



COUNTRY BRIEFING · POLAND

KSeF is live. What happens next

Mandatory structured invoicing arrived in Poland during 2026, and the grace period that softened it ends with the year. This briefing is for companies already inside KSeF — what changes on 1 January 2027, where live implementations are quietly failing, and how KSeF and the JPK files fit together.

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For
CFOs, tax and finance leads

Scope
KSeF, with JPK context

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01 Where the mandate stands today

Live for everyone — but not yet enforced

Poland's National e-Invoice System moved from optional to compulsory during 2026. Structured invoices in the national format, issued through a central government platform, are now the norm for business-to-business transactions. What has not yet arrived is enforcement — and that changes at the end of the year.

1 Feb 2026

Mandatory for the largest taxpayers — broadly those whose 2024 sales exceeded PLN 200 million

1 Apr 2026

Mandatory for all other businesses established in Poland, and foreign entities with a Polish fixed establishment

Through 2026

Grace period: penalties for invoicing failures suspended, and the obligation to quote the KSeF number in payments deferred

1 Jan 2027

Penalties apply under current law (a draft bill proposes 1 Jan 2028), payment references change, and the smallest taxpayers join

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The structured format in force, with attachment support and additional party fields

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The window to deliver an offline-issued invoice into the system — the next business day

10 years

Invoices retained centrally, which changes what your own archive is for

1 Jan 2027

When penalties start under current law — a draft bill proposes 1 January 2028

The trap in a grace period

A suspended penalty regime is not the same as a working process. Through 2026 an invoice that failed to reach the platform, a rejection nobody noticed, or a customer quietly receiving a PDF instead of a structured document has carried no immediate cost. From January those same gaps carry exposure of up to a proportion of the VAT on the documents concerned — and they will be visible, because everything that did reach the platform is already recorded there. A proposal to delay penalties by a year (see section 04) would change the date, not the gaps.

THE QUESTION TO ASK YOUR TEAM THIS MONTH

"How many invoices did we issue last month, and how many are confirmed in KSeF?" If those two numbers do not match, or if nobody can produce them quickly, that gap is the project for the fourth quarter — and it is a far smaller one now than it will be in February.

Three things that surprised companies at go-live

EXPECTATION	WHAT ACTUALLY HAPPENED
"It is an IT project"	It changed how sales are billed, how corrections are made and when revenue is recognised as invoiced. The people most affected sat in finance, not in IT
"We will connect the ERP and we are done"	Invoices also came from billing engines, service tools and local spreadsheets. Every one of those had to reach the platform too
"Receiving will look after itself"	Supplier invoices stopped arriving by email and started waiting in the platform. Accounts payable had to change before month-end, not after

Who is still outside

- ◀ **The smallest taxpayers** — those below the defined monthly sales and per-invoice values — have an exemption that runs until the start of 2027.
- ◀ **Consumer invoicing** remains outside the mandate, which means most businesses run two paths and have to keep them reliably separate.
- ◀ **Foreign entities without a Polish fixed establishment** are generally outside the obligation, though this is precisely the sort of determination worth confirming rather than assuming.

02 How KSeF works in practice

A central platform, an identifier, and a moment of legal truth

Poland uses a centralised model. The invoice goes to the government platform, which validates it and returns an identifier; only then does it exist as a legal invoice. Your customer collects it from the same platform.

STEP	WHAT HAPPENS, AND WHAT CAN GO WRONG
Authenticate	Your system connects using a qualified signature, a trusted profile or a token with a certificate. Certificates and tokens expire — and an expiry discovered during a billing run is an outage
Send	The invoice is transmitted in the national structured format. Anything the schema does not allow is rejected outright, not warned about
Receive the identifier	The platform returns a unique number. This is the moment the invoice legally exists — and the number has to be stored against the document, not just logged
Customer collects	Your customer retrieves the invoice from the platform. You do not send it to them, and a PDF you email is a courtesy copy, not an invoice
Inbound	The same is true in reverse: your supplier invoices wait in the platform to be pulled into your system and posted

