



# Preparing for Belgium's e-invoicing mandate

**Stefanie Dreher**

Director, Indirect Tax

24 April 2025





**01**

# **Background**



# Background

# ViDA proposal

## 01 VAT Gap

Estimated VAT Gap **€61 billion VAT** in 2023 (€99 in 2020), due to e.g. VAT fraud, evasion and avoidance, non-fraudulent bankruptcies, miscalculations, ...

## 02 Cost of compliance

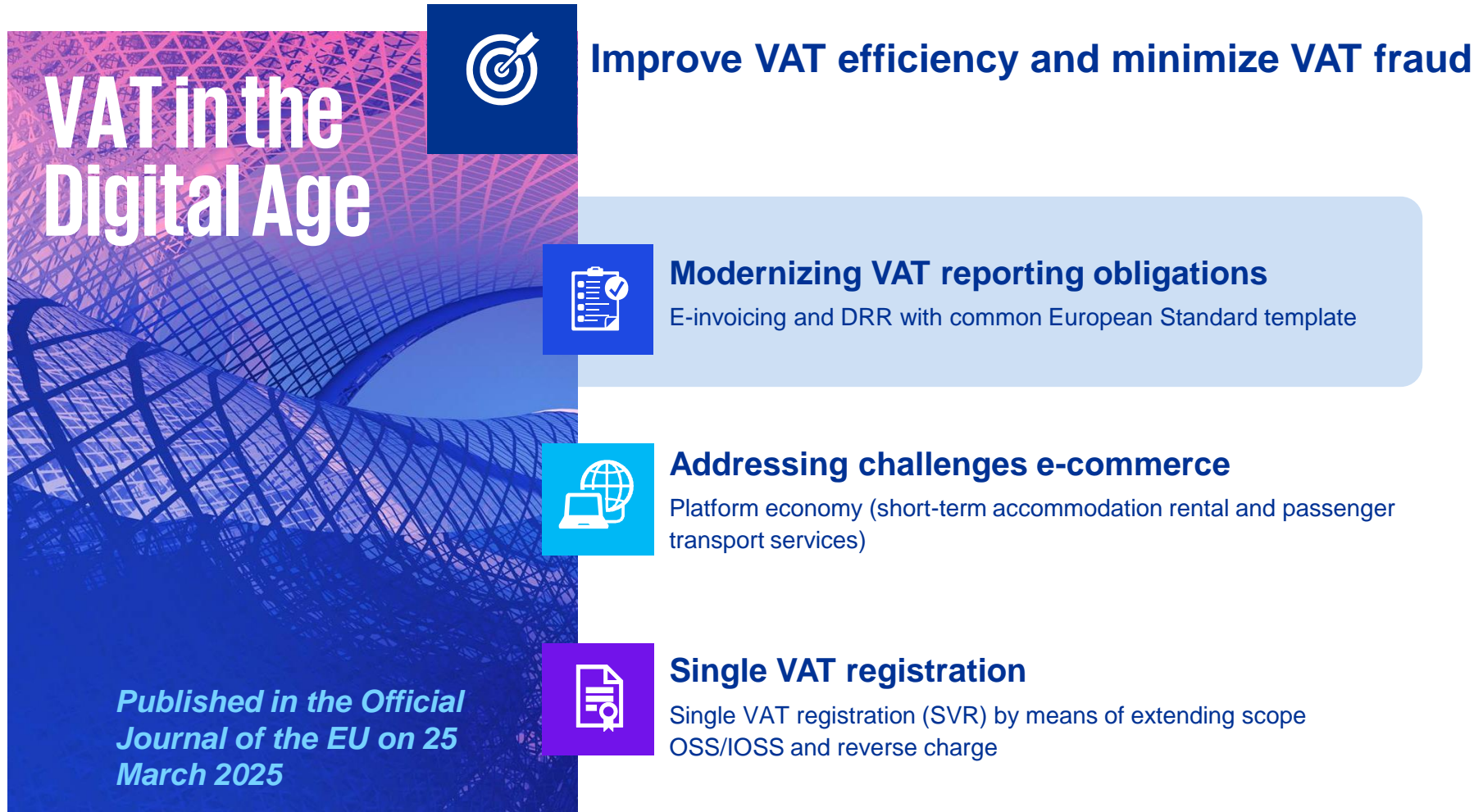
VAT system increasingly complex and burdensome resulting in excessive cost  
*E.g. annual cost for VAT compliance in other EU MS is estimated between €2,400 and 8,000*

## 03 Growth of online platforms

Triggers VAT inequality. Up to 70% not VAT registered.



# Background





**02**

# **ViDA: e-invoicing and DRR**



# ViDA: e-invoicing changes

- ❑ New definition of '**structured**' e-invoices

## Current

“An invoice that contains the information required in this Directive, and which has been **issued and received in any** electronic format.”



## New

“An invoice that contains the information required by this Directive, and which at least in relation to the data included in articles 262 and 271b has been **issued, transmitted and received** in a **structured** electronic format, which allows for its **automatic and electronic processing.**”

- ❑ E-invoices (in scope) will become the **default**
- ❑ E-invoices will need to comply with the **European Standard EN16931**
- ❑ **No more acceptance** needed by recipient
- ❑ Member States may accept documents and messages on paper or in other electronic formats than e-invoices as well as other standards for transactions not subject to the DRR



# ViDA: e-invoicing changes

## ☐ Scope?

Which invoices will 'at least' be in scope?

- ✓ VAT exempt intra-Community supplies of goods and transfers of own goods
- ✓ Intra-Community acquisitions of goods and transfers of own goods
- ✓ Supplies of goods and services (not VAT exempt) subject to reverse charge
- ✓ The acquisition of goods and services (not VAT exempt) subject to reverse charge

## ☐ Summary invoices should remain possible

## ☐ Additional invoice requirements (additional reference to triangular transactions, reference to original invoice in case of corrective documents, bank account)

## ☐ Invoice issuance period will be 10 days following chargeable event (↔ Belgium: 15<sup>th</sup> of the month following the month of the supply)



# ViDA: Digital Reporting Requirements (DRR)

**European Sales Listing (ESL) will be replaced with a Digital Reporting Requirements (DRR) system**

## ❑ Scope

- a) VAT exempt intra-Community supplies of goods and transfers of own goods
- b) Intra-Community acquisitions of goods and transfers of own goods
- c) Supplies of goods and services (not VAT exempt) subject to reverse charge
- d) The acquisition of goods and services (not VAT exempt) subject to reverse charge

→ Member States may opt out for the reporting by the customer (b and d)

→ Taxable persons using the special scheme for transfers of own goods should not report this information

## ❑ European Standard

## ❑ Timing e-transmission

- For sales: when the invoice is issued or should have been issued (i.e. within 10 days following chargeable event) > in case of self-billing within 5 days following when the invoice is issued or should have been issued
- For purchases: within 5 days after the invoice is received



**03**

# **Global trends**



# Global roadmap of VAT reporting requirements

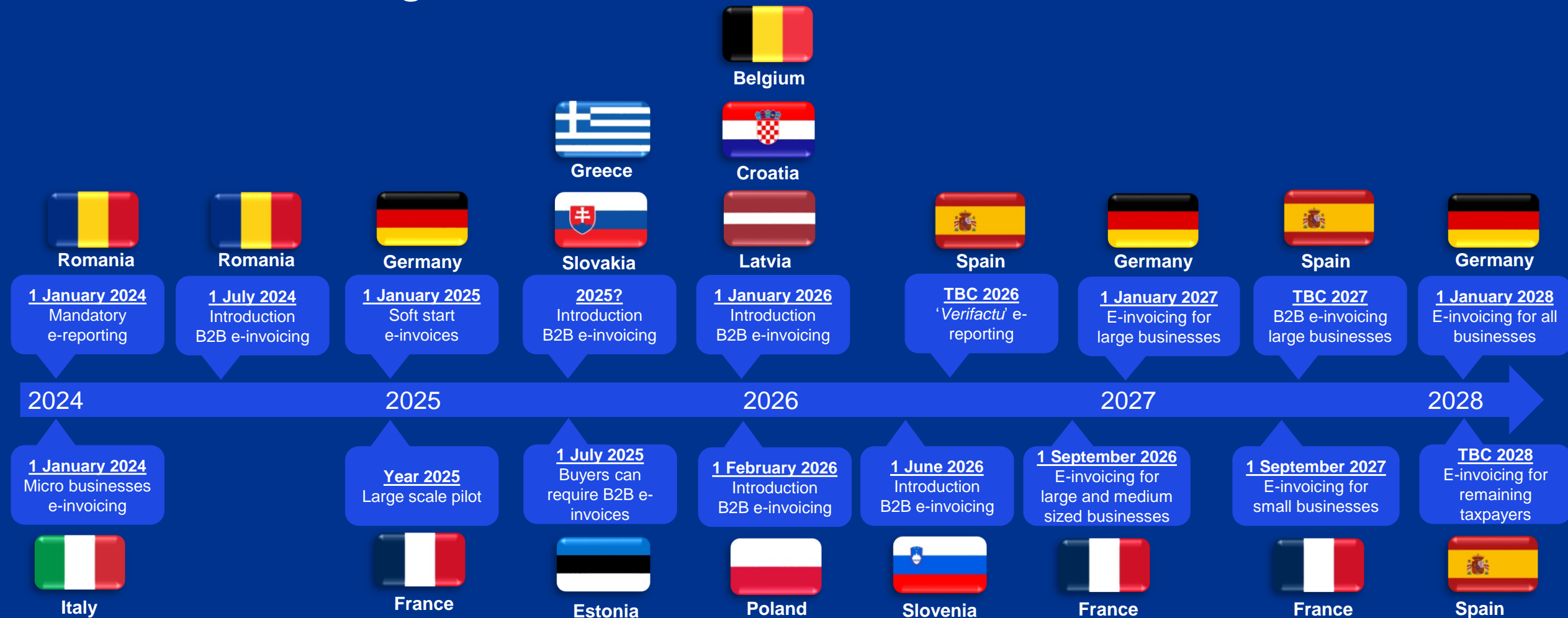
		2001 - 2009	2011	2014	2016	2017/18	2019/20	2021	2022	2023	2024	2025	2026	2027	Beyond
Audit files (SAF-T, VAT Books)	Periodic	Germany			Italy										
	On demand	Netherlands			Czech Republic										
Real time reporting		Bulgaria			Poland		Norway		Romania						
		Portugal		Slovakia	Lithuania		Croatia	Greece	Hungary						
Digital Tax Reporting		Austria	Luxembourg	France	Poland	Portugal									
						Spain									
E-invoicing						Hungary									
Other															
E-invoicing	B2G	Denmark			Czech Republic	Lithuania	Netherlands	Sweden	Belgium						
		Finland	Italy			France	Greece	United Kingdom	Luxembourg						
E-invoicing	B2B	Argentina	Mexico	Chile	Indonesia	Italy	Spain	Hungary	Australia						
		Brazil	Peru	South Korea	Taiwan		India	Egypt	Panama	Saudi Arabia	Romania	Germany	Belgium	Germany	Latvia
Other			Uruguay				Ukraine	Russia	Paraguay	Serbia	Israel	Australia	Slovakia	Oman	Bulgaria
							Colombia	China	Vietnam	Ghana	Malaysia	Philippines	UAE	Spain	Netherlands
Other							Costa Rica		Guatemala		Dominica	Singapore	Poland	Slovenia	Sweden
										Japan	Mauritius	Bahrain	France	Croatia	Malta
Other												Portugal		Ireland	EU ViDA

