

2019-11-12 Workshop on eInvoicing Implementation at the Sub-central Level

eInvoicing Expert Group (EMSFEI)

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Date	 12 nov. 2019
Time	09.30 - 17:00
Venue	Room 2.17, Rue Philippe Le Bon 1-3, Brussels
Contact	CEF-BUILDING-BLOCKS@ec.europa.eu ¹
	<ul style="list-style-type: none">• Context²• Agenda³

1 <mailto:CEF-BUILDING-BLOCKS@ec.europa.eu>

2 <https://ec.europa.eu/cefdigital/wiki/display/EINVEXPERT/Workshop+on+eInvoicing+Implementation+at+the+Sub-central+level-Context>

3 <https://ec.europa.eu/cefdigital/wiki/display/EINVEXPERT/Workshop+on+eInvoicing+Implementation+at+the+Sub-central+level-Angeda>

1 Context

Following the deadline to transpose the eInvoicing Directive on April 2019, EU Member States have been working to ensure the compliance to the Directive's obligations and, subsequently, implement the European Standard on eInvoicing (EN) at the different levels of administration. While there is still a way to go to ensure that all public entities across Europe can process eInvoices according to the EN, 12 Member States have opted for the optional extra year for sub central authorities' compliance with the eInvoicing Directive. In order to address the specific challenges to implement eInvoicing at sub central level, the CEF eInvoicing team proposes the organization of a workshop to facilitate knowledge exchange on this topic.

The **main objective** of this workshop is to share best practices from Member States as well as provide participants with some practical knowledge and key takeaways when it comes to the implementation of the eInvoicing Directive's obligations at the sub-central level.

2 Draft Agenda

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentation s	Notes
09:30	10:00	30 min	Registration	N/A	Master deck ⁴	
10:00	10:15	15 min	Introduction and Welcome <ul style="list-style-type: none"> • Welcoming word and overview of the day's objectives. • Presentation of the latest eInvoicing developments and plans for the future. 	David Blanchard , DG GROW G4, Head of Unit (Acting) for Innovative and eProcurement	ibid.	
10:15	10:30	15 min	Roundtable introduction	Workshop participants		

⁴ https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/12.11.2019%20WS%20Subcentral%20eInvoicing%20implementation_%20SD4pptx.pptx?api=v2&modificationDate=1573546064876&version=1

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentation s	Notes
1 0 : 3 0 0	1 : 0 0	1 2 0 m in	eInvoicing at sub-central level: best practices and lessons learnt <ul style="list-style-type: none"> • Three 15 min presentations by countries with successful eInvoicing implementation at sub-central level. Focus on the key challenges, lessons learnt and sharing of experiences. • Each presentation is followed by a 15 min Q & A session. 	<ul style="list-style-type: none"> • Justin Jager & Raymond Dijkstra (<i>Ministry of the Interior and Kingdom Relations, the Netherlands</i>) • Santiago Grana & Paloma Gobernado Ferrando (<i>General Secretariat of Digital Administration, Spain</i>) • Lars Engberg (<i>DI GG, Sweden</i>) 	Justin Jager Presentatie BZK - eInvoicing.pptx ⁵ Santiago Grana FACE_workshop-r2.pptx ⁶ Lars Engberg 12Nov-CEF.pptx ⁷	Q & A Justin Jager: Q: How long do you think it will take to fully implement eInvoicing without the 'stick', and only with the 'carrot' as a motivation? A: The speaker indicated that he would personally prefer to have eInvoicing mandated for all municipalities and suppliers, as otherwise the implementation will take longer. However, to get it mandated, it is important to have clear supporting signals from all municipalities, currently there is no critical mass for this. Q: Do you face any payment delay issues or issues related to terms of payment for the government? A: Once the Secretary of State for Foreign Affairs got a question about this as the current payment term is 30 days, which is rather long. In this regard eInvoicing is being advocated as a solution to reduce this delay. In a couple municipalities, which use eInvoicing consistently and as the only option, time for payment is getting shorter.

