

2025


Groupe RSA



Guide to
electronic invoicing



Crowe



In the current digitalization environment, providing companies with multiple competitive advantages, the mandatory implementation of electronic invoicing is an important and structuring step for your organization. All the rules and laws that constitute the legal and tax framework of this evolution must not constitute an obstacle but the assurance of a favourable ground for the implementation of new processes within your company while ensuring their proper functioning.

Already mandatory in exchanges with the public sector, electronic invoicing will now be extended to inter-company relations. From September 1, 2026, all companies shall be able to receive and then issue (according to a specific schedule) invoices in electronic format, regardless of their size.

Therefore, to best prepare for this transformation, your chartered accountant has provided you with this guide covering the main developments in this area.

The document is intended to be accessible and to remain succinct and informative.

Please do not hesitate to contact us to help you understand this important reform and 1SSX SSAA5d implement this new stage in the digitalization of your company.

CONTENTS

1	Why electronic invoicing ?	
	1.1 Background and objectives	4
	1.2 Am I concerned ?	5
	1.3 Timeline and criteria	6
2	Invoice or electronic invoicing ?	
	2.1 Electronic invoicing: definition and principle	7
	2.2 Why electronic invoicing ?	8
3	E-invoicing	
	3.1 What is e-invoicing ?	9
4	E-reporting	
	4.1 What is e-reporting ?	10
	4.2 How often should I produce and issue my e-reporting ?	10
5	Platforms : PIP / PDP / DO ?	
	5.1 How to choose ?	12
	5.2 Comparative table	16
6	Effects on my enterprise	
	6.1 What does this mean specifically for my enterprise ?	17
7	The benefits of support from your chartered accounting firm	
	7.1 Why and how to get support ?	18

Updated on 25 January 2025

1 Why e-invoicing ?

1.1 Background and objectives

As of 1 September 2026, e-invoicing will gradually become mandatory for business-to-business transactions nationwide. This approach aims to strengthen the competitiveness of companies by reducing the administrative burden and generating productivity gains. There are multiple benefits, encompassing aspects such as costs, safety and monitoring of the activity. Thus, this will allow to:

National level:

- Improving fraud detection, for the benefit of bona fide economic operators,
- Improving real-time knowledge of business activity to enable economic and budgetary policy to be steered as closely as possible to the economic reality of economic actors,

Company level:

- Reduction of administrative and management costs,
- Shortening payment terms,
- Better control of cash flow,

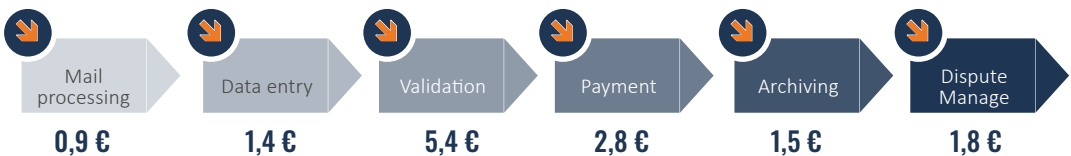
- Minimising the risk of error,
- Reducing organizational carbon footprint,
- The simplification, in the long term, of companies' reporting obligations in terms of VAT thanks to pre-filling of declarations.

The implementation of electronic invoicing will make it possible to increase the competitiveness of companies, in particular thanks to:

- **Savings :** between 50 and 70% savings compared to paper processing,
- **More reliable and better management:** due to the automation of payments, self-reminders and reminders to customers and suppliers,
- **An image of modernity:** With e-invoicing, the company supports its ecological and technological values,
- **Optimised archiving:** Less costly, more secure.

Many studies estimate the average cost of processing a complete invoice in a non-digital environment at around €14, which breaks down as follows:

The breakdown of average costs at the different stages of treatment



Source : Arthur D. Little for Desmond/Post@xess.

NB

The amount of late payments in France is estimated at more than €20 billion (Observatory of Payment Terms), 80% of which is borne by SMEs and VSEs and 20% by mid-size enterprises.

Source : GS1 France.

1.2 Am I concerned ?

All companies subject to French VAT are concerned by electronic invoicing.

Indeed, since the company is subject to taxation, irrespective of whether it is liable for value added tax (such as, for example, VAT exempt taxable

persons), it falls within the scope of the reform.

