

A stylized globe on the left side of the slide, rendered in shades of blue with a grid of dots. Several curved lines in white, green, and yellow arc across the globe, connecting various points, symbolizing global connectivity or data flow.

Public Policy and Compliance WG meeting

May 21, 2026

Agenda

- ▶ **PPCWG objectives and deliverables (reminder)**
- ▶ **Greek mandate – presentation by Antonis Ntinou**
- ▶ **New Workstream : EU Public Procurement E-invoicing Directive – Public Consultation**
- ▶ **EC's (DG CONNECT) requirement on End-to-end encryption**

PPCWG – General purpose

- ▶ **General Purpose:** “engage with stakeholder forums and EU policy- and decision-makers in relation to public policy areas and compliance issues to promote good practice and optimal solutions. Compliance is defined as those activities undertaken by service providers and their clients to ensure compliance with applicable laws and regulations impacting invoicing and related processes.”

PPCWG – objectives and deliverables

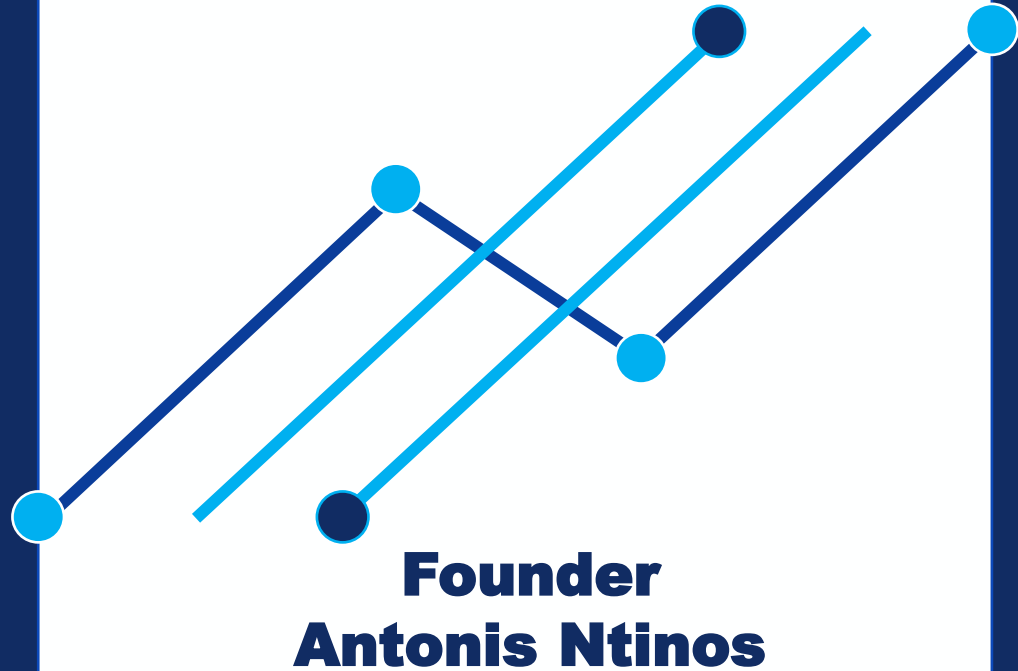
▶ 2026 Objectives:

- ▶ Share information on compliance & best practices with members & policy makers
- ▶ Define GENA aligned vision on 5/6-corner model and objectives as basis framework
- ▶ Increase influence on the EC: DG Grow / TAXUD / CONNECT
- ▶ Be vocal on the major stakes for GENA : standards harmonisation, SP accreditation, 5C model...
- ▶ Follow closely the implementation of ViDA and the Peppol Vida pilot
- ▶ Increase awareness on EU Business Wallet & other initiatives in the Digital Identity space (EIDAS2, DORA, NIS2,...)
- ▶ Reflect on SMEs adoption
- ▶ Share insights, experiences and best practices => we know more, we provide better service to our customers
 - National mandates implementation (France 5C...)*
 - Coordination with local chapters*
 - Follow-up of the EN16931 standard update*

▶ 2026 Deliverables:

- ▶ Hybrid invoices paper => Workstream (wip)
- ▶ ViDA implementation / VEG comments => Workstream (wip)
- ▶ ViDA E-invoicing mandates insights : Croatia (Lyubov), ROI (Joanna) - **done**
- ▶ Comments on Peppol ViDA pilot – **done**
- ▶ DG Grow position paper – **done**
- ▶ Hungary ViDA implementation public consultation– **done**
- ▶ Presentation of Qualified Trust services / EU BW– **done**
- ▶ New Public Procurement Directive consultation => Workstream