Visual for illustrative purposes and is not exhaustive of all global developments. Timelines are subject to change depending on Tax authority announcements



# EU E-invoicing timelines\*

\*The information on this slide is subject to continuous change and is indicative.





**04**

# **New Belgian e- invoicing regulation**



# Mandatory e-invoicing General

E-reporting in scope as of 2028

- ➔ No more approval EU Council required (ViDA was published on 25 March 2025)
- ➔ Mandatory e-invoicing in **B2B context (not B2G/B2C)**
- ➔ New **definition** (structured) electronic invoice (in B2B context)

## Current

“An invoice containing the information prescribed by the VAT Code and its implementing decrees, issued and received **in any electronic form.**”

## New

“An invoice which is created, sent and received in a **structured electronic form** which allows for its **automatic and electronic processing.**”



**PDF invoices** will not qualify as structured electronic invoices!



# Mandatory e-invoicing General

- No change to invoice content
- No change to invoice issuance date
- No change to invoice modalities
  - Structured electronic invoice can be issued by:
    - ✓ supplier
    - ✓ a third party (in the name and on behalf of the supplier)
    - ✓ customer in the context of self-billing (but prior agreement between parties is still required)
- The electronic invoice in PDF format will continue to exist (and be accepted) in cases where the 'structured' e-invoicing is not mandatory
- Obligation applies both to the invoices and the related credit notes

➡ Network: **PEPPOL**

➡ Format: **PEPPOLbis**

→ Derogations allowed (if both parties agree and the invoices comply with the European Standard)



# Mandatory e-invoicing Scope - Suppliers

## VAT taxable persons **established in Belgium**

- Including VAT groups and Belgian fixed establishments of foreign taxable persons
- The obligation does **not** apply to
  - VAT taxable persons taxed based on the flat rate scheme (→ abolished effective 1 January 2028, except for the flat rate scheme for farmers)
  - Bankrupt suppliers (for the transactions for which they are bankrupt)
  - VAT taxable persons performing exclusively VAT exempt transactions covered by article 44 of the Belgian VAT Code (with or without deduction right)  
= e.g. certain financial institutions, doctors, schools, insurance companies...  
→ Mixed VAT taxpayers are in scope for the activity not covered by article 44

Obligation to issue structured e-invoices also applies (to the extent that the conditions are met) to internal documents or invoices issued between the members of the VAT group

VAT taxable persons **not established in Belgium** are **not in scope** of the mandatory structured electronic invoicing → regardless whether the VAT taxable person has a Belgian VAT-identification number and fiscal representative for VAT purposes



# Mandatory e-invoicing Scope - Customers

## New law: VAT taxable persons established in Belgium

- Including VAT groups and Belgian fixed establishments of foreign taxable persons
- The obligation does **not** apply to
  - VAT taxable persons performing exclusively VAT exempt transactions covered by article 44 of the Belgian VAT Code (without deduction right)
  - VAT taxable persons performing exclusively VAT exempt transactions covered by article 44 of the Belgian VAT Code (without deduction right) having a BE VAT identification number to declare
    - VAT on purchases of general B2B place of supply services from abroad (reverse charge)
    - VAT on intra-Community acquisitions of goods from other EU countries exceeding the threshold of EUR 11,200 or optional (reverse charge)
    - Services taking place in another EU Member State for which the VAT is reverse charged by the customer

VAT taxable persons **not established in Belgium** are **not in scope** of the mandatory structured electronic invoicing → regardless whether the VAT taxable person has a Belgian VAT-identification number and fiscal representative for VAT purposes



# Mandatory e-invoicing Scope - Transactions

- Supplies of goods taking place in Belgium (= without transport outside of Belgium)
- Supplies of services taking place in Belgium
- Exception: VAT exempt transactions covered by article 44 of the Belgian VAT Code
  - Regardless whether VAT is charged, the VAT is reverse charged to the customer (local reverse charge) or an exemption applies (other than article 44)



# Mandatory e-invoicing Timing

1 January 2026

## Obligation to issue:

- All VAT taxable persons in scope

## Obligation to receive:

- All VAT taxable persons in scope
- For e-invoices in scope of the obligation, (regardless whether the customer is required to issue e-invoices himself)



# Mandatory e-invoicing Timing

1 January 2026

What if the **supplier** is not ready to send e-invoices via the Peppol network?

- Incompliant invoice
- Risk for penalties for supplier
- No VAT recovery for customer?
- Risk for non-payment by customer

What if the **customer** is not ready to receive e-invoices via the Peppol network?

- The use of the HERMES platform will no longer be promoted. Instead, you can use the solution from your service provider (invoices issued in XML with embedded PDF will be sent via email to the recipient).



**05**

# **European Standard**



# European Standard

## European Standard

- Interoperability is the functionality of information systems to exchange data and to enable sharing of information
- Different levels required for full interoperability:
  1. Semantic information: content of the invoice
  2. Syntax: a format that allows direct exchange between sender and recipient and that allows for automatic processing of the semantic information
  3. Technical: the method of transmission (exchange and communication protocols)
- The European standard on e-invoicing was developed and published by the European Committee for Standardization (CEN), at the request of the European Commission
- Structured electronic invoices need to comply with the European standard **EN 16931**
- Peppol is an interoperability framework
- Electronic invoices issued in Peppol-bis format (XML-UBL) comply with that European Standard (UBL is the standard format for electronic invoicing → XML)



**06**

# **Government support**



# Government support

- Deduction for **digital investments** increased to 20% as of 1 January 2025
- Temporary **increased cost deduction of 120%** for costs directly related to the implementation of e-invoicing such as the purchase of invoicing packages enabling structured electronic invoicing (e.g. subscription) and the advisory cost incurred for the operationalization of the electronic invoicing obligations

→ Limited to:

- ✓ Costs not subject to depreciation
- ✓ Taxable periods 2024 → 2027
- ✓ Small companies i.e. companies not exceeding more than one of the criteria
  - 1) Annual turnover of EUR 11.250.000
  - 2) Balance sheet total of EUR 6.000.000
  - 3) Annual average of 50 employees



**07**

# **How to get started**



# Strategy for e-invoicing and e-reporting

## Do you still have time...?

Average total  
throughput time of 8 to  
14 months!







Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.



**[kpmg.com/socialmedia](https://kpmg.com/socialmedia)**

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.

## Key Contact



**Stefanie Dreher**

Director

Indirect Tax

[sdreher@kpmg.com](mailto:sdreher@kpmg.com)

Mob: +32 473 602 677



# Towards e-invoicing compliance

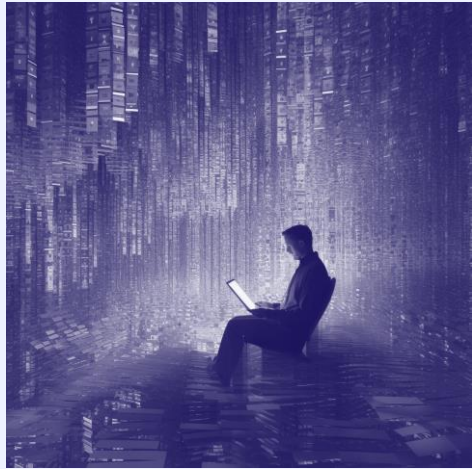
Partnering for a smooth transition to e-invoicing and e-reporting







## Navigating the Future. Changes in regulation that will impact 2025 and beyond



**ViDA  
e-invoicing**



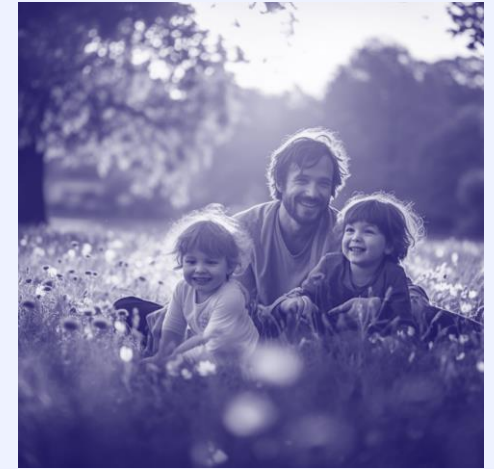
**ViDA  
e-reporting**



**eIDAS 2.0  
eID**



**PSD3  
digital euro**



**Green Deal  
CSRD**



# Electronic invoicing and reporting

What is coming our way and why now?