5 <https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/Justin%20Jager%20Presentatie%20BZK%20-%20eInvoicing.pptx?api=v2&modificationDate=1573220831794&version=1>

6 https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/Santiago%20Grana%20FACE_workshop-r2.pptx?api=v2&modificationDate=1573546018378&version=2

7 <https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/Lars%20Engberg%2012Nov-CEF.pptx?api=v2&modificationDate=1573220766451&version=1>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: Is the use of PEPPOL mandated? A: No, PEPPOL is not mandated but it is strongly recommended as the main solution. PEPPOL is officially recognised in national procurement forms and supporting examples. For the speaker, it is important to keep the choice of the tool open. This is because, in the case a new preferred solution would appear on the market, having an already legally mandated solution would slow down and complicated the transition. However, 99.9% of municipalities follow the recommendation to use PEPPOL anyways, so there is no need to mandate.</p> <p>Q: How many different solutions from different producers are there in the Netherlands? A: Given that the country relies on an open four corner system, the access points help to ensure that connections can be established between different systems. The market gathers 42 providers of PEPPOL solutions.</p> <p>Q: Can municipalities impose eInvoicing to their suppliers through contracts, if they choose to mandate? A: There are two possibilities: either they can do it that via legislation or through procurement contracts.</p> <p>Q: Are the guidelines successful? A: The investments done into clarifying and explaining the guidelines of implementation paid off and helped to reach a high level of implementation.</p> <p>Q? How are fiscal issues addressed? Is any clearance provided? A: Not that they are aware of. eInvoicing is seen as an easy solution for faster and efficient payments.</p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: Do they have anything to visualise & communicate the benefits of eInvoicing? A: The current approach is oriented toward a technical perspective and there is not so much focus on communicating the benefits with the broader public. Mr. Jager stated that it is perhaps something to take into account for the future. Now that the implementation of eInvoicing is reaching a mature stage, it is important to start to broader communication in order to optimise further onboarding. Interestingly, economic savings (financial savings) is not always the most important motivating factor for the Dutch stakeholders.</p> <p>Q: What about monitoring the uptake of eInvoicing at semi-public organisations (schools, hospitals)?A: This is not explicitly tackled as there is no monitoring in place but they are aware of some uptake across different institutions. .</p> <p>Q & A Santiago Grana:</p> <p>Q: Given that Facturae⁸ is used as the core system that could be later upgraded at the sub-central level, how do you handle the international eInvoicing exchanges? A: The FACe platform is only meant for the delivery for eInvoicing from suppliers to the public sector, they are not redirected to any other companies.</p> <p>Q: Is the four-corner model used? A: So far it has not been considered.</p>

