with total monthly sales of up to PLN 10,000.

Scope & application

When it comes to the obligation to issue invoices in the System, the legal form of the business does not matter. As a general rule, every taxpayer (registered and exempt) who is required to issue an invoice must issue it in KSeF-in accordance with the following phases: February 1, 2026 (large entities) and April 1, 2026 (all others). The obligation to receive invoices in KSeF has been in effect since February 1, 2026. In Poland, the System is not used to report purchases from foreign suppliers. The System is intended for issuing invoices as defined by Polish regulations (including to foreign contractors). Until the end of 2026, invoices may be issued using cash registers without the need to use the System. Starting in 2027, if an invoice is issued for a transaction recorded using an online cash register, it must be issued through the System if the transaction involves a sale to a taxpayer. Invoices for individuals (consumers who do not conduct business activities) do not have to be issued through the System-they may be issued through the System on a voluntary basis.

Mandatory formats & transmission channels

Poland has a National e-Invoice System (Krajowy System e-Faktur). It is a platform for issuing, sending, receiving, and storing invoices. The National e-Invoice System allows users to issue, upload, and send invoices online, as well as grant and revoke access rights to the System. Our customers can also log in to the System using accounting software that is integrated with the System. This eliminates the need to log in to the System each time.

Penalty regime

In 2026, the Ministry of Finance will not impose penalties in Poland for failure to join the System.

According to the regulations, the maximum administrative penalties will be:

- Up to 100% of the VAT amount shown on the invoice (if the document is issued without using the system);
- Up to 18.7% of the total amount due (for invoices without VAT shown, e.g., for exempt taxpayers);
- Penalties for failing to meet deadlines for submitting documents in emergency or offline mode.

Tax authority responsiveness (self-rated)

4/5

Automation & efficiency gains reported

Currently, customers are beginning to use accounting systems adapted for e-invoicing implementation, so for now, this tool has not reduced the time spent on tax obligations. What is important, however, is that documents are easily accessible in the System, so if documents are lost, there is no need to contact business partners and request duplicates. The System also provides continuous access to invoices for 10 years and faster VAT refunds, i.e., within 40 days instead of 60 days.

Impact on payment cycles / DSO

No, we did not notice.

Reduction in VAT errors/disputes

No.

Difficulties reported

Most of our customers were not required to implement the e-Invoicing System until April 1, 2026, and as a result, we have so far encountered technical difficulties, particularly regarding access to the System.

Announced future developments

The ViDA package is coming into effect in Poland and across the European Union in stages between 2027 and 2035.

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04.13. PORTUGAL

Contributor: Catarina Breia - Santos Carvalho & Associados SROC SA

Deadlines & timeline

In the public procurement/B2G sphere, Portuguese contracting authorities have been required to receive and process structured electronic invoices under the phased implementation of the Portuguese e-invoicing framework. As regards suppliers, the transitional period for entities other than micro, small and medium-sized enterprises and public entities acting as co-contractors has already expired. Under the 2026 State Budget, the transitional regime applicable to micro, small and medium-sized enterprises and public entities acting as co-contractors was extended until 31 December 2026. Consequently, absent a further legislative extension, the structured e-invoicing requirement will apply to those entities from 1 January 2027.

Portugal does not currently impose a general mandatory structured e-invoicing regime for domestic B2B or B2C transactions. As a transitional tax measure, invoices issued in PDF format continue to be accepted and treated as electronic invoices for the purposes of Portuguese tax legislation until 31 December 2026. This transitional rule should be distinguished from the structured e-invoicing requirements applicable in public procurement.

Scope & application

Portugal's current mandatory structured e-invoicing regime is principally focused on public procurement/B2G transactions. Domestic B2B and B2C transactions are not currently subject to a general Portuguese structured e-invoicing mandate. Intra-EU and export transactions are likewise not currently subject to a separate general Portuguese structured e-invoicing mandate, although the relevant transactions remain subject to the applicable Portuguese invoicing, VAT reporting and tax digitisation requirements, including certified invoicing software, ATCUD, QR code, invoice-data communication and archiving requirements, where applicable. No general sector-specific private-sector structured e-invoicing mandate has been introduced.

Mandatory formats & transmission channels

For electronic invoices issued in the context of Portuguese public contracts, the applicable model follows the relevant European electronic invoicing standard, EN 16931. In Portugal, the technical implementation is supported by CIUS-PT. Portaria n.o 289/2019 regulates the complementary aspects of electronic invoicing under Article 299-B(5) of the Portuguese Public Contracts Code and establishes the governance framework assigned to eSPap, including the applicable technical and interoperability requirements.

FE-AP (Fatura Eletronica na Administracao Publica) is the electronic invoicing solution provided by eSPap for the receipt and processing of electronic invoices by public entities. Use of the eSPap system is mandatory for services of the direct State administration and public institutes. Other public-sector entities may adhere to the FE-AP solution voluntarily, subject to the applicable interoperability and technical requirements.

