



CLIENT DOSSIER · SPAIN · INDIRECT TAX & E-INVOICING

VeriFactu and Ley Crea y Crece: two rules, one invoice

Spain is regulating the same invoice twice — once where it is produced, and once where it travels to the customer and gets paid. What each rule requires, how they differ, where they meet, and what the 5 October 2026 alignment to October 2028 means for your plans.

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Audience	VeriFactu	Crea y Crece	Status
CFOs, heads of tax, finance & IT leads with Spanish entities	Ley 11/2021 · RD 1007/2023 · Orden HAC/1177/2024 · RDL 15/2025	Ley 18/2022 · RD 238/2026 · Orden HAC/1028/2026	7 October 2026

The VeriFactu postponement to October 2028 was announced by the Ministry of Finance on 5 October 2026 and is not yet published in the BOE; until it is, the legal dates remain 1 January 2027 (corporate taxpayers) and 1 July 2027 (others). This dossier is general information, not tax or legal advice.

01 At a glance

The whole comparison on one page

VeriFactu controls how an invoice is produced and recorded. Ley Crea y Crece controls how it travels between businesses and when it is paid. One is an anti-fraud rule aimed at the invoicing software; the other is an e-invoicing and late-payment rule aimed at the exchange. For most Spanish SMEs both will land on the same invoice — and, since 5 October 2026, very likely in the same month.

Oct 2028

VeriFactu: announced new date for all pending obligations (not yet in the BOE)

6 Oct 2027

B2B e-invoicing: companies with turnover above €8M

6 Oct 2028

B2B e-invoicing: all other businesses and professionals

€50,000

VeriFactu fine per year for using non-compliant invoicing software

VERIFACTU

Integrity of the invoicing system

Every invoice issued with software creates a tamper-evident record, chained to the previous one and, in VERI*FACTU mode, sent automatically to the Tax Agency (AEAT). Every invoice carries a QR code the customer can check.

The question it answers: was this invoice really issued, and has anyone altered it since?

LEY CREA Y CRECE

Structured exchange and payment behaviour

Businesses must issue, send and receive structured e-invoices with each other — through the AEAT's public solution or private platforms — and report rejections and the date of full payment.

The question it answers: did the invoice reach the customer in a usable format, and when was it paid?

WHAT CHANGED ON 5 OCTOBER 2026

Order HAC/1028/2026 was published in the BOE and started the B2B clock (in force 6 October 2026). The same day the Ministry of Finance announced that the pending VeriFactu obligations would move to **October 2028** “to align them with e-invoicing”, and that a later reform will seek **convergence of scope and technical aspects** between the two, with the EU's ViDA reporting in mind. The technical guarantees VeriFactu requires stay substantially the same.

Does it apply to me? The short answer

PROFILE	VERIFACTU	B2B E-INVOICING
Company in SII with turnover above €8M	EXEMPT SII filers are out	From 6 Oct 2027
Company in SII, turnover €6M–€8M	EXEMPT	From 6 Oct 2028
SME or self-employed, not in SII, using software	APPLIES Oct 2028 announced	From 6 Oct 2028
Retailer selling only to consumers	APPLIES if not in SII	Consumer sales are out of scope
Basque Country or Navarre	Own regimes (TicketBAI / Navarre)	Own provisions in RD 238/2026 — confirm

Assessed per legal entity (NIF), not per group. Details and exceptions on page 8.

02 Two laws, two purposes

Different origins explain most of the differences

The two rules are often discussed as if they were one “e-invoicing reform”. They are not. They come from different laws, answer to different ministries and were written to solve different problems.