What changed for the people who do the work

ACCOUNTS RECEIVABLE

- The issue date and the legal date can differ — dunning and revenue cut-off follow the platform, not the printout
- A rejected invoice is not a technical ticket; it is an unbilled sale
- Corrections follow the structured process, with a reference to the original

ACCOUNTS PAYABLE

- Supplier invoices arrive as data — no more manual capture, but also no more informal arrangements
- What is in the platform is the invoice; a PDF from the supplier is not a substitute
- From 2027 the payment reference itself changes — see section 04

Who has to do what, after go-live

ROLE	DAILY OR PERIODIC RESPONSIBILITY
Accounts receivable	Check that yesterday's invoices are confirmed; fix and resend anything rejected; issue corrections through the structured process
Accounts payable	Collect supplier invoices from the platform, match and post them, and query anything that arrives outside it
Tax	Reconcile what was invoiced to what was reported, and own the treatment of the awkward cases in section 03
IT	Keep authentication valid, monitor the interface, and hold a tested procedure for the day the platform is unavailable
Finance leadership	Ask for the completeness numbers monthly, and treat a gap as an exception requiring an explanation

WHY THIS MODEL IS STRICTER THAN A NETWORK MODEL

In Peppol-style countries — the UAE and much of northern Europe — invoices travel between accredited providers and the authority receives a copy of the tax data. In Poland the platform **is** the route. There is no fallback path, no second provider, and no version of the invoice that exists outside the system. That makes availability, authentication and status handling operational matters, not IT details.

03 Offline modes and the awkward cases

Where live implementations quietly fail

Poland accepts that an invoice sometimes has to be issued when the platform cannot be reached — by you, or at all. The rules allow it, with conditions, and those conditions are where most operational problems appear.

Issuing outside the system

SITUATION	WHAT IS PERMITTED	THE OBLIGATION THAT FOLLOWS
Permanent offline option	An invoice may be issued outside the platform and given to the customer, carrying a QR code that lets them verify it	It must be delivered into the platform by the next business day
Platform unavailable	Issuing continues under the published failure rules while the outage lasts	Submission once service is restored, within the period the rules allow
Your own systems down	The same practical route, but the reason is yours rather than the platform's	The clock still runs; nothing about the deadline is softened

THE QR CODE IS NOT DECORATION

An invoice handed over before it reaches the platform must carry the prescribed code so the recipient can verify it. Where the invoice is issued using a certificate outside the system, a second code applies. This is a **layout and printing requirement** that reaches every invoice form you produce — and it is a common gap in implementations that focused only on the data being transmitted.

WRITE THE PROCEDURE DOWN, THEN REHEARSE IT

An offline procedure that exists only in someone's head is not a procedure. It should name who decides the platform is unreachable, who authorises issuing outside it, how the invoices are tracked until they are submitted, and who confirms that every one of them landed. **Rehearse it once a year** — the first execution should not be during a real outage at month-end.

The cases that catch people out

CASE	WHY IT IS DIFFICULT
Attachments	The format now allows an attachment as part of the invoice, with notification requirements — but only in defined circumstances. Businesses that used to append schedules to a PDF need a different answer
Invoices from other systems	Billing engines, field-service applications and local tools all have to reach the platform and return the identifier to wherever the accounting entry lives
Self-billing and intra-group	Agreed arrangements between parties still have to fit the structured process rather than the informal one they replaced
Consumer invoices	Outside the mandate, so two paths exist. The failure mode is a business customer treated as a consumer, and an invoice that never reaches the platform
Cross-border supplies	The determination of what belongs in the system is not always obvious, and getting it wrong in either direction has consequences

04 What changes on 1 January 2027

Three changes, and one of them reaches treasury

Penalties begin — for now

Under current law the suspension of sanctions ends. Exposure is a proportion of the VAT on the documents concerned, so the cost scales with the gap. A draft bill would move this to 2028 — see below.