For private-sector transactions, Portugal does not currently prescribe a general mandatory structured e-invoice format such as CIUS-PT, UBL, CII or Peppol. Under Portuguese tax legislation, invoices and other fiscally relevant documents may be issued electronically subject to acceptance by the recipient. Authenticity of origin and integrity of content are deemed to be ensured, in particular, through a qualified electronic signature, a qualified electronic seal or an EDI system based on the European Model EDI Agreement. So for B2B/B2C, the mandatory obligations are mainly tax digitisation/reporting, not mandatory e-invoice exchange.

Penalty regime

Portugal does not provide for a single, standalone 'e-invoicing penalty'. The applicable sanction depends on the specific obligation breached, including invoice issuance, communication of invoice data to the Portuguese Tax Authorities, certified invoicing software and other invoicing or reporting requirements. The fine ranges indicated below correspond to the statutory ranges provided for each infringement. Pursuant to Article 26(4) of the RGIT, the statutory minimum and maximum limits are doubled where the fine is imposed on a legal person, company or other equivalent entity, without prejudice to the general limits and to any applicable reduction or waiver mechanisms.

These amounts can essentially be retained, but I suggest adding the corresponding articles:

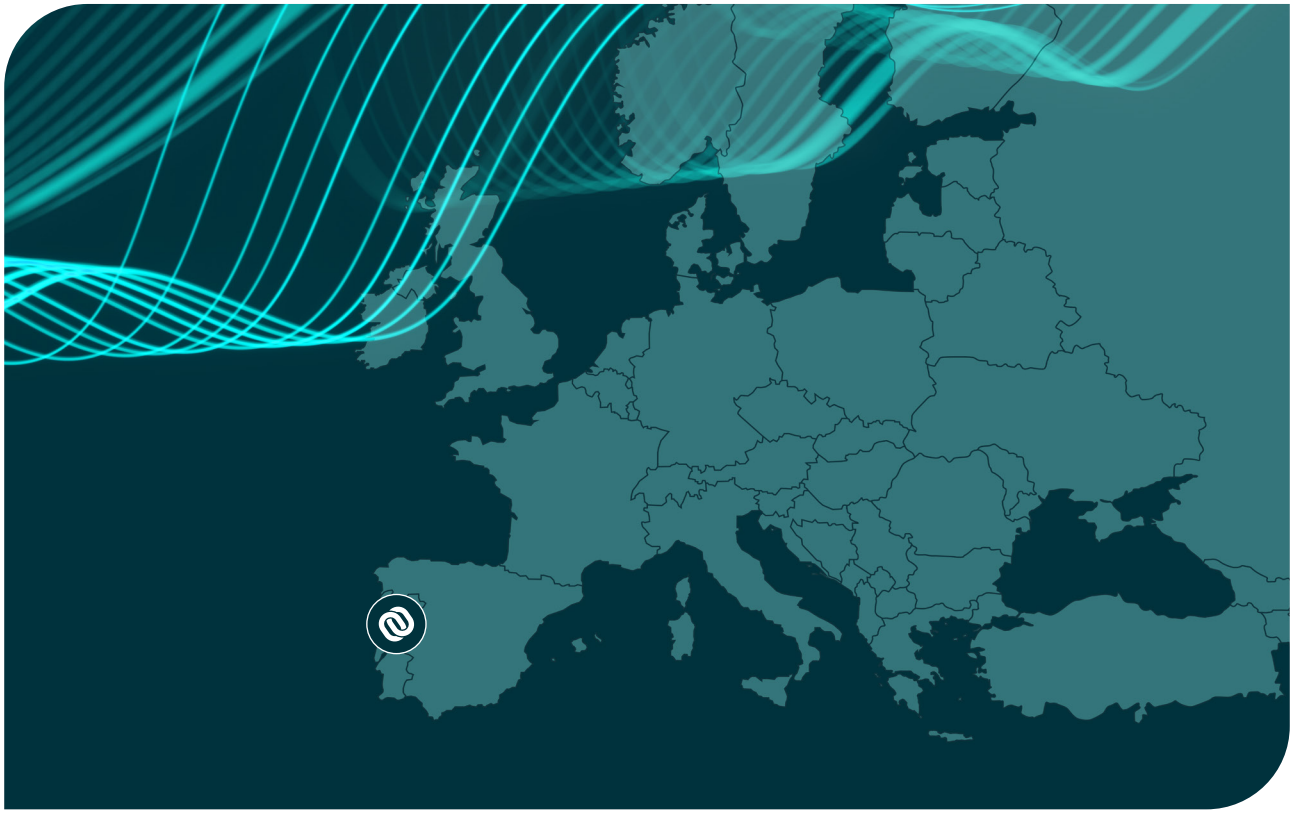
- Late/non-communication of invoice data: 200 EUR-10,000 EUR (Article 117(9) RGIT);
- omissions/inaccuracies in declarations, communications or other fiscally relevant documents: 375 EUR-22,500 EUR (Article 119(1) RGIT);
- failure or late issuance of invoices: 150 EUR-3,750 EUR (Article 123(1) RGIT);
- failure to use certified invoicing software where legally required: 1,500 EUR-18,750 EUR (Article 128(2) RGIT).