AN Digital & Business Analysis Info



GENA

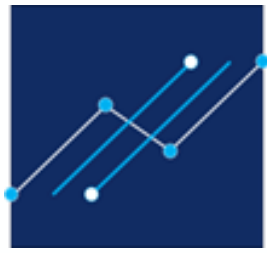
Global Exchange Network Association

May 2026

**Digitalization of Tax and Accounting Processes –
Business Data Analysis**

**Scientific Associate
Business Consultant**





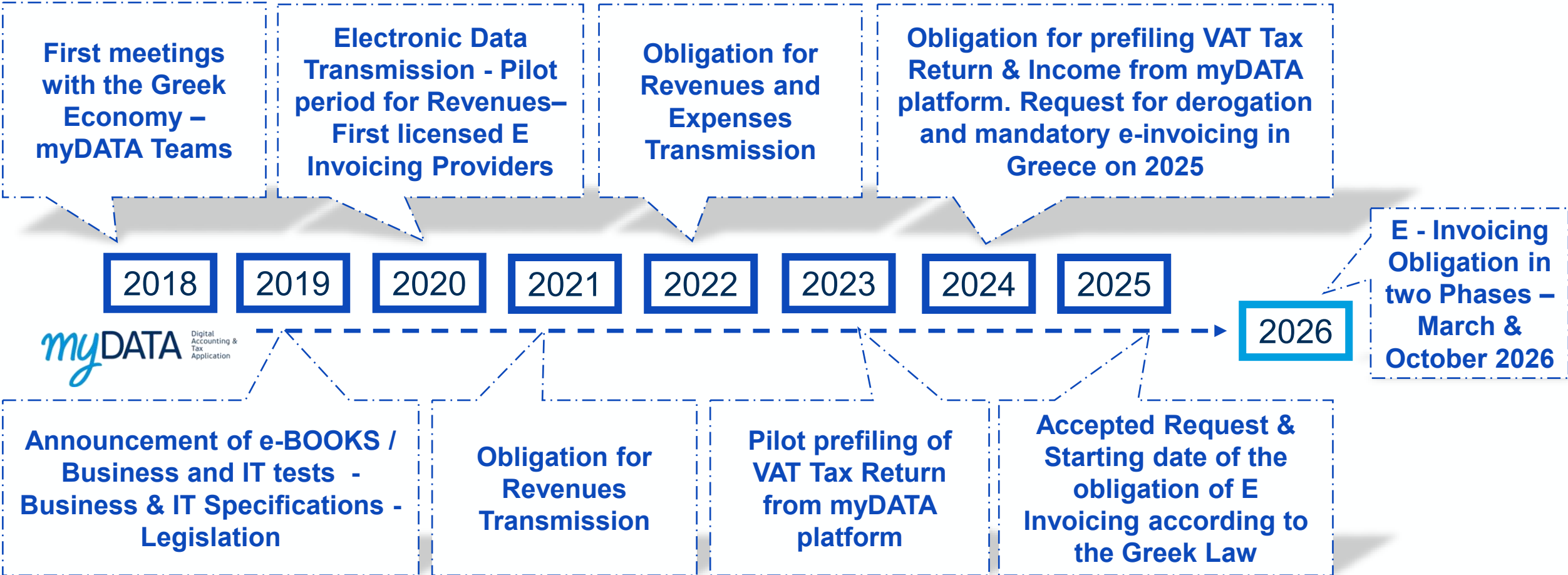
Greek Mandate E Invoicing 2026





Greece's Digital Journey

Timeline of Digital Tax Transformation - From concept to full-scale implementation



Creation of 70 working groups with professional sectors of the Greek economy



How the Greek Model Works



Licensed e-Invoicing Providers Framework

- Central architecture managed by IAPR (AADE)
- Providers certified by official evaluation committee from AADE
- Real-time transmission of structured data to the tax authority
- Seamless integration with ERP systems and payment solutions

Greece has a proven tax reporting system for the transmission of income and expense data, called myDATA

The e-invoicing providers and invoicing software solutions have been responsible for transmitting the relevant data from 2020 to 2025 for B2B transactions

Starting in 2026, in two implementation phases (March 2 and October 1), providers will assume the full responsibility for authentication and transmission of B2B and B2G transaction data



Reform Timetable



MD.1128/2025 – Mandatory Electronic Invoicing

For businesses with gross revenues exceeding €1,000,000 in fiscal year 2023, the obligation starts on 2 March 2026 (Phase 1), with a gradual onboarding period until 3 May 2026 and full mandatory implementation from 4 May 2026.

Businesses are required to submit the “Declaration for the Commencement of Electronic Issuance of Tax Documents” under Article 6 of Decision A.1112/2025 by 2 March 2026.

For all remaining businesses, the obligation starts on 1 October 2026 (Phase 2), with a gradual onboarding period until 31 December 2026 and full mandatory implementation from 1 January 2027.

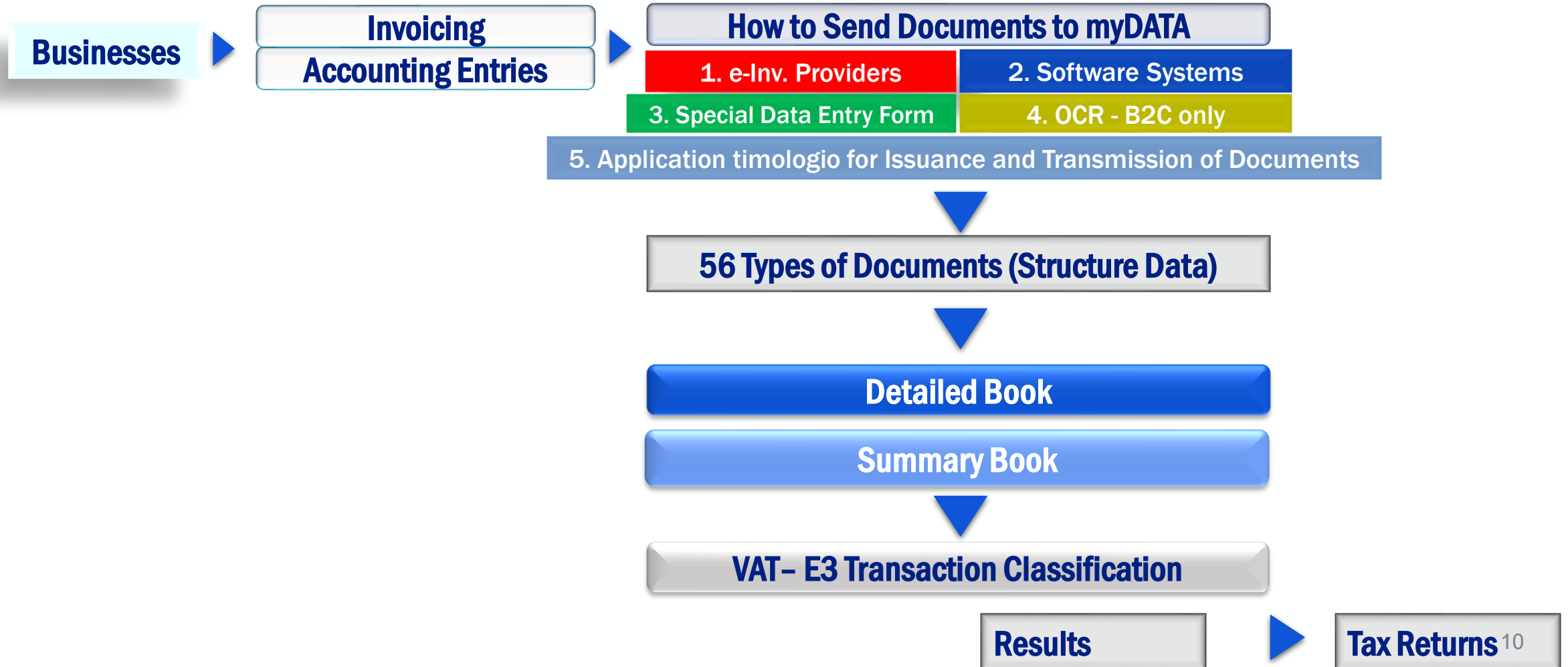
Businesses are required to submit the “Declaration for the Commencement of Electronic Issuance of Tax Documents” under Article 6 of Decision A.1112/2025 by 1 October 2026.



