WEEK 39 | 21–27 SEPTEMBER 2026

Weekly Global VAT Newsletter

ViDA, EU case law, e-invoicing mandates and country developments worldwide

Source: VATupdate.com

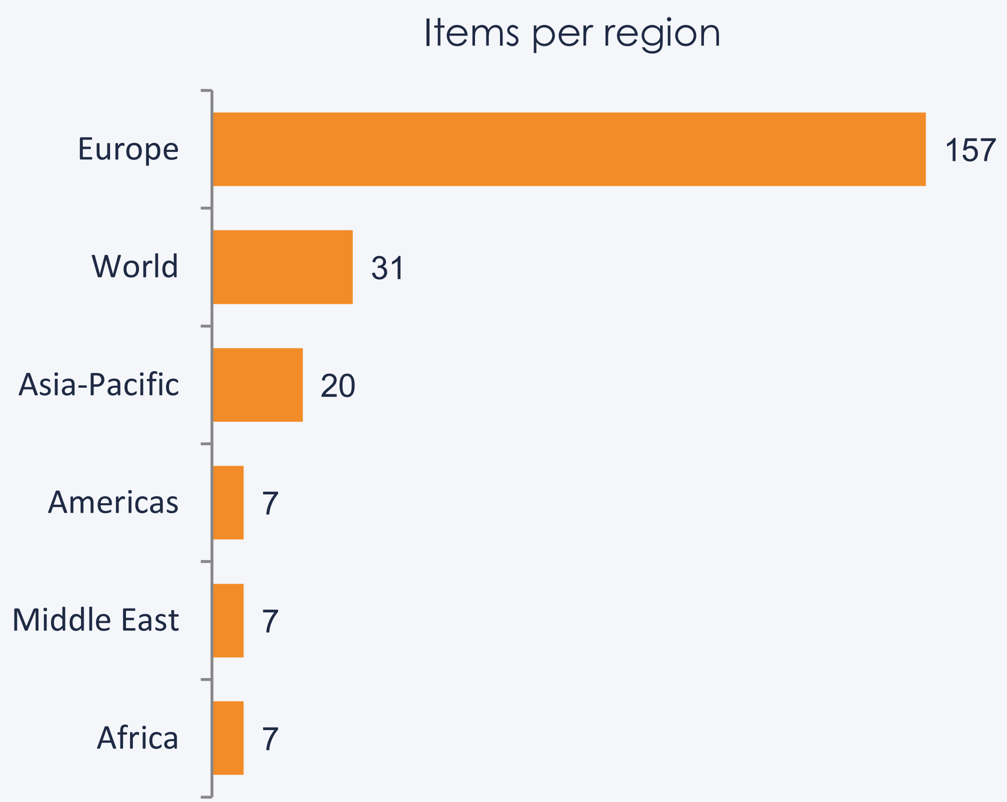
Week at a Glance

Items retained after filtering and de-duplication

229 news items

31 European countries covered

9 EU court items



Key Dates Ahead

Effective or planned dates reported this week

1 Oct 2026
UAE amended VAT Executive Regulations; Maldives GST on inbound tourism

1 Nov 2026
China: buyers withhold VAT on services from individuals

12 Dec 2026
Uzbekistan: VAT on non-resident online goods sellers

31 Dec 2026
Philippines: e-invoicing compliance deadline

1 Jan 2027
ViDA deemed supplier/OSS; France simplified regime ends; Norway & UAE e-invoicing; Poland KSeF payment refs

1 Mar 2027
Denmark: bookkeeping system e-invoicing requirements

1 Jan 2028
Drafts: Bulgaria e-invoicing, Belgium e-reporting, Germany cash registers

1 Jul 2030
ViDA cross-border reporting; NL B2B e-invoicing; Germany B2B reporting (planned)

Draft or planned dates are not yet enacted, as reported in the source articles.

Europe | ViDA (VAT in the Digital Age)

EU-level developments and implementation guidance

FROM 1 JAN 2027

ViDA 2027: Deemed Supplier, Distance-Sales Threshold and OSS Changes

Deemed-supplier rule extends to taxable persons and non-taxable legal persons; the €10,000 threshold counts only sales dispatched from the establishment Member State; Union OSS temporarily covers gas, electricity, heating and cooling.

E-INVOICE STANDARD

Revised EN 16931-1:2026 Expands VAT Data Model Ahead of ViDA

EN 16931-1:2026 adds business terms for national tax rules, exemption reasons, goods/services indicators and intra-Community transactions. The 2017 version remains compliant during a migration period.