**“An electronic invoice is an invoice that has been issued, transmitted and received in a structured electronic format, which allows for its automatic and electronic processing”**

From Directive 2014/55/EU

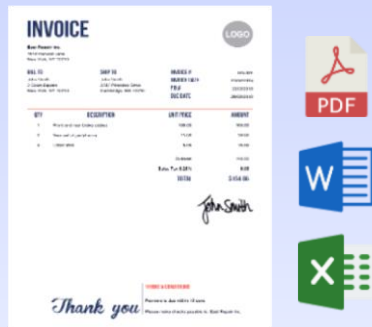


# Towards e-invoicing

From an unstructured to a structured format

## Unstructured

Human  
Readable



paper, pdf, excel, word



Manual process

## Structured

Machine  
Readable



xml, UBL BIS



Automated  
process

## Hybrid

Human &  
Machine  
Readable



PDF-A3 + xml



Simply emailing PDFs or using OCR to scan paper purchase invoices doesn't count as true electronic invoicing.

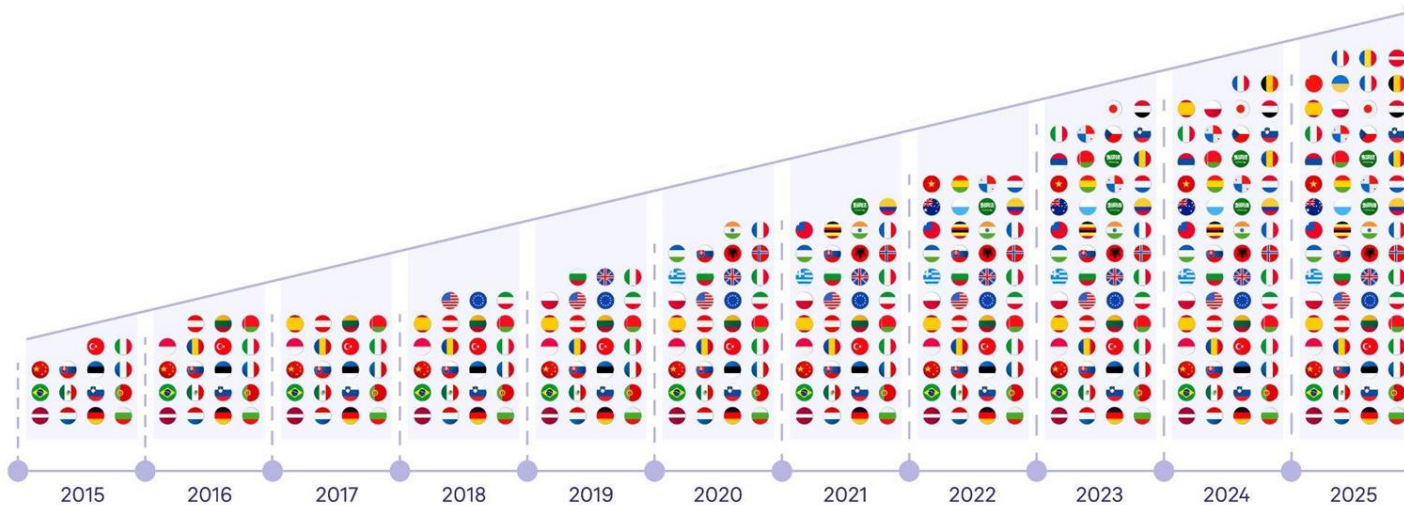
E-invoicing shifts away from visual, human-readable documents towards structured data designed for automated, machine-to-machine processing.

E-invoices meet all international standards and local regulations, making them legally and fiscally compliant.



# The rise of electronic invoicing

Why now?



Governments worldwide are mandating e-invoicing and e-reporting to **close the VAT gap, increase tax compliance and automate audits.**

This shift requires all type of businesses to start **exchanging invoice data electronically and in real-time.**

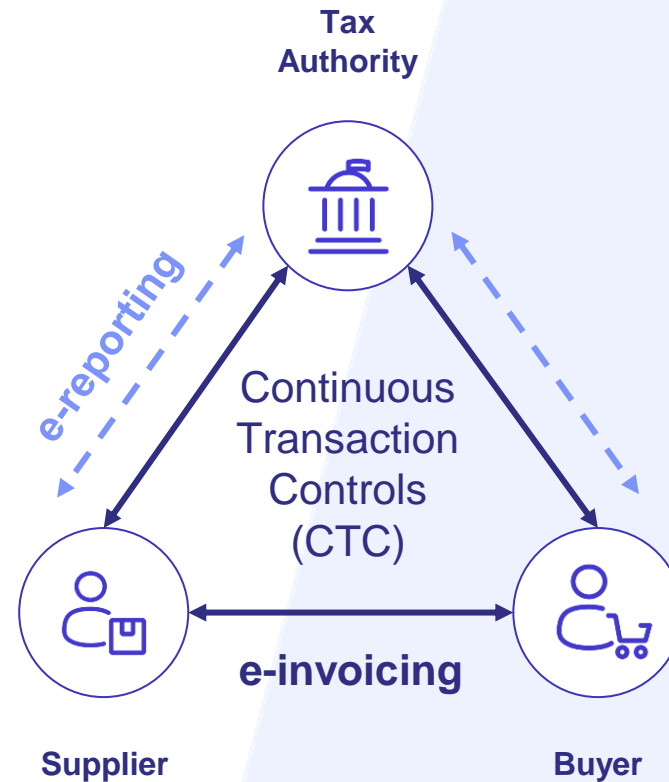


# Governments want more data, faster

The need for accurate and timely tax reporting

**E-invoicing** mandates require suppliers and buyers to exchange invoices electronically in a standardized format, ensuring consistency in data content.

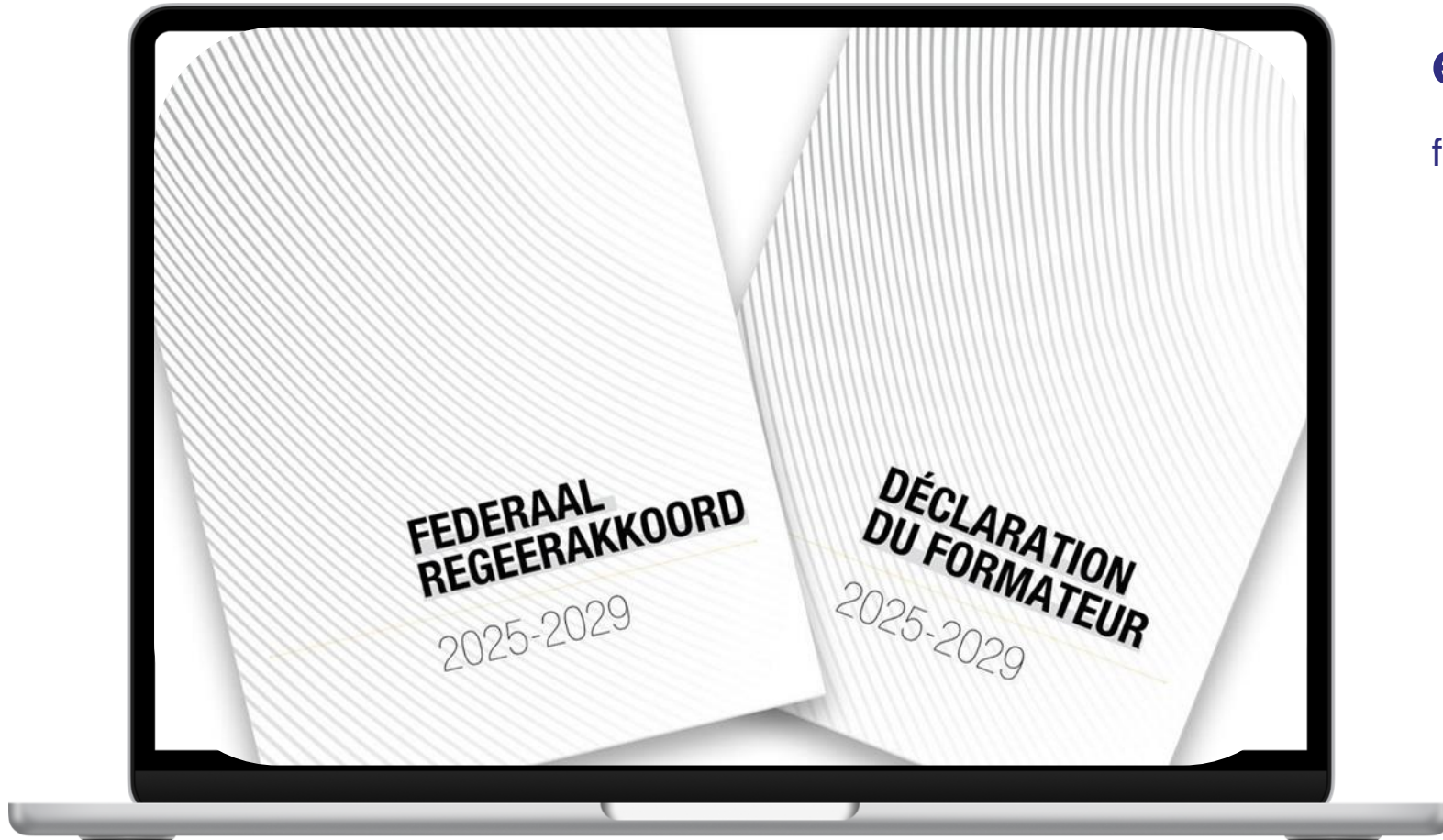
This exchange sometimes occurs through a designated government platform, facilitating efficient and transparent processing of invoices.



**E-reporting** mandates require businesses to report tax and transactional data to tax authorities in real-time, simultaneously with the billing process, through a government platform.

This allows the tax office to automatically capture the necessary data.