Payments carry the KSeF number

Buyers settling invoices issued through the system are to quote the invoice's identifier in the payment reference — a change that reaches banking files, payment runs and cash application.

The smallest taxpayers join

The exemption for very small issuers ends, bringing the final group into the regime and completing the coverage of domestic business-to-business invoicing.

PROPOSED: PENALTIES FROM 1 JANUARY 2028

In September 2026 the Ministry of Finance proposed extending penalty protection to 31 December 2027, so that KSeF penalties would apply from **1 January 2028** (draft bill UD477), with warnings before sanctions. It **does not postpone the obligation to use KSeF** and had not been passed at the time of writing, so this briefing keeps 1 January 2027, the date in current law.

The payment-reference change deserves attention now

It looks like a formatting detail and it is not. Quoting the invoice identifier in payments touches systems and processes that usually sit outside a compliance project:

- ◀ **Outgoing payment files** must carry the identifier, so it has to be stored on the invoice being paid, reliably, from receipt.
- ◀ **Cash application** will see identifiers on incoming payments — automatic matching if the data is in place, noise if not.
- ◀ **Bank formats and agreements** may need review, as does anything that truncates a payment reference.
- ◀ **Supplier invoices captured before the change** may lack the identifier — a transitional population to plan for.

How to test the payment change before it is mandatory

STEP	WHAT YOU ARE PROVING
Pick ten supplier invoices	That the identifier received from the platform is on the accounting document, not only in an interface log
Run a payment proposal	That the proposal can read the identifier from the invoice it is settling, without anyone looking it up
Generate the bank file	That the reference field carries the identifier intact, without truncation or reformatting
Check with the bank	That the format is accepted and the reference is passed through to the beneficiary as sent
Look at incoming payments	That your cash application can use an identifier arriving on a customer payment, rather than discarding it

A PRACTICAL SEQUENCE FOR THE FOURTH QUARTER

October — confirm the identifier is stored against every inbound and outbound invoice, and that it is retrievable from the accounting document. **November** — test a payment run carrying the reference end to end, including the bank file, and agree with your bank that the format is accepted. **December** — close the gap between invoices issued and confirmed, and decide how older supplier invoices will be paid.

05 What it means for your SAP system

Two obligations, one framework

SAP addresses Polish requirements through **SAP Document and Reporting Compliance**. Its electronic-document side turns billing and supplier documents into structured invoices, submits them, and returns the identifier and status to the document; its statutory reporting side produces the periodic JPK files. Both draw on the same ledger, and that is the point.

What a healthy implementation looks like

ELEMENT	WHAT "GOOD" MEANS
Determination	Every document that must go to the platform does, and nothing else does. Consumer and out-of-scope flows are separated by rule, not by memory
Identifier handling	The returned number is stored against the accounting document and is retrievable for payments, reporting and audit — not only visible in a monitor
Validation before sending	Content is checked in your system first, so rejections are rare and are fixed by the person who caused them
Status monitoring	A daily view of documents without a final status, with alerting, owned by a named person in finance rather than by an inbox
Inbound processing	Supplier invoices pulled in, matched and posted from structured data, with the identifier carried through to payment
Output and QR	Printed and emailed forms carry the required codes in the required cases

Where live systems are usually weakest

- Nobody owns the daily check, so failures accumulate silently
- The identifier is stored in an interface table, not on the document
- Non-ERP billing sources were left for "phase two" and never returned to
- Offline and failure procedures were written but never rehearsed
- Certificate and token expiry has no owner and no calendar entry
- Inbound is still keyed by hand because the project ran out of time

Five questions for whoever supports your system

- ◀ **Show me last month's completeness figures** — invoices issued against invoices confirmed — produced from the system rather than assembled by hand.
- ◀ **Where exactly is the identifier stored**, and can a payment programme read it without a custom lookup?
- ◀ **What alerts exist**, who receives them, and when did one last lead to an action?
- ◀ **Which billing sources are not connected**, and what is the plan and date for each?
- ◀ **Who applies the next specification change**, under what arrangement, and is regression testing included?