POLICY PAPER

IOTA Paper Proposes Data Reconciliation Procedure for the ViDA Era

IOTA proposes an automated Data Reconciliation Procedure matching real-time invoice data with VAT returns, while preserving self-declaration and due-process safeguards.

Europe | ECJ / CJEU / General Court

Judgments, opinions, referrals and hearings

CJEU JUDGMENT

CJEU: Donation of Business Shares Is Not an Article 19 Transfer

Donating half-shares of a business to two daughters is not an Article 19 transfer; the later contribution is a separate transaction.

ECJ

ECJ: Loss-Making Coffee Trips Still Fall Under Special VAT Scheme

Loss-making coffee trips still fall within the special VAT scheme.

OPINION

ECJ C-167/26: Opinion on When Input VAT Deduction May Be Claimed

Opinion on the timing of the right to claim input VAT deduction; judgment pending.

BFH REFERRAL

BFH Referral: Can a Fixed Establishment Exist Without Personnel?

Can a fixed establishment exist with equipment only and no personnel? Automated sludge-drying facility case.

REFERRAL

Pending Referral T-548/26: German De Minimis Threshold

Is Germany’s €1,000 de minimis threshold for input VAT adjustment compatible with the VAT Directive?

HEARING 21 OCT

Court Agenda: Hearing in T-689/25 (James Howden) on 21 October

T-689/25 (James Howden): exemption conditions for intra-Community supplies and the role of VAT IDs.

Source: VATupdate.com – click headlines to open articles

Europe | E-Invoicing & Digital Reporting

National mandates and timelines

GERMANY

Germany Outlines Roadmap for B2B Digital VAT Reporting

Legislation from 2027, voluntary pilot early 2029, reporting from 1 July 2030 (planned).

NETHERLANDS

Mandatory B2B E-Invoicing From July 2030, E-Reporting From 2031

Domestic B2B e-invoicing 1 July 2030, e-reporting 1 July 2031, based on EN 16931.

BULGARIA

Draft Law: Mandatory E-Invoicing and Real-Time Reporting From 2028

Draft: clearance e-invoicing, real-time reporting and pre-filled returns from 1 Jan 2028.

BELGIUM

Belgium Prepares Near Real-Time E-Reporting From 2028

Draft near real-time e-reporting by supplier and customer from 1 Jan 2028.

DENMARK

Update: Bookkeeping System E-Invoicing Requirements Delayed to March 2027

Requirements moved to 1 March 2027; single Peppol format by mid-2029.

NORWAY

Mandatory B2B E-Invoicing From 2027; Digital Accounting by 2030

Structured B2B sending from 1 Jan 2027; receiving obligation from 1 Jan 2030.

SLOVAKIA

Proposal to Defer Buyer-Side Reporting to July 2030

Draft defers buyer-side reporting to July 2030; receiving still from 1 Jan 2027.

SPAIN

Tax Agency Details Public B2B E-Invoicing Platform (SPFE)

Public SPFE (UBL 2.5); possible start 1 Oct 2027 (>€8m) and 1 Oct 2028.

Europe | France & Germany

Compliance changes and guidance

FRANCE

Simplified VAT Return Regime Abolished From 1 January 2027

Monthly or quarterly CA3 returns from Jan 2027; automatic transfer by the tax administration.

Early E-Invoicing Figures Show High Rejection Rates

4.81 million entities on platforms; 14.4% of F1 flows non-compliant by 14 September.

Start-Up Period: Must Paper or PDF Invoices Be Recreated as XML?

Fallback invoices remain valid; no systematic XML recreation appears to be required.

GERMANY

Finance Ministers Back Import VAT Offsetting in VAT Return From 2030

Import VAT offsetting in the periodic VAT return targeted from 1 Jan 2030.

Draft Law: Secure Cash Registers and Digital Receipts From 2028

Draft: TSE cash registers above €100,000 turnover and digital receipts from 2028.

XRechnung 4.0 Preliminary Specification Published

Aligned to EN 16931-1:2026; XRechnung 3.0 mandatory until at least 31 July 2027.

Europe | Poland

KSeF, legislation and case law

KSEF

Update: Draft Amendment Defers KSeF Penalties and Extends Reverse Charge

Draft defers KSeF penalties until end-2027 and extends the reverse charge.

FROM 1 JAN 2027

KSeF Number Required in Payment References From 2027

KSeF number required in B2B payment references; insurer compensation payments distinguished.

KSEF STATISTICS

KSeF Statistics: 657 Million Invoices; No Outages Recorded

657 million invoices by 2.37 million issuers; no outages triggering offline or emergency modes.