Tax authority responsiveness (self-rated)

Not answered / not applicable.

Automation & efficiency gains reported

To a moderate but uneven extent.
In Portugal, many companies initially approached the reform as a compliance project, especially because the mandatory structured e-invoicing obligation is mainly focused on B2G/public procurement, while ordinary B2B and B2C flows are still not subject to a general mandatory structured e-invoicing regime. Public contracting authorities must be able to



receive and process e-invoices compliant with the European e-invoicing standard for relevant public procurement contracts. However, some clients have used the reform as a broader opportunity to modernise their finance, procurement and sales processes.

Impact on payment cycles / DSO.

From our experience, the reform has helped companies reduce administrative delays before an invoice enters the payment process, but the effect on domestic DSO depends on whether the company also modernises its credit control, dispute management and cash collection processes. For many companies, the main benefit is therefore not a guaranteed reduction in contractual payment terms, but better visibility, faster follow-up and fewer avoidable delays.

Reduction in VAT errors/disputes

Yes.

Difficulties reported

In short, the recurring difficulties our clients face are: defining the exact scope, identifying the right public-sector transmission channel, cleaning master data, mapping ERP fields to CIUS-PT, managing ATCUD and document series, meeting the monthly AT reporting deadline, handling rejections and corrections, and aligning finance, tax, IT, sales and procurement teams around a single controlled process.

Announced future developments

As of September 2026, the principal announced developments in Portugal remain transitional extensions and future EU-driven alignment rather than the introduction of a general domestic B2B/B2C structured e-invoicing mandate. In summary:

- the transitional B2G regime for micro, small and medium-sized enterprises and public entities acting as co-contractors applies until 31 December 2026;
- PDF invoices continue to be accepted as electronic invoices for Portuguese tax purposes until 31 December 2026;
- submission of the SAF-T (PT) accounting file applies to periods beginning in 2027, with submission in 2028 or subsequent periods;
- no general domestic B2B or B2C structured e-invoicing mandate has yet been announced;
- Portugal already applies the EN 16931 framework in the public procurement context; and - further legislative adaptation will be required in connection with the EU ViDA framework.

04.14. ROMANIA

Contributor: Karina Nicolau - KG Audit & Accounting

Deadlines & timeline
E- invoicing is already implemented and mandatory since 2024.

Scope & application
Invoicing flows: Domestic B2B, B2C and B2G.

Mandatory formats & transmission channels
Electronic invoices in Romania must be issued and submitted to the national RO e-Factura platform in a structured XML format. This XML must strictly comply with the European EN 16931 standard and the local RO_CIUS (Core Invoice Usage Specification) rules.

Penalty regime
Invoices have to be submitted in 5 working days to the tax authority. Fines for failing to submit invoices within the legal deadline (5 calendar days from the issue date) are tiered by company size:Large Taxpayers: 5,000 to 10,000 RONMedium Taxpayers: 2,500 to 5,000 RON Small Enterprises & Individuals: 1,000 to 2,500 RON. Core Business ConsequencesNo VAT Deduction: If an invoice is not registered in the RO e-Factura system, it is considered invalid for tax purposes. Buyers cannot deduct VAT or register it as a deductible business expense. Transaction Penalties: Issuing and receiving invoices outside the mandatory e-Factura system can trigger a penalty of (15%) of the total invoice value.

Tax authority responsiveness (self-rated)
3/5

Automation & efficiency gains reported
Not necessary.

Impact on payment cycles / DSO
No.

Reduction in VAT errors/disputes
Yes.

Difficulties reported
Technical problems, at the beginning there were also some VAT reporting inconsistencies (credit notes were added to normal invoices instead of being subtracted).

Announced future developments
Significant developments have been announced in Romania's e-invoicing framework (RO e-Factura) to adjust deadlines, expand scopes, and align with EU standards.Timeline Extensions: For small businesses (SMEs) and specific entities, full compliance enforcement has been deferred until July 1, 2026. Additionally, sole proprietors and individuals identified by CNP (not CIF) have a transitional period and are not obligated to use the e-Factura system until June 1, 2026.B2C Expansions: As of January 1, 2025, reporting B2C (Business-to-Consumer) transactions via the RO e-Factura portal is mandatory, although these are for tax reporting purposes only rather than being delivered to consumers via the system.B2B Expansions: Since January 1, 2026, the obligation applies to invoices issued by Romanian taxpayers to foreign companies registered for VAT in Romania.Deadline Changes: Introduced via Government Emergency Ordinance No. 89/2025, the invoice submission window for B2B and B2C is now 5 working days from the issue date, shifting from the previous 5 calendar days.

EN 16931 Convergence: Romania has been committed to aligning its electronic invoicing data model with the European EN 16931 standard to ensure compatibility with broader EU directives.ViDA Adaptation: Romania's real-time reporting framework lays the groundwork for the EU's VAT in the Digital Age (ViDA) rules, which aim to standardize and require near-real-time intra-community transaction reporting across member states by 2030.

