POLICY INSIGHT ARTICLE

The Simplified Invoice: A Small Document with Big Policy Implications

Fiscalisation, e-invoicing and e-reporting at the boundary of digital tax control

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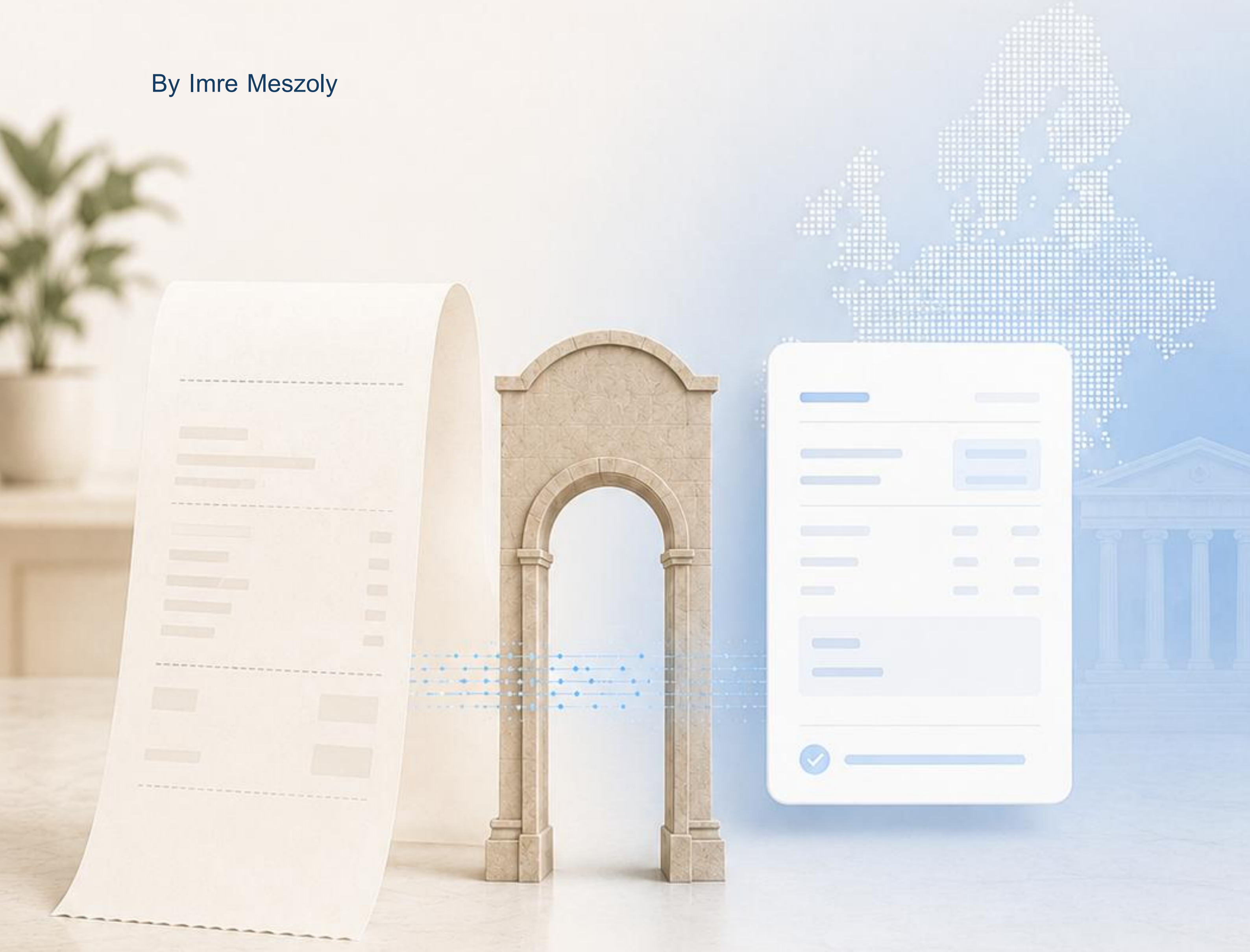

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The simplified invoice may be simplified in name, but not in policy impact.

Over the past few years, I have seen the same small policy dilemma emerge at the boundary between fiscalisation and e-invoicing.

When a simplified invoice is issued for a taxable transaction,

- is it only part of the fiscalisation or POS-side documentation layer, or
- can it also trigger structured e-invoicing duties?

After all, a simplified invoice is still an invoice. Yet in practice, it is often generated by POS systems or fiscalisation units that traditionally sit inside the fiscal control layer.

At the same time, emerging e-invoicing mandates increasingly expect Business-to-Business (B2B) invoices, including simplified invoices, to move through structured e-invoicing channels. Simplified invoices issued in Business-to-Customer (B2C) situations may create an even more delicate question, because the customer may ask for an invoice but has no meaningful e-invoicing endpoint, while the transaction may still be governed by fiscalisation, reporting or consumer-facing documentation rules.

Does that sound like a complex complication?

The Direction of Travel Is Clear

The described circumstance is not necessarily a problem today in every jurisdiction. But it is a question worth asking early, preferably before legal mandates, technical specifications and service-provider responsibilities are locked into place. Across Europe, digital tax-control models are moving quickly, for example:

- France is rolling out mandatory B2B e-invoicing and e-reporting through a platform-based model from 2026 to 2027.
- Poland is implementing KSeF in stages from 2026, with larger businesses entering first.
- Romania has extended RO e-Factura into B2C invoice reporting, and
- Germany has also started its B2B e-invoicing transition.

