



**THE EUROPEAN MULTI STAKEHOLDER FORUM ON E-INVOICING:  
ACHIEVEMENTS AND THE WAY AHEAD**

## **Introduction**

The European Multi Stakeholder Forum on e-invoicing (hereafter called "the Forum") was created in 2010 for a three-year mandate pursuant to Commission Decision of 2 December 2010<sup>1</sup>. The purpose of this note is to take stock of the achievements of the Forum at the end of its mandate and to suggest future activities for the Forum.

Article 2 of the Decision stipulates that the Forum's task shall be:

- a) to assist the Commission in the monitoring of the development of the e-invoicing market and the e-invoicing adoption level in industry and services sectors across the Member States
- b) to bring about an exchange of experience and good practice that facilitates the emergence of inter-operable e-invoicing solutions
- c) to point out problems encountered in particular as regards cross-border transactions and propose appropriate solutions
- d) to support and monitor work leading to the adoption of a e-invoice standard data model.

The Forum is composed of:

- Representatives of National Fora (two representatives for each National Forum)
- Representatives of European Association representing consumers, small and medium-sized enterprises and large corporates<sup>2</sup>
- Representatives of EU organisations and bodies (European Committee for Standardisation, European Central Bank and the Article 29 Data Protection Working Party).

In addition to full members, the Commission has invited several observers to attend the meetings from the supply-side sector (bank associations, e-invoicing service providers), relevant communities (Open PEPPOL), as well as (former) candidate country (Croatia) and EEA countries (Liechtenstein and Norway).

---

<sup>1</sup> Commission Decision of 2 November 2010 setting up the European Multi-Stakeholder Forum on Electronic Invoicing (e-invoicing) :

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:326:0013:0015:EN:PDF>

<sup>2</sup> Consumers associations (BEUC, FIN-USE), SMEs associations (UEAPME, Eurochambres), large corporates (Business Europe, EACT)

## 1/ Activities of the Forum during 2010-2013

In the period 2010 - 2013 the Forum met in Brussels<sup>3</sup> on four occasions. Plenary meetings were co-chaired by DGs Enterprise and Industry and Internal Market and Services and attended by a large majority of delegates<sup>4</sup>. At the first meeting of the Forum, a work plan, drafted by the Commission services, was discussed and then approved by the Forum. In accordance with the work plan, the following 4 Activity groups were set up and the Forum's members<sup>5</sup> joined the group of their choice.

- Activity Group 1 "Monitoring e-invoicing uptake in Member States and at EU level"

This Activity Group was asked to collect and analyse information regarding the level of adoption of e-invoicing across EU countries. Data from EUROSTAT, national data from certain Member States as well as private studies were compiled. The analysis of the data showed an increasing use of e-invoicing EU-wide (with more unstructured e-invoices than structured ones) and large differences between countries although the majority of invoices is still on paper. The main drivers for e-invoicing adoption are cost savings, efficiency increase and faster payment, while important obstacles are the complexity, acceptance and high investment. However, country-specific data are often not comparable because of the different collection methods. For this reason, the Activity Group considered to collaborate with EUROSTAT to improve the statistical monitoring of e-invoicing at EU level. As a result of the collaboration between EUROSTAT, the European Commission and the Activity Group, EUROSTAT decided to improve its survey method on e-invoicing and as of 2014 quantitative data on the use of e-invoicing among EU enterprises both for receiving and sending sides will be collected<sup>6</sup>.

- Activity Group 2 "Exchange of experience and good practices"

The Activity Group first launched a large survey to study good practices. Main results of this exercise show the critical role of government policy and service providers to support the uptake of e-invoicing. On the basis of the survey's results, the Activity Group investigated good practices that foster SME adoption of e-invoicing and the role of public procurement (two sub-groups were set up for that purpose).

The sub-group which investigated the SME adoption focused on the SME market challenges ("Why has the SME market failed to adopt e-invoicing fully?"), on the solutions currently available for SME (either as suppliers or buyers) and on the role of different stakeholders groups (banks, service provider, government, SME influencers & experts).

The sub-group which dealt with public procurement investigated the following issues: a) the "business case" for parties involved (public sector buyers, suppliers to public sector and services

---

<sup>3</sup> The Forum met on the 13/09/2011, 06/03/2012, 26/09/2012, and 07/03/2013. The next meeting of the Forum is scheduled for the 1<sup>st</sup> of October 2013

<sup>4</sup> All meetings' minutes as well as list of participants are publicly available at:

[http://ec.europa.eu/enterprise/sectors/ict/e-invoicing/benefits/invoicing\\_forum\\_en.htm](http://ec.europa.eu/enterprise/sectors/ict/e-invoicing/benefits/invoicing_forum_en.htm)

<sup>5</sup> All reports prepared by the Activity Groups are publicly available at :

[http://ec.europa.eu/enterprise/sectors/ict/e-invoicing/benefits/invoicing\\_forum\\_en.htm](http://ec.europa.eu/enterprise/sectors/ict/e-invoicing/benefits/invoicing_forum_en.htm)

<sup>6</sup> A module with quantitative questions on e-invoicing will be introduced in 2014 in the survey on the ICT usage by enterprises.

providers), b) the infrastructural solutions currently available for B2G, and c) the standards issues for e-invoicing in public procurement (in collaboration with Activity Group 4).

- Activity Group 3 "Legal barriers to cross-border exchange of e-invoicing"

The role of the Activity Group was to address potential difficulties in the transposition of the revised VAT Directive<sup>7</sup> and to identify legal and regulatory issues outside the field of VAT which may complicate the exchanges of e-invoices across borders.

The Group collected information on the transposition of the VAT Directive in 19 Member States and paid special attention on how Member States have defined "business controls".

