

**MEMORANDUM ON CONSULTATION
FEEDBACK**

Record No.: VH/3261/00.02.00.01/2024

Memorandum on consultation feedback: Report on the needs of businesses for the reform of official reporting

ABSTRACT

The Tax Administration's preparatory project has drawn up a report on the need to reform official reporting by businesses as part of the follow-up work on the Real-Time Economy project. The report was submitted for a public consultation round in early 2026, and a total of 35 consultation opinions on it were received from various public authorities, ministries, interest groups and companies.

The feedback obtained from the consultation round indicates that the objectives of the reform, i.e. the reduction of the need for service use, improvement of the efficiency of official reporting, elimination of overlapping reporting, and more efficient utilisation of data, are generally considered worth supporting. The availability of structured and standardised financial data is considered to enable an increase in automation, improve data quality and streamline official processes.

At the same time, some reservations are expressed in the opinions concerning the implementation, schedule and scope of the reform. Key challenges identified include the harmonisation of data content, the diversity of financial administration software and details related to reporting practices. Many of the parties consulted emphasise that without adequate standardisation that also takes into account international perspectives, compliance with the principle of data minimisation and legislative amendments, the reform may not necessarily reduce the administrative burden, but could, instead, even increase it.

In general, the opinions emphasise making gradual progress, the role of piloting and adequate transition periods. They also note that legislation must be completed in good time before the technical implementation to ensure that necessary system changes can be implemented in a controlled manner.

From a legal point of view, key areas include the compatibility of the reform with EU regulation, especially the Value Added Tax Directive and the ViDA Directive. In addition, the opinions highlight issues related to securities market legislation, differences in accounting and taxation, data protection and information security, and ensuring the legal protection of businesses. The opinions also draw attention to differences between IFRS and FAS reporting and the complex reporting systems of international groups.

From the business perspective, the main concern is related to a potential increase in costs and administrative burden, especially in small and medium-sized enterprises and micro-enterprises. Many of the parties issuing opinions emphasise the need for performing a more detailed impact assessment in the follow-up work, taking into account both costs and benefits for different types of actors. They also raised challenges in international operating environments that differ from one another in terms of accounting and taxation structures and reporting standards. The consultation opinions call for consideration of industry-specific special features of VAT reporting.

The planned data flows are viewed partly positively, but concerns are raised about the scope of the data content, details related to standardisation and the effects on businesses' reporting obligations. The principle of data minimisation is deemed essential, and only data necessary for statutory tasks may be collected from businesses.

Based on the feedback received from the consultation round, the preparatory project considers that further efforts to prepare the reform will require especially the following measures: specifying the data content and standards and specifying the details related to the proposed reporting method, carrying out more in-depth impact assessment (e.g. presenting benefits in concrete terms by customer segment and specifying cost estimates), investigating the data users and possible use purposes more broadly, and planning the schedule and phasing in more detail. It is also key to ensure the compatibility of the solution with national and EU-level regulation and to take into account the capabilities of different types of actors.

The preparatory study will continue in the period 2026–2027 in close cooperation with stakeholders. The aim is to prepare a more detailed package and the necessary legislative amendments to support political decision-making to enable controlled implementation of the reform, ensuring that it will bring benefits to different parties.

CONTENTS

| | | |
|-----|---|----|
| 1 | Foreword..... | 4 |
| 2 | Number of opinions and their distribution | 4 |
| 3 | Overview of consultation feedback..... | 5 |
| 4 | Key observations from the opinions by theme..... | 6 |
| 4.1 | Feasibility | 6 |
| 4.2 | Data flows | 8 |
| 4.3 | Impacts | 9 |
| 4.4 | Phasing, dependencies and schedule..... | 10 |
| 5 | Estimates and conclusions of the preparatory project..... | 10 |
| 5.1 | Reporting | 10 |
| 5.2 | Implementation of the reform and different implementation options | 11 |
| 5.3 | Small businesses' readiness for the reform..... | 12 |
| 6 | Changes and further assessment based on the opinions | 12 |
| 6.1 | Follow-up work on the reform schedule and phasing..... | 12 |
| 6.2 | Specifying the details of reporting..... | 13 |
| 6.3 | More extensive examination of the purposes of data use | 13 |
| 6.4 | Impact assessment..... | 14 |

1 FOREWORD

At the beginning of 2025, the Tax Administration was assigned the task of examining the reform of official reporting as part of the follow-up work of the Real-Time Economy project. The Finnish Tax Administration's VirTa preparation project drew up a report on the reform of the official reporting of financial data of businesses. The preparatory project organised a public consultation round on the report. Consultation opinions were requested from 9 February to 27 March 2026 at lausuntopalvelu.fi.