## e-reporting

federal coalition agreement

“To combat VAT fraud, we will introduce "near real-time reporting" from 2028 for transactions between VAT-liable entities and transactions where a GKS (Certified Cash Register System) is used.”



# Compliance challenges in motion

The maze of regulation and fragmented systems



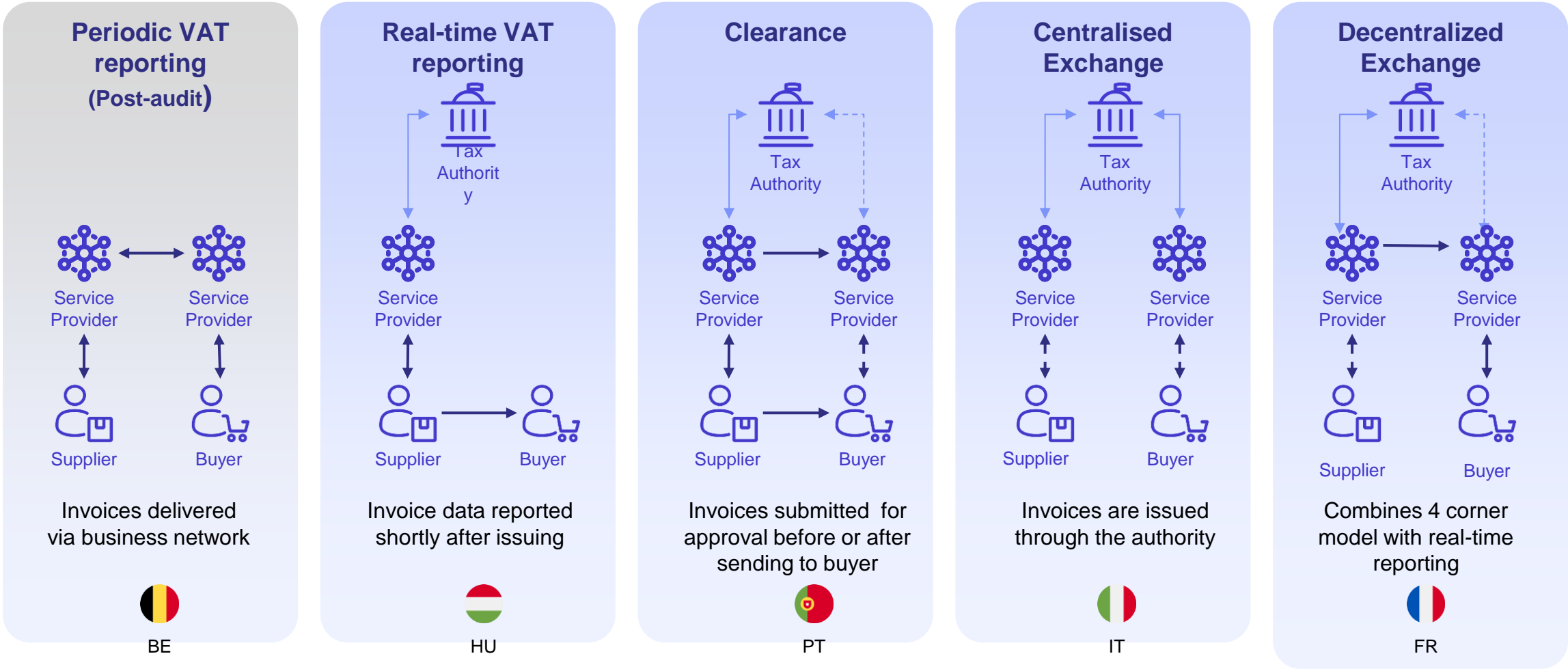
E-invoicing presents a complex challenge for businesses due to the lack of a global standard, with each country having unique requirements and frequent changes.

Companies face pressure to adapt to new mandates quickly, manage implementation and ongoing costs, and integrate e-invoicing systems with existing technology while ensuring continuous compliance.



# Governments need more data, faster

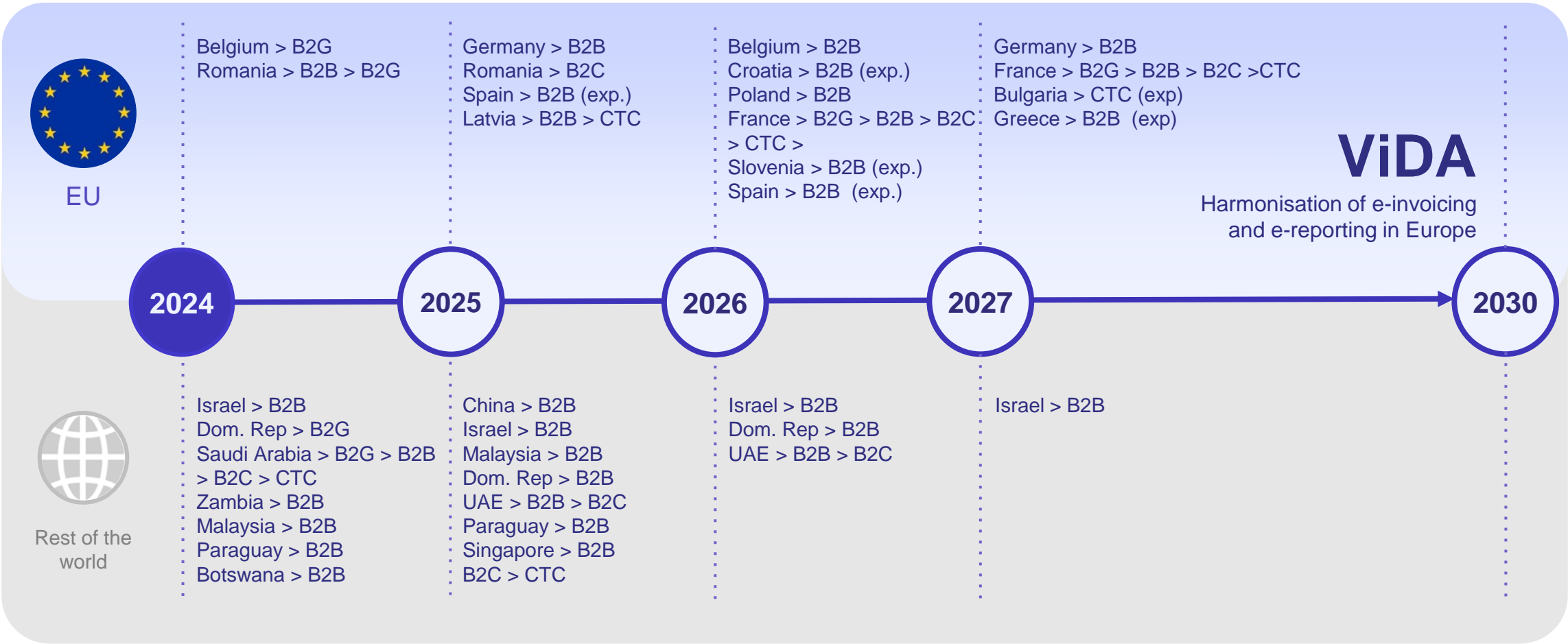
## The Fragmentation of Implementation Models





# More mandates on the horizon

E-invoicing and e-reporting regulations vary and change





# Electronic invoicing and reporting

## Benefits for businesses

### For accounts receivable



Get paid faster



Secure transmission



Reduced handling cost



Reduced storage cost

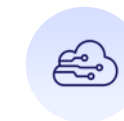
### For accounts payable



Reduced processing costs



Minimised errors



ERP integration



Eliminate OCR

E-invoicing boosts efficiency, reduces errors, and improves financial management.

**To reap these benefits, businesses need to address challenges like compliance and technology upgrades.**



# E-invoicing in Belgium

Target date of January 2026





**“A fair tax system is one where everyone pays their fair share as expected. When we see that the government receives less VAT revenue than it should, this fundamental fair distribution is undermined. The step towards mandatory digital invoicing will not only reduce that VAT gap and ensure more fairness, but will also represent a significant administrative simplification for our businesses”**

Vincent Van Petegem, Belgian Minister of Finance



# The shift to e-invoicing in Belgium

From an unstructured to a structured format

## When?

**January 1, 2026**

- This is the date when the B2B e-invoicing mandate comes into effect in Belgium.

## What?

**B2B e-invoicing**

- All businesses in Belgium will be required to issue and receive structured electronic invoices for domestic transactions.
- The e-reporting obligation is expected to be defined and introduced in a later stage

## Who?

**All Belgian businesses**

- All Belgian businesses established and registered for VAT purposes, with few exceptions

## How?

**Peppol and UBL BIS**

- The Peppol network will be the primary channel for exchanging e-invoices in Belgium.
- The format will be UBL BIS.
- Today, approximately 15% of the active businesses in Belgium are using Peppol



# Peppol

A short introduction



# Peppol

(Pan-European Public Procurement Online)