Furthermore, the Group identified legal issues that could prevent the exchanges of e-invoices across borders. The outcome of this investigation demonstrated that the differences between the various legal systems across EU countries (in particular as regards archiving and accounting, data protection and electronic signatures) bring additional complexity into electronic invoicing. The Group had the opportunity to raise these issues to the relevant Commission's services and concluded that these different legal issues do not block cross-border e-invoicing.

- Activity Group 4 "Migration towards a single e-invoice standard data model"

The conclusion of the work carried out by the Activity Group is that the universal convergence towards a common semantic data model, as recommended in the Commission Communication<sup>8</sup> "Reaping the benefits of e-invoicing for Europe" doesn't appear feasible in the short/medium term and risks to penalise players and large business communities that have already implemented e-invoicing solutions based on specific requirements and specifications. A more realistic objective lies in the production of a reference semantic data model for the core elements of an invoice, to which existing and future standards could be mapped. For that purpose, the Activity Group has prepared a draft Recommendation on the use of a semantic data model to support interoperability for electronic invoicing which proposes a model to achieve semantic interoperability in Europe through the definition of a core invoice and of its extensions. The draft Recommendation describes the use of the core invoice, its development and maintenance, the content, the link to syntaxes and possible implementation paths. The draft Recommendation has been put under consultation in June 2013 and is expected to be formally adopted at the next meeting of the Forum in October 2013.

Besides the plenary meetings in Brussels, Activity Groups organised regular conference calls to exchange views for the preparation of their reports. **The level of commitment and participation to the Activity Groups was very heterogeneous among the Forum's members. The strong**

---

<sup>7</sup> Council Directive 2010/45/EU of 13 July 2010 amending Directive 2006/112/EC on the common system of value added tax as regards the rule on e-invoicing

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:189:0001:0008:EN:PDF>

<sup>8</sup> COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS "Reaping the benefits of electronic invoicing for Europe"

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0712:FIN:EN:PDF>

**involvement of Activity Groups leaders was, however, instrumental in ensuring the fulfilment of the Forum's tasks.**

## **2/ Achievements of the Forum**

The Forum (and its Activity Groups) succeeded in achieving a profound exchange of views and experience between its members. In particular, the Forum managed to assemble the more advanced communities with those at an early stage of e-invoicing adoption. The expertise of the Forum has also been valuable to the European Commission for the preparation of legal initiatives (in particular for the proposed Directive on e-invoicing in public procurement<sup>9</sup>) and standardisation activities (draft Recommendation on the use of a semantic data model to support interoperability for electronic invoicing). Moreover, the members of the Forum ensured the close link with their corresponding National Fora in a way that all the deliverables of the Activity Groups were discussed and commented at national level.

## **3/ Future activities of the Forum**

The mandate of the Forum will expire at the end of 2013, as foreseen by the Decision setting up the Forum. The Commission has invited the members of the Forum to express their opinion on the renewal of the mandate of the Forum and to suggest possible future activities. Only 4 responses were received, notably from the Dutch, UK, German and Spanish Fora.

The following elements need to be taken into consideration:

- The adoption of the Directive on e-invoicing in public procurement:

The proposed Directive stipulates that the relevant European standardisation organisation should draw up a European standard (EN) for the semantic data model of the core electronic invoice. The Forum is currently addressing standardisation matters and can therefore continue to play a role to support the development and adoption of the future European standard.

- The set-up of a "Forum on e-procurement":

As announced in the Communication of the Commission on "end to end e-procurement"<sup>10</sup>, the Commission will set up a "Forum on e-procurement" to deal with different steps of the e-procurement, including e-invoicing. The purpose of this Forum will be to group key actors to identify further standardisation work, to coordinate European and national initiatives, and to share best practice. The creation of this Forum will certainly affect the activities undergoing in the e-invoicing area and will require further coordination between the different communities to make end to end e-procurement happen.

---

<sup>9</sup> Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on electronic invoicing in public procurement <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0449:FIN:EN:PDF>

<sup>10</sup> COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS "End-to-end e-procurement to modernise public administration"  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0453:FIN:EN:PDF>

The Commission is intending:

- To continue the activities of the "European multi stakeholder forum on e-invoicing" for three more years. The composition of the Forum will remain identical and members will continue to ensure close link with their National Fora and communities.

- To extend the mandate of the "European Multi Stakeholder Forum on e-invoicing" to cover e-invoicing within the e-procurement chain. In other words, the "European Multi Stakeholder Forum on e-invoicing" will closely collaborate with the future "Forum on e-procurement" and will be responsible for all issues related to e-invoicing in the broader e-procurement context. The activities carried out by the "European Multi Stakeholder Forum on e-invoicing" in the e-procurement context will be considered as being an integral part of the work of the Forum on e-procurement. In this way, it will become an important element of the Commission's efforts to promote end-to-end e-procurement in Europe.

- To set-up three new activity groups which will take into consideration the work done so far and deal with the following fields:

1. "Standardisation": This Activity Group will continue to support the development and adoption of the future European standard.
2. "Legal issues": This Activity Group will continue to identify and analyse legal issues for e-invoicing.
3. "Linkages between e-invoicing and e-procurement": This Activity Group will ensure synergies with the "Forum on e-procurement" and analyse e-invoicing issues which have an impact on the other steps of the e-procurement chain.

**The Commission would like to have your views on the following three questions:**

**- Do you agree with the assessment of the first mandate of the Forum?**

**- Do you support the relaunch of the "European Multi-Stakeholder Forum on e-invoicing" for three more years with an extended mandate and the proposed new Activity Groups?**

**- Which would be your suggestions to improve the functioning and the efficiency of the Forum and the relations with the National Fora?**