Businesses Ecosystem and Trust in Greece



Data flow process on myDATA platform





Statistics on Data Transmission



From October 2020 to date

- **Transmission of Documents: 9.305.617.880**
- **Total Value: 3.310.462.962.751€**
- **Registered Businesses: 1.550.698**
- **timologio Registered users: 610.423**
- **Licensed E – Invoicing Providers: 37**



Statistics on Data Transmission



From October 2020 to date transmissions from:

- **E – Invoicing Providers: to date 4.426.489.441 / daily 8.868.659**
- **ERP Software Systems: to date 4.802.372.117 / daily 1.714.144**
- **timologio: to date 65.450.425 / daily 73.880**
- **Special Data Entry Form: to date 8.763.672 / daily 4.493**

AADE in 2025 had expand the functionality of timologio as an E – Invoicing Provider



Statistics on Data Transmission



From 2023 to date

Year	B2B private sector*	B2G / PEPPOL active	B2C / retail	Total	Other invoice transmission channels
2023	18.392.094	16.033	193.212.999	211.621.126	651.277.523
2024	92.651.488	859.542	837.346.794	930.857.824	620.025.093
2025	242.162.459	3.164.623	1.961.474.411	2.206.801.493	389.820.607
April 2026	125.695.868	1.479.583	745.002.357	872.177.808	108.290.472
Total	478.901.909	5.519.781	3.737.036.561	4.221.458.251	1.769.413.695



Statistics on VAT Tax Returns



The mandatory pre-filing of VAT Tax Return

- From December 2022, started with 61% correct income and 34% correct expenses (pilot period)
- From January 2024, had 85% correct income and 61% correct expenses (period with rules)
- To date we have more than 99% correct income and 99% correct expenses (period with rules)



Key Outcomes & Benefits



- **Real-time, high-quality transactional data**
- **Structure Data - Interoperability**
- **99% VAT pre-filing accuracy**
- **Reduced VAT gap & tax evasion**
- **Improvement of VAT collection**
- **Lower compliance costs for businesses**
- **Integration with POS and e-payments**
- **Legislative maturity supporting continuous innovation**





Interoperability - Public Policy & e-Payments



GENA Focus Area - Greek Alignment

▪ **Interoperability & Standards**

▪ **myDATA & e-Invoicing fully structured (UBL/EN16931)**

▪ **Public Policy & Compliance**

▪ **Collaboration between IAPR & private sector**

▪ **e-Payments & Automation**

▪ **Interconnection POS – AADE, eReceipts ecosystem**



**Greece: Early mover in VAT
digitalization –
fully converging with ViDA by 2030**





Greece & the ViDA / DRR Alignment



- **myDATA already meets many ViDA objectives**
- **Early implementation of Digital Reporting Requirements (DRR)**
- **Greece as a reference model for:**
 - * **real-time reporting,**
 - * **structured and real-time e invoicing,**
 - * **interoperability between e invoice providers,
business & Greek Tax Administration IAPR (AADE)**



Schematic illustration of data transmission with electronic invoicing





Electronic Invoicing Process Flow



The ASP authenticates the invoices and transmits the invoice synopsis.

The Recipient receives the invoice summary through their ERP, which includes the new downloadingInvoiceUrl field generated by the ASP during the authentication process.



Issuer



The ASP continues to send the invoice to the Recipient via e-mail.



Receiver

Data Authentication Process by the Accredited Service Provider (par.5 article 7 MD.1112/2025)
For every invoice issued through the services of an Accredited Service Provider or a Self-Provider, the following information must be included, in addition to the fields defined in Article 9 of Law 4308/2014: the name and website of the Provider, the authentication string, the Unique Registration Number (MARK), the date and time of issuance, and the document identifier. The Provider authenticates the document using the SHA-1 algorithm.

Furthermore, for each issued invoice, the tax summary of the electronic document is transmitted to AADE in a specific format and through a defined submission process published on AADE's website. These provisions are described in Annex B of MD.1112/2025.