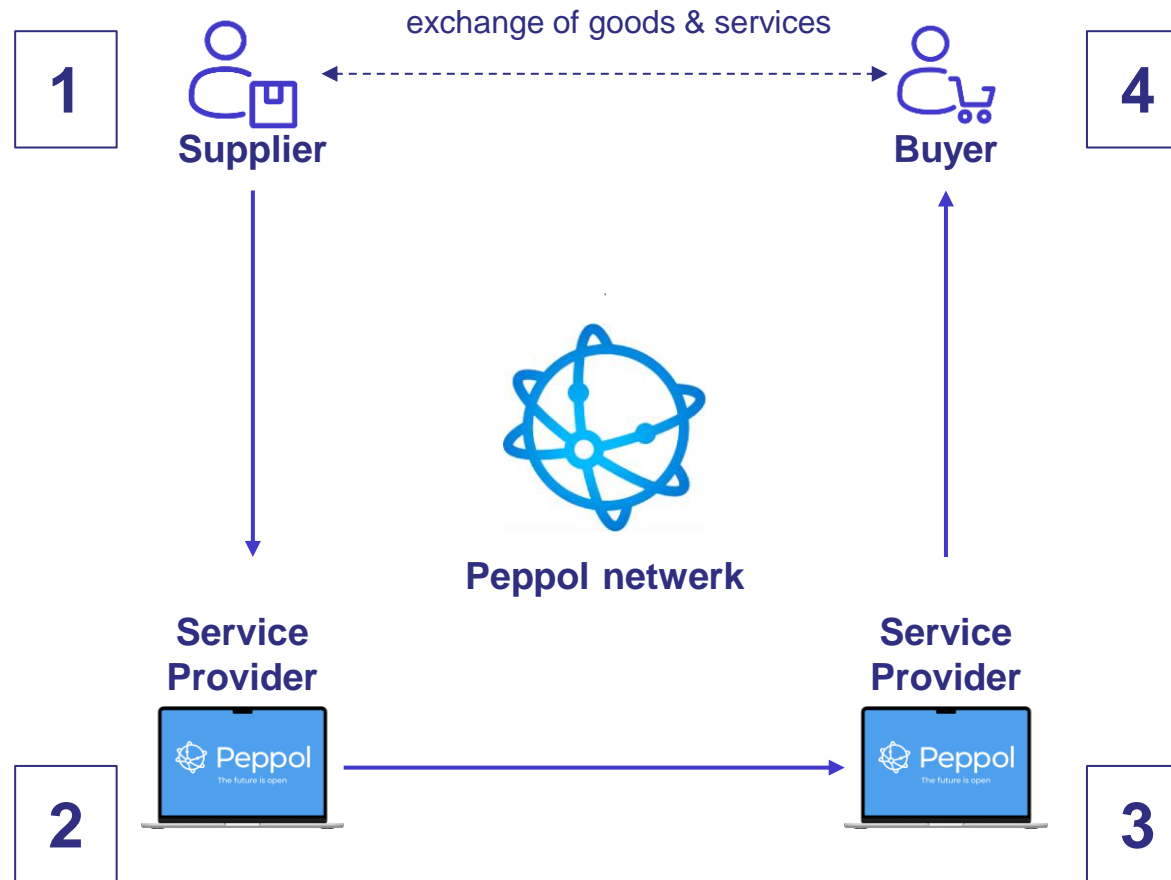
Peppol is an international framework for the secure, standardised exchange of machine-readable electronic documents, especially e-invoices, between businesses and governments within and between countries.





# How does Peppol work?

## The four corner model



Peppol simplifies electronic document exchange by providing a standardized format and secure network through certified service providers.

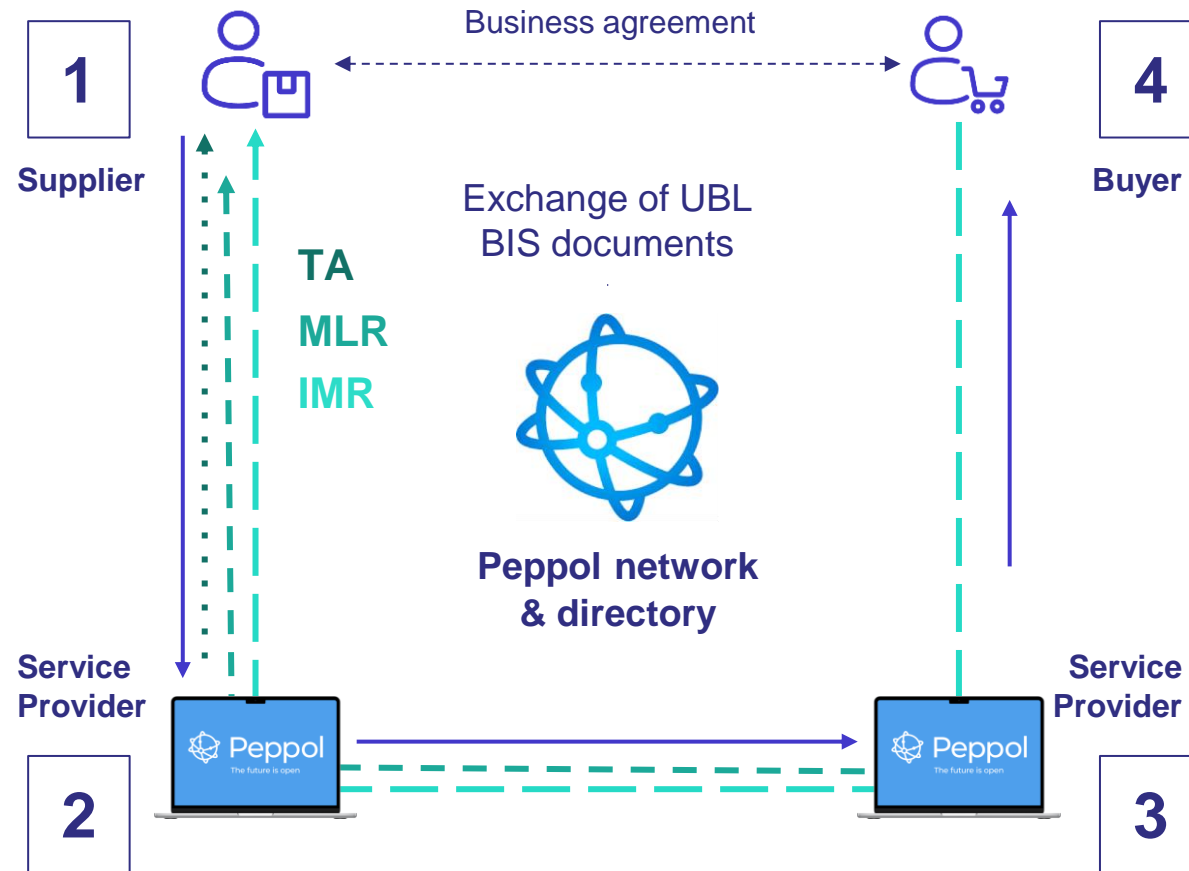
Here's how it works:

1. Supplier Invoice creation
2. Peppol Service Provider of Supplier sends your invoice securely and in the right format to the Buyer via Peppol
3. The Peppol Service Provider receives the invoice and converts it the format required by the buyer
4. Invoice delivered to the Buyer



# Peppol feedback

How Peppol boosts efficiency, accuracy, and transparency in e-document exchange



Peppol status reporting involves a structured system for tracking and confirming the exchange of documents within the Peppol framework.

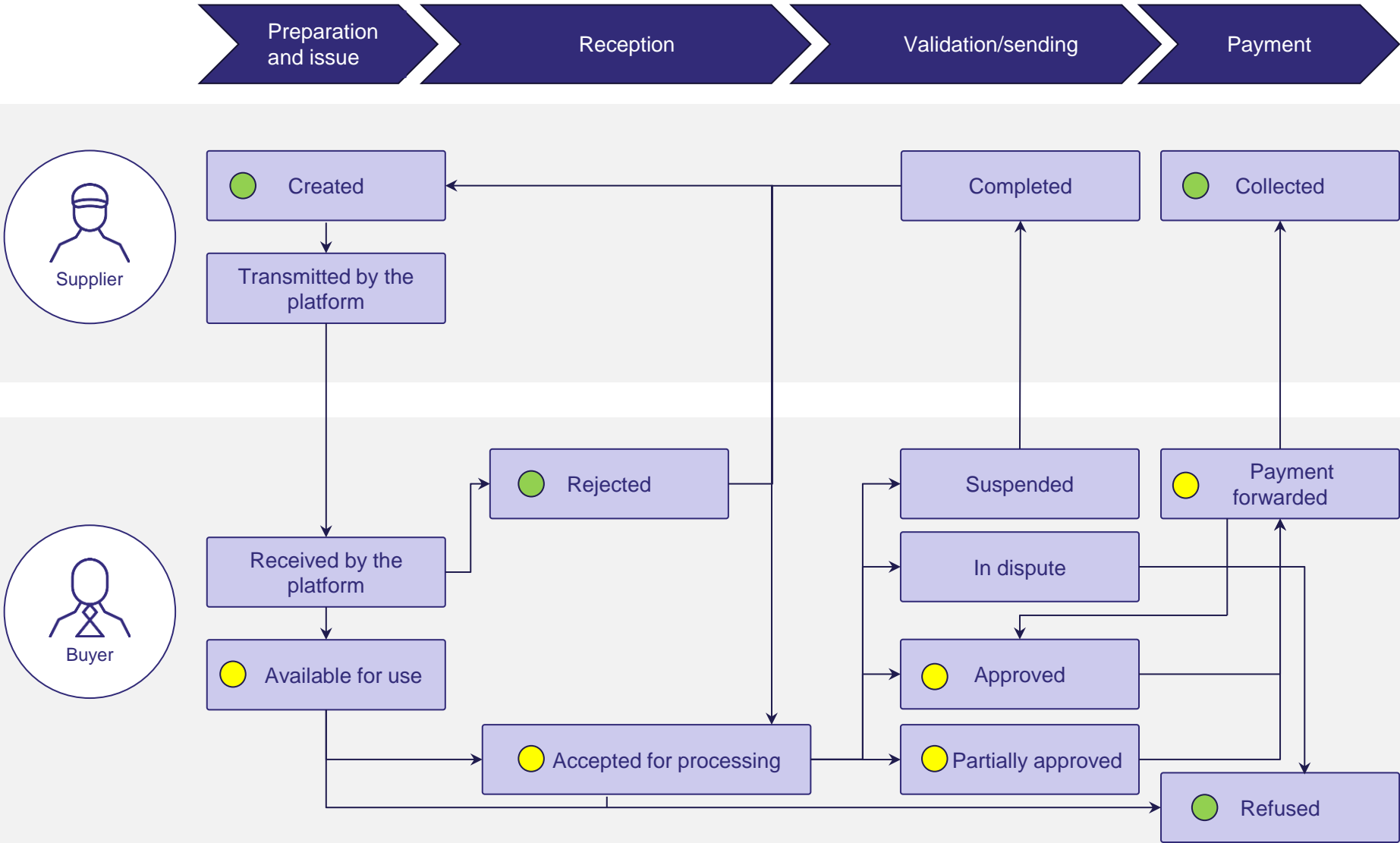
It includes three main types of acknowledgments or responses, **Transport Acknowledgements (TA)**, **Message Level Responses (MLR)**, and **Invoice Message Responses (IMR)**



# E-invoicing in France

Various target dates





## Collaborative State Sharing & Reporting

As part of their efforts to close the VAT gap, more and more governments require extensive reporting from buyers and suppliers. They require insights in the complete workflow of invoices (and other documents in the future).