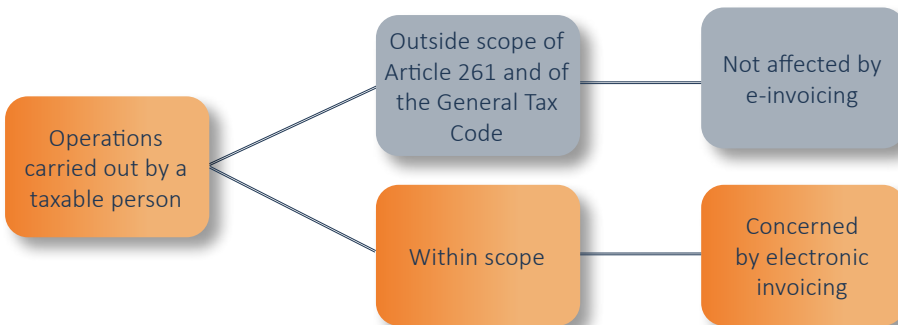
As a reminder: a taxable person for VAT purposes is any natural or legal person who independently carries out an economic activity on a regular basis.

NB

Persons who are exempt from VAT are actually taxable persons for this but are not liable for VAT. They do not charge VAT and therefore do not recover it. However, they remain subject to electronic invoicing.

This is particularly the case for self-employed persons, who are exempt from VAT declaration and payment but must indicate "VAT not applicable under Article 293 B of the French Tax Code " on their sales documents. The latter will therefore also be obliged to receive and issue electronic invoices.

Conversely, the scope of the scheme does not apply to operators who exclusively carry out exempt transactions within the meaning of Articles 261 to 261 E of the General Tax Code (health activities, education, etc.).



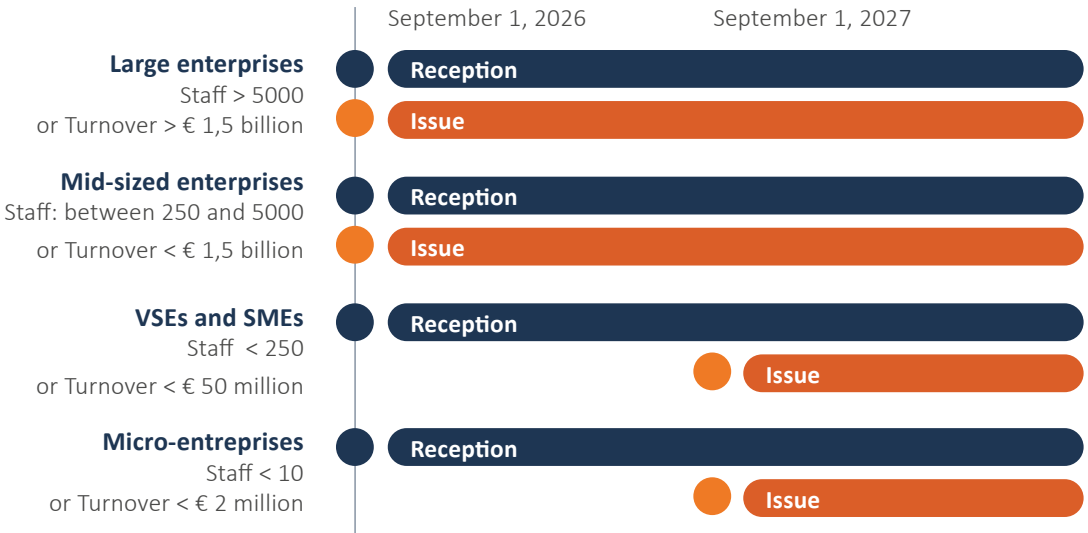
Do not hesitate to ask us if you have any difficulty determining whether you are concerned.

When will it affect me ?

From 1 September 2026, all taxpayers subject to VAT in France must be able to receive electronic invoices.

The issuance obligation will be gradually implemented between 2026 and 2027, depending on the size of the companies. It is essential that all economic actors start anticipating this change to facilitate the transition and achieve the expected productivity gains..

1.3 Timeline and criteria



What are the definitions of the different criteria ?

- Enterprise**
 - The concept of enterprise is that of a **legal unit identified by its Siren number.**
- Staff**
 - Corresponds to the number of annual work units (AWU), i.e. **the number of persons who worked in or on behalf of the enterprise on a full-time basis throughout the year in question.** The work of persons who have not worked the whole year, or who have worked part-time, regardless of the duration, or seasonal work, is counted as fractions of AWUs.
- Fixed turnover**
 - This is calculated **excluding VAT and other indirect duties or taxes**, for the amount of invoicing made to natural and legal persons outside the scope of the company's definition.
- Balance sheet total**
 - This is considered for its consolidated value within the scope of the company's definition.

