



COUNTRY BRIEFING · BELGIUM

Peppol is live. E-reporting is next

Belgium made structured B2B invoicing compulsory on 1 January 2026, ended its tolerance period in the spring, and has already approved the draft law for the next step: near-real-time reporting of every invoice, by both parties, from 2028. This briefing covers what the first nine months taught, and what 2028 will demand.

-
- | | | | |
|----|-----------------------------------|----|--|
| 01 | Where Belgium stands today | 05 | Penalties, and the obligation to receive |
| 02 | How the Belgian model works | 06 | E-reporting from 2028 |
| 03 | Scope, exclusions and edge cases | 07 | What it means for your SAP system |
| 04 | What the first nine months taught | 08 | How 30 Advisory helps |

For
CFOs, tax and finance leads

Scope
B2B e-invoicing, e-reporting

Status at
25 September 2026

Prepared by
30 Advisory

01 Where Belgium stands today

The mandate is enforced. The next one is drafted

Since 1 January 2026, invoices between Belgian businesses must be structured electronic documents, exchanged by default over the Peppol network. A PDF is no longer an invoice. The first three months were covered by a tolerance period; since April the rules are enforced — and the government has already approved the draft law that will require both parties to report every invoice to the tax authority from 2028.

1 Jan 2026 Structured B2B e-invoicing mandatory, based on the invoice's issue date	1 Apr 2026 Tolerance ended; full enforcement. Self-billing followed on 1 July	€1,500 First penalty for lacking the means to send or receive , rising to €5,000	2028 Near-real-time e-reporting by supplier and customer, replacing the client listing
--	---	---	--

The regime in one table

ELEMENT	POSITION
Legal basis	The Law of 6 February 2024 amending the VAT Code, and the Royal Decree of 8 July 2025 setting technical rules and penalties
Format	Peppol BIS Billing 3.0 in UBL, conforming to the European standard. No Belgian national extension
Network	Peppol by default. Another conforming channel only by mutual agreement — and every in-scope business must still be reachable on Peppol
PDF	No longer a valid invoice. It may travel as an attachment inside the structured invoice
Trigger	The invoice date, not the supply date: anything issued from 1 January 2026 is in scope
Next step	E-reporting from 1 January 2028, approved as a pre-draft law in July 2026

Why the story is not over

- ◀ **Sending works for most; receiving often does not.** The obligation — and the penalty — covers the ability to receive, which many companies treated as secondary.
- ◀ **Master data is being tested for the first time.** Every counterparty now needs a reachable Peppol identity, and every mismatch is visible.
- ◀ **2028 changes the purpose of the data.** Today invoices go to the customer. From 2028 their content also goes to the authority — from both sides, where every discrepancy can be matched.

Who it reaches inside the business

FUNCTION	WHAT CHANGED FOR THEM IN 2026, AND WHAT CHANGES IN 2028
Billing and AR	Every domestic customer invoiced over Peppol; undeliverable invoices to chase; rounding and credit notes to get right
Accounts payable	Supplier invoices arriving as data; the obligation to be able to receive; from 2028, reporting their side too
Master data	Peppol identifiers, VAT and enterprise numbers, and addresses — now tested on every invoice
Tax	Scope decisions, edge cases, and the reconciliation that e-reporting will make continuous

02 How the Belgian model works

A network, providers, and a directory

Belgium did not build a government platform. It adopted Peppol — the network already used for public-sector invoicing across Europe — and made it the default route for business invoices. The authority does not sit in the exchange today; from 2028 it will receive a copy of the data.

STEP	WHAT HAPPENS	WHAT CAN GO WRONG
Register	Your business is registered on Peppol through an access-point provider, under its enterprise or VAT number	Registered under one number but addressed under the other
Look up	Your system checks that the customer is reachable before sending	The customer is not registered, or registered elsewhere
Send	The invoice travels from your provider to the customer's provider over the network	Content fails validation and is refused
Receive	The customer's provider delivers structured data into their system	It arrives, and nobody processes it
Correct	Credit notes correcting structured invoices are themselves structured, over Peppol	Corrections sent as PDF out of habit

Three technical details with practical consequences

DETAIL	WHY IT MATTERS
VAT rounding	VAT may be rounded only on the total per rate, not line by line. Systems that round per line produce invoices that fail validation or disagree with the customer's calculation
Attachments	A limited set of file types may travel inside the invoice. A customer cannot reject an invoice because no PDF is attached
Self-billing	Permitted over Peppol with prior agreement and an acceptance procedure, under its own specification

Choosing and holding an access-point provider

- Integration with your ERP, not only a portal
- Transparent validation rules you can apply first
- Status responses returned to the source document
- Readiness for 2028 e-reporting, which will run through providers
- Coverage of your other Peppol countries
- A clean exit, including your registration

DIRECT CONNECTION OR PROVIDER PORTAL?