RATES

23% VAT Rate Approved for Selected Non-Alcoholic and Energy Drinks

23% VAT for selected non-alcoholic and energy drinks, planned from 2027.

SEJM

Sejm Adopts VAT Amendment Easing Export Proofs and Import Procedures

Wider export evidence; electronic centralised clearance; monthly low-value import declaration.

NSA

NSA: Residential-Letting Exemption Requires Residential Character

Residential-letting exemption needs residential character, not only residential use.

Europe | Rates & Thresholds

Adopted, proposed and temporary measures (click country to open article)

Country	Measure	Status
Belgium	Small-business exemption €25,000 → €30,000 (2027–2031)	Approved
Bulgaria	VAT registration threshold to EUR 75,000	Proposal
Netherlands	Floriculture and balloon rides 9% → 21% from 1 Jan 2028	Tax Plan 2027
Lithuania	Restore 9% on residential heating from 1 Jan 2027	Draft law
North Macedonia	Specified fuels 18% → 10% (15–28 Sept 2026)	Temporary
Portugal	Fuel 23% → 13%; zero VAT on essential foods	Opposition proposal
France	Linear pay-TV 10% → 20%	2027 budget proposal
Germany	Fuel VAT cut rejected; energy tax –€0.14 per litre	Oct–Dec 2026

Europe | Selected National Case Law & Guidance

Deduction, taxable supplies and exemptions

AUSTRIA

VwGH Denies Input VAT on Undocumented Recharged IT Service Fees

Input VAT denied on recharged IT fees without evidence of actual supply.

GERMANY

BFH: Input VAT Deductible on Legal Fees for Damages Claims

Legal fees for damages claims deductible as general overheads.

NETHERLANDS

Supreme Court: No Bad-Debt Relief Merely Due to Fiscal Unity

Bad-debt relief needs a contractual link; fiscal unity alone is insufficient.

ITALY

Ruling 175/2026: Data Centre Colocation Is Property-Related Service

Private-cage colocation is a property-related service at standard rate.

SWITZERLAND

Federal Supreme Court: No Option or Deduction Before Tax Liability

No option to tax or deduction for a supply before VAT liability began.

SWEDEN

Tax Agency: VAT on Company Cars Provided Against Salary Deductions

VAT due on company cars provided against salary deductions.

FINLAND

KHO: Device Protection in Equipment Leasing Not Exempt Insurance

Device protection in leasing is not exempt insurance.

ITALY

Construction Reverse Charge Follows ATECO 2025 Classification

Historic building restoration no longer under construction reverse charge.

Europe | United Kingdom

HMRC initiatives and tribunal decisions

HMRC

HMRC VAT Assist: Pre-Filing Checks on Draft VAT Returns

Rule-based pre-filing checks via MTD software, planned from around April 2027.

HMRC

HMRC Changes Overseas Refund Rules for VAT Group Members

Non-UK VAT group members claim separately; transition claims by 31 Dec 2026.

FTT

FTT: Collagen Beauty Drinks Standard-Rated, Not Zero-Rated Food

Collagen drinks standard-rated; £3.64 million refund refusal upheld.

FTT

FTT: Hypercar Input VAT Recoverable for Hire Business

Input VAT recoverable where hire intention is proven at acquisition.

FTT

FTT: Outsourced Payroll Is Not a Supply of Staff

Payroll administration, not staff supply; VAT on wages not recoverable.

HMRC

HMRC GfC20 on Outsourced Fund Management Services

Single vs multiple supply approach for outsourced fund management.

Americas

VAT/GST developments

CANADA

CRA Memorandum Clarifies GST/HST Province-of-Supply Rules

Contracting address generally most closely connected for province of supply.

CHILE

Proposed Place-of-Supply Changes for Financial and Wealth Management

Proposed place-of-supply changes for financial and wealth management services.

DOMINICAN REPUBLIC

ITBIS Withholding Exempted Between Authorised E-Invoice Issuers

Certain ITBIS withholdings exempted on e-CF transactions between authorised issuers.

ARGENTINA

Opposition Proposal: Dual VAT and Electronic-Payment VAT Refunds

Proposal for dual national/subnational VAT and refunds for electronic-payment purchases.

MEXICO

List of VAT-Registered Non-Resident Digital Service Providers Published

List of VAT-registered non-resident digital service providers published.

URUGUAY

E-Invoicing Test Certificate Updated

E-invoicing test certificate updated.