Issuer's E Invoicing Provider



Receiver's E Invoicing Provider



myDATA Version 1.0.12



Version 1.0.12 is in production and includes the following updates:

1. **MD.1128/2025 – Electronic Invoicing for B2B, B2C, B2G** (Applicable to Accredited E-Invoicing Providers) Enhancement of the myDATA schema with the field `downloadingInvoiceUrl` — **transmission of a URL by the Accredited E-Invoicing Provider**, through which the recipient of the document can retrieve the invoice by calling this URL with a defined parameter. **The URL call parameter is as follows:**

/pdf → **retrieval in PDF format** (This is the default parameter. If no parameter is included in the URL call, the URL will return the invoice in PDF format.)

/myDATA → retrieval in the detailed myDATA format (InvoicesDoc_detailed.xsd)

- all invoice lines in detail, per item/service,
 - the item/service description,
- each line will additionally include the item/service code,
 - classification information is not included, for consistency and ease of use,
- the TARIC code (where available).
 - the data must comply with the currently applicable InvoicesDoc_detailed.xsd.

/EN16931 → retrieval in the European Standard format (ELOT EN 16931).

THIS FUNCTIONALITY IS VERY IMPORTANT — THE RECIPIENT RECEIVES THE ELECTRONIC INVOICE IN REAL TIME.



New functionality



downloadingInvoiceURL

- **Direct access to invoice data**
- **Real-time invoice access**
- **Immediate retrieval by the receiver**
- **Structured formats PDF, XML, EN16931 for interoperability**