VERIFACTU · TAX CONTROL Born from the anti-fraud law Ley 11/2021, the anti-fraud law, amended the General Tax Law (art. 29.2.j) to require that invoicing software guarantees the integrity, conservation, accessibility, legibility, traceability and inalterability of records — and banned “dual-use” software able to hide or alter sales. It was developed by RD 1007/2023, the regulation on invoicing systems (RRSIF), and Orden HAC/1177/2024, the technical specifications. RD 254/2025 and RDL 15/2025 moved the dates; the decree-law was validated by Parliament on 11 December 2025. Owner: Ministry of Finance and the AEAT. Target: sales suppression and undeclared turnover, especially in cash-intensive sectors.	LEY CREA Y CRECE · LATE PAYMENT Born from the business-growth law Ley 18/2022 (“Crea y Crece”, on company creation and growth) amended Ley 56/2007, art. 2 bis: all businesses and professionals must issue, send and receive electronic invoices in their commercial relations — and the status of each invoice, including payment, must be traceable. It was developed by RD 238/2026 (BOE 31 March 2026) and Order HAC/1028/2026 (BOE 5 October 2026), which set the operating rules of the public solution and started the transition periods. Owner: economic and digital-transformation policy; the AEAT runs the public solution (SPFE). Target: late payment between businesses, and SME digitalisation.
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The legal history, side by side

WHEN	VERIFACTU	LEY CREA Y CRECE
Jul 2021	Ley 11/2021 (anti-fraud law)	—
Sep 2022	—	Ley 18/2022 amends Ley 56/2007
Dec 2023	RD 1007/2023 — invoicing-systems regulation	—
Oct 2024	Orden HAC/1177/2024 — technical specifications	—
Apr 2025	RD 254/2025 — user dates moved to 2026	—
29 Jul 2025	Software producers must offer adapted systems	—
Dec 2025	RDL 15/2025 — 1 Jan 2027 (corporate taxpayers), 1 Jul 2027 (others)	—
31 Mar 2026	—	RD 238/2026 — the B2B regulation
5 Oct 2026	Postponement to Oct 2028 announced (press note)	Order HAC/1028/2026 published; in force 6 Oct

WHY THE DIFFERENT PURPOSES MATTER Different purpose means different scope, different authority and different penalties. VeriFactu cares about every invoice a system produces, including tickets to consumers. Crea y Crece cares only about invoices between businesses — and about whether they are paid on time.	THEY WILL CONVERGE, NOT MERGE The Ministry now wants “maximum convergence” between the two, but nothing announced so far removes either obligation. Plan for two sets of requirements served by one design.
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03 VeriFactu in brief

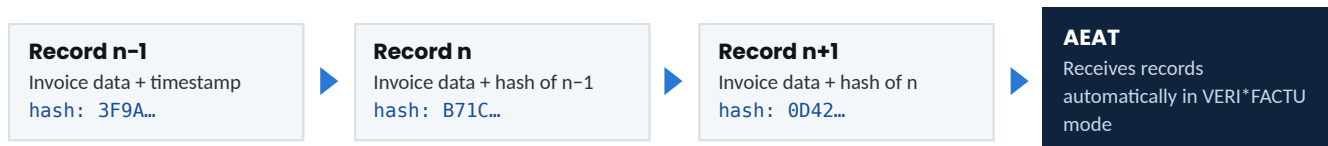
Rules for the software that issues invoices

VeriFactu does not change what an invoice looks like or how it reaches the customer. It changes what the **system** must do every time it issues one.

The six guarantees every invoicing system must provide



How it works: a chain of invoice records



For every invoice the system creates an **invoice record** (and an annulment record when one is cancelled). Each record carries the fingerprint (hash) of the previous one, so a deleted or edited invoice breaks the chain. Hash values above are illustrative.

Two ways to comply

	VERI*FACTU MODE	NON-VERI*FACTU MODE
Records	Sent to the AEAT automatically as invoices are issued	Kept by the taxpayer, electronically signed
Event log	Not required	Required
On the invoice	QR + “VERI*FACTU” legend	QR
On request	—	Records delivered to the AEAT when asked

The QR lets the customer check the invoice at the AEAT’s website. On paper and PDF invoices it is printed; for structured e-invoices the specifications ask for the QR’s URL to be included as a field in the file (Orden HAC/1177/2024, art. 20 — as reported by practitioners).

What an invoice record contains

- Issuer NIF, invoice series and number, issue date
- Invoice type (full, simplified, corrective) and description
- Recipient, where there is one
- VAT breakdown and invoice total
- Hash of the previous record, timestamp and system identification

SOFTWARE PRODUCERS

Since **29 July 2025**, producers must offer adapted systems with a **responsible declaration** of compliance. Ask your vendor — or your SAP partner — for it.