04.15. SWEDEN

Contributor: Mikael Landin - Malmö Revision och Rådgivning AB

Deadlines & timeline
2030
Regarding public sector rules about e-invoicing are in place.

Scope & application
Regarding 2030 the scope is only B2B within European Union. (not domestically).

Mandatory formats & transmission channels
Recomendation is Peppol Bis Billing 3.

Penalty regime
Since the seller dont get paid (when invoicing to public sector) this is solved that way, so no penalties.

Tax authority responsiveness (self-rated)
Not answered / not applicable.

Automation & efficiency gains reported
Not that we have heard of.

Impact on payment cycles / DSO
Na.

Reduction in VAT errors/disputes
Not answered / not applicable.

Difficulties reported
Na.

Announced future developments
Nothing yet since there is 4 years left until this goes live regarding B2B within EU. Sweden has still not decided to when they will implement this domestically.

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04.16. SWITZERLAND

Contributor: Britta Rehfisch - ADB Altorfer Duss & Beilstein AG

Deadlines & timeline
No deadlines.

Scope & application
Switzerland is not part of the EU.

E-invoicing is voluntary in Switzerland for B2B and B2C transactions, but is already mandatory in the B2G (business-to-government) sector.

Mandatory formats & transmission channels
The federal government recommends structured formats such as swissDIGIN, ZUGFeRD CH, Swiss Invoice, and Peppol BIS UBL. The Peppol network is primarily used for sending documents.

Penalty regime
Not answered / not applicable.

Tax authority responsiveness (self-rated)
Not answered / not applicable.

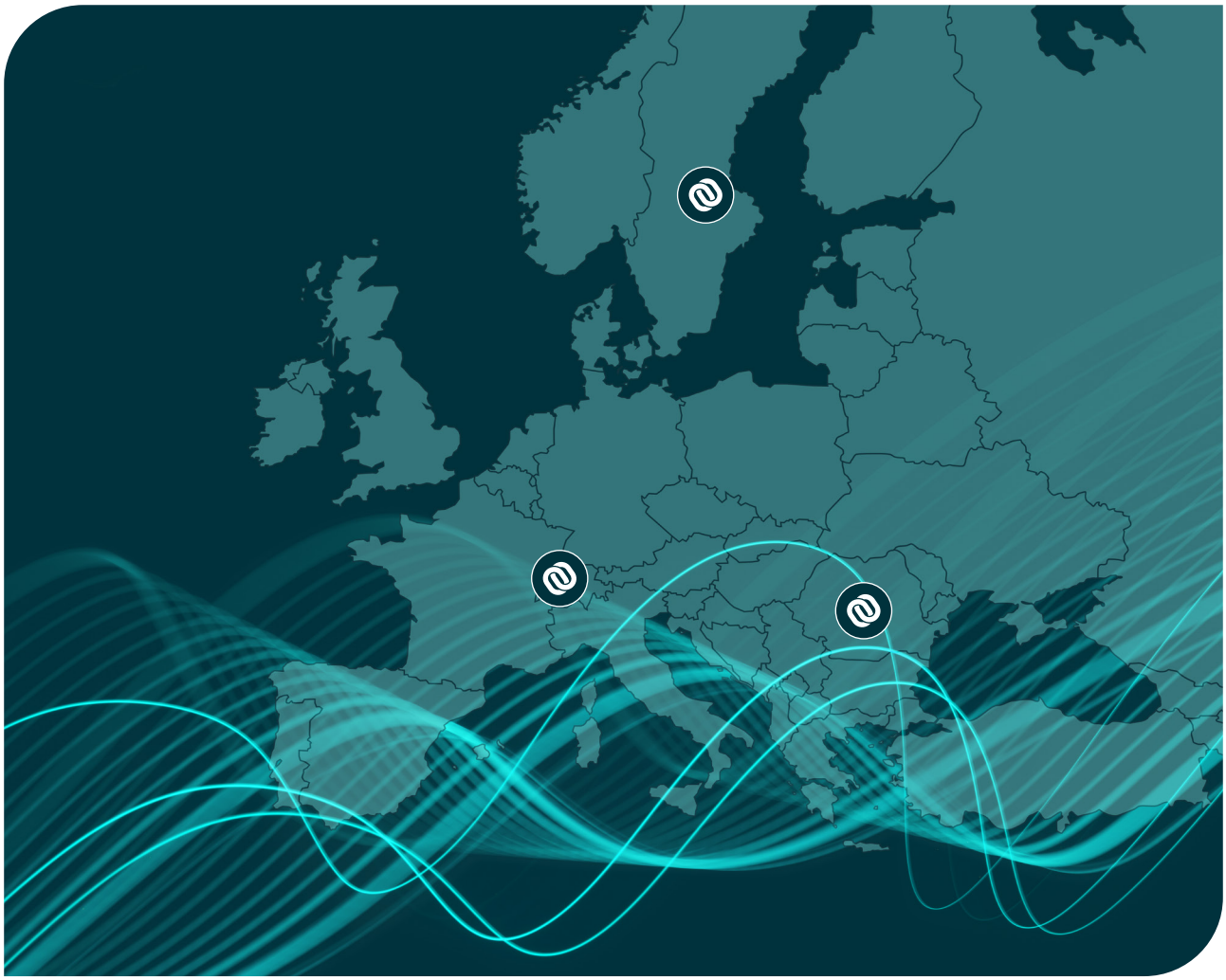
Automation & efficiency gains reported
Not answered / not applicable.