Prefilling VAT Returns & Income



- **Automatic population**

VAT returns and Income generated from transmitted data

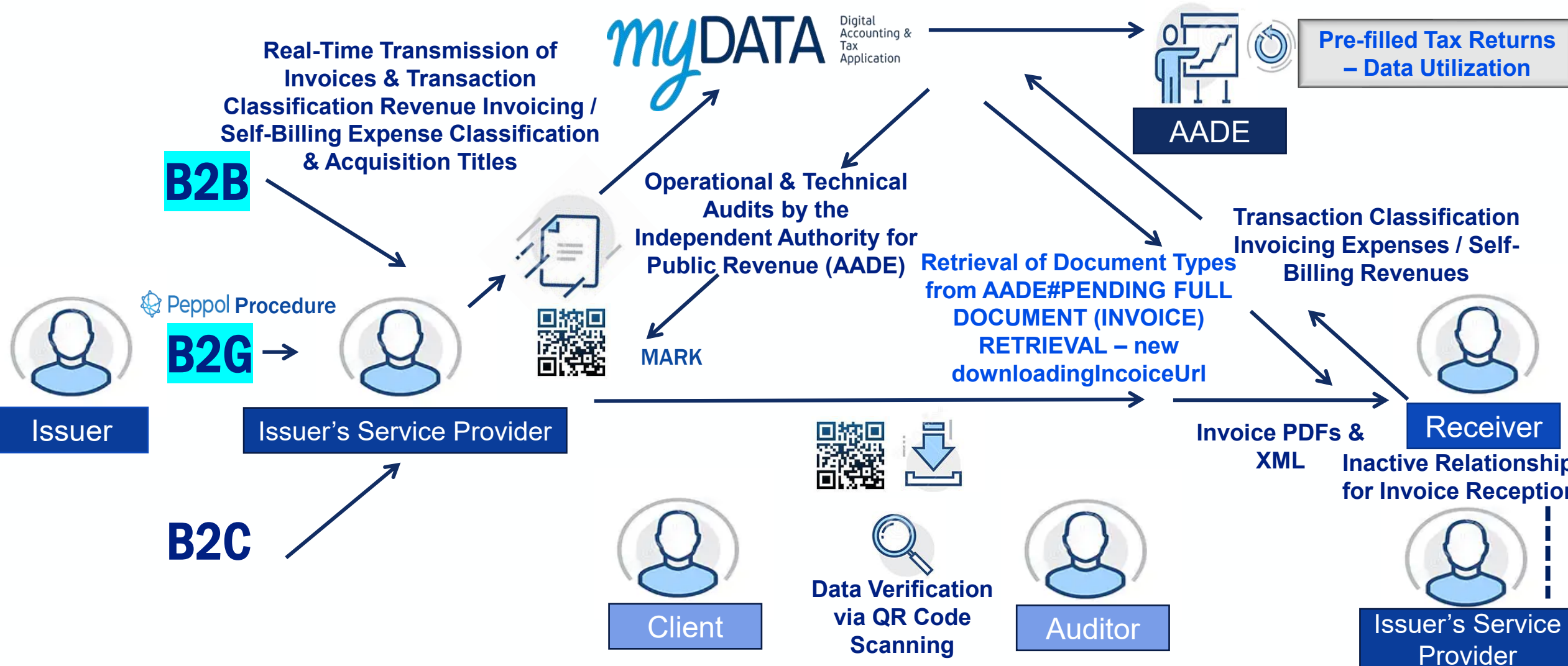
- **Based on real-time data**

Eliminates delays and discrepancies

- **Income vs Expenses matching**

Ensures accuracy through cross-validation

Electronic Invoicing Process Flow

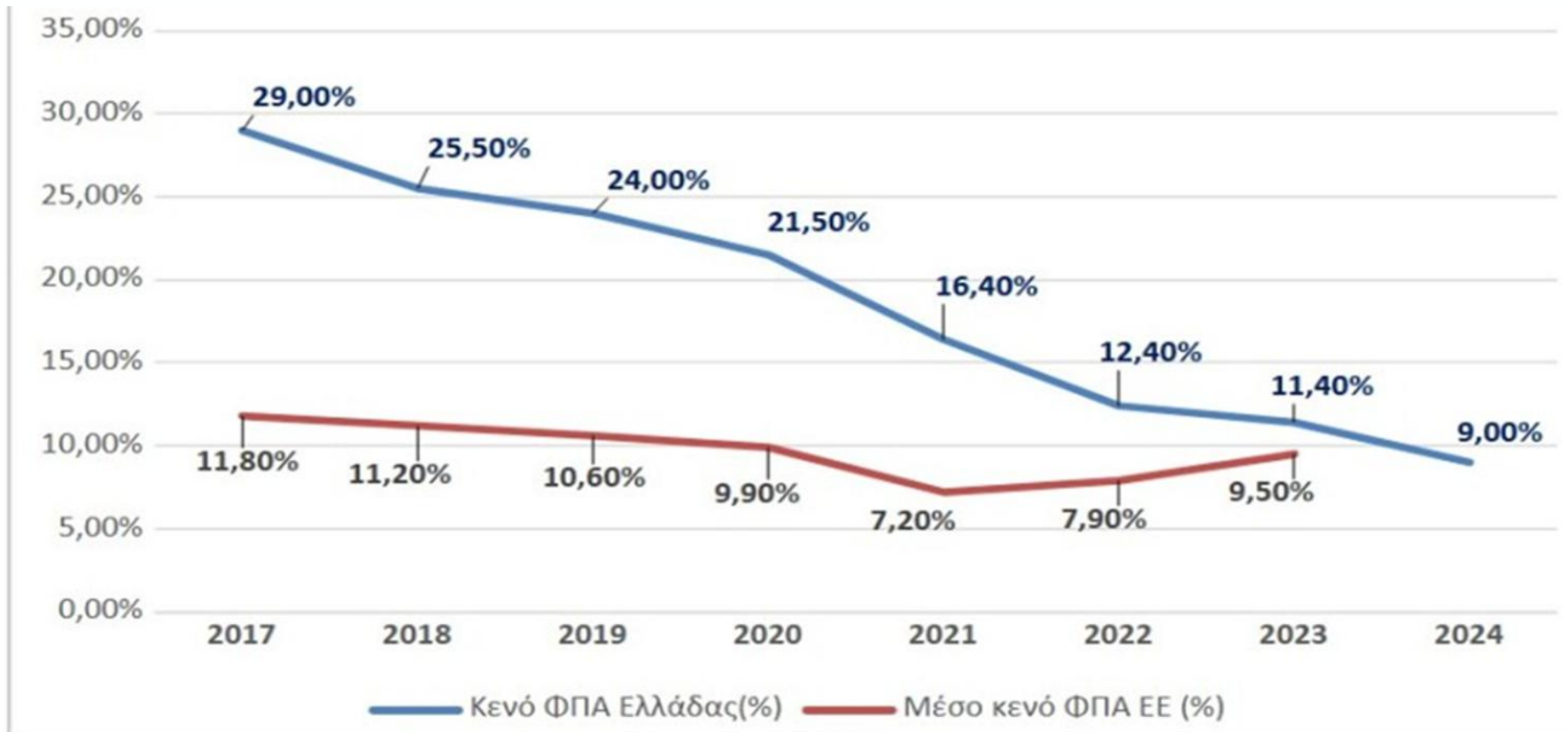




Results & Impact



Greece VAT Gap Reduction – VAT Gap Trend vs EU Average



Greece, through the digital transformation of its economy via the myDATA Digital Reporting platform and e-Invoicing, achieved a significant reduction in the VAT gap, from 29% in 2017 to 9% in 2024, with further reductions expected in the coming years.

Πηγή: European Commission: Directorate-General for Taxation and Customs Union, CASE, Intellera, Syntesia, Poniatowski, G. et al., VAT gap in Europe – Report 2025, Publications Office of the European Union, 2025, <https://data.europa.eu/doi/10.2778/7868422>



VAT Collection



Greece was once shut out of markets and collecting too little tax. Today it runs a primary budget surplus and stands as one of only five EU countries to do so. Tax administration reform powered this striking reversal.

VAT collection has improved during the last fifteen years

VAT collection to GDP, percent



Source: IMF staff estimates.





Final Message



- **Businesses digitize their transactional operations**
All transactions are generated and transmitted digitally
- **Accounting becomes automated**
Data flows directly into tax and accounting systems
- **Tax is no longer a separate process**
It is embedded into business operations

TAX JUST HAPPENS

- **Real-time data**
- **Automated reporting**
- **Zero manual intervention**



Next Steps

From Digitalization to Intelligence



- **Greece enters a new phase of digital transformation**
Moving beyond reporting to intelligent data utilization
- **High-quality, real-time structured data is now available**
Reliable foundation for advanced analytics and AI
- **Benefits for the entire ecosystem**
Businesses, Tax Administration and the State
- **AI-driven decision making**
Faster, more accurate and proactive decisions
- **Secure data correlation & interoperability**
Combining datasets across systems in a controlled environment
- **Next big project - E Delivery Note**



Digital

**Thank you for your
Attention**

Agenda

- **PPCWG objectives and deliverables (reminder)**
- **Greek mandate – presentation by Antonis Ntinou**
- **New Workstream : EU Public Procurement E-invoicing Directive – Public Consultation**
- **Other updates**

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement

The European Commission is preparing a **revision of the EU rules on electronic invoicing (eInvoicing) in public procurement**. This initiative aims to address shortcomings identified in the recent evaluation of Directive 2014/55/EU and to ensure that harmonised, interoperable eInvoicing becomes the norm across the EU. Strengthening eInvoicing is a key part of the Commission's broader strategy to simplify the Single Market and reduce administrative burdens for businesses.

