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Good Practice: e-Invoicing Compliance Guidelines - The Commentary

S.R. CWA 16460:2012

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English version

Good Practice: e-Invoicing Compliance Guidelines - The Commentary

This CEN Workshop Agreement has been drafted and approved by a Workshop of representatives of interested parties, the constitution of which is indicated in the foreword of this Workshop Agreement.

The formal process followed by the Workshop in the development of this Workshop Agreement has been endorsed by the National Members of CEN but neither the National Members of CEN nor the CEN-CENELEC Management Centre can be held accountable for the technical content of this CEN Workshop Agreement or possible conflicts with standards or legislation.

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COMITÉ EUROPÉEN DE NORMALISATION
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Foreword

This CEN Workshop Agreement has been drafted and approved by a Workshop of representatives of interested parties on 2012-02-15, the constitution of which was supported by CEN following the public call for participation made on 2010-02-26.

A list of the individuals and organizations which supported the technical consensus represented by the CEN Workshop Agreement is available to purchasers from the CEN-CENELEC Management Centre. The following organizations endorsed this document:

- AITI, Italy
- CEGEDIM, France
- Dr. Otto Mueller Consulting, Switzerland
- FIR-DIG Consultants, Italy
- Hub2Hub, Italy
- ID Cyber-Identity Ltd, Switzerland
- InfoCert spa, Italy
- Legal Counsel, Stefan Engel-Flechsigg, Germany
- OFS Portal LLC, USA
- Orange – France Telecom Group, France
- Sage France, France
- STS Group, Belgium
- Trustweaver, Sweden
- Voxel Group, Spain
- xft GmbH, Germany

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The draft CWA was presented and discussed with industry representatives during two Open meetings, the first on September 22 and the other on December 12, 2011, both held in Brussels. The public comments period run from November 23, 2011 until January 23, 2012.

The final review/endorsement round for this CWA was started on 2012-04-04 and was successfully closed on 2012-04-16. The final text of this CWA was submitted to CEN for publication on 2012-04-18.

This CWA is part of a set of CWAs that has been prepared by Phase II and Phase III of CEN/WS e-Invoicing.

The overall target of Phase 3 is the “Integration of efforts in standardisation and developments” in the following areas:

1. Standards (e-invoicing modules for business software, methodology of software tools, functionalities and specifications for business software requirements)
2. Compliance (improvement of cooperation between companies and tax authorities, establishment of clear common understanding between companies and tax authorities in EU, accessibility of rules and regulation)
3. Implementation (best practice implementations with model agreements for electronic invoicing, model processes and SME focussed best practices)
4. Business Process (integration of electronic invoice in existing business processes).

This CWA covers the subject of project 2 and 4 listed above and is based on CWA 16047:2009, the original work of e-Invoicing Phase 2.

In addition, the Workshop has assumed the overall responsibility, as far as CEN is concerned, for the standards aspects of the European Commission's Expert Group on Electronic Invoicing, complementing and linking with the relevant Commission groups, and ensuring the relevant global standards activities are correctly informed and primed.

The following CEN/WS eInvoicing III members have contributed to the work of this document:

Joost Kuipers	Leader	Netherlands Tax and Customs Administration <i>Belastingdienst</i> ,
Christiaan van der Valk		TrustWeaver
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Comments or suggestions from the users of the CEN Workshop Agreement are welcome and should be addressed to the CEN-CENELEC Management Centre.

1 Scope

1.1 General

The guidance set out in this CWA addresses electronic invoicing within the scope of VAT. In practice, this includes the majority of business-to-business sales/purchase transactions, but other types of transactions may also be involved. The regulatory background for the practices set out herein is the EU VAT Directive 2006/112/EC (1) as amended by Directive 2011/45/EU (2). Geographically, the practices set out herein are aimed at relevant invoices governed by at least one Member State's law transposing this Directive. The authors of this CWA document do not exclude that this CWA can be used to enhance or ensure compliance with similar requirements in other countries; however caution should be exercised in drawing parallels between EU rules and those of countries outside the EU.

Regulatory areas other than VAT are not specifically addressed in this CWA. The reader should remain cognisant of the fact that laws concerning the protection of personal data, corporate governance, customs, accounting and taxes other than VAT may impose different or additional requirements on electronic invoices.

The CEN Code of Practice (3) also published as part of this workshop (CWA 16463) provides a high level overview of legal requirements, while this guidance gives more detailed information on implementing E-Invoice processes.

1.2 Objectives

This CWA aims to inform and guide stakeholders in the setting up, operating and auditing of electronic invoicing processes and systems in accordance with requirements applicable under VAT law.

1.3 Target audience

The Guidelines are addressed to:

- Entities engaged in, or about to introduce, e-invoicing.
- Internal and external auditors.
- Solution and service providers offering e-invoicing functionality.
- Tax Auditors in Tax Administrations.

1.4 Guidelines as voluntary self-regulation

These Guidelines are not specific to any Member State and they are not substitute for complying with Member States' individual requirements, but they may assist in clarifying the basics for compliant e-invoicing processes underlying EU Member States' laws relating to e-invoicing and intra-community e-invoicing.

These Guidelines are not intended as "regulation through the back door" – they will be equally or even more useful in a regulatory environment characterized by free choice of ways in which companies can satisfy reasonable tax requirements. The Guidelines are voluntary and fully neutral with regards to technologies and processes companies may choose to adopt.

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