⁸ <https://www.facturae.gob.es/Paginas/Index.aspx>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: How many invoices in total are there in Spain for public buyers? A: S. Grana was not sure about the total number and the proportion that eInvoices represent. Most entities do use eInvoices. However, suppliers are only mandated to send eInvoices when the bill exceeds 5K EUR. Therefore, it is difficult to say how many eInvoices of fewer than 5k EUR are exchanged through FACe.</p> <p>Q: What is the process of eInvoices – questioned asked by Lukàs Slavik from CZ with the example of paper plane tickets. A: In Spain, there is a central contract for plane tickets, so the purchases will be invoiced electronically. The aim is to be as digital by default as possible.</p> <p>Q: How is sustainability and financing of public sector platforms ensured? A: There is a dedicated development team in Spain of no more than 10 people, which is responsible for maintaining the platforms in the public administrations and at the national level.</p> <p>Q: Can you elaborate on what actions you take to on-board SMEs? A: The call centre was specifically created to target its services to SMEs. The aim is to ensure that SMEs find the transition process to eInvoices smooth. Under the Spanish law, procurement actors need to sign electronically to the <i>Facturae</i> format. SMEs receive an information kit, which provides provides practical advice on implementing eInvoicing. They need to implement a desktop tool or use a provider to help them produce eInvoices.</p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: Many of the suppliers sell to other private organisations. Is there a similar type of service where <i>Facturae</i> is also used for business to business (B2B) eInvoicing? A: In 2015, FACe has been extended into FACe B2B. The B2B version also any private companies working under the same public contract to exchange invoices among themselves.</p> <p>Q: Perhaps the Spanish representatives can also promote eInvoicing for B2B? A: This is out of their responsibilities. There are however some companies that use it and work toward a strategy to promote the usage of invoices.</p> <p>Q & A Lars Engberg & Martin Forsberg:</p> <p>Q: How is SFTI organised and funded? A: At the moment there are three main public owners who provide funding. There is also the technical secretariat, which provides the support. It also acts as the hotline to service providers.</p> <p>Q: Is there no confusion among stakeholders as a consequence of the new law and is everyone satisfied? A: There are many challenges and the legacy of previous processes and standards is perceived as potentially the main one.</p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: Are there any challenges arising from the usage of PEPPOL? Furthermore, are there any monitoring tools in place in Sweden, that allow to monitor the flows of information integrated into PEPPOL? A: Since there is a mandate, there is no need to work with incentives to use PEPPOL as such. However, as long as there are many options available, the service providers will choose the option that is most profitable, currently being the oldest artifact. That is why it is important to have a good dialogue with service providers.</p> <p>Q: What is the proportion of issued eInvoices against that of paper ones? A: For B2G, provided statistics relate to 2018. When it comes to 2019, L. Engberg is confident that the numbers are over 90%, as the mandate was introduced in April 2019. Today, there are still old contracts that allow paper invoices (as signed before April 2019). The proportion should reach 100% soon.</p> <p>Q: What is the advantage of having a local trace? Do representatives of Sweden encourage or plan to adopt electronic transition? A: For a valid purchase there must be a trace, so consequently the orders have to be recorded in a system. However, big organisations also have to process ordering from school kitchens/office/ medical equipment. For this type of order, there are electronic invoices being sent for the full business process and the matching is automatic.</p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
1 2 : 0 0	1 3 : 0 0	6 0 m in	LUNCH BREAK			

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentation s	Notes
1 3 : 0 0	1 : 0 0	6 0 m i n	<p>eInvoicing at sub-central level: best practices and lessons learnt (continued)</p> <ul style="list-style-type: none"> Two 15 min presentations by countries with successful eInvoicing implementation at sub-central level. Focus on the key challenges, lessons learnt and sharing of experiences. Each presentation is followed by a 15 min Q & A session. 	<ul style="list-style-type: none"> Ilola Pirjo (<i>Ministry of Finance (State Treasury agency, Finland)</i>) Sebastien Rabineau (<i>Ministry of Finance, France</i>) 	<p>Ilola Pirjo Eu-2019-11-12.pptx⁹</p> <p>Sébastien Rabineau FRANCE_AIFE_CHORUSPRO.pptx¹⁰</p>	<p>Q & A Pirjo Ilola:</p> <p>Q: You mention that smaller municipalities have to join their efforts in order to implement eInvoicing. However, how do their resources differ from small SMEs, which manage to successfully adopt eInvoicing individually? A: Any average municipality normally has many functions and responsibilities that they are legally obliged to fulfill. This implies, that they do not always have the appropriate amount of dedicated resource to support implementation of eInvoicing, so they collate their resources jointly. SMEs, on the other hand, often turn to accounting firms for this.</p> <p>Q: Normally, the availability of software that supports processing of eInvoices in new formats is limited. Is this also the case for firms in Finland? A: There are specific requirements related to eInvoicing for firms. However, they have just started to implement the EU norms in Finland. Hence, the maturity is rather low at the moment. When it comes to municipalities, they are faced with a very high number of competing tasks, in which many issues, for example related to healthcare, are deemed as having a higher priority than eInvoicing.</p>

⁹ <https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/Ilola%20Pirjo%20Eu-%202019-11-12.pptx?api=v2&modificationDate=1573220759578&version=1>

¹⁰ https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/S%C3%A9bastien%20Rabineau%20FRANCE_AIFE_CHORUSPRO.pptx?api=v2&modificationDate=1573545998170&version=3