Please note that the size of the company is assessed on 1 January 2025, on the basis of the last financial year closed before this date or, in the absence of such a financial year, on that of the first financial year closed on or after that date.



Please consult us if you have any difficulties determining the size of your company.

FAQ

Will VSEs/SMEs be able to anticipate their entry into the reform ? LVSEs/SMEs will be able, at their convenience, to anticipate the 2027 deadline.

2 Invoice or electronic invoicing

2.1 Electronic invoicing: definition and principle

The electronic invoice is a support for **information structured** according to a predefined **computer language** so that it can be automatically integrated into a database.

This means that a simple dematerialised invoice is not necessarily an electronic invoice.

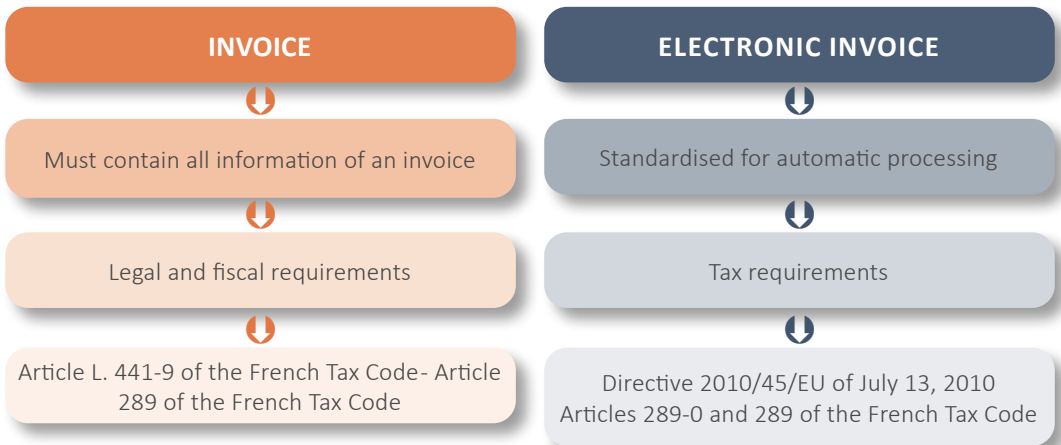
Note: the dematerialised invoice can be a paper invoice that is then scanned to facilitate sending, archiving or an invoice produced without the use of paper but which does not include structured data (simple PDF).

* * * * *

Please note that the electronic invoice will therefore never be in paper form.

* * * * *

To comply with the law, the electronic invoice must **simultaneously** meet the specific legal and tax requirements of invoices (legal notices*, 10-year archiving period, etc.) and dematerialised documents:



The electronic invoice must therefore also guarantee the following 3 cumulative conditions:



* NB: **4 new legal notices** must be displayed:

- **The SIREN number of the customer**, only that of the issuer was mandatory until now
- **The distinction between supplies of goods and services**, the invoice will mention if *"the information about the transactions of the invoice consists exclusively of the supply of goods or exclusively the provision of services or of both these categories of transactions"*,
- **The delivery address of the goods**, an invoice

can therefore include up to 3 addresses (in addition to that of its issuer): that of the customer's head office, that of invoicing and that of delivery,

- **The "Flow based VAT" option**, this option, if the company exercises it, will require the mention *"Option for payment of flow-based VAT"* on all invoices.



Consult us on the compliance of your electronic invoices.

FAQ

How will I invoice tomorrow ? Invoices will be addressed to business customers (B2B) through a partner digital platform that will effectively send electronic invoices to the customer digital platform.

How often should I file an electronic invoice ?
The billing methods will remain the same. Issuance is not subject to a specific deadline and can be done as necessary.

2.2 Why is it called e-invoicing ?

When we talk about electronic invoicing, 2 complementary **processes** are implicitly mentioned:

- **E-invoicing,**
- **E-reporting.**

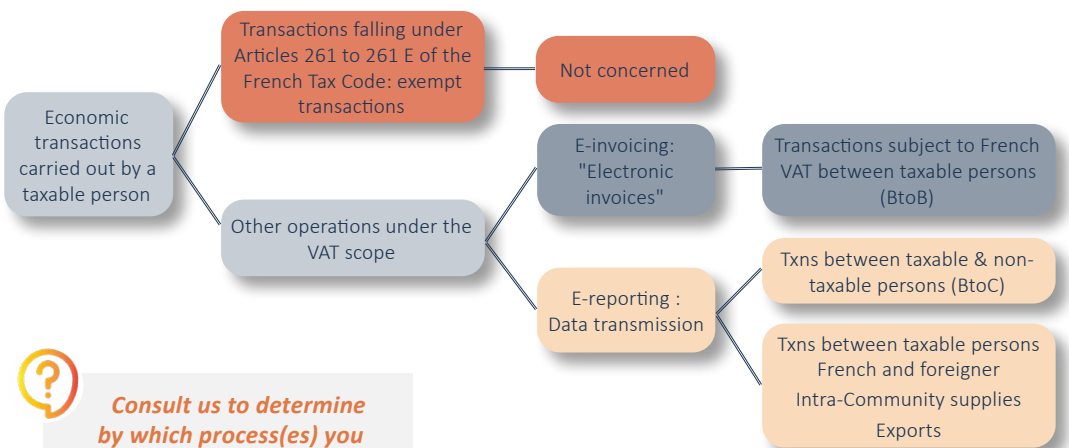
They should be differentiated both in terms of their operating methods and their respective perimeters.

E-invoicing : this is the mechanism for the exchange of invoices, which concerns all transactions involving the purchase and sale of goods and/or the provision of services between companies established in France, which are subject to VAT, provided that they concern

national territory (including invoices on account on supplies of movable property).

For operations that do not fall within the scope of **e-invoicing**, the company must produce **e-reporting**.

E-reporting: this involves the transmission to the administration of certain information (amount of the transaction, amount of VAT invoiced, etc.) relating to commercial transactions that are not concerned by electronic invoicing. The transactions concerned by this method of transmission of information are listed in Article 290 of the General Tax Code. **E-invoicing and e-reporting are therefore complementary mechanisms.**



Consult us to determine by which process(es) you are concerned (e-invoicing, e-reporting, or both).

FAQ

My customers are both companies and individuals, what system applies ? Both.

- E-invoicing: If you issue invoices to your professional customers,
- E-reporting: If you issue invoices to your private customers.

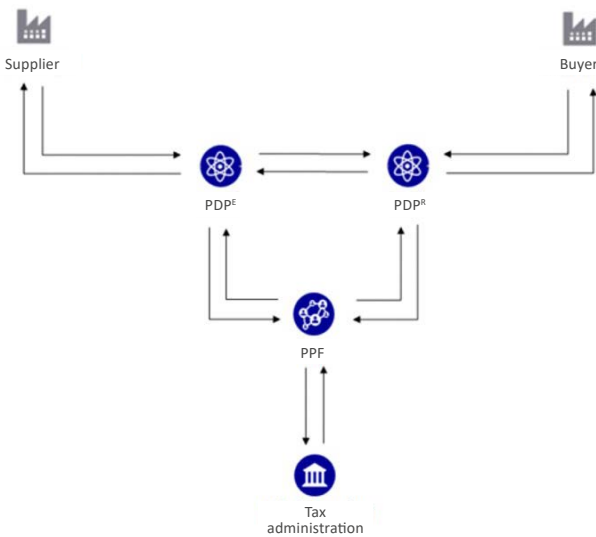
3 E-invoicing

3.1 What is e-invoicing ?

E-invoicing and e-reporting differ both in terms of their respective scopes and mechanisms.

Indeed, the mechanism specific to e-invoicing has the particularity of producing a 2 dual stakeholder

transmission: the commercial stakeholder (customer) and the administrative stakeholder (the tax administration). A Y-shaped diagram emerges as follows:



(Source : impot.gouv.fr)

In this scheme, invoices must pass directly through certified private platforms (PDPs).

The latter extract the information intended for the administration from the invoices and transmit it to the public platform, which gathers it and then sends it to the DGFIP's information system.

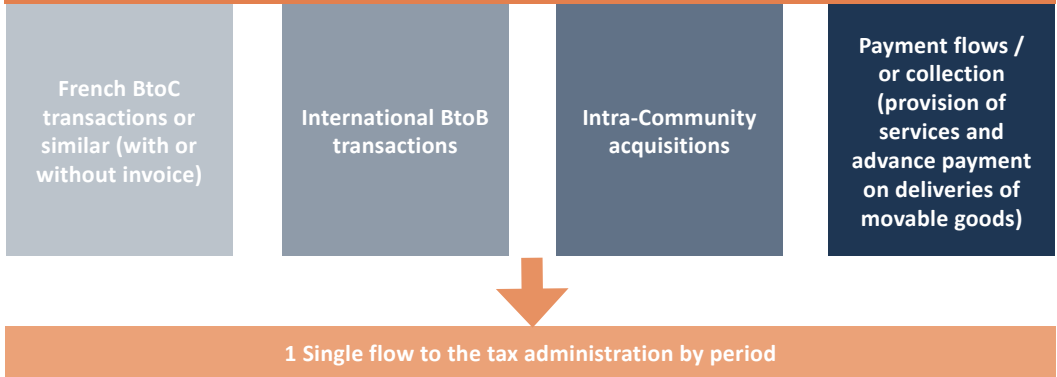
Why a decentralised Y-model ? Because it allows:

- The free choice of billing provider by businesses,
- The security of exchanges by platforms subject to specific security obligations,
- The verification of the computer format of the information flow,
- The implementation of different invoicing solutions adapted to each category of company.

4 E-reporting

4.1 What is e-reporting ?

E-reporting gathers all the information necessary to monitor the taxpayer's VAT declaration flows that do not fall within the scope of e-invoicing:



4.2 How often do I have to produce and issue my e-report ?

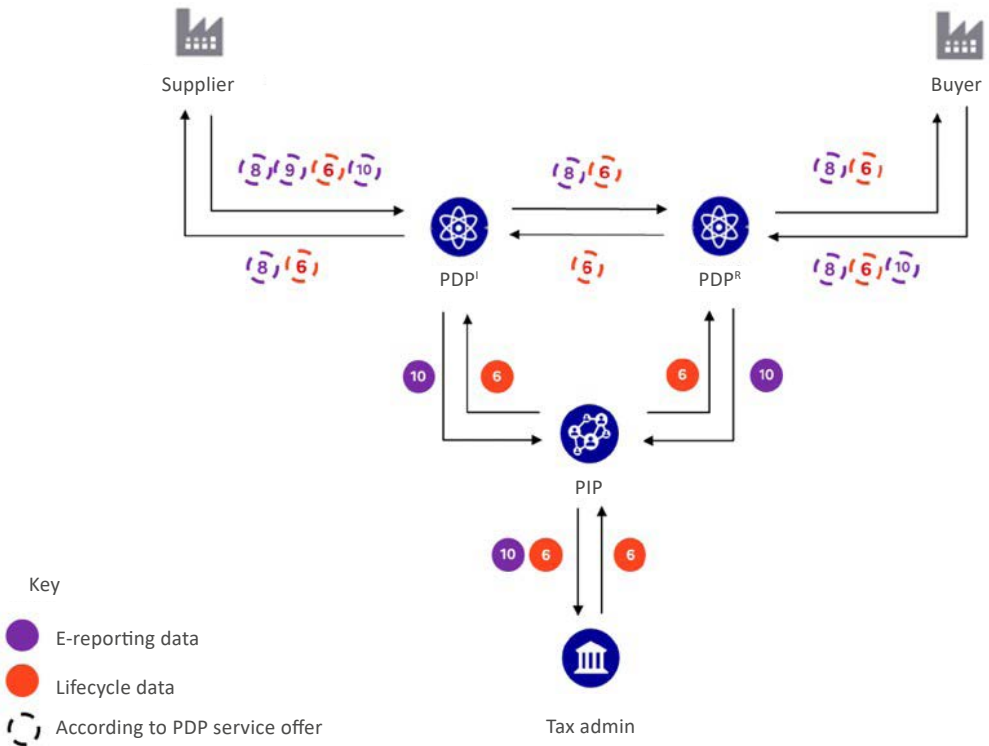
- | | |
|--|---|
| Normal monthly actual scheme | <ul style="list-style-type: none"> At least 3 issues per month, Period of 10 days following the 10th of the month for transactions carried out between the 1st and 10th of the month, the 20th of the month, for transactions carried out between the 11th and 20th of the month, the last day of the month, for transactions carried out after the 21st of the month. |
| Normal quarterly actual scheme | <ul style="list-style-type: none"> At least 1 issue per month, Period of 10 days following the last day of the month for which the transmission is made. |
| Simplified real scheme | <ul style="list-style-type: none"> At least 1 issue per month, Between the 25th and 30th of the month following the month in question. |
| Exemption scheme for basic / similar allowances (298 c and d) | <ul style="list-style-type: none"> At least one transmission every 2 months, Between the 25th and 30th of the month following the 2 months subject of the transfer. |

Important: it will be necessary to communicate a digital sales report through e-reporting, for sales invoices (to non-taxable persons, for export) or for all operations generated by a receipt or cash register Z.