The report proposes a shift from the current decentralised official reporting to centralised data transfer. The reform would apply to parties required to keep accounts and those subject to record-keeping requirements that are registered for value-added tax. It would also affect the authorities as data users.

The aim of the consultation round was to gather stakeholders' views on the proposals presented in the report. The aim was also to gain insight into how stakeholders perceive the feasibility of the solution and the use of data. In particular, they were asked to pay attention to the benefits for companies and the costs incurred by companies.

The consultation round was open to everyone. A separate request for comments was sent to the public authorities, ministries and interest groups related to the reform that had been identified during the study work.

The opinions support further preparatory work. The opinions received enable the preparatory project to continue its efforts to examine the needs for legislative amendments and to define and specify the details of the reform.

The purpose of this memorandum on consultation feedback is to compile the observations received during the consultation round and to inform stakeholders of the measures taken based on the opinions received. The aim is to support the Government's discretion related to the implementation of the reform of the official reporting of financial data.

2 NUMBER OF OPINIONS AND THEIR DISTRIBUTION

In total, 35 parties provided opinions: 4 ministries, 9 agencies or institutions, 17 interest groups, 4 companies, and 1 pension institution. The table below lists the parties issuing opinions and information about their stakeholder types.

| Organisation | Stakeholder type |
|---|-------------------------------|
| Ajantieto Oy | Business |
| Confederation of Finnish Industries (EK) | Interest group |
| Federation of Finnish Special Commodity Trade ETU | Interest group |
| Fennoa Oy | Business |
| Finance Finland (FA) | Interest group |
| Business Finland – the Finnish Funding Agency for Innovation | Government agency/institution |
| Social Insurance Institution of Finland (Kela) | Government agency/institution |
| Finnish Commerce Federation | Interest group |
| Central Chamber Of Commerce | Interest group |
| Kirjuriuote Oy | Business |
| Finnish Immigration Service | Government agency/institution |
| Farmers' Social Insurance Institution (MELA) | Other |
| Micro and Solo Entrepreneurs Association (MYRY) | Interest group |
| Central Union of Agricultural Producers and Forest Owners (MTK) | Interest group |

| Organisation | Stakeholder type |
|--|-------------------------------|
| Service Sector Employers Palta | Interest group |
| Finnish Patent and Registration Office | Government agency/institution |
| Central Finnish Cooperative Society (SOK) | Business |
| Ministry of Social Affairs and Health | Ministry |
| Association of Finnish Cities and Municipalities, Vitality and Economy Unit | Interest group |
| Suomen Taksiliitto ry | Interest group |
| Association of Finnish Accounting Firms (TAL) | Interest group |
| Finish Association of Authorised Public Accountants | Interest group |
| Federation of Finnish Enterprises | Interest group |
| Technology Industries of Finland | Interest group |
| Statistics Finland | Government agency/institution |
| Finnish Customs | Government agency/institution |
| Ministry of Economic Affairs and Employment | Ministry |
| Finnish Pension Alliance TELA | Interest group |
| Federation of Unemployment Funds in Finland (TYJ) | Interest group |
| National Enforcement Authority Finland, Office of Director General, development and control unit | Government agency/institution |
| State Treasury | Government agency/institution |
| Prime Minister's Office, Finance Unit | Ministry |
| Ministry of Finance | Ministry |
| Finnish Tax Administration, Incomes Register Unit | Government agency/institution |
| Taxpayers Association of Finland | Interest group |

3 OVERVIEW OF CONSULTATION FEEDBACK

In principle, the ministries have a positive view of the objectives of the reform. They consider centralised data transfer as a strategically sound means to improve the efficiency of official reporting, increase automation and promote a transition to structured, standardised and shared financial data that will enable reducing administrative burden in the long term. At the same time, the ministries emphasise that this is a very extensive and complex reform whose benefits and costs are still inadequately assessed and whose benefits appear, at this point, to focus on public authorities in particular, while the impacts on businesses remain uncertain. Based on their view, it is key for follow-up work to proceed gradually, involve detailed determination of data content and standards, ensure information security and data protection, and account for the interoperability and coordination of different systems with other national and EU projects (such as VAT in the Digital Age, ViDA). They also emphasise that the reform must not create overlapping reporting obligations, that the needs of various current and future users must be taken into consideration extensively, and that businesses must be given enough time to adapt to the changes. Further work must also involve assessment of the effects of the centralised data transfer system on the exchange of data between public authorities and other organisations performing a public task, and also more broadly examine the purposes for which data is used in the private sector.