REACHING THE PLATFORM IS NOT THE SAME AS BEING COMPLIANT

Most implementations delivered in the 2026 rush achieved the first milestone: invoices reach the system. Fewer achieved the second: **a process that proves every invoice reached it, catches the ones that did not, and can be operated by the finance team without the implementation partner**. The grace period hid the difference. January will not.

06 KSeF and JPK: one data foundation

Poland asks for the invoices and the books

Structured invoicing is only half of Poland's digital reporting. The JPK files — Poland's implementation of the standard audit file — have been in place for years and have recently extended from VAT into the accounting and corporate-income-tax domain. A company operating in Poland now files at several levels of detail, and the administration can compare them.

OBLIGATION	WHAT IT COVERS	RHYTHM
KSeF	Individual structured invoices, at the moment of issue	Continuous
JPK for VAT	The VAT records and the return combined in one file, with transaction-level detail and classification codes	Monthly, by the 25th
JPK for accounting and CIT	Accounting books with tax reconciliation data, plus a fixed and intangible asset file	Annual, phasing in by taxpayer group

The accounting and CIT files have phased in from 2025 for the largest taxpayers, extending to further groups in 2026 and 2027, with the annual deadline subject to change. Confirm which files and dates apply to your entity.

Why this matters to a CFO rather than to IT

- ◀ **The same transaction is reported three times**, at three levels of detail, to the same administration. Differences between them are findable automatically, and they are the natural starting point for an enquiry.
- ◀ **The underlying data is shared**. Tax codes, partner identification, document types and the chart of accounts drive all three. Fixing them once improves all three; leaving them broken means explaining the same issue repeatedly.
- ◀ **Reconciliation is a control, not a project task**. Companies that reconcile invoices issued to invoices in KSeF, and the VAT file to the ledger, find their own problems first. That is a materially better position than being told about them.

What a monthly reconciliation should cover

COMPARISON	WHAT A DIFFERENCE TELLS YOU
Invoices issued ↔ invoices in KSeF	Completeness. A difference is an unreported sale, and it is the easiest thing for the administration to find
VAT file ↔ the ledger	That what you declared is what you posted. Differences here are the classic source of enquiry
VAT file ↔ invoices in KSeF	That the transaction-level detail agrees with the documents themselves, including corrections
Annual accounting file ↔ statutory accounts	That the books you file and the accounts you publish tell the same story

THE REGIONAL PICTURE

Poland is not unusual any more. Romania has filed a standard audit file since 2022 and has piloted automated comparison against the VAT return. Bulgaria began its own regime in 2026. For a group operating across the region, the efficient answer is one compliance design and one team rather than a local solution and vendor per country — the second country costs a fraction of the first when the foundation is shared.

07 A health check before January

Twelve questions, and what a poor answer costs

If your implementation went live during 2026, use this as a short diagnostic. Each answer should rest on a number or a document, not on an opinion.

QUESTION	IF THE ANSWER IS UNCLEAR
1 How many invoices did we issue last month, and how many are confirmed in the system?	You cannot demonstrate completeness — the first thing an enquiry tests
2 Who looks at failures, and how often?	Failures are accumulating and will surface all at once
3 Is the identifier stored on the accounting document?	The 2027 payment-reference change becomes a project you have not planned
4 Do all our billing sources reach the platform?	An unreported population exists, and it is invisible until it is penalised
5 When do our certificates and tokens expire?	An avoidable outage during a billing run
6 Has the offline procedure ever been rehearsed?	It will be executed for the first time under pressure
7 Do our printed forms carry the required codes?	A compliance gap on every document handed over early
8 Are supplier invoices posted from structured data?	Manual effort you are still paying for, and the 2027 change is harder
9 Can finance correct an invoice without IT?	Every correction becomes a ticket, and cycle time suffers
10 Does the VAT file reconcile to the ledger each month?	Differences will be found by someone else, later
11 Do we know which JPK accounting files apply, and when?	An annual obligation discovered after its deadline
12 Who applies specification changes after go-live?	The solution drifts out of compliance without anyone deciding to let it
13 Can we reproduce, for any invoice, exactly what was sent and what came back?	You cannot evidence your own position in an enquiry or a customer dispute
14 Do consumer and out-of-scope flows separate by rule, or by judgement?	A business customer will eventually be treated as a consumer, and that invoice never reaches the platform