The diagram in the left summarizes the French governmental requirements about state reporting of electronic invoices.



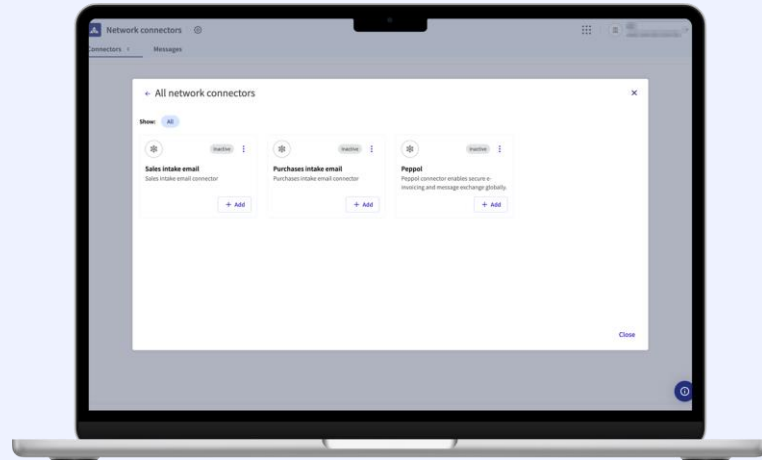
# Introducing the Banqup platform

Business operations just got modern

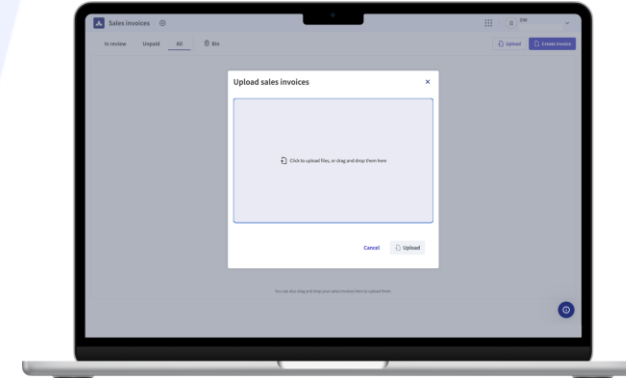


# Invoices processing

Flexible ways to send & receive invoices



**Automated import  
via the Banqup web app**  
(through various channels, such as sales intake  
email or an API)  
**or via API**