Consult us about the transmission frequency of e-reporting.

E-reporting diagram



5 Platforms: PIP / PDP / DO ?

5.1 How to choose ?

To issue or receive an electronic invoice, a company will have to use a digital platform that is a partner of the administration (PDP).

The Public Invoicing Portal (PIP)

This is the system deployed by the AIFE (Agency for State Financial Information) and set up by the tax administration as part of the future obligations relating to electronic invoicing.

Its main missions are:

- Administer the central directory which makes it possible to identify the issuer and the recipient of the electronic invoice,
- Collect invoicing, transfer and payment data as well as information on processing statuses on behalf of the tax authorities.

Private Digital Platforms (PDP)

These are private platforms that have been registered with the State. Their main missions are:

- Exchange electronic invoices,
- Control the compliance of the documents filed,
- Provide the data for central directory update,

- Transmit electronic invoices while guaranteeing they are authentic,
- Ensure interoperability and availability of documents,
- Guarantee the proper transmitted flows,
- Ensure the proper transmission of e-invoicing and e-reporting data to the administration.

Other complementary services may be offered by PDPs, such as probative value backup for documents (including invoices), as well as automated invoice payment tools.

Data Operators (DO)

These are the operators that provide support to companies upstream or downstream of Private Digital Platforms (PDPs) to help them comply with the new regulatory obligations.

Their intervention can take different forms, ranging from the construction of invoices according to the required formats, to the reconciliation of invoices to facilitate their processing, to the proposal of payment solutions.

It is important to note that the Data Operator (DO) does not have a registration and does not allow the direct transmission or receipt of invoices.

NB

In order to allow exchanges, a directory is used to bridge the gap between the issuer and the receiver. Indeed, this directory, a single, centralised reference database accessible via the PIP and the PDPs, will aim to ensure the smooth running of electronic invoices. It is via this directory that companies will be identified.

FAQ***Can I choose my platform ? Can I choose more than one digital platform ?***

The choice of platform is completely free, a company can choose one or more digital platforms (for example a platform A for issuance and a platform B for reception).

How do we know if an operator has the status of a digital platform partner of the tax administration ?

On 13 January 2025, the administration published a version of the list of private digital platforms (PDPs) that have successfully passed the first stage of the registration procedure. Their status is conditional on their future connection to the Public Invoicing Portal (PPF). This list is evolving and will be updated; one can find it on the impots.gouv.fr website.

Companies will have to anticipate the deadlines, with the help of their chartered accounting firms, if they wish to take advantage of the opportunities resulting from this reform. To do this, it will be essential to choose the right provider, not only to adapt to this evolution, but also to use it as a real lever for growth. Each company will need to improve document management, workflows and the way people collaborate.

To achieve this, several parameters will have to be taken into account.

In-house side :

- The current compliance of the invoices issued,
- The current compliance of the invoicing software if there is one,
- The number of invoices issued,
- The number of invoices received,
- The number of suppliers,
- The types of products and/or services,

- The invoice approval circuit (visa, voucher to be paid, etc.),
- The accounting tool available to the company (ERP, software, etc.).

PDP Side :

- **Reliability** : the platform must be available continuously without offline periods,
- **Data accuracy** : on the one hand in order to guarantee the quality of accounting and financial reporting and on the other hand in order to have a maximum of information to allow an analysis based on more detailed and better quality data,
- **The price** : to put into perspective the additional services offered,
- **Additional services** : Better automation of tasks, better integration of tools, archiving, etc. These services will drive value for their users.

About additional services :

Some private platforms may offer the following services:

- Automating the management of electronic invoices,
- The direct payment of supplier invoices,
- Data security
- The provision of dashboards to monitor customer and supplier invoice schedules.



Consult us about the different stakeholders and their respective specificities to choose the most relevant one for your business..

Does my platform support any of the 3 formats ?