Public consultation to respond to by June 10, 2026.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14792-Electronic-invoicing-revision-of-EU-rules_en

1) GENA's contribution sent in 2025, Dec 17th :

[Call for Evidence Public Procurement & E-invoicing - GENA – final](#)

2) Service Providers' questionnaire, April 30

3) June 10 : 10-12am : <https://ec.europa.eu/eusurvey/runner/d3d96d45-e23b-44a5-9840-c4de16a0e330>

WORKSTREAM team : Ruud/Nazar, Joanna, Oriol, Leentje, Anna + Charles ; 1st meeting on May 19

- 1. Make E-Invoicing mandatory for all B2G and extend it across the supply chain**
- 2. Use incentives to speed up adoption**
- 3. Harmonise syntaxes and semantics, and enable data reuse**
- 4. Create a common EU Scheme for access point certification**
- 5. Harmonise the definition of “Critical Data” and security requirements**
- 6. Make Peppol/eDelivery the default channel for B2G**

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement

- **Consultation Questionnaire for Service Providers**

Revision of Directive 2014/55/EU on Electronic Invoicing in Public Procurement

Introduction

- The European Commission is currently preparing a revision of the EU rules on electronic invoicing (eInvoicing), with a legislative proposal expected by the end of 2026. The objective is to assess policy options aimed at improving interoperability, reducing administrative burden, and supporting the digitalisation of invoicing across the EU.
- The European Commission wants to better understand the practical impact of eInvoicing for companies, including possible costs, benefits, and challenges. You are welcome to suggest additional measures that could further reduce complexity or administrative burden. The Commission will assess impacts of each policy measure outlined in this questionnaire.
- **As a Service Provider, your feedback is essential to ensure that the future rules work well for all enterprises. Your practical experience will help us to develop solutions and to understand the impact of possible policy measures.**
- This survey aims to collect information on the following aspects:
 - Current use and costs of eInvoicing for companies
 - Impacts of the proposed policy measures on companies
- Your responses will directly contribute to shaping future EU eInvoicing policy and ensuring that the revised rules are practical, proportionate and supportive of all organisations including SMEs across the Single Market.

This Questionnaire will be open until April 30, 2026.

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Overall objectives

To what extent do you consider that the following findings from the evaluation are still relevant?

(Please rate from 1 = not relevant to 5 = very relevant)

	1	2	3	4	5
The eInvoicing standard has contributed to harmonising invoicing in Europe	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited use of the European eInvoicing standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Persistent interoperability challenges, in particular at the transmission level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Complex national governance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
eInvoicing uptake remains uneven across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please justify the reason(s) for your ranking

...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Overall objectives

Do any of the following elements contribute to legal and technical complexity (barriers/issues)?

(Select all that apply)

- Different national transpositions of the Directive and related obligations on suppliers to issue eInvoices
- Mandatory support of national standards
- National extensions to the European eInvoicing standard
- Non interoperable eInvoicing networks and platforms
- National accreditation schemes
- Other, please specify

Please justify the reason(s) for your choice

- ...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Overall objectives

To what extent do you consider the following elements relevant for ensuring legal clarity and technical simplification?

(Please rate from 1 = not relevant to 5 = very relevant)

	1	2	3	4	5
EU-wide use of eInvoices based on the European eInvoicing standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National eInvoicing legal framework (including mandates and related obligations)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Training initiatives and technical guidance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free-of-charge eInvoicing tools (e.g. national eInvoicing portals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technical specifications for implementers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please justify the reason(s) for your selection(s)

- when you have good specs and clear legal framework, you don't need training...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Overall objectives

To what extent do differences in national implementations of the European eInvoicing standard ([Core Invoice Usage Specifications](#)) increase cost for businesses operating across borders in the EU?

(Please select one option)

- a very large extent
- a large extent
- a moderate extent
- a small extent
- Not at all
- No opinion

Please justify the reason(s) for your selection and, if relevant, provide data /cost estimates

- dependent on business and especially technical models of the SPs...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Overall objectives

Based on your experience, what should the revised eInvoicing Directive address?

- eInvoicing in public procurement above EU thresholds (B2G)
- eInvoicing in public procurement below EU thresholds (B2G)
- Government-to-Business transactions (G2B) e.g. local tax
- Business-to-Consumer transactions (B2C)
- Other, please specify

Please justify the reason(s) for your selection

- + common accreditation schemas, common transmission...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Specific objectives

The Evaluation of the Directive identified the following issues: low uptake of eInvoicing, limited and uneven implementation of the European Standard alongside the continued parallel use of national formats, the lack of interoperable solutions and networks at EU level, legal and technical fragmentation increasing complexity for companies operating across multiple EU countries. Challenges related to governance at both national and EU level were also identified. Please consider those issues when answering the following question.

Please rank the importance of the following potential objectives that could be considered for the revised Directive.

(From 1 = lowest priority to 5 = highest priority. Please note that you may assign the same score to multiple elements.)

	1	2	3	4	5
Increase the adoption of eInvoicing in business-to-government (B2G) transactions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure the harmonised use of the European eInvoicing standard (EN 16931)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improve interoperability at the transmission level for B2G eInvoicing, enabling secure and reliable exchange between different IT systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduce eInvoicing-related compliance costs for economic operators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please justify the reason(s) for your ranking

- when the basics are ok, cost should go down...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Governance

Based on the findings of the Evaluation, national eInvoicing governance has been identified as a key challenge. This is because responsibilities for B2G and B2B eInvoicing frameworks, as well as related policy and technical roles, are often split between different national authorities. The Evaluation also showed that there is a lack of clarity for stakeholders about eInvoicing governance at the EU level.