Impact on payment cycles / DSO
Not answered / not applicable.

Reduction in VAT errors/disputes
Not answered / not applicable.

Difficulties reported
Not answered / not applicable.

Announced future developments
Not answered / not applicable.



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04.17. TURKEY

Contributor: BARKIN UNLUEROGLUGIL - COZUM DENETIM

Deadlines & timeline
In Turkey, the transition to e-invoicing is not a one-time reform but an ongoing, phased process. Deadlines are updated annually based on companies' annual gross sales revenue thresholds (3 Million TL in recent years) and their specific sectors. Once a business is mandated to join the e-invoicing system, there is no difference between the dates for sending and receiving; both obligations start simultaneously on the same day.

Scope & application
The scope of the system is highly comprehensive. Domestic B2B transactions are handled via «e-Fatura», while B2C transactions fall under «e-Arşiv Fatura». For exports, an «e-Export Invoice» is mandatory for transactions with customs declarations. Sector-specifically, industries such as e-commerce (including marketplaces), real estate, motor vehicles, hotels/accommodation, online advertising, healthcare (invoices issued to the Social Security Institution), and energy are subject to mandatory e-invoicing immediately, regardless of their revenue thresholds.

Mandatory formats & transmission channels
The mandatory e-invoice format in Turkey is UBL-TR, an XML-based standard customized by the Turkish Revenue Administration (GİB). Regarding transmission channels, businesses must choose one of the following three methods: GİB Portal, Private Integrators and Direct Integration.

Penalty regime
In Turkey, non-compliance with e-invoicing mandates is subject to a «Special Irregularity Penalty» under the Tax Procedure Law (VUK). The main penalty rules are:

• **Wrong Format or Non-Issuance:** If a paper invoice is issued instead of a mandatory e-invoice, or if no invoice is issued at all, a penalty of 10% of the invoice amount is applied;

• **Late Issuance:** Failing to issue the invoice within the legal 7-day period following the delivery of goods/services means the invoice is considered legally «null» (never issued), triggering the same 10% penalty;

• **Caps and Limits:** This 10% penalty is subject to a minimum penalty amount per document and a maximum total penalty cap per calendar year, both of which are updated annually by the Ministry of Finance.

Tax authority responsiveness (self-rated)
4/5

Automation & efficiency gains reported
Large companies seized the opportunity by automating invoice approval and accounting workflows, freeing up teams for data analysis and tax compliance. However, SMEs mostly focused solely on meeting the minimum legal requirements.

Impact on payment cycles / DSO
Absolutely positive. Instant delivery eliminated the «invoice lost in the mail» excuse. Specifically, the 8-day legal rejection limit for «Commercial Invoices» ensures debts are finalized faster, thereby shortening collection cycles (DSO).

Reduction in VAT errors/disputes
Yes.

Difficulties reported
The most common difficulties are technical rejections due to XML schema (schematron) errors, periodic reporting inconsistencies between VAT returns and e-invoice data (often due to late invoice approvals), and temporary system/integrator downtimes during peak days.

Announced future developments
In Turkey, the system's scope is continuously expanding by progressively lowering the revenue thresholds for mandatory e-invoicing every year. B2C transactions are already digitalized via «e-Arşiv Fatura,» and the limits for issuing paper invoices have been reduced to near zero, aiming for full digitalization. Since Turkey is not an EU member, ViDA is not directly binding; however, Turkey's existing «Clearance» and real-time reporting infrastructure is already highly advanced and aligned with ViDA's core objectives. While GİB's own UBL-TR standard remains mandatory, discussions and developments regarding interoperability with international standards for cross-border transactions are being closely monitored.

04.18. UKRAINE

Contributor: Olena Voznyuk - Nexia DK

Deadlines & timeline
Not applicable for Ukraine so far. E-invoicing reform has not been launched in Ukraine as of now. However, there are relevant discussions of its perspectives at the governmental level.