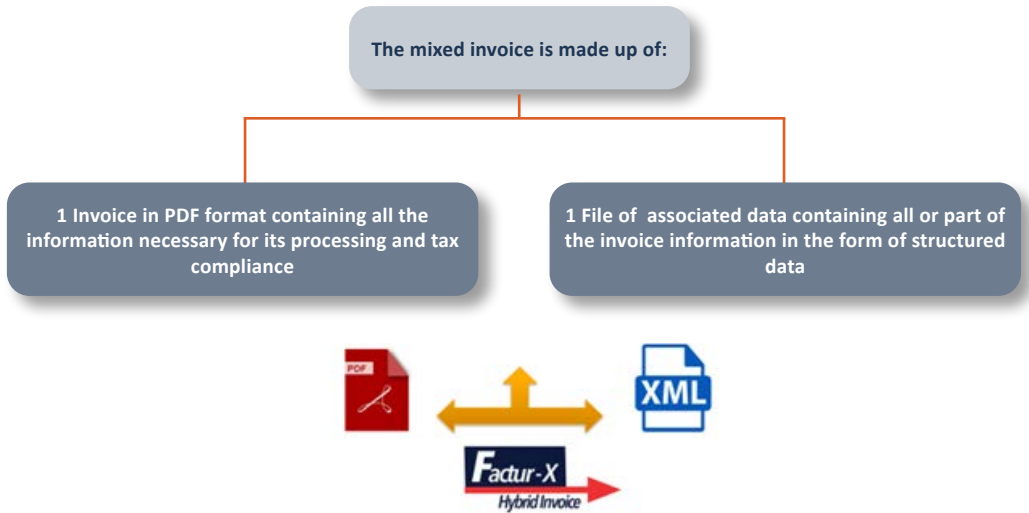
As of January 1, 2028, the DGFIP will only accept 3 file formats that comply with the EN-16931 standard:

- The Cross Industry Invoice (CII) exchange standard,
- The *Universal Business Language* (UBL) standard; **which is an EDI file based on an XML file,**
- A mixed format standard **such as Factor-X (XML).**

About Factor-X :

The Factor-X format, due to its flexible features, is the preferred format for exchanges between small and medium-sized companies.

Factor-X is a Franco-German standard for mixed electronic invoicing (PDF for direct reading by human users and XML data for automated computer processing).



For VSEs and SMEs: the Factor-X standard is ideal

- It is readable with any computer: PDF file (A3),
- It allows automated management: XML file.

NB

The use of invoices in the form of structured data will increase interoperability. The latter being the ability of systems to "communicate" and operate together.

These new exchange protocols will allow for greater automation of administrative and accounting processes and promote the flow of more reliable information in real time, thus facilitating the management of companies.

5.2 Comparison Table

	PIP	PDP	DO
Helps the company manage sales, create invoices, and track payments	✗	✓	✓
Supports at least ONE of the formats of the minimum base (UBL, CII, Factur-X) for issuance and ALL for reception	✗	✓	✓
Applies regulatory obligations to issue invoices (controls, data extraction and transmission to the administration via the PPF, traceability of the processing carried out to be archived over time)	✗	✓	✗
Applies regulatory obligations to receive domestic invoices (updating the directory of recipients, incoming checks, delivery to the recipient or his service provider, traceability of the processing carried out to be kept over time)	✗	✓	✗
Helps the company to process the invoices received (accounting integration, reconciliation, validation, payment, etc.)	✗	✓	✓
Issue invoices outside the e-invoicing scope (international B2B, B2C or issued by non-taxable persons)	✗	✓	✓
Receives invoices outside the e-invoicing perimeter (international B2B, B2C or received by non-taxable persons)	✗	✓	✓
Helps the company prepare e-reporting from its relevant invoices issued or received (international B2B) or from sales	✓	✓	✓
Transmits the e-reporting to the tax authorities via the PIP	✓	✓	✓
Provides all types of value-added services upstream or downstream of invoice transmission: ordering, delivery, collection, refinancing, reconciliation, central purchasing, marketplace, payment, digitization of paper invoices, data extraction from invoices outside the e-invoicing perimeter (OCR, video coding), accounting, operational reporting, big data, legal archiving, etc..	✗	✓	✓

(source : FNFE-MPE).

✓ **Obligatory**

✓ **Can be done**

✗ **Cannot be done**

6 The effects on my enterprise

6.1 What does this mean specifically for my enterprise ?

The era of direct transmission of invoices between a supplier and its customer is over. Indeed, all invoices between two taxable persons shall have to go through one or more private platforms. Although the parties involved retain the possibility of communicating by e-mail, telephone or post concerning the transaction or any disputes, **the transmission of the invoice shall be separate and intermediated.**

Due to the timing of the reform, a **transition period** will be introduced during which companies will be confronted with different types of invoice flows: not all companies face the same obligations, each will receive (and/or issue) both electronic invoices and traditional invoices.

Once the company is subject to the obligation to issue electronic invoices, it will no longer be able to send its invoices without the use of a PDP.