Who is in, who is out

- ◀ **In:** corporate taxpayers, self-employed with business income, non-residents with a permanent establishment — when they issue invoices with software
- ◀ **In:** every invoice that software issues — B2B, B2C and simplified invoices (tickets)
- ◀ **Out:** taxpayers in the SII
- ◀ **Out:** the Basque Country and Navarre (own regimes, e.g. TicketBAI)
- ◀ **Out:** invoicing by hand, without a computerised system

What VeriFactu does not change

- The invoice format — paper and PDF remain valid
- How the invoice reaches the customer
- The VAT return or the SII
- Anything about payment

PENALTIES (ART. 201 BIS GENERAL TAX LAW)

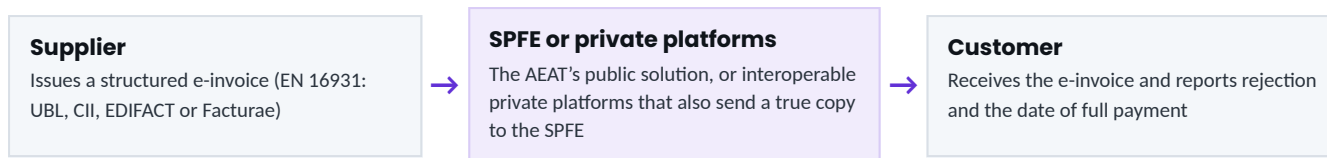
€50,000 per year for users of non-compliant systems;
€150,000 per year for each type of non-compliant system a producer sells.

04 Ley Crea y Crece in brief

Rules for the invoice exchanged between businesses

Crea y Crece changes the invoice itself — it must be structured data, not a PDF — and makes the **customer** part of the process: receiving, rejecting and reporting when it paid.

The mixed model: public solution or private platforms



Private platforms must be free to interconnect with each other and meet RD 238/2026's requirements (ISO 27001, AS2/AS4, eIDAS, all four syntaxes, continuity). Customer consent is no longer needed to send an e-invoice.

Statuses and payments

- **Mandatory:** rejection, the date of full payment, the due date
- **Voluntary:** collection, non-payment
- **Presumed acceptance** if the customer does not reject
- Reported within **four calendar days**, excluding weekends and national holidays
- Payment is reported whichever route the invoice took

Scope

- ◀ **In:** all businesses and professionals, as issuers and as recipients, when the customer is a business established in Spain
- ◀ **Out:** sales to consumers; simplified invoices unless a full invoice is requested
- ◀ **Out:** electricity and gas market operators; IATA clearing houses
- ◀ **Special:** the Basque Country and Navarre (own provisions)

One unique identifier

Each invoice is identified by the issuer's **NIF + series and number + issue date**.

Dates set by Order HAC/1028/2026

DATE	WHAT APPLIES
6 Oct 2026	Order in force; the transition periods start
By Aug 2027	The SPFE must be available at least two months before the first effective date
6 Oct 2027	Businesses with turnover above €8M; for 12 months they also send a PDF unless the customer accepts the e-invoice alone
6 Oct 2028	All other businesses and professionals
6 Oct 2029	Status reporting becomes mandatory for individuals and income-attribution entities up to €8M

PENALTIES: LIGHTER AND LESS CLEAR THAN VERIFACTU'S

Ley 56/2007, art. 2 bis.9, provides a **warning or a fine of up to €10,000**, imposed by the Secretary of State for Digitalisation and AI. Its wording targets failing to offer e-invoicing or access to past invoices; how it applies to B2B breaches is debated, and neither RD 238/2026 nor the order adds a specific regime. The commercial consequence — customers who cannot process your invoice — will be felt first.