Overall, the public authorities welcome the reform. They see centralised data transfer as a means of improving the efficiency of official activities, improving the quality and timeliness of data, and increasing automation, which would reduce manual work and separate data requests. The authorities estimate that the reform will particularly support decision-making, oversight and smooth service processes in various official tasks. At the same time, the opinions emphasise the need for further preparation to specify the data content, ensure standardisation and interoperability, and allow for the scalability of the solution for different purposes. The authorities'

opinions also highlight issues related to data protection, information security and costs as well as the need for phased implementation, sufficient transition periods and clear official steering to enable controlled implementation and avoid new, overlapping obligations.

In their opinions, the interest groups have a partly positive view of the objectives of the reform, such as reducing administrative burden, increasing digitalisation and following the one-stop shop principle. However, they still consider the preparation of the reform to be unfinished. In their opinions, interest groups raised concern about the increase in costs and administrative burden for businesses and the uncertainty about whether the benefits will materialise. According to the opinions, the assessment of the impacts on small and medium-sized enterprises, micro-enterprises and international groups has not yet been broad enough. In addition, the interest groups highlight challenges related to information security, data protection, coordination of legislation, technical feasibility and the special features reporting in specific industries. Many interest groups call for a more detailed impact assessment, a clear definition and limitation of the data content, phasing, assessment of various implementation alternatives and making the progress optional, as well as better utilisation and coordination of both current solutions and EU projects.

Businesses have twofold views of the reform. Some welcome the objectives of the centralised data transfer system, such as the standardisation of data, a higher level of automation and more efficient reporting. If correctly implemented, the reform will reduce administrative work, provide a better opportunity for more up-to-date data, and result in higher data quality. The change will enable businesses to automate their reporting obligations with data that is of higher quality and more structured than at present. At the same time, the opinions from businesses draw attention to changes occurring in the operating environment at the same time and a need for phasing and ensuring adequate transition periods. The main concern is related to costs and administrative burden. The different data systems and charts of accounts used by companies may complicate the implementation of the reform. The opinions also put emphasis on determining data needs clearly and ensuring predictable implementation.

4 KEY OBSERVATIONS FROM THE OPINIONS BY THEME

4.1 Feasibility

The opinions primarily welcome the general objectives of the reform, such as reducing the administrative burden and promoting digitalisation, but there are reservations and critical observations concerning the conditions for implementing the reform and its impacts.

While the one-stop-shop and once-only principles are considered worth supporting, their implementation must ensure that they do not result in an increase in the administrative burden on businesses and that the collection of data does not expand unnecessarily. The opinions present a need to strengthen a company-driven approach to reduce overlapping reporting without an unreasonable cost burden. Achieving the objectives will require comprehensive cooperation between the public authorities and the commitment of all key data users to the system. If this fails, there is a risk that reporting obligations will not actually decrease, and companies will continue to have to provide their data to several different public authorities.

From a legal perspective, the opinions emphasise a need to ensure the compatibility of the proposal with the EU VAT Directive and other regulation. The opinions draw attention to conflicts with securities market legislation and insider regulation, especially in the context of listed companies.

They highlight issues related to data protection, information security and data processing as key preconditions for the implementation of the centralised data transfer system. The proposed model is based on extensive centralisation of financial data, which includes considerable volumes of confidential material, such as trade secrets, data related to companies' strategic and operational solutions, and personal data. The opinions note that the technical solutions used the system should be of a high standard and based on clear and uniform principles based on legislation. At

the same time, they emphasise that the grounds for processing data, access rights, responsibilities and control mechanisms must be precisely defined, and they must cover the entire data life cycle. The opinions also highlight aspects related to the legal protection of businesses. Companies should be given adequate visibility to their own data, including information about which public authorities use the data, for what purposes and on what legal basis.