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: Legacy systems is a problem in Sweden – what is the situation in Finland? A: I. Pirjo believes that a road-map with clear actions and priorities can support and ensure a smooth transformation process. It is important to think about how consumers can be approached for eInvoicing implementation as this is currently a big challenge in Finland.</p> <p><i>‘Old standards never die on their own, you have to kill them.’</i></p> <p>Q & A Sebastien Rabineau:</p> <p>Q: Since Chorus Pro is also intended as a PEPPOL access point, what position does this have in your overall strategy? A: The eInvoicing stakeholders view this system as an European access point as inside France they do not use PEPPOL as a way to transport eInvoices. However, anybody can use the access point to address eInvoices to the French administrations (this is rarely done).</p> <p>Q: Will all suppliers have to eInvoice no matter the amount of the eInvoice? A: Indeed, there is no limit set on the amount of the invoice. The goal is to collect as much data as possible.</p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Q: Is the platform easily used by the stakeholders? A: The platform is easy to use. It does not require a lot of efforts to implement. They have around 3,000 EDI and API partners directly connected to the platform. These partners work with the end users who find eInvoicing submission procedure easy. There is an intermediary between the end-users and the Chorus Pro in cases of API and EDI connections (e.g. accounting software).</p> <p>Q: Is Chorus Pro supporting B2B? A: Not for the moment. Business sub-contractors can use eInvoices within their contracts (B2B2G). They will have to find a way to extend to B2B before 2023, but this may not necessarily be done through Chorus Pro.</p> <p>Q: How do you ensure that the B2B platform does not compete with the market? A: If Chorus Pro becomes a B2B platform, they would not be the ones operating the web-portal. It is clear that the private operators would have to manage the platform. Chorus Pro for B2G will remain free of charge as it is publicly funded. The platform can be used by anyone and an English version is also available. However, there is little usability from outside-France.</p> <p>Discussion:</p> <p><i>Where is interoperability between countries? Just looking at five presentations, one can see that the taken approaches are completely heterogeneous.</i></p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
						<p>Perhaps the differences arise from whether you read the letter or the intent of the legislation itself. The end goal is seen as a common market interconnected through eInvoicing. Centralised hubs and access points should be added upon existing solutions to ensure that there is interoperability. Different systems across Europe can coexist, but one standard that supports exchange is necessary.</p> <p><i>What about B2B?</i></p> <p>It is important to ensure similar environments and to maintain cooperation, so that countries converge in the future. However, it is difficult to see a common solution for all actors. However, PEPPOL was chosen for a reason to ensure a EU wide solution that support interoperability and exchanges. Interfaces can be different but the transport of eInvoices should be through a standardised way. In order to ensure cross-border and cross-sector interoperability, the creation of a common hub will be necessary. Of course, the cost is a challenge.</p> <p>At the end of the discussion, there were two key opinions in the room: a) the system should be homogeneous across the EU; b) managed diversity approach should be taken.</p>

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
1 4 : 0 0	1 : 0 0	1 2 0 m in	<p>How to approach sub-central level eInvoicing</p> <p>Hands-on session with eInvoicing trainers focusing on the key challenges related to implementing eInvoicing at sub-central level.</p> <ul style="list-style-type: none"> Part 1: Round table with participants - debriefing on the implementation status at subcentral level Part 2: Collection of the main implementation challenges faced and feedbacks from the participants 	<p>Christian Rasmussen & Martin Forsberg, DIGIT D3, CEF eInvoicing trainers</p>	<p>Master deck ¹¹</p>	<p><i>(The round-table discussion summary on the sub-central implementation status is detailed below in a separate table)</i></p> <p>Identified challenges:</p> <ul style="list-style-type: none"> Putting together rules and guidelines to the suppliers (have a single message); Defining the distinction between consensus approach and mandating it legally; Approaching capacity building in an appropriate way. Some choose to leave for the market players to uptake eInvoicing individually whilst others, seems to be taken the more successful approach of proactively on-boarding and supporting eInvoicing implementation; Having a successful change management approach; Promoting the importance of one standard (more generally: approach to standards is a challenge as diverging views); Showing to end-user that there is value in adoption to create incentives when it's not mandatory.