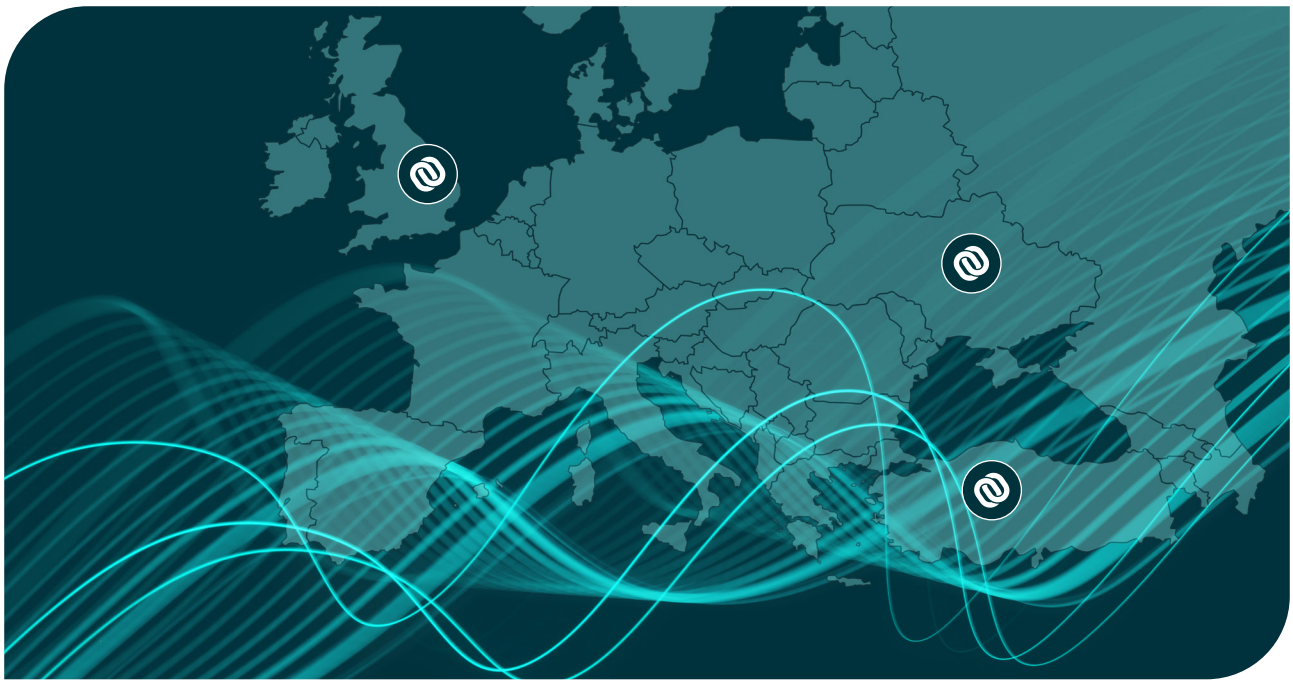
In Ukraine, since 2015, it has been mandatory to submit sales and services invoice data to the tax authority Unified Register of Tax Invoices (URTI) if the issuing taxpayer exceeds UAH 1 million revenue annually (this is about VAT invoices as opposed to invoices itself). Additionally, since January 1, 2023, mandatory SAF-T reporting has been implemented for small and medium-sized entities, with a reporting obligation for large enterprises already present since January 1, 2022.

Scope & application
Not applicable so far.

Mandatory formats & transmission channels
Not applicable for Ukraine.

Penalty regime
Not applicable for Ukraine.

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Tax authority responsiveness (self-rated)
Not answered / not applicable.

Automation & efficiency gains reported
Our Clients are effectively implementing automation of the entire procurement and sales chain. E.g., we are exchanging agreements, invoices, acceptance statement with our Clients in specialized services for electronic document management and use of digital signatures, like Vchasno, MEDoc, etc. However, this is not being regulated at the legislative level.

Impact on payment cycles / DSO
Those our Clients who voluntarily implemented electronic exchange of documents observe tangible impact of the acceleration of payment cycles.

Reduction in VAT errors/disputes
Not answered / not applicable.

Difficulties reported
Not applicable for Ukraine.

Announced future developments
Not answered / not applicable.

04.19. UNITED KINGDOM

Contributor: Nick Hart - Saffery LLP

Deadlines & timeline
Mandatory from 2029 - likely from 1 April 2029 but to be confirmed. No differences in implementation dates for sending and receiving at this stage.

Scope & application
Mandatory implementation currently for B2B and B2G.

Mandatory formats & transmission channels
No mandatory requirements specified as yet - process is still under consultation.

Penalty regime
Penalties for non-compliance with electronic invoicing have not been announced by the UK tax authority at this time.

Tax authority responsiveness (self-rated)
3/5

Automation & efficiency gains reported
Larger companies have been automating many internal processes regardless of electronic invoicing being introduced or not ; we expect SMEs to adopt more automation as well as they plan and prepare for electronic invoicing.

Impact on payment cycles / DSO
Not applicable at this time.

Reduction in VAT errors/disputes
Not answered / not applicable.

Difficulties reported
Not applicable at the moment - too early in the implementation process and awaiting further tax authority guidance.

Announced future developments
Just that electronic invoicing is mandatory from 2029 - plans are still at very early stage.

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05

Looking ahead: 2026-2035 and recommended actions



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Between now and the EU-wide ViDA deadline of 1 July 2030, businesses operating in several European countries face a staggered set of national deadlines rather than a single compliance date. The most immediate priority for finance leaders is to map, country by country, which of their trading entities already fall under a live mandate (e.g. Belgium since January 2026, France from September 2026, and several others already implementing) versus which are only bound by the 2030 EU deadline.