05 Side by side

The differences, row by row

	VERIFACTU	LEY CREA Y CRECE
Core question	Was the invoice really issued, and is it unaltered?	Did the structured invoice reach the customer, and when was it paid?
Policy goal	Fight sales suppression and tax fraud	Fight late payment; digitalise business-to-business trade
Legal basis	Ley 11/2021 · General Tax Law art. 29.2.j · RD 1007/2023 · Orden HAC/1177/2024 · RDL 15/2025	Ley 18/2022 · Ley 56/2007 art. 2 bis · RD 238/2026 · Order HAC/1028/2026
What is regulated	The invoicing software and the records it produces	The invoice : its format, its exchange and its statuses
Who is obliged	Taxpayers who issue invoices with software	All businesses and professionals in B2B relations — as issuer and recipient
Transactions	Every invoice the system issues: B2B, B2C, simplified	B2B only, customer established in Spain
Main exclusions	SII filers · Basque Country and Navarre · manual invoicing	Consumers · simplified invoices · energy market operators, IATA clearing
Invoice format	Unchanged — paper, PDF or e-invoice — plus a QR	Structured e-invoice (EN 16931: UBL, CII, EDIFACT, Facturae); PDF only during the transition
Data the AEAT gets	An invoice record (header, tax breakdown, hash) — automatically in VERI*FACTU mode	The e-invoice through the SPFE, or a true copy from private platforms, plus statuses
Customer's role	Passive — may check the QR	Active — must receive, and report rejection and payment date
Payment data	No	Yes — date of full payment within four days
Moment of truth	When the invoice is issued	When it is exchanged — and again when it is paid
Dates	Legal today: 1 Jan 2027 / 1 Jul 2027 · Announced: Oct 2028 for all	6 Oct 2027 (> €8M) · 6 Oct 2028 (rest) · 6 Oct 2029 (status reporting for individuals)
Penalties	€50,000/yr users · €150,000/yr per system for producers	Warning or up to €10,000 — application to B2B breaches debated
SII filers	Exempt	Fully in scope
Vendors	Responsible declaration since 29 Jul 2025	Private platforms must meet RD 238/2026 requirements

And what they have in common

The same authority

Both send invoice data to the AEAT's systems — records in one case, e-invoices or copies in the other.

The same invoice

Both identify an invoice by issuer NIF, series and number, and issue date.

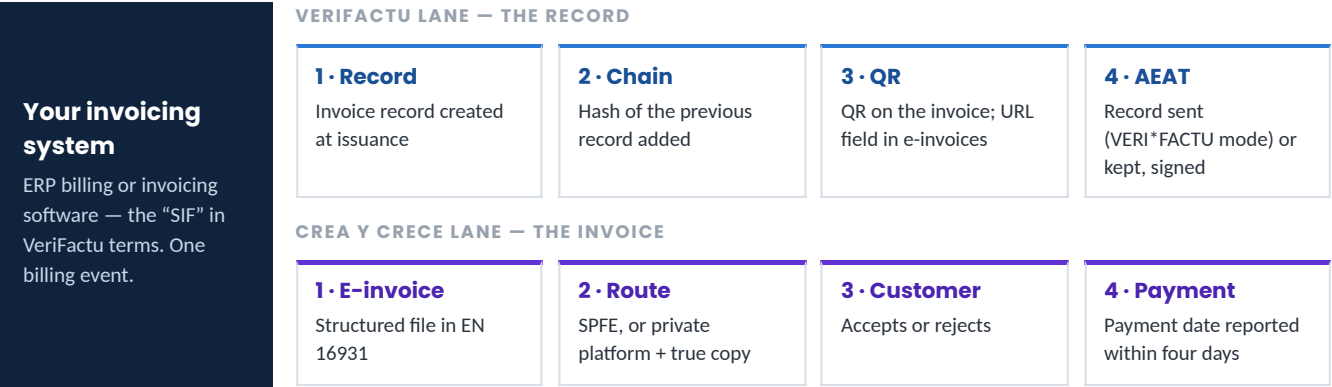
The same direction

Both move Spain towards near-real-time, structured invoice data — the destination of the EU's ViDA package from 2030.

06 Where they intersect

One billing event, two obligations

For a company subject to both, a single invoice triggers two flows that start at the same moment, in the same system, and end at the same authority.



07 Who must do what, and when

The answer depends on SII, turnover and territory

One fact sorts most companies: SII is mandatory above roughly **€6M** of annual turnover, and SII filers are exempt from VeriFactu. In practice, almost every company in the first B2B wave (above €8M) is already in SII — so VeriFactu and B2B land together mainly on the **second wave**, in October 2028.