¹¹ https://ec.europa.eu/cefdigital/wiki/download/attachments/153028239/12.11.2019%20WS%20Subcentral%20eInvoicing%20implementation_%20SD4pptx.pptx?api=v2&modificationDate=1573546064876&version=1

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
			<ul style="list-style-type: none"> Part 3: Conclusion with best practices, “what you need to know” and implementation strategies 			
16:00	15:05	15min	COFFEE BREAK			
16:15	16:45	15min	Presentation of eInvoicing country factsheets 2020 <ul style="list-style-type: none"> Brief overview of the latest edition of the eInvoicing country factsheets and their key findings. 	Ines Costa , DIG IT D3, CEF eInvoicing team	ibid.	Feedback & suggestions on the factsheets: <ul style="list-style-type: none"> NL: Are the country updates easily shareable through social media? Yes, they are easy to share and PDFs can be extracted from the webpage. The updates are shared on open website. There is an on-going social campaigns shared on Twitter, LinkedIn. IT: Is it possible to benchmark countries and have some tabular overview? There is a monitoring dashboard where every representatives can have a quick overview of different country statistics. PL: The questionnaire is clear but long to complete.

S t a r t	F i n i s h	D u r a t i o n	Subject	Speaker	Presentations	Notes
1 6 : 4 5	1 : 0 0	3 0 m in	Conclusions and final remarks	<p>Irena Rivière-Osipov, DG GROW G4, eInvoicing Policy Officer</p> <p>Caroline Corneau, DIGIT D3, CEF eInvoicing Project Manager</p>	ibid.	<p>Participant take-aways:</p> <ul style="list-style-type: none"> • FI: It is important that participants meet each other and that they can discuss to share experiences. This type of event helps to have concrete points of contact and reference. • EESPA: It is good to meet and good to hear the complexities of such implementation. It is important to hear the priorities and focus areas in the future of the EC • EACT representative: He expressed his satisfaction on the fact that so many references were made to open PEPPOL and that he is glad to see that PEPPOL plays an important role in eInvoicing. It also nice to observe that the application of the system is going beyond the European borders. • NL: As the final goal is to have a fully automated procurement chain, is the Commission looking to connect political goals and priorities with the topic of procurement? In this sense, this could help and encourage national governments in formulating their priorities. In short, J. Jager believes that it is important to take a common approach, creating a unique streamlined policy.
Part 1: Round table with participants - debriefing on the implementation status at sub0central level						
C o u n t r y	Feedback					

<p>P o l i s h</p>	<p>The central platform is a solution which makes all Polish entities ready for receiving eInvoices. People working on the eInvoicing implementation have also ran pilot projects implementing eInvoicing with two sub-central level institutions. The Polish representative elaborated on the challenges faced in the city hall: one of the requirements set by the city hall was that the solution was expected to deliver eInvoices directly to the organisation. The sub-central institutions are using quite different IT systems which are not interconnected and not managed centrally. It has been decided to use the identifiers GLN1 system for electronic addressing. The city hall was obliged to use the national platform for eInvoicing, which is based on PEPPOL. However, there was a question on how to manage 350 organisational units. The organisation was then divided into several parts: A) City halls and its units B) Educational units C) Other departments. Secondly, they found that internal regulations and procedures of the city hall were a barrier to implementation of eInvoicing. They agreed to change procedures once they demonstrated that the new approach is successful.</p>
<p>G e r m a n y</p>	<p>Germany is a unique case due to the country's federal organisation. There is a need for 17 laws and regulations (so far, only 6 or 7 regulations are in place). Many discussions are now ongoing as sub-central contractors are not aware of what they should use and whom to turn to next year. The answers & discussions are different across federal states. However, there is little room for maneuver as the regulations are rather strict. The next challenge is related to the four standard extensions. The work on extensions is initiated by an expert group.</p>
<p>B e l g i u m</p>	<p>The central government has an ongoing collaboration with the Flemish Region (sub-central). However, the positive impacts of the Directive could only work if a significant mass of communities contribute to this and 'play the game'. It is important for Belgium to on-board all the regions at sub-central level. At this time, they are still building the capacity to start on this. The idea is to invest on the practical side through collaboration with Flanders to ensure a decent adoption level, but work is still to be done with other regions.</p>
<p>M a l t a</p>	<p>The representative does not see any major issues related to the implementation of eInvoicing at sub-central level. Potential issues with regard to standards might pop-up. However, they always try to ensure the most efficient ways and not lose themselves in the details. On the other hand, money is an issue for SMEs especially, this justifies the slow implementation for these actors.</p>
<p>I t a l y</p>	<p>The idea in Italy is to have the same standard and the same approach at sub-central level as at the central level. If sub-central authorities already use the compliant invoice, they can continue to use it and if not, they can add an additional elements on the eInvoice in order to be compliant. In terms of challenges, they are the same as at the central level. However, sub-central administrations are smaller and have lower capacity, so they need more time and resources to be compliant.</p>
<p>C z e c h i a</p>	<p>There is a strong tradition and culture of decentralised authorities in the country. There are a total of 14 local authorities and 6 530 municipalities. The central level can provide methodology and guidance. However, it is up to the authorities to decide fully how to they want to deal with the implementation. Generally speaking, implementation status at sub-central is working in a way that it is up for authorities to allocate budget to the implementation.</p>