Many companies met the January deadline by uploading invoices to a provider's portal. It works — but it leaves status outside the ERP, invoices re-keyed on the inbound side, and no basis for the reconciliation 2028 will require. **A direct system-to-system connection is the durable answer.**

THE FREE OPTION HAS GONE

The government's free Peppol tool, Hermes, closed at the end of 2025. Every business now needs a commercial provider — which makes the provider a supplier to be managed, not a utility to be assumed.

03 Scope, exclusions and edge cases

Domestic, between businesses, established in Belgium

SITUATION	IN SCOPE	NOTES
Belgian-established VAT taxpayer to another	Yes	The core of the mandate
Foreign company with a Belgian fixed establishment	Yes	For supplies involving that establishment
Foreign company with only a Belgian VAT number	No	Proposals to include non-residents from 2028 have been discussed — see section 06
Taxpayers making only exempt supplies	No	Those without deduction rights under the relevant exemption
Flat-rate scheme taxpayers	No	The scheme itself ends by 2028
Cross-border B2B	No	Domestic transactions only, for now
Business to consumer	No	Unchanged

Edge cases that generate questions

CASE	POSITION
Credit note for a 2025 PDF invoice	May remain a PDF if the customer agrees; credit notes against structured invoices must be structured
Invoice sent to the wrong party	Clarified in the official guidance during 2026 — follow the correction procedure rather than re-sending informally
Reverse-charge supplies	In scope; the correct tax category codes matter, and were clarified in 2026 guidance updates
Small-business franchise scheme	Treatment should be confirmed against the current official guidance

THE GROUP-STRUCTURE TRAP

Multinationals often invoice Belgian customers from a foreign entity holding a Belgian VAT number, and assume they are out of scope. **If that entity has a fixed establishment in Belgium, they are in** — and the question of whether an establishment exists is one for your adviser, not a default.

How to confirm your own scope

- ◀ List every entity that invoices Belgian businesses, and whether it is established in Belgium or only registered.
- ◀ For foreign entities, obtain a view on whether a fixed establishment exists — and document it.
- ◀ Identify exempt or special-scheme activity, and whether it is the whole activity or only part.

The public sector

Invoices to federal authorities have been structured and routed through the Mercurius platform over Peppol for several years, with the threshold now at a few thousand euros for newer contracts. Flanders and Brussels require it; Wallonia prefers it. For most suppliers, B2G was the rehearsal for the B2B mandate.

04 What the first nine months taught

The network held. Companies were the bottleneck

Technically, the rollout went well: no network outages and no central bottlenecks, with Peppol registrations in Belgium passing two million by mid-2026 (a figure inflated by double registrations). The problems were inside companies, and they were predictable.

WHAT WENT WRONG	WHY, AND WHAT IT COST
Customers not on Peppol	Invoices could not be delivered. Sending by other means was tolerated in the first quarter; it is not now
Master data not fit for purpose	Wrong VAT or enterprise numbers, missing codes, incomplete addresses — each a rejected or undeliverable invoice
"Emailing a PDF is e-invoicing"	A persistent belief. A PDF is not an invoice, and the customer cannot deduct VAT on it
Receiving treated as secondary	Invoices arrived as data and waited, unprocessed, while AP looked for PDFs
Per-line VAT rounding	Totals that disagree between supplier and customer, or fail validation outright
Self-billing left late	Its own tolerance ended in June; many schemes were not ready

What good looks like nine months in

- Every customer's Peppol reachability checked before invoicing
- Inbound invoices matched and posted from data, not re-keyed
- Undeliverable invoices visible the same day, with an owner
- Credit notes flowing the same route as invoices
- Rounding per rate total, matching the customer's calculation
- Provider statuses returned to the source document

A remediation sequence

STEP	WHAT TO DO
1 • Measure	Count sent, delivered and undeliverable invoices for the last three months, by cause
2 • Clean	Fix the master data behind the undeliverable ones — identifiers, VAT numbers, addresses
3 • Receive	Move inbound from portal download to direct posting in the ERP
4 • Own	Give the daily exception list a named owner in finance, not in IT

THE BELIEF THAT WILL NOT DIE

Nine months in, some suppliers still email PDFs to Belgian business customers. **Those are not invoices under Belgian law**, and the customer who accepts them is taking a deduction risk. Check your own inbound mailboxes — the problem is often visible there first.

