

Företagarnas svar på EU-kommissionens remiss av slutrapporten från Expertgruppen om e-fakturering.

I vårt remissvar tryckte vi särskilt på följande:

Medlemsstater ska inte kunna kräva särskilda säkerhetslösningar för att acceptera e-fakturering. Sverige och Finland som idag inte ställer särskilda krav för e-fakturor måste kunna fortsätta att göra detta.

Företagarna, the Swedish Federation of Business Owners, is the leading organization for small-business owners in Sweden and represents some 70, 000 entrepreneurs.

With regard to the consultation on the Final Report of the Expert Group on E-invoicing, we would like to contribute the following input.

We strongly support the Group's conclusion of the importance of equal treatment between invoices on paper and e-invoices. Further we would like to stress that additional requirements such as signatures of any kind on invoices, whether on paper or electronic should not be introduced or allowed.

Any problems related to fraud must of course be taken seriously, and combated with efficient measures. However, increasing information or authentication requirements on all types of invoices is not an effective measure to combat fraud and would create substantial obstacles for all businesses and deteriorate the business climate. As the suggestion is to have the same rules apply for all invoices regardless of if they are sent within one Member state or cross-border, any new requirements would impact all business, large and small. It is also very important that Member states like Sweden and Finland, who already have equal treatment of invoices whether on paper or electronic, remain free to keep their scheme. We would also like to underline the importance to apply the principles of Think Small First in the regulatory process. Often this requires applying a new perspective when designing regulations.

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