**Manual upload  
via web app**  
(Upload or drag and drop via  
homepage or the sales  
invoices app)

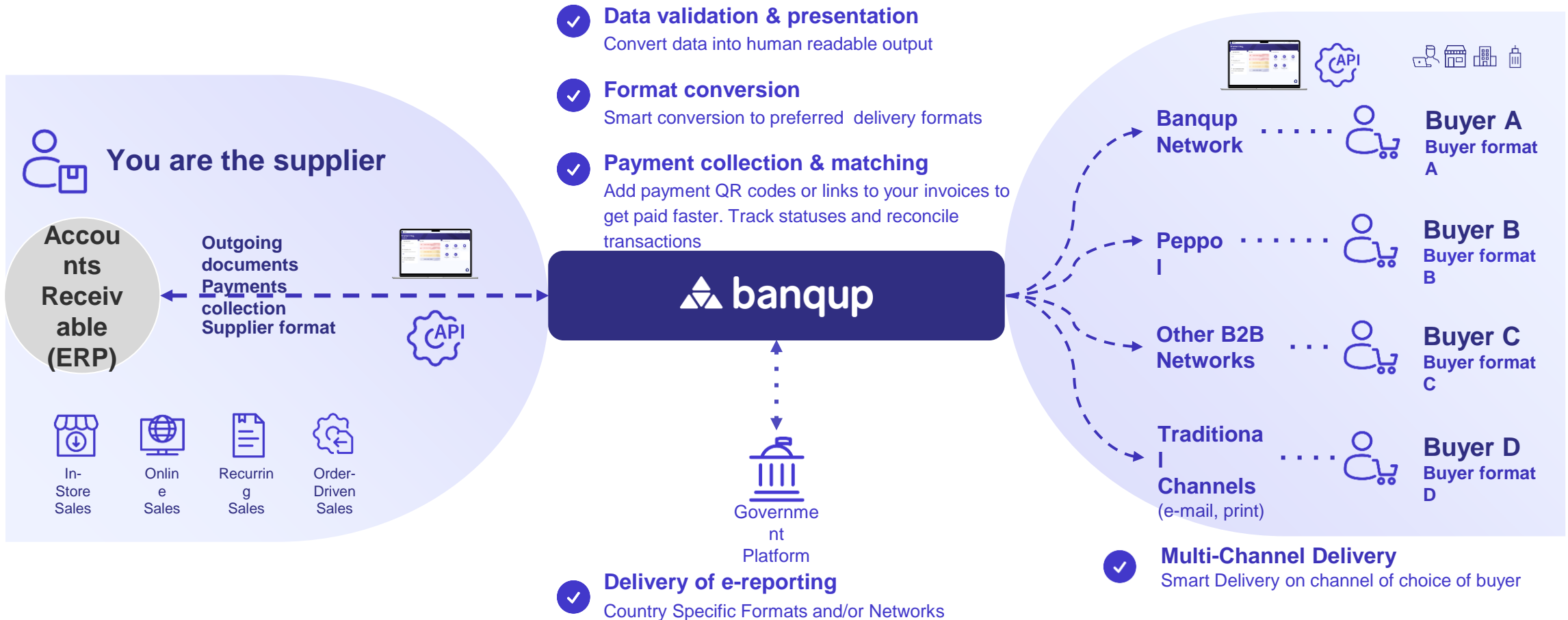


**Manual upload  
via mobile app**  
(Upload or scan sales  
invoices via the Banqup  
mobile app)

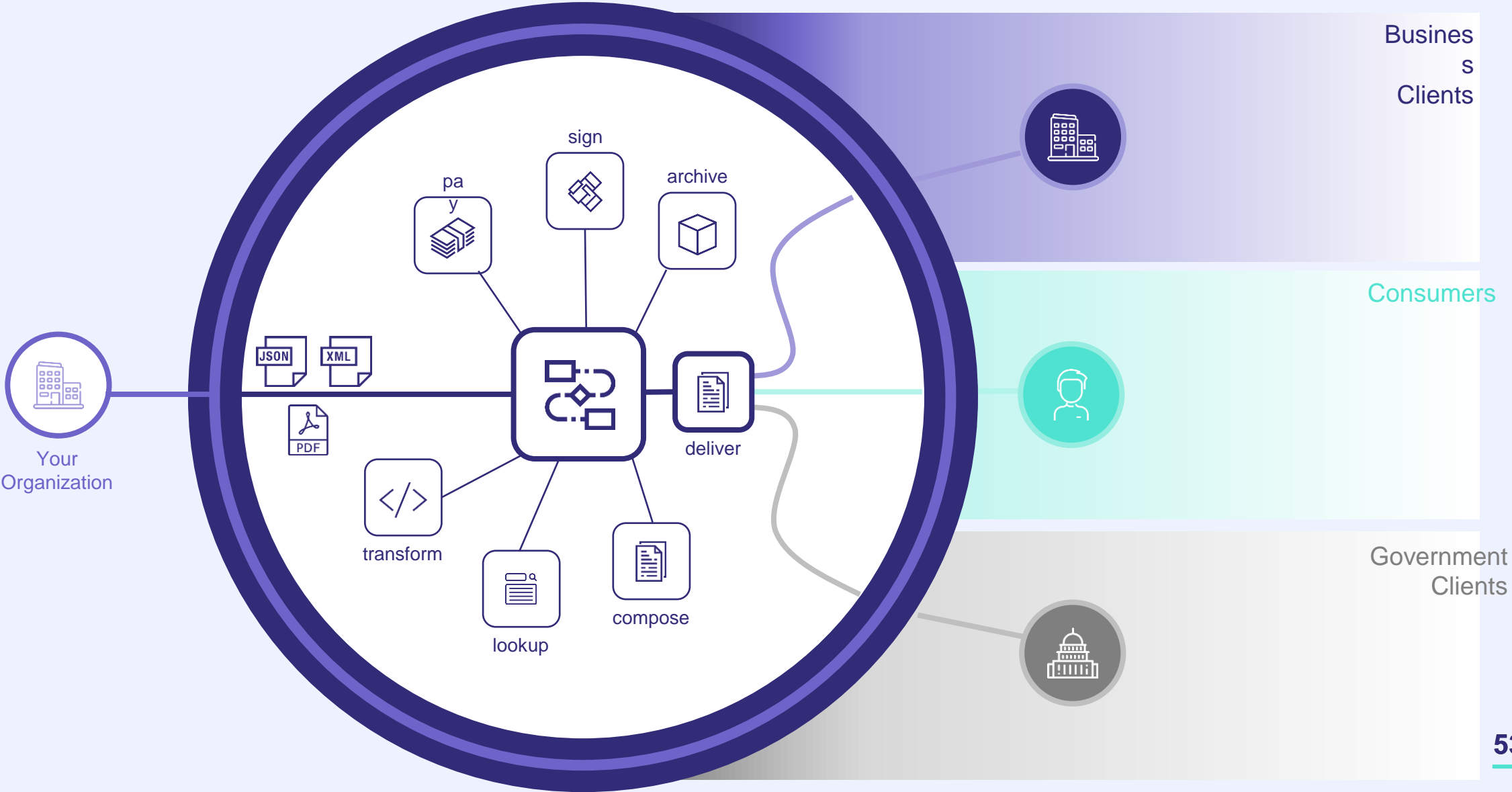


# Sales automation

Seamless and secure invoice delivery to your customers

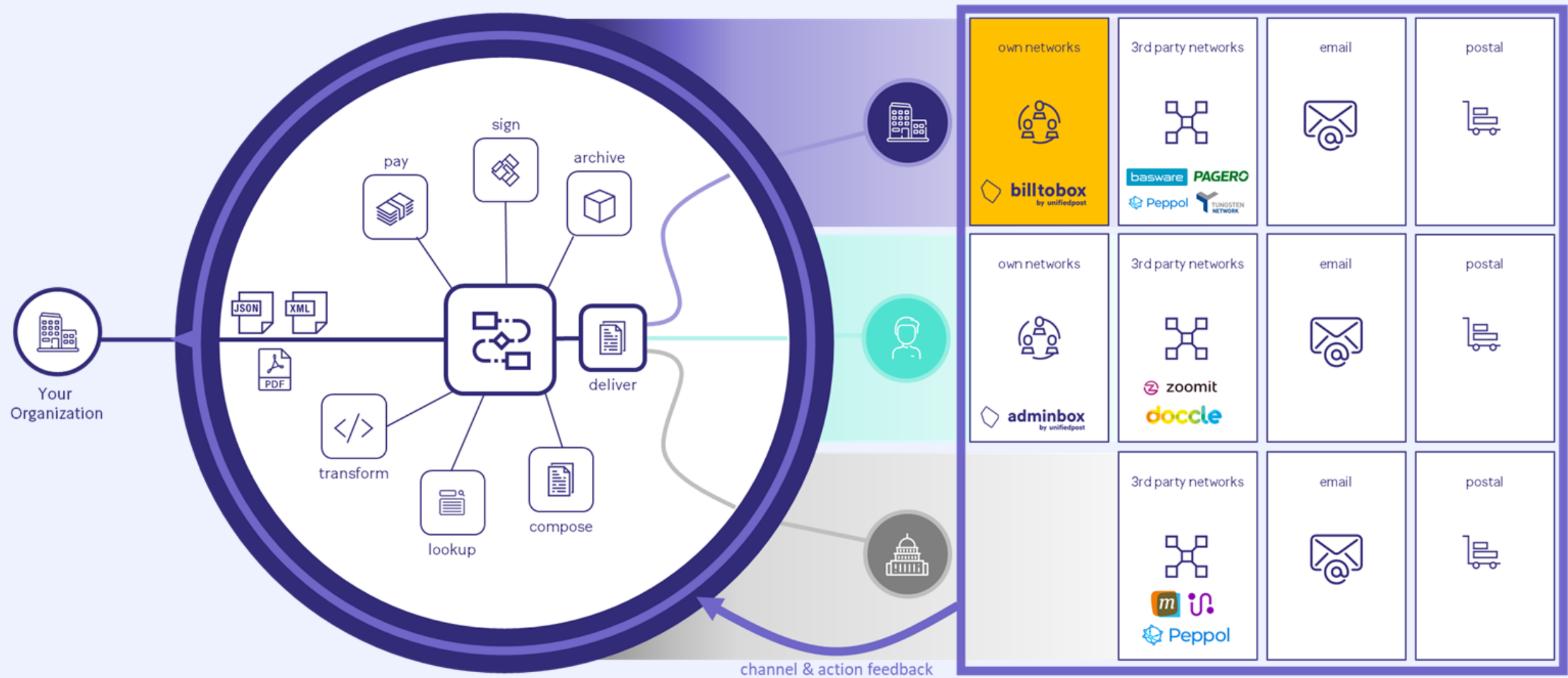




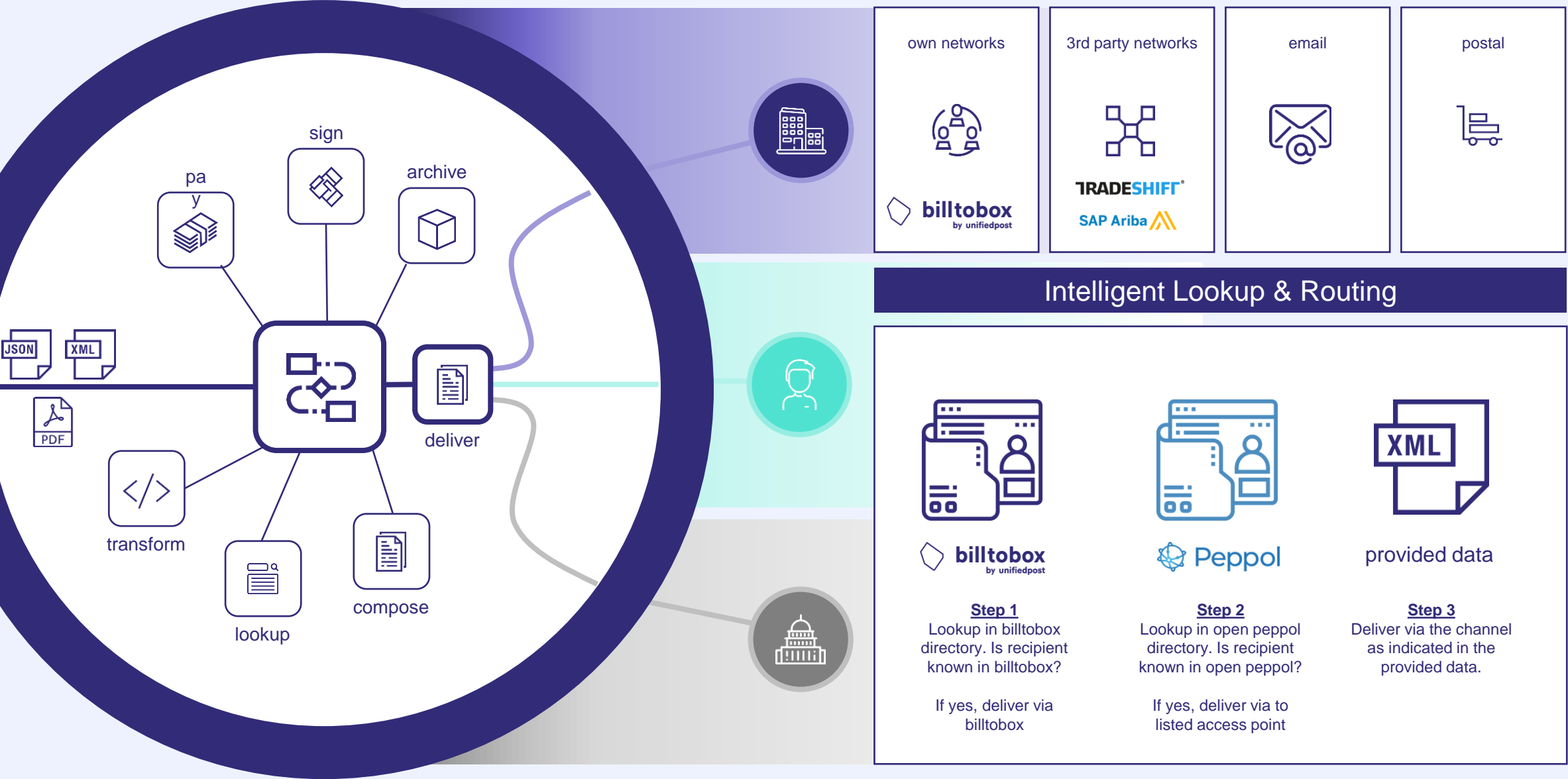




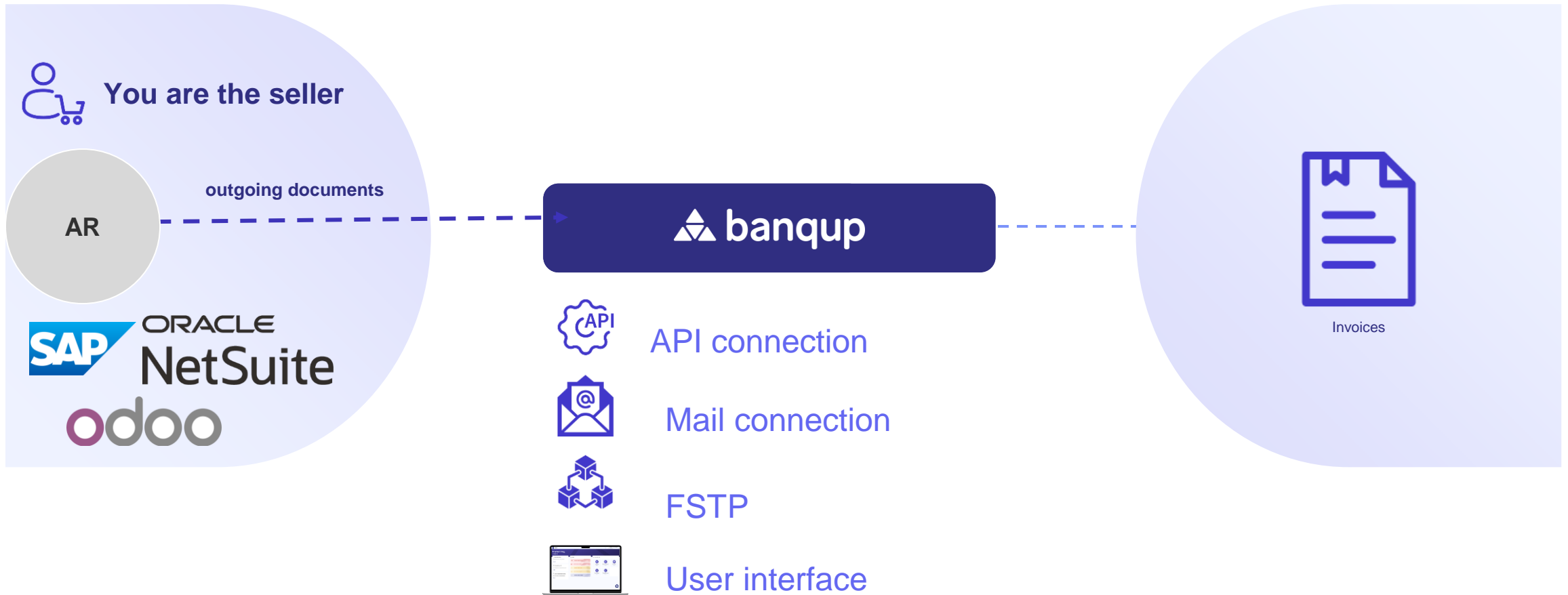
# Multichannel outbound solution











Multiple connections; fully automated easy set-up



# Needed datapoints

1. **Invoice Identification & Dates:**
  - Unique Invoice Number
  - Invoice Issue Date
  - Due Date (if applicable)
  - Tax Point Date (if different from issue date)
2. **Supplier Information:**
  - Name & Legal Entity Identifier (LEI or VAT Number)
  - Peppol ID (e.g., Belgian CBE number in Peppol format: 0208:BE)
  - Address (Street, City, Postal Code, Country)
  - Contact Details (Email, Phone)
  - Bank Account Details (IBAN, BIC/SWIFT)
3. **Customer (Buyer) Information:**
  - Name & VAT Number (if applicable)
  - Peppol ID
  - Address (Street, City, Postal Code, Country)
  - Contact Person (optional)
4. **Invoice Line Items:**
  - Description of Goods/Services
  - Item Quantity & Unit Price (excluding VAT)
  - Item Unit of Measure (e.g., pieces, hours)
  - Item Net Amount
  - VAT Rate & VAT Amount per Line Item
  - Any Discounts or Surcharges per Line Item
5. **Tax & Financial Summary:**
  - Total Net Amount (excluding VAT)
  - VAT Breakdown (per applicable rate)
  - Total VAT Amount
  - Total Gross Amount (including VAT)
  - Payment Terms & Conditions
  - Payment Reference (if applicable)
6. **Legal & Compliance Information:**
  - Reference to Order/Contract (if applicable)
  - Legal Invoice Reference (e.g., structured reference for payments)
  - E-invoicing Compliance Note (mentioning Peppol BIS standard)
  - Any Additional Legal Disclosures Required in Belgium

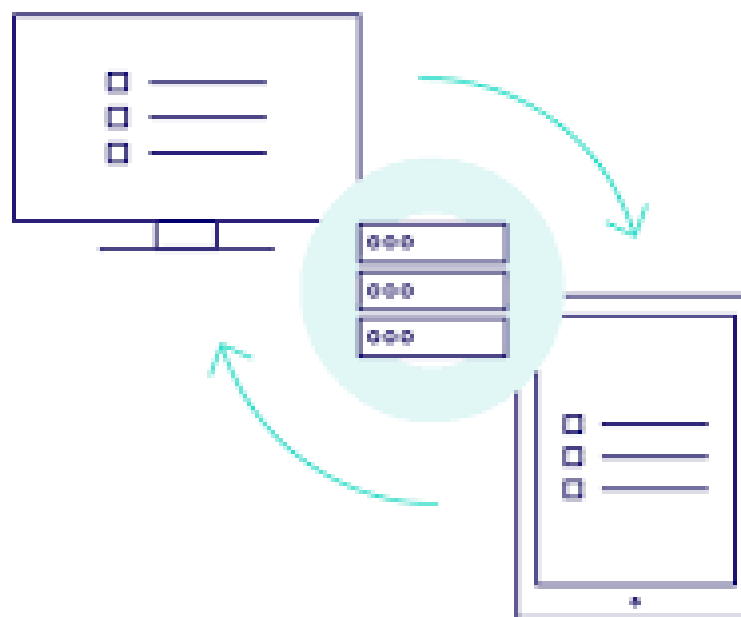
## Additional Optional Data Points:

- Purchase Order Reference