PROFILE	VERIFACTU	B2B E-INVOICING	WATCH
SII filer, turnover above €8M	Exempt	6 Oct 2027; PDF alongside for 12 months unless the customer accepts the e-invoice alone	Inbound: suppliers' invoices will carry VeriFactu data
SII filer, €6M–€8M	Exempt	6 Oct 2028	Same as above
Not in SII, invoices with software	Oct 2028 announced (legal today: 1 Jan / 1 Jul 2027)	6 Oct 2028	One project for both
Joins SII voluntarily	Exempt while in SII	6 Oct 2028	Leaving SII is only possible in November
Self-employed invoicing by hand	Out while invoicing by hand	6 Oct 2028	Structured e-invoices need software — VeriFactu follows
B2C retailer	Applies if not in SII	Consumer sales out	B2B purchases still arrive as e-invoices
Basque Country / Navarre	Own regimes (TicketBAI in all three Basque provinces)	Own provisions — confirm	Foral treatment still unsettled

VAT-group members and companies in the monthly refund register (REDEME) are also in SII. Each NIF is assessed on its own — groups usually mix profiles.

The combined calendar

	2025	2026	2027	2028	2029–30
VeriFactu	29 Jul: producers must offer adapted software	5 Oct: postponement to Oct 2028 announced	LEGAL UNTIL BOE CHANGES IT 1 Jan: corporate taxpayers 1 Jul: others	ANNOUNCED Oct: all pending obligations	—
B2B e-invoicing	—	31 Mar: RD 238/2026 6 Oct: Order in force	By Aug: SPFE live 6 Oct: turnover > €8M	6 Oct: all others	6 Oct 2029: status reporting for individuals
Also	—	—	31 Dec: SAP ERP 6.0 mainstream maintenance ends	—	1 Jul 2030: EU ViDA digital reporting

THE SII DECISION

A company below €6M can join the SII voluntarily (form 036) and so fall outside VeriFactu. The price: submitting invoice records — issued **and received** — within four days, and you can only leave in November, for the following year. For mid-sized companies with good data this can be the simpler route; for others VeriFactu is lighter. It is a real, dated decision worth taking before 2028.

08 What it means for SAP users

Company code by company code

Most large SAP users in Spain file under SII, so VeriFactu can look irrelevant. It rarely is: smaller subsidiaries, suppliers' invoices and the B2B obligation all reach the same SAP system.

VERIFACTU IN SAP

Available in SAP Document and Reporting Compliance

SAP DRC offers a VERI*FACTU scenario for Spain, creating and submitting the records as electronic documents (SAP Help; SAP knowledge base article 3609812 collects the FAQ). It matters for company codes **not** in SII.

Check: which company codes are outside SII; whether invoices are also issued outside SAP (POS, portals, other tools), since every issuing system must comply.

B2B E-INVOICING IN SAP

Outbound and inbound eDocuments

DRC handles the outbound structured invoice and the inbound flow; SAP has indicated it will cover Crea y Crece in DRC. Confirm the release and SAP Notes once the SPFE specifications are final.

Check: route (SPFE directly or a private platform); where the full-payment date comes from (payment run, clearing, confirming, netting); inbound processing for suppliers' e-invoices.

Six design principles for one programme

PRINCIPLE	IN SAP TERMS
One billing event, two outputs	The billing document drives both the VeriFactu record and the structured e-invoice — no parallel tools
One invoice identity	Number ranges, series and document dates designed once; no renumbering downstream
One correction process	Rejections, credit memos and cancellations mapped to both rules — corrective invoice and annulment record on one side, statuses on the other
Payment data from FI	The full-payment date comes from clearing in FI, not from a manual log — this is where most B2B projects underestimate effort
Clean master data	NIFs, addresses and tax codes valid for both validators
Reconciliation	SII, VeriFactu and B2B data about the same invoice must agree — the AEAT can compare them

Four places where SAP projects get caught out

Invoices outside SAP

POS, portals or billing tools issue invoices too. Every issuing system must meet VeriFactu, and B2B invoices must go out structured.