Which governance aspects are the most relevant for eInvoicing today?

(Please choose up to three challenges)

- Lack of coordination between Member States

10

- Unclear roles and responsibilities at national level
- Unclear roles and responsibilities at EU level
- Insufficient coordination between policy, standardisation and implementation
- Limited stakeholder involvement or feedback mechanisms
- Fragmented oversight of implementation practices
- No significant governance challenges
- Other, please specify

- insufficient practicality due to lack of operational experience, need for a more pragmatic approach...

Please justify the reason(s) for your selection(s)

- too many lawyers, not enough technicians...

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Governance

Which governance measures would be most effective to support a more harmonised and consistent implementation of eInvoicing across the EU?

(Please choose up to three options)

- Stronger EU-level coordination mechanism (e.g. EU accreditation framework)
- EU monitoring of national B2G eInvoicing implementations and national reporting activities
- Enhanced cooperation between public authorities and stakeholders
- No additional governance measures needed
- Other, please specify

Please specify

- standardisation, not bureaucracy...

Please indicate your views on how the following potential policy Options for a revised eInvoicing Directive would impact your organisation.

Policy option 1: Targeting higher adoption for contracts above EU thresholds and harmonisation through the mandatory use of the European eInvoicing standard.

Policy option 2: Targeting full adoption of eInvoicing in public procurement above and below thresholds, as well as harmonisation, interoperability at the transmission level, and integration of eInvoicing functionalities into accounting software.

Policy option 3: Building on policy option 2 and also addressing governance challenges and emerging market needs by requiring the European Commission to introduce monitoring activities and an EU-wide accreditation framework for eInvoicing services and solutions.

You are being asked to assess the potential Measures (from M1 – M9) and fill out the following table as follows:

Agreement: Please state the extent to which you agree with the introduction of a specific measure.

Expected benefits: Please rate the expected benefits resulting from the introduction of a specific measure.

Expected costs: Please rate the expected costs resulting from the introduction of a specific measure.

Comment: Please include comments to substantiate your rating for the related measure.

Please note that not all the following potential Measures might be relevant to your organisation.

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement

Survey – Policy options

Preliminary Policy Options and Potential Measures

Preliminary Policy Options	Potential Measures	Agreement <i>(Rating from strongly agree=5 to disagree=1)</i>	Expected benefits <i>(Rating from high benefits=5 to low benefits=1 + no benefit=0)</i>	Expected costs <i>(Rating from high costs=5 to low costs=1 + no costs=0)</i>	Comment <i>(Please include comment / data to substantiate)</i>
Policy option 1 <i>(includes the following measures: M1+M2+M3+M4)</i>	M1 - Obligation for suppliers to issue eInvoices for public procurement contracts above EU thresholds	<i>Only values of at least 0 are allowed</i> <input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 1 <i>(includes the following measures: M1+M2+M3+M4)</i>	M2 - Mandatory and exclusive use of the European eInvoicing standard for B2G eInvoicing	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 1 <i>(includes the following measures: M1+M2+M3+M4)</i>	M3 - EU technology-neutral obligation to ensure interoperability for the transmission of eInvoices	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 1 <i>(includes the following measures: M1+M2+M3+M4)</i>	M4 - Recommendation to integrate eInvoicing functionality into accounting software, conformant to the European eInvoicing standard (EN 16931)	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 2 <i>(includes the following measures: M1+M2+M5+M6+M7)</i>	M5 - Obligation for suppliers to issue eInvoices for public procurement contracts below EU thresholds	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 2 <i>(includes the following measures: M1+M2+M5+M6+M7)</i>	M6 - Obligation for contracting authorities to support one or multiple specific transmission methods for the exchange of eInvoices in B2G to address interoperability issues	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 2 <i>(includes the following measures: M1+M2+M5+M6+M7)</i>	M7 - Obligation to integrate EN 16931-conformant eInvoicing functionality into accounting software including technical and functional requirements	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 3 <i>(includes the following measures: M1+M2+M5+M6+M7+M8+M9)</i>	M8 - EU accreditation framework for eInvoicing service and solution providers	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Policy option 3 <i>(includes the following measures: M1+M2+M5+M6+M7+M8+M9)</i>	M9 - EU monitoring of B2G eInvoicing	<input type="text"/>	<input type="text"/>	<input type="text"/>	

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey – Policy options

What outcomes would you expect in the following areas for each potential Policy Option?

For Policy option 1

	Very negative	Negative	Neutral	Positive	Very positive	Don't know
On interoperability and acceptance of eInvoices at intra-Community level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the cost of eInvoicing services /solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On business process automation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On legal and technical complexity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For Policy option 2

	Very negative	Negative	Neutral	Positive	Very Positive	Don't know
On interoperability and acceptance of eInvoices at intra-Community level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the cost of eInvoicing services /solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On business process automation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On legal and technical complexity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For Policy option 3

	Very negative	Negative	Neutral	Positive	Very positive	Don't know
On interoperability and acceptance of eInvoices at intra-Community level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the cost of eInvoicing services /solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On business process automation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On legal and technical complexity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey – Compliance costs

How would you assess the overall impact on costs of complying with eInvoicing requirements for public procurement (B2G) in your country?

(Please select one option)

- Very high cost increase
- High cost increase
- Moderate cost increase
- Moderate cost decrease
- High cost decrease
- Very high cost decrease
- Don't know

Which types of costs related to compliance with eInvoicing requirements for public procurement have the highest impact on your organisation?