Asia-Pacific

Selected developments

CHINA

Business Buyers to Withhold VAT on Services From Individuals

Buyers withhold VAT on specified services from individuals from 1 Nov 2026.

JAPAN

Cabinet Outline: Temporary 1% Consumption Tax on Food

Proposed 1% rate on qualifying food, 1 Apr 2027 – 31 Mar 2029.

PHILIPPINES

Update: RMC 98-2026 Confirms E-Invoicing by 31 December 2026

E-invoicing compliance by 31 Dec 2026; PDFs do not qualify.

MALDIVES

GST Registration and Returns for Overseas Tourism Suppliers

Overseas tourism suppliers register via MIRA 120 from 1 Oct 2026.

UZBEKISTAN

Non-Resident VAT Regime Extended to Online Goods Sellers

Non-resident online goods sellers in VAT regime from 12 Dec 2026.

BANGLADESH

Online VAT Returns Mandatory for 11 Major Sectors

Online VAT returns mandatory for 11 major sectors.

KYRGYZSTAN

Foreign Digital Service Providers Must Register Before Starting

Portal registration also constitutes VAT registration.

VIETNAM

Circular on Electronic VAT Refunds for Departing Foreigners

Electronic VAT refund system for departing foreigners.

Middle East & Africa

Selected developments

MIDDLE EAST

UAE

Cabinet Decision 149 of 2026 Overhauls VAT Executive Regulations

Output-based residual recovery from 1 Oct 2027; cash-payment deduction limit.

UAE

E-Invoicing From 1 January 2027 for Large Taxpayers

Peppol PINT-AE structured XML; B2B and B2G in scope.

BAHRAIN

Margin Scheme Limited to Used Goods Previously Subject to VAT

Pre-2019 goods excluded; evidence of prior VAT required.

AFRICA

SOUTH AFRICA

SARS Consults on Digital VAT Model With E-Invoicing

Consultation on e-invoicing, interoperability, e-reporting and auto-assessments.

KENYA

KRA Outlines VAT Changes Under Finance Act 2026

Bad-debt claims after 3 years; digital payment fees standard-rated.

IVORY COAST

45 Days to Align E-Invoicing API Interfaces With FNE

Remediation period from 14 Sept 2026; API key suspension risk.

Source: VATupdate.com – click headlines to open articles

World | Briefings & VAT Concepts

E-invoicing / e-reporting country briefings and explainers

BRIEFING

France: Comprehensive Briefing on the E-Invoicing Mandate

Y-model, 2026/2027 phases and soft-landing tolerance.

BOOKLET

Bulgaria: SAF-T, E-Invoicing and E-Reporting Country Booklet

SAF-T, B2G e-invoicing and proposed NISSEF clearance system.

BOOKLET

Taiwan: E-Invoicing and E-Reporting Country Booklet

eGUI near-real-time CTC; Peppol cross-border since Sept 2025.

BRIEFING

Spain: Briefing on B2B E-Invoicing, VERI*FACTU and SII

Crea y Crece, VERI*FACTU, SII, FACe and TicketBAI.

VAT CONCEPTS

VAT Concepts Explained: Joint and Several Liability in the EU

Article 205, knowledge test and Member State practice.

VAT CONCEPTS

VAT Concepts Explained: Taxable Person and Economic Activity

Taxable person definition and four-step activity test.

BRIEFING

Briefing: EU Fixed Establishment Principles Based on ECJ Case Law

Permanence plus human and technical resources required.

EXPLAINED

E-Invoicing Explained: UBL Versus CII Under EN 16931

One EN 16931 model, two syntaxes: mapping impact.

World | Global Developments

International organisations and cross-border trends

OECD

OECD: Digitalisation Drives Global VAT Enforcement

116+ jurisdictions apply OECD-style digital trade VAT rules; 43 collect VAT on low-value imports at point of sale; 27 changed rates in 2025.

OECD

OECD Warns of Fragmentation in E-Invoicing and DCTR Mandates

Uncoordinated e-invoicing and DCTR mandates raise compliance costs; January 2026 guidance stresses interoperability.

TRACKER

Worldwide Upcoming E-Invoicing Mandates: Chronological Overview Updated

Updated chronological overview of upcoming e-invoicing mandates, implementations and changes worldwide.

SERIES

VAT Headaches: New Series on Errors, Pitfalls and Grey Zones

About thirty instalments on contested VAT grey zones, from invoice errors to ViDA-era reporting mismatches.

Business Use

Full newsletter

All 229 items, with three-bullet summaries and additional links, are in the Week 39 Word newsletter.

Source: **VATupdate.com**