- Project/Contract Identifier
- Delivery Date & Address (if different from buyer's address)
- Additional Tax Exemptions or Special VAT Handling
- Payment Method (e.g., SEPA transfer, credit card)

```
<?xml version="1.0" encoding="UTF-8"?>
<Invoice xmlns:cac="urn:oasis:names:specification:ubl:schema:xsd:
  <cbc:UBLVersionID>2.0</cbc:UBLVersionID>
  <cbc:CustomizationID>urn:www.cenbii.eu:transaction:biicoretr
  <cbc:ProfileID>urn:www.cenbii.eu:profile:bii04:ver1.0</cbc:f
  <cbc:ID>230073</cbc:ID>
  <cbc:IssueDate>2023-01-18</cbc:IssueDate>
  <cbc:InvoiceTypeCode>380</cbc:InvoiceTypeCode>
  <cbc:DocumentCurrencyCode>EUR</cbc:DocumentCurrencyCode>
  <cac:AccountingSupplierParty>
    <cac:Party>
      <cac:PartyIdentification>
        <cbc:ID schemeAgencyName="BTW">NL1234567890</cbc:
      </cac:PartyIdentification>
      <cac:PartyName>
        <cbc:Name>BEDRIJFSNAAM</cbc:Name>
      </cac:PartyName>
      <cac:PostalAddress>
        <cbc:StreetName>STRAAT</cbc:StreetName>
        <cbc:BuildingNumber>gebouw23</cbc:BuildingNumber>
        <cbc:Cityname>Amsterdam</cbc:Cityname>
        <cbc:Postalzone>1082 ET</cbc:Postalzone>
      <cac:country>
        <cbc:IdentificationCode>NL</cbc:Identificati
      </cac:country>
      </cac:PostalAddress>
      <cac:PartyTaxScheme/>
    </cac:Party>
  </cac:AccountingSupplierParty>
  <cac:AccountingCustomerParty>
    <cbc:SupplierAssignedAccountID>P425</cbc:SupplierAssigne
  </cac:Party>
    <cac:PartyIdentification>
      <cbc:ID schemeAgencyName="BTW"/>
```



- We can process over 2500 formats in our standard offering
- We prefer to receive the XML + the PDF to generate the Peppol UBL

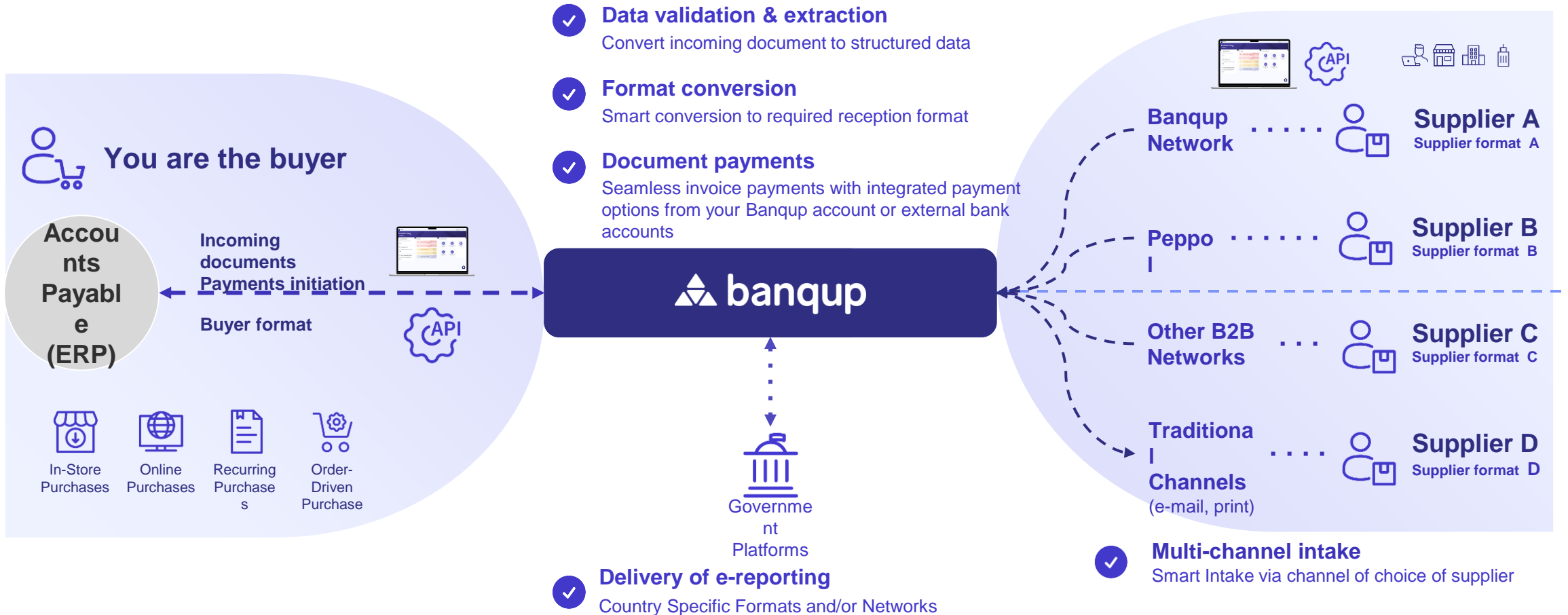


Needed files



# Purchase automation

Ensuring data accuracy and trust from the start





## Contact details



**Kris Van Kelst**

Product Coordination Team

kris.vankelst@unifiedpost.com

+ 32 471 70 54 02



**Christophe Vanhoutte**

Country Manager Belgium

christophe.vanhoutte@unifiedpost.com

+ 32 488 22 55 10



**Luc Caubergh**

Sales Director Corporate

luc.caubergh@unifiedpost.com

+ 32 475 43 38 30