These models are not the same. Some are based on structured exchange, some on clearance or platform reporting, some on phased mandates, and some separate B2B and B2C obligations differently. Still, they point to the same broader policy trend: invoice data is becoming part of continuous digital tax control.

That trend matters for fiscalisation as well.

Where Fiscalisation Meets the Invoice World

For many years, fiscalisation service providers operated in a relatively clear functional space. They supported fiscal receipts, POS compliance, online reporting, middleware integration, fiscal device connectivity, transaction validation, audit trails and legal preservation of fiscal transaction data.

In many markets, the simplified invoice sat comfortably close to that world. It was often connected to retail, hospitality, services or other high-volume transactions, carried reduced mandatory content, and could be generated by the same POS or middleware layer that already handled receipts and fiscal records.

This raises a legitimate question. In countries where mandatory e-invoicing requires in-scope invoices to be transmitted through structured e-invoicing channels, how should simplified invoices be treated when they are legally invoices but operationally generated inside the fiscal or POS layer?

Does this mean that fiscalisation service providers may need to extend their services towards the e-invoicing regime, even though that regime may traditionally have been seen as separate from fiscalisation?

Belgium provides a useful example of why the question matters. From 1 January 2026, structured electronic invoicing is mandatory for transactions between Belgian VAT-liable businesses. This does not mean that every simplified invoice in Belgium automatically becomes an e-invoice in every context, nor does it mean that B2C transactions are treated in the same way as B2B transactions. However, where a simplified invoice is legally issued for an in-scope B2B transaction, it becomes reasonable to ask whether the service provider should treat it only as a fiscal or POS-side document, or also as part of the structured e-invoicing compliance chain.

That question may look narrow, but it is not. It affects document classification, data mapping, validation, routing, archiving, service-provider responsibility and audit evidence. It also affects how taxpayers understand the role of the systems they rely on.

The B2B case may often be easier to analyse. There is a business recipient, an invoice exchange relationship, and in many countries a structured e-invoicing framework or platform route.

The B2C case is more delicate. Not because B2C transactions are generally subject to structured e-invoicing – they usually are not. But because the document itself may already be much closer to the invoice world than it looks from the counter.

Portugal is a useful example. In Portuguese retail practice, the Fatura Simplificada document type is commonly used in situations that, in many other markets, would feel operationally like a simple receipt. Yet it is not just a receipt, but a simplified invoice, with its own role in the certified billing and SAF-T reporting environment. Where the final consumer does not provide a tax identification number, the generic “Final Consumer” NIF 999999990 is used in the audit data. This small practical detail helps explain why the document often feels like a receipt at the counter, even though it remains a simplified invoice in the fiscal and reporting framework.

This is not the same policy model as mandatory B2B structured e-invoicing. But it is a useful reminder that a “receipt-like” B2C retail document can already sit inside an invoice-based fiscal control framework.

This is exactly where a simplified invoice can quietly become the point where fiscalisation, VAT invoicing and consumer protection meet. Small document, big personality.

From Operational Document to Policy Design Question

For policymakers and tax administrations, this creates a real design question at the intersection of law, architecture and market responsibility:

- Should simplified invoices be handled through e-invoicing, through fiscalisation, or through a separate reporting model where neither framework is a natural fit?
- When a simplified invoice is issued for a transaction that is already subject to fiscalisation, should it be treated as a separate compliance event or as an additional legal representation of the same underlying transaction?
- Where fiscalisation and e-invoicing obligations overlap, should taxpayers be expected to determine the correct compliance route for a simplified invoice, or should this be defined upfront by the legal and technical framework, including edge cases?

These are not only technical questions. They are questions of legal design, administrative clarity, service-market responsibility and taxpayer certainty.

Some existing fiscalisation frameworks already show that invoice-level fiscal control can be approached differently. The TaxCore® VAT Monitoring System (VMS), for example, uses invoice fiscalisation as part of a broader transaction-level tax-control architecture, with fiscal invoice creation, QR-based verification and audit-data generation under tax authority control. This does not make it equivalent to European structured e-invoicing, nor does it suggest that one model should replace another. It simply illustrates that the boundary between fiscal receipts, invoices and reporting can be designed in different ways.

When Service Boundaries Start to Blur

The broader policy question is therefore not about one system, one vendor or one national model. It is about whether future digital tax-control frameworks should continue to treat fiscal receipts, simplified invoices, VAT invoices and structured e-invoicing as separate design conversations, even when they increasingly meet at the transaction level.

For fiscalisation service providers, this is also a strategic question. A provider that supports only the fiscal receipt layer may still be sufficient in jurisdictions where fiscalisation and e-invoicing remain clearly separated. But where simplified invoices fall within the scope of structured e-invoicing obligations, the service boundary becomes less obvious. Is the provider generating a fiscal document, a VAT invoice, or both? Is it validating whether the transaction is in scope? Is it transmitting structured data to a platform or tax authority system? Is it preserving the legal audit trail? And perhaps most importantly, does the taxpayer know where the provider's responsibility ends?

The simplified invoice may never become the headline issue in digital tax reform. But it may be one of those small documents that reveals whether a reform has connected all the right policy dots, from transaction data to legal mandates and taxpayer experience.

It is simplified in name.

Not necessarily in impact.