It will be essential for it to adopt a **technological solution** that allows it to issue invoices in a structured electronic format.

Thus, the implementation of electronic invoicing implies that invoices will be transmitted " in real time " and stored digitally.

The pace of accounting is accelerating.

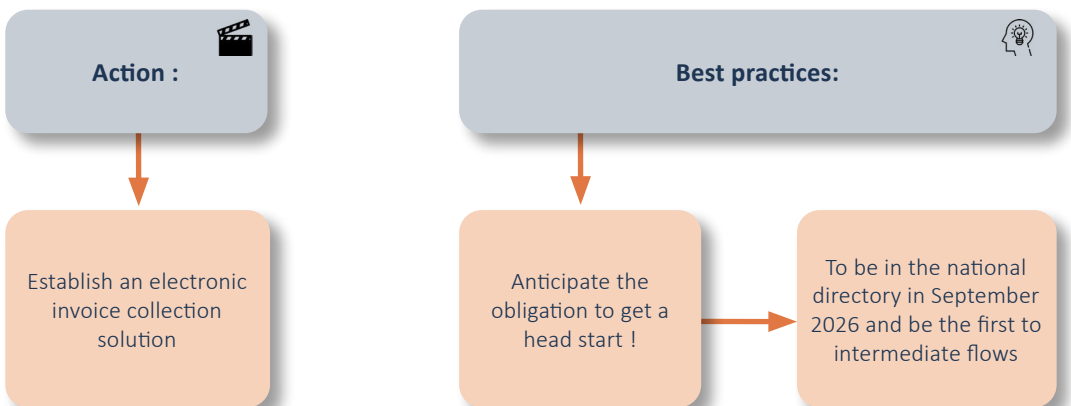
For the company, this also means:

- Faster payments,
- The implementation of a more regular monitoring of collections,
- More accurate cash management,
- More refined management of its income and expenses,
- Management support facilitated by your chartered accounting firm.

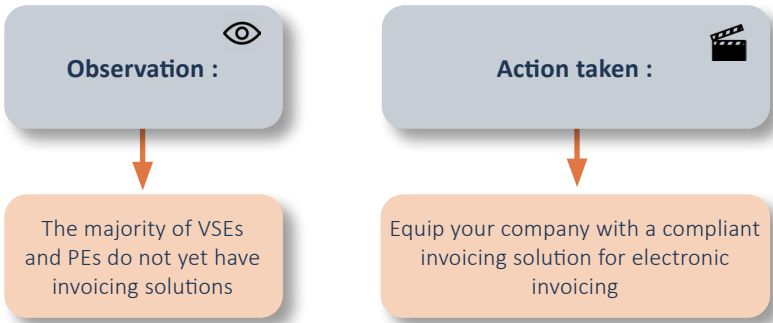
The implementation of electronic invoicing requires:

- Rigour in the administrative organisation of the company,
- An overhaul of your organisational processes,
- The use of a platform to collect, process and store invoices.

1°) On the one hand, collect electronic invoices



2°) On the other hand, issue electronic invoices



7 The benefits of support from your chartered accounting firm

7.1 Why and how to get support ?

Your chartered accounting firm is here to support you

- Support by dedicated teams,
- New service offers support on a daily basis.

The way of receiving and issuing invoices will be transformed

- New **requirements** (full traceability, update of statuses, etc.),
- New **opportunities** (automation, acceleration of payments, etc.).

Your chartered accounting firm is here to support you in order to:

- Recieve your electronic invoices
- Issue your electronic invoices
- Archive your invoices

The advantages of being supported by your chartered accounting firm:

- Be ready for e-invoicing,
- Benefit from help from your chartered accounting firm,
- Be sure of the confidentiality of your data,
- Optimise administrative management and accountant of your company,
- Focus on your professional activity !

Any reproduction, in whole or in part, made without the consent of the publisher, is illegal. Only copies or reproductions strictly reserved for the private use of the copyist and not intended for collective use are authorised on the one hand, and, on the other hand, analyses and short quotations for the purpose of example and illustration (Art. L.122-4, L.122-5 and L.335-2 of the Intellectual Property Code).

Photocopies may be made for a fee with the agreement of the publisher.

Contact: Centre français d'exploitation du droit de copie - 16, rue du Quatre Septembre - CS 46354 - 75082 PARIS CEDEX 2 – Telephone: 00 33 (0)1 44 07 47 70.



Crowe

Groupe RSA

11/13 avenue de Friedland

75008 Paris

www.crowe-rsa.fr