THE CUSTOMER'S DEDUCTION

A customer's VAT deduction requires a valid invoice, which for in-scope supplies means a structured one. Advisers have described the risk of losing deduction as largely theoretical given European case law — but **customers are increasingly unwilling to test that theory**, and are refusing PDFs.

05 Penalties, and the obligation to receive

The fine is for not being able to take part

Belgium's specific penalty is framed around capability: failing to have the technical means to **issue and receive** structured invoices. Because it covers receiving, it reaches customers as well as suppliers — a feature many companies missed.

INFRINGEMENT	PENALTY	APPLIES FROM
First	€1,500	1 April 2026
Second	€3,000	If found more than three months after the first
Each subsequent	€5,000	On the same spacing
Self-billing arrangements	As above	1 July 2026

These sit alongside the existing penalties for invoicing irregularities, which continue to apply. No published figures on fines actually imposed since April were available at the time of writing.

What the receiving obligation actually requires

- ◀ **Registration.** Your business must be findable on Peppol under the identifier your suppliers will use.
- ◀ **A working inbound route.** Invoices must arrive somewhere your organisation will see them — ideally directly into the ERP.
- ◀ **Processing, not just receipt.** Technically the obligation is capability; commercially, an invoice received and ignored is an unpaid supplier and a missed deduction.

Where the exposure really sits

THE FORMAL EXPOSURE

- A fixed penalty per infringement, escalating
- Existing invoicing penalties on top

THE PRACTICAL EXPOSURE

- Customers refusing non-compliant invoices, and paying late
- Suppliers unpaid because their invoices were never processed

A quick self-assessment

QUESTION	IF THE ANSWER IS NO
Are we registered under the identifier suppliers actually use?	Invoices sent to you never arrive
Do inbound invoices reach SAP without manual steps?	Receiving works on paper, not in practice
Does someone review undelivered and rejected invoices daily?	Receivables stop ageing and nobody notices

THE NUMBER THAT MATTERS MORE THAN THE FINE

The penalties are modest for a large company. **Days sales outstanding is not.** An invoice that cannot be delivered, or that a customer rejects, is a receivable that does not start ageing towards payment — and that effect compounds across a billing run.

06 E-reporting from 2028

Every invoice, reported by both sides

In July 2026 the Council of Ministers approved a pre-draft law introducing near-real-time reporting of invoice data from **1 January 2028**. Supplier and customer will both report; the data will flow through the Peppol providers to the authority; and the annual client listing will be replaced.

ELEMENT	WHAT IS KNOWN	FIRMNESS
Start date	1 January 2028	DRAFT
Who reports	Both the supplier and the customer	DRAFT
What is reported	Certain mandatory invoice fields, not the full invoice	DRAFT
How	A five-corner Peppol model: providers pass data to the authority	EXPECTED
What it replaces	The annual client listing	DRAFT
Deadlines and penalties	To be set by royal decree, expected in early 2027	OPEN
Non-residents	Inclusion discussed; not confirmed in the approved text	OPEN

Why dual reporting changes the game

- ◀ **Every invoice becomes two records** — yours and your customer's. Any difference between them is visible to the authority automatically.
- ◀ **Your customer's data quality becomes your problem.** A mismatch caused by their error still produces a question addressed to both of you.
- ◀ **The ledger has to agree with the network.** What you report must match what you post, invoice by invoice, continuously.

What the authority will be able to see

COMPARISON	WHAT A DIFFERENCE SUGGESTS
Supplier report ↔ customer report	One side has the invoice wrong, or one side has not reported it
Reported invoices ↔ VAT return	Tax declared does not match invoicing activity
Period over period	Patterns in timing, credit notes or counterparties worth a question

Open questions to watch

- The exact dataset and the reporting deadlines, set by decree
- Whether non-resident taxpayers are brought in
- Whether the customer's deadline is days after receipt, and how many
- The penalty regime for late or inconsistent reports

WHAT TO DO IN 2026 FOR 2028

Most of the work for e-reporting is the work the B2B mandate should already have done: clean master data, reliable statuses, and invoices that match what is posted. **Companies that fixed their 2026 gaps are largely ready for 2028; companies that worked around them will meet the same gaps again** — this time with the authority watching.

07 What it means for your SAP system

From "can we send" to "can we prove"

SAP addresses Peppol-based mandates through **SAP Document and Reporting Compliance**, whose electronic-document framework creates the structured invoice, passes it to the network through a provider or SAP's own Peppol service, and returns the status to the billing document. The framework exists on both SAP S/4HANA and classic SAP ERP, so Belgium is rarely a platform question.