Questions 1, 3 and 4 are the ones to fix first in almost every case: completeness protects you in an enquiry, identifier storage decides how hard January is, and unconnected billing sources are the gap that grows quietly for as long as nobody measures it.

SCORING IT HONESTLY

Three or more unclear answers is not unusual for a system delivered against a hard 2026 deadline — but it is worth correcting now, while the grace period still absorbs the cost of what you find.

08 How 30 Advisory helps

An SAP finance and compliance practice

Most of the Polish work we are asked for now is not implementation. It is making a live implementation trustworthy before it starts to cost money.

KSeF health check

Two to three weeks against the twelve questions in section 07, evidenced from your own system — completeness, identifier storage, monitoring, offline readiness and output.

Output: a prioritised gap list with effort and dates.

Remediation and 2027 readiness

Closing the gaps: identifier handling through to payments, inbound automation, monitoring with real ownership, rehearsed failure procedures and corrected output forms.

Output: a clean January.

Run and legal change

Specification changes watched and applied in controlled windows, JPK obligations kept aligned, and the same design extended to your other countries.

Output: compliance that stays compliant.

What a health check produces

Completeness evidence	Invoices issued against invoices confirmed, by month and by source system, with the gap quantified rather than estimated
A prioritised gap list	Each finding with its consequence, the effort to close it and the date it becomes expensive
A 2027 readiness view	Identifier coverage, payment-reference readiness and the transitional population of older invoices
An operating model	Who checks what, how often, and what they do when something fails — written down and agreed

What makes this different

- ◀ **We work from evidence, not from a questionnaire.** The health check is run against your data — invoice counts, statuses, identifier coverage — because that is what an enquiry will do.
- ◀ **We treat completeness as the deliverable.** Reaching the platform is easy; proving that everything reached it is the control that actually protects you.
- ◀ **KSeF and JPK together.** They share a data foundation, so we fix it once rather than twice.
- ◀ **We say what we are not.** We are not your tax adviser. We work alongside the people who are, and we are explicit about where that line sits.

A SENSIBLE FIRST STEP

Ask for last month's numbers: **invoices issued, invoices confirmed in the system, failures outstanding, and identifier coverage.** If they arrive quickly and they agree, you are in good shape. If they do not, you have found your fourth-quarter priority — with time still on your side.

Sources consulted 25 September 2026, updated 6 October 2026 — Sovos, Marosa, PIKON, Banqup, EDICOM and VATupdate guidance on the KSeF mandate, its phasing, offline modes, QR codes, attachments, payment references and penalties; VATupdate (18 and 28 September 2026) on the proposed penalty postponement and draft bill UD477; vatcalc on the JPK accounting and corporate-income-tax files. SAP behaviour from the SAP Help Portal and partner commentary on SAP Document and Reporting Compliance.

This briefing is provided for information only and does not constitute tax, legal or accounting advice. It summarises publicly available material as at 6 October 2026. It uses 1 January 2027, the penalty start date in current law; draft bill UD477 would move it to 1 January 2028 if enacted. Polish requirements have been amended repeatedly during implementation and secondary sources disagree on detail, including thresholds and deadline dates. Confirm the position for your own entity with the tax administration or a qualified adviser before acting. 30 Advisory accepts no liability for decisions taken on the basis of this document.