(Please rank each item from 1 = very low impact to 5 = very high impact)

	1	2	3	4	5
Adjustment costs related to understanding and managing different national requirements across Member States <i>(e.g. investments and expenses to comply with legal obligations, including the use of external consultants or accountants)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adjustment costs related to adapting IT infrastructure <i>(e.g. investments and operational expenses for technical services, software, or solutions)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative costs <i>(e.g. training, internal resources, or organisational efforts required to comply with legal administrative obligations)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory costs <i>(e.g. fees, levies, or charges imposed by public authorities or mandated systems)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other cost types, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any evidence to support any negative/positive impacts that preliminary Policy Options and potential Measures would have on your organisation, if implemented?

Consultation on the Revision of EU Rules on Electronic Invoicing in Public Procurement Survey - Synergies

Synergies with other EU policies and initiatives

Which EU policies and initiatives have the potential to create synergies with the revised eInvoicing Directive?

(Please select all that apply)

- VAT in the Digital Age (e.g. alignment on timelines; terminology)
- Revision of the Public Procurement Directives (e.g. decision on transmission method(s) for public eProcurement messages)
- Late Payments Directive
- European Business Wallet
- [EU Customs Data Hub](#)
- Digital Euro
- Corporate Sustainability Reporting Directive
- Other, please specify

Thank you for your participation.

Agenda

- ▶ **PPCWG objectives and deliverables (reminder)**
- ▶ **Greek mandate – presentation by Antonis Ntinou**
- ▶ **New Workstream : EU Public Procurement E-invoicing Directive – Public Consultation**
- ▶ **EC (DG CONNECT) exploration of additional / stricter digital requirements, e.g. QERDS and End-to-end encryption – for discussion**

Context

- ▶ Risk that the Commission might be overdoing security requirements by considering end-to-end encryption and potentially making QERDS mandatory for DRR. This makes little sense from ViDA perspective.
- ▶ Should GENA should do something in this situation of potential overregulations / unnecessary layering of security requirements, which risks make CTC an expensive story.

Other updates

- ▶ **Create better awareness on Digital Identity and IT security:**
 - ▶ eIDAS2, KYC/ EU Business Wallet + EIDAS2 / NIS2 / DORA / EUCC
- ▶ **SMEs (mass) adoption**
 - ▶ Existing paper update?
- ▶ **Ongoing work with HRMC**
- ▶ **EN16931 extensions/sector specifics with IWG**
- ▶ **Globalisation**
 - ▶ Chapters: APAC, US...
- ▶ **Create a template that can be reused for public consultations (based on documents we have created thus far) =>** Make update on public consultations into a standing point on PPCWG recurring meetings.
- ▶ **with Supply Chain WG: ESG, Customs directive, EFTI regulation**
- ▶ **Specific focuses on some countries' regulations :**
 - ▶ Slovakia: public consultation in progress, with a fair and balanced SP accreditation process
 - ▶ **FR, DE, UK, Norway, Slovakia, Oman, Bahrein, UAE,** Other volunteers for other countries?

GENA representation matrix (1/2): EU & global

Organisations	Groups	GENA representatives
GENA	PPCWG	Chair: Ruud / Vice Chair: Nazar
	IWG	Chair: Michel / Vice Chair: Ahti
	IFWG	Chair: Arthur / Vice Chair: Carmine
	INWG	Chair: Alex / Vice Chair: Sébastien
	SCWG	Chair: Adam / Vice Chair: Andy
OpenPeppol	Joint Steering Committee (eB2B)	Bengt, Christiaan, Marcus, Michel, Ahti, Patrick + OP
	eB2B / SP2SP Working Group	Michel, Ahti, Patrick + OP
	<i>Peppol ViDA Pilot</i> WS1 (coordination with TA) WS2 (architecture & solutions) WS3 (implem., starts in April) WS4 (communication & reference)	Nazar Michel Implementers Ahti, Stanislava, Amaury Patrick, Radhia, Ondrej
European Commission	DG GROW CEN TC434 Tech Advisory Group (TAG) FISCALIS & DG TAXUD VAT Expert (VEG)	Christiaan, Marcus Paul Michel Anna, Ruud, Nazar Anna, Ruud
DBNA	Digital Business Network Alliance (US)	Marcus
Politecnico, Milano	International Observatory E-invoicing	Anna
World Bank/ICC/ DIFO	DIFO Invoice Financing pilot	Arthur
ICC/DSI	ICC Digital Standard initiative	Marcus
GLEIF	Global Legal Entity Identifier Foundation	Marcus
FEBIS	Federation of Business Information Services	Patrick

▶ BECOME A GENA REPRESENTATIVE!

- ▶ Convey GENA messages
- ▶ Provide local insights

GENA representation matrix (2/2): regional & local

Organisations	Groups	GENA representatives
GENA Chapters	Nordics	Henrik
	Germany	Richard
	Italy	Enrico
	Middle East	Alex
	APAC	Tricia
	France	Aihedan, Kamila
	UK	Susie
	Greece	Antonios
	Benelux	Jan
	...	
Other countries	South Africa	Julian
	...	X
External experts	PPCWG – Business wallets	Sander
	IFWG – Invoice Financing	William, André, Ongine
	INWG - Innovation	Politecnico (tbc)
	...	

- ▶ **BECOME A GENA REPRESENTATIVE!**
 - ▶ Convey GENA messages
 - ▶ Provide local insights

Don't ask what PPCWG can do for you, but...

- ▶ Join the working group!
- ▶ Suggest ideas to our (vice)chair : drop an email, schedule a call,
- ▶ Attend our upcoming workshop **May 21, 10am**



Chair

Ruud Van Hilten

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Vice-chair

Nazar Paradiivskyy

nazar.paradiivskyy@thomsonreuters.com