Intercompany

Invoices between Spanish group companies are B2B — in scope for e-invoicing, and for VeriFactu where the issuer is not in SII.

Self-billing and third parties

When the customer or a provider issues the invoice for you, agree who generates the record and who sends the e-invoice.

Credit notes

Corrective invoices need their own record and their own e-invoice, linked to the original — map them early.

THE ERP CLOCK COMES FIRST

Mainstream maintenance for **SAP ERP 6.0 ends 31 December 2027** — before both October 2028 dates. Legal updates after that require extended maintenance, available to 2030. For ECC users, the e-invoicing design and the S/4HANA plan are one decision.

DON'T STOP THE VERIFACTU WORK

The October 2028 date is announced, not published. Keep the design moving, re-plan the go-live, and use the extra time to build VeriFactu and B2B as **one** project instead of two.

09 How 30 Advisory helps

One design for both rules — Prepare → Run

PHASE	WHAT WE DO	YOU RECEIVE
Prepare	Map every Spanish NIF: SII or not, turnover band, territory, invoicing systems in use	Entity map: who is in VeriFactu, which B2B wave
Explore	One target design: billing event, numbering, corrections, payment data, route (SPFE or platform); the SII decision where relevant	Target design and roadmap
Realize	SAP DRC configuration for VERI*FACTU and B2B, master-data fixes, end-to-end tests including rejections and payments	Tested solution
Deploy	Cutover, hypercare, cockpit routines for billing, AR, AP and tax	Live, with buffer before the date
Run	Regulatory watch — the BOE text of the postponement, the convergence reform, ViDA	Compliance as routine

Six questions for your team

1. Which of our Spanish entities are in SII, and which are not?
2. Which systems issue invoices — only SAP, or also POS, portals or others?
3. Does our software vendor have the VeriFactu responsible declaration?
4. Will we use the SPFE or a private platform for B2B?
5. Where will the full-payment date come from?
6. Is our plan built on the legal VeriFactu dates or the announced one?

Why 30 Advisory

- ◀ **Finance, tax and SAP in one team** — DRC experience across Spain, Italy and Türkiye
- ◀ **Founder-led** — the people who scope the work do the work
- ◀ **One roadmap** — e-invoicing, VeriFactu and S/4HANA planned together

OUR SCOPE, HONESTLY

We are SAP finance and compliance advisors, not a tax law firm. Tax positions stay with your tax advisers; we turn their decisions into a working process in SAP.

Let's build together

One hour, no slides: we map your Spanish entities against both rules and tell you where to start.

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Sources

VeriFactu: Ministerio de Hacienda, nota informativa on VeriFactu (5 Oct 2026) · Infobae/Europa Press, elDerecho, SAPI and VeriBai on the announced postponement (5–6 Oct 2026) · RDL 15/2025 (BOE 3 Dec 2025) and its validation (BOE 16 Dec 2025) · RD 254/2025 (via Manubens) · RD 1007/2023 · Orden HAC/1177/2024 (QR in structured e-invoices, via Quaderno) · art. 201 bis General Tax Law. **Ley Crea y Crece:** Ley 18/2022 · Ley 56/2007, art. 2 bis (BOE consolidated text) · RD 238/2026 (BOE 31 Mar 2026) · Order HAC/1028/2026 (BOE 5 Oct 2026) · creaycrece.es on penalties. **Comparisons and SAP:** Sage, Davisa and Spun on how the two interact · SAP Help Portal and SAP KBA 3609812 on VERI*FACTU in DRC · 30 Advisory briefings on Spain (Sept–Oct 2026).

General information prepared by 30 Advisory on 7 October 2026 from public sources. It is not tax or legal advice. The VeriFactu postponement to October 2028 is announced, not yet published in the BOE; the legal dates remain 1 January 2027 and 1 July 2027 until it is. Thresholds, exclusions, foral provisions and SAP scope must be confirmed for each entity and software release. Hash values and examples are illustrative. SAP and SAP S/4HANA are trademarks of SAP SE; 30 Advisory is independent of SAP.