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1. Map invoicing flows by country and by counter part type (B2B, B2G, B2C) to identify which entities are already, or will soon be, in scope.



2. Prioritise a transmission solution compatible with Peppol and EN 16931, given how frequently they recur across the countries surveyed, while confirming any country-specific platform requirements.

4. Budget for a phased rollout ahead of 2030-2035 rather than a last-minute one, given the wide range of penalty regimes and tax-authority readiness reported across countries.

3. Treat the reform as a finance-transformation opportunity, not only a compliance exercise - several contributing firms report automation and process gains once implementation is under way.

5. Involve local Nexia member firms early in each jurisdiction, given the significant differences in tax-authority support reported in Part 3.

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CONCLUSION

Electronic invoicing in Europe will not arrive on a single date, in a single format, or with a single set of rules - as this survey shows, it is arriving country by country, on the ground. That is precisely where a network like Nexia adds value: local expertise in each of the jurisdictions covered in this report, coordinated internationally so that multi-country businesses do not have to piece the picture together themselves. If your organisation needs support mapping its e-invoicing obligations across Europe, our local experts are ready to help - contact details for each country are listed in the Annex.



ANNEX

01
METHODOLOGY

Survey conducted by Nexia using a common 16-question questionnaire. Responses were collected between 7 May and 16 June 2026 and reviewed by the contributing firms in August–September 2026. They were consolidated by Robert Hazelton (Nexia, Head of Marketing and Business Development) and coordinated on the continental production side by Nexia S&A.

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UNITED KINGDOM - Saffery LLP (Nick Hart)