<p>N o r w a y</p>	<p>There was no standard format when they initiated eInvoicing, which eventually led to some challenges. It is getting better now as the state invoice is applied as the new norm. Sub-central level had to adjust and successfully did it to the new format requirement. What is happening now in Norway is that they are working on on-boarding more end users for the solutions. They are currently establishing payments using PEPPOL and implementing further updates for eTendering, eCatalogue, eOrdering catalogues and solutions. The goal is to use the available European standard to the extent possible. The system is working more smoothly since the legislation mandating this was adopted. Adopting legislation in this domain was a good move to speed up implementation at sub-central level.</p>
<p>E E S P A</p>	<p>It is apparent that countries who deployed eInvoicing from zero had no legacy challenges and hence, might have enjoyed a smoother process. For others, it is clear that technical/architecture/ legal legacy is an important factor influencing the success of eInvoicing implementation. The importance of change management has been strongly underestimated. Hence, each implementation is unique and it is difficult to have a one-size-fits all approach.</p>
<p>B u s i n e s s E u r o p e</p>	<p>There is a need to implement eInvoicing across Europe as quickly as possible. They see this becoming as an example of success to the countries outside of the European Union.</p> <p>It is also evident that to ensure successful implementation at national and sub-central levels, there is a need to show value-for-money.</p> <p>There is a need to have a EU wide application.</p>

3 Session 2: How to approach sub-central level eInvoicing: Hands-on session



This page aims to facilitate the work for the *Session 2: How to approach sub-central level eInvoicing: Hands-on session* to be held during the EMSFEI Workshop on 12 November 2019.

3.1 Background

Following the deadline to transpose the [eInvoicing Directive](#)¹² on April 2019, EU Member States have been working to ensure the compliance to the Directive's obligations and, subsequently, implement the European Standard on eInvoicing (EN) at the different levels of administration.

While there is still a way to go to ensure that all public entities across Europe can process eInvoices according to the EN, 12 Member States have opted for the optional extra year for sub central authorities' compliance with the eInvoicing Directive.

In order to address the specific challenges to implement eInvoicing at sub central level, the CEF SMO hopes that this workshop will facilitate knowledge exchange on this topic. During the workshop, the hand-on session will focus on sharing of practical knowledge and insights with regard to the implementation of eInvoicing at sub-central level.

3.2 Triggering questions

1. What are the key challenges that you encounter or have encountered when implementing eInvoicing at sub-central level?

2. What aspects of the transposition of the eInvoicing Directive would you like to have more practical insights on and why?

¹² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014L0055>

 **YOUR ACTION**

In order to make the workshop most relevant to you, we invite you to comment your answers below on the questions proposed above prior to the meeting in order to facilitate our discussion.