

The European Multi-Stakeholder Forum on Electronic Invoicing, hereinafter referred to as *'the Forum'*, was set up by Commission Decision [1] of 2 November 2010. Article 2 of the Decision describes the tasks for the Forum; in particular:

1 (d)	<i>to support and monitor work leading to the adoption of a e-invoice standard data model.</i>
2	<i>In carrying out its tasks, the Forum shall take account of the results of previous activities, existing work and solutions, in particular concerning the legal environment, business requirements and technical standards, in the domain of e-invoicing in the public and private sector.</i>

This Decision follows the Actions as described in the Communication [2] from the Commission *'Reaping the benefits of electronic invoicing for Europe'*; this Communication also states: *'The European E-Invoicing Forum's main tasks will be to assist the Commission in the following areas: - support and monitor work leading to the adoption of a e-invoice standard data model.'*

The essential characteristics of the Process and the context in which it is intended follow from: *"The Forum will monitor the uptake of e-invoicing in all Member States. It should also help the Commission in identifying further measures to facilitate the mass adoption of e-invoicing across borders. First recommendations are expected to be presented and discussed in the first half of 2012"* [3] This *modus operandi* of the Forum is exemplified in the activities leading to Directive 2014/55/EU [4]:

- (an Activity Group in) the Forum develops a Recommendation aimed at a contribution to [2],
- it is discussed (and required amendments are made) and endorsed by the Forum, where
- the Commission embeds it in next steps within the Commission's remit.

The 'endorsed by Forum' is a relevant qualification in the context depicted by [2] and the overarching Europe 2020 strategy. Any other deliverable (by non-Forum), no matter how much in use (already), does not (automatically) have that qualification.

It can be observed, that the publication of the Directive and the launch of the CEN Project Committee 434 [5][6] on e-Invoicing (established following the initiative of a few EU Member States to meet the 'sense of urgency' expressed in the Forum) lead to intensified activities in the playing field.

This can be a good development, it basically helps the *'ex ante verification'* principles used in the development of deliverables, but these activities can also can pose challenges and perhaps even lead to disappointment.

The essential hindrance, often overlooked, is that for individual contributions that have been (or are being) developed outside of the Forum the requirements as envisaged by the (Activity Group in the) Forum have not been part of their ToR.

These requirements cannot be unambiguously derived from the text in the Directive - as that necessarily needs to be complemented with Recommendations that are still under development in the Forum.

Amending current developments based on interpretations of the Directive is not advisable (even then, the result would not meet the essentials from the *modus operandi* of the Forum) for several reasons:

- it could lead to 'scope creep' of the project that takes it up, jeopardising deadlines and deliverables of the project as originally envisaged.
- it could (unintentionally) lead to duplication of effort
- it could (unintentionally) lead to inadequate use of resources.

It should be restated that for the purpose of the objective of the Forum, within the Europe 2020 targets, no relevant contribution should be wasted.

In order to achieve this, the following is suggested to entities, groups, persons, ... that do want to contribute to or participate in the process:

1. Take proper notice of the relevant documentation. References to the 'top of the iceberg' are given below. Submitting requirements already covered in the Directive or that are not properly aligned with the Directive is less resource-efficient.
2. (For EU) Get in touch with the National Standardisation Organisation to register interest in the work of the CEN PC 434
3. (For EU) Get in touch with the National Multistakeholder Forum on e-Invoicing to register interest in the work of the Forum
4. (if 2 and 3 are not suitable) submit the proposed (way of) contribution to ebcg@nen.nl possibly by end of July. NEN is not only the secretariat of CEN PC 434 but also in the position to guarantee the proper allocation of the contributions received.

This approach would lead to optimal possibility of participation and/or contribution. Note that, as has been confirmed with the Commission, the CEN rules [7][8] will necessarily apply and will have to be followed by the CEN PC434 whereas the CEN eBCG [9] will certainly help to prevent fragmentation and duplication of efforts.

[1] [http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32010D1203\(02\):EN:NOT](http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32010D1203(02):EN:NOT)

[2] <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52010DC0712>

[3] http://ec.europa.eu/enterprise/sectors/ict/e-invoicing/benefits/invoicing_forum_en.htm

[4] http://eur-lex.europa.eu/legal-content/NL/TXT/?uri=OJ:JOL_2014_133_R_0001

[5] <http://www.cen.eu/work/areas/ICT/eBusiness/Pages/default.aspx>

[6]

http://www.cen.eu/work/areas/ICT/eBusiness/Documents/N001_Calling%20notice%201st%20plenary%20meeting%20CENPC%20434%20Electronic%20Invoicing%202014-09-09.doc

[7] <http://boss.cen.eu/Pages/default.aspx>

[8] <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:316:0012:0033:EN:PDF>

[9] <http://www.nen.nl/CEN-eBusiness-Coordination-Group-1.htm>