03
FULL QUESTIONNAIRE (16 QUESTIONS)

1. Deadlines & timeline

2. Scope & application

3. Mandatory formats & channels

4. Data to transmit

5. Approved use cases

6. Problematic workflows identified

7. Difficulties during preparatory phase

8. Automation opportunities seized

9. Structural changes in finance functions

10. Impact on payment cycles / DSO

11. Recurring implementation difficulties

12. Reduction in VAT errors/disputes

13. Tax authority responsiveness rating

14. Tax audits & data reconciliation

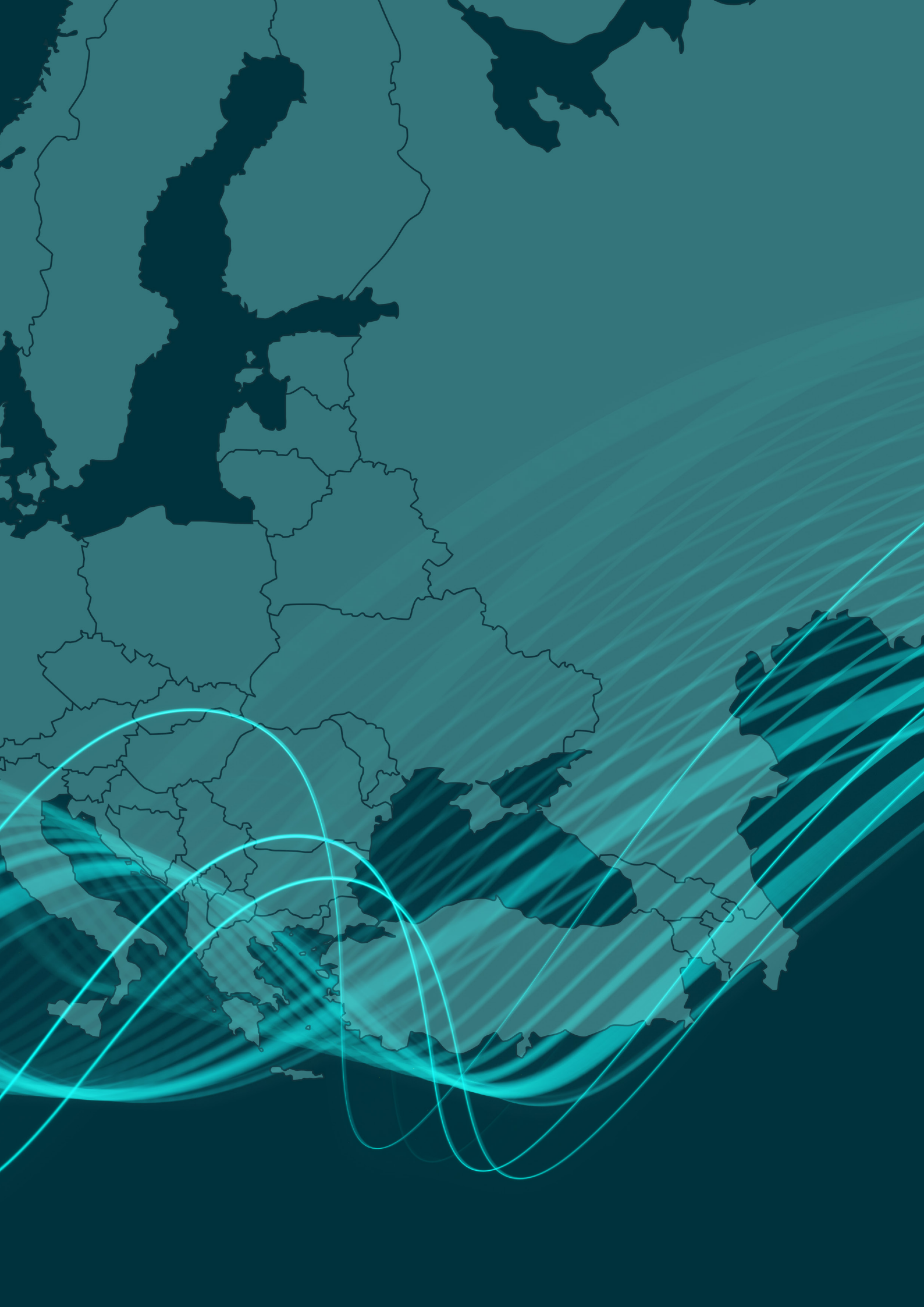
15. Penalty regime

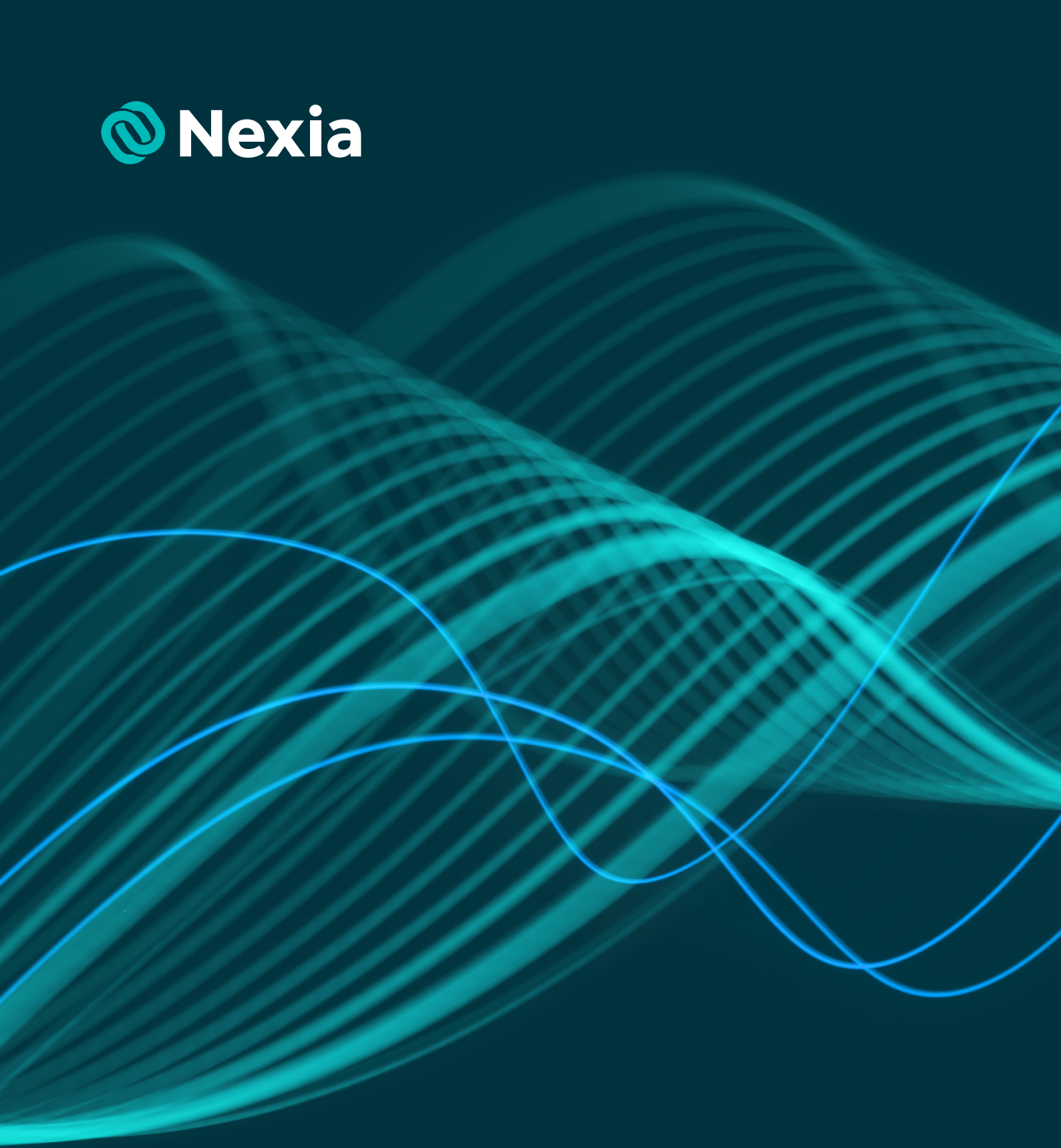
16. Announced future developments

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