



Update e-invoice

September 2026

Dear Sir or Madam,

The start of mandatory e-invoicing is drawing nearer - especially as the transition periods come to an end, January 1, 2027, and 2028 are just around the corner. Although the legal situation has not changed in principle since our last newsletter, we would like to use this letter to briefly remind you of the upcoming obligations and summarize the key points:

1 Who is affected by e-invoicing?

- In general, this applies to businesses based in Germany that provide services subject to value-added tax to other domestic businesses (B2B).
- This does not apply to B2C transactions (services provided to private end consumers) or to many tax-exempt transactions, such as tax-exempt real estate rentals.
- Foreign businesses with taxable rental property located in Germany are considered resident in Germany for these purposes.

2 Receiving e-invoices — mandatory since January 1, 2025

Since January 1, 2025, domestic businesses must be technically capable of receiving and processing e-invoices. In practice, this means:

- An email inbox is sufficient as a transmission channel; in addition, portals, interfaces, or shared storage locations, for example, can be used.
- Structured e-invoices are often not directly readable by the human eye; a visualization program (viewer) is required for verification.

3 From when must e-invoices be issued?

The following applies to domestic B2B transactions:

- Issuing e-invoices will be mandatory as of January 1, 2027 if total revenue in 2026 exceeds k€ 800.
- If total revenue in 2026 is less than k€ 800, paper invoices or other electronic invoices (e.g., pdf) may continue to be issued, provided the recipient agrees to the format. The responsibility for this lies with you.
- By 2028 at the latest, issuing e-invoices will be mandatory for all companies mentioned above.

Schiff-Martini & Cie. GmbH Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft

Amtsgericht Frankfurt am Main | HRB 56676 | USt-IdNr. DE271491460

Bankverbindung: Frankfurter Sparkasse | BLZ 500 502 01 | Kto-Nr. 88 33 06 | IBAN DE55 5005 0201 0000 8833 06 | SWIFT-BIC HELADEF1822

Geschäftsführer: WP/StB Anita Bolkovac | WP/StB Kirstin Neeser | StB Katja Scherpf | WP/StB Dirk Weiler | StB Peter Zimmermann

4 Which formats qualify as e-invoice?

An e-invoice is considered valid only if it is issued in a structured electronic format that enables automated electronic processing and complies with or is interoperable with the EN 16931 standard. Recognized formats include, among others:

- XRechnung
- ZUGFeRD version 2.0.1 or higher
- Factur-X, Peppol-BIS-Billing, or comparable XML-based formats

Hybrid formats (e.g., ZUGFeRD) contain both a structured electronic format and a human-readable PDF version. It is important to note that the electronic data is authoritative and not the pdf, should any discrepancies exist.

5 What specific steps need to be taken now?

- If not already done, ensure that e-invoices can be received (at a minimum, a central email inbox for incoming invoices).
- You should clarify with your financial accounting/ERP software provider whether
 - structured e-invoice formats can be created, received, and processed,
 - a viewer is available for readable display, and
 - audit-proof digital archiving of e-invoices is ensured, which also guarantees the ability to transfer the data to the tax authorities in the event of an audit.

6 How does this change affect input tax deduction for incoming invoices?

- Electronic data is decisive: For structured or hybrid formats (e.g., ZUGFeRD), the electronic data file is decisive; the pdf view serves only for readability.
- Digital retention: E-invoices must be archived in their original electronic format — unchanged, complete, and audit-proof; a simple printout is not sufficient. The responsibility for this lies with you.
- Audit by the tax authorities: The data must be available electronically in the event of an on-site audit. The responsibility for this lies with you.
- In terms of content, everything remains the same as before: No new mandatory information is required, but complete and accurate invoice details are still a prerequisite for input tax deduction.

If you wish, we can work with you to determine when and to what extent you must implement e-invoicing, and whether your process for receiving or processing incoming e-invoices needs to be adjusted to avoid jeopardizing any input tax credit. In this context, it is also sensible to review the VAT treatment of individual business transactions and processes.

Please let us know if you would like further assistance.

Best regards,
Schiff-Martini & Cie. GmbH