ELEMENT	WHAT "GOOD" MEANS
Reachability	Customer Peppol identifiers held in master data and checked before sending
Rounding and content	VAT rounded per rate total; validation applied before transmission
Status	Delivery and rejection returned to the document, with a daily view and an owner
Inbound	Structured supplier invoices received, matched and posted in SAP
Credit notes and self-billing	The same route, the same controls
2028 readiness	A reconciliation between what is sent, received and posted — the basis for e-reporting

Where Belgian landscapes are usually weakest

- Portal-based sending, with status invisible in SAP
- Peppol identifiers held outside master data
- Inbound invoices downloaded and re-keyed
- No owner for undeliverable invoices
- Per-line VAT rounding in custom billing logic
- Self-billing handled outside the standard route

Five questions for whoever supports your system

- ◀ How many invoices last month could not be delivered, and who resolved them?
- ◀ How are inbound invoices posted — from the data, or by re-keying?
- ◀ Does our VAT rounding match the Belgian rule on every invoice type?
- ◀ Is our provider preparing for 2028 reporting, and on what terms?
- ◀ Can we reconcile sent, received and posted today, invoice by invoice?

SAP's own Peppol service, or a third-party provider?

CONSIDERATION	SAP'S PEPPOL SERVICE	THIRD-PARTY PROVIDER
Integration effort	Designed for the SAP framework	Depends on the provider's connector
Other networks and countries	Peppol countries	Often broader, including clearance countries
Commercial model	Part of the SAP relationship	A separate supplier to manage

THE DESIGN DECISION FOR 2028

E-reporting will run through the Peppol providers. **Whoever carries your invoices will also carry your reporting** — so the provider choice made in a hurry for 2026 deserves a second look before 2028.

08 How 30 Advisory helps

An SAP finance and compliance practice

Most Belgian work now is not a first implementation. It is closing the gaps a rushed 2026 go-live left — and making sure they are closed before the authority starts comparing both sides of every invoice.

Post-go-live health check

Two to three weeks. Deliverability, rejections, inbound processing, rounding, credit notes and self-billing — evidenced from your system and your provider.

Output: a prioritised gap list.

Remediation and 2028 readiness

Master data, inbound automation, status monitoring with an owner, and the sent-received-posted reconciliation e-reporting will depend on.

Output: ready for dual reporting.

Run and next country

The e-reporting decree tracked, provider arrangements reviewed, and the same Peppol design extended to your other countries.

Output: one network model, many mandates.

What a health check produces

Deliverability evidence	Invoices sent, delivered and undeliverable by month, with the causes classified
An inbound position	How supplier invoices actually reach and are posted in SAP, and what is still re-keyed
A 2028 gap view	Where sent, received and posted disagree today — the mismatches e-reporting will expose

IF YOU ARE AHEAD

If your deliverability is high, inbound is automated and exceptions have an owner, the remaining 2028 work is modest — a reconciliation and a provider conversation. **We will tell you that, and keep the engagement small.**

What makes this different

- ◀ **We are independent of the provider.** We help you choose and hold them to account; we do not sell the network.
- ◀ **We treat receiving as half the mandate.** Because the penalty does, and because AP is where value is lost.
- ◀ **We design for 2028 now.** The reconciliation that e-reporting requires is the same one that proves 2026 is working.
- ◀ **We say what we are not.** We are not your tax adviser. We work alongside the people who are.

A SENSIBLE FIRST STEP

Ask for last month's numbers: **invoices sent, delivered and undeliverable; supplier invoices received as data, and how many were re-keyed.** Those four figures show whether 2026 is working — and how much of 2028 is already done.

Sources consulted 25 September 2026 — FPS Finance and einvoice.belgium.be guidance and FAQs; the Royal Decree of 8 July 2025 as summarised by Loyens & Loeff; Deloitte, BDO, KPMG and EY commentary on enforcement and the 2028 pre-draft law; vatcalc and VATupdate on non-residents and e-reporting; Peppol registration statistics. SAP behaviour from the SAP Help Portal and partner commentary.

This briefing is provided for information only and does not constitute tax, legal or accounting advice. It summarises publicly available material as at 25 September 2026. The e-reporting law is at draft stage; its implementing decree, deadlines and penalties are not yet adopted; and sources disagree on detail, including the position of non-residents and certain exemptions. Confirm the position for your own entity with the FPS Finance or a qualified adviser before acting. 30 Advisory accepts no liability for decisions taken on the basis of this document.