Some of the interest groups' opinions also draw attention to a need for broader assessment to determine which changes are required in accounting, auditing and tax legislation. Based on the opinions, the proposed model does not yet sufficiently address the impacts of structural differences between accounting and taxation and the international reporting environment. The opinions also point out that accounting and tax regulation are based on separate sets of norms that partly serve different objectives, which is why generating tax data cannot be reliably generated directly from accounting without legislative amendments. Based on the assessments of the parties issuing opinions, tax positions are expected to continue to apply in the future, and some of them note that the positions cannot be automated by technical means. The opinions of the interest groups also highlight differences in IFRS and FAS reporting, the complicated reporting systems of international groups, and companies' varying opportunities and especially their different practical resources for implementing system changes or introducing new systems.

Some interest groups point out that the report subject to the consultation round does not yet provide a sufficiently comprehensive analysis of technical feasibility, costs and risks, especially from the perspective of businesses. The interest groups also note that digitalisation should not be promoted through binding regulation without sufficient and reliable evidence of the concrete benefits created for businesses. Instead, some of the opinions propose progress based on voluntary participation and the development of existing data exchange solutions before building the new system.

The consultation opinions call for consideration of industry-specific special features. Challenges identified include the formation of VAT reporting, in which the allocation of account-level data from accounting to reporting structures and related solutions may reduce data accuracy and be technically complicated to implement. Situations related to value-added taxation, such as the distribution of taxable and tax-exempt activities, reverse charge procedure and non-deductible expenses, make it more difficult to implement reporting consistently. In addition, the structures of the VAT groups and the special characteristics of the financial sector, such as the use of multiple parallel systems and sector-specific processes, increase the complexity of the implementation of the system. The opinions also request that attention be paid to the fact that the smallest operators do not have access to extensive digital systems, nor do they have realistic resources to introduce such systems.

Some of the opinions also draw attention to the effects of the reporting model on the financial administration structures of businesses, such as charts of accounts. The proposed standard chart of accounts and standardisation may require some companies to introduce conversion solutions and the use of parallel classification systems. This may especially be the case with large enterprises. It will increase costs and reduce the potential for automation. Historical VAT rates and retroactive tax adjustments should also be taken into account when developing the system.

The opinions included varying perspectives on the real-time nature of data. Listed companies are subject to restrictions imposed by the Securities Markets Act, which limit their ability to report unpublished material financial data that would be considered inside information. In some of the opinions, the proposal was interpreted to refer to transaction-specific accounting data, which would require significant changes in financial administration systems and processes and result in an increase in administrative burden. This would also partly conflict with those financial administration processes where data are only specified at the financial statements phase.

The opinions also urged that attention be paid to the requirement for real-time data potentially resulting in a need to correct the data, as it may not be possible to take changes occurring in transactions into consideration at the time of reporting, especially in invoice-level data. There is a concern that real-time reporting will increase the number of errors, adjustments and requests for information. At the same time, the parties issuing opinions understand the public authorities' need

to obtain data in a more real-time and structured manner to improve official processes and reduce businesses' need to interact with public authorities.

The opinions emphasise the need for clear procedures for correcting errors and ensuring the accuracy of data. In connection with the penalty system, the opinions make reference to predictability, clarity and proportionality. Imposing penalties is not considered justified in situations where the error does not affect the tax amount or is due to ambiguity in interpretation. The parties issuing opinions also propose a less severe penalty practice in the early implementation phases and note that the new system may not result in a significant increase in requests for information or oversight without corresponding added value.

Many of the opinions emphasise the need for comprehensive support and advisory services that are easy to access. They should be specifically targeted at small and medium-sized enterprises, small operators and self-employed people. At the same time, the opinions indicate that the reform will raise competence requirements, especially regarding the deployment of technical interfaces and the introduction of standards, which increases the risk of a shortage of skilled labour.

The opinions also emphasise the importance of clear, detailed and timely instructions and documentation. In particular, providing a transparent description of technical specifications, interfaces, data content and data access rights is considered necessary to ensure consistent and controlled system implementation.

4.2 Data flows

The parties issuing opinions had a partly positive view of the data flows related to the centralised data transfer system. However, there were some reservations in the opinions, especially regarding the scope of the data content, implementation method, costs and impacts on companies' administrative burden.

As a rule, several parties issuing opinions find it justified to use a model in which key data flows consist of accounting data, data supplementary to accounting data and e-invoice data. This combination is considered to form a logical basis for the automation of reporting and meeting public authorities' needs for data. Structured and standardised data is seen as a key prerequisite for improving data quality, utilising automation and enhancing the exchange of data between public authorities. At the same time, the opinions emphasise that broad-based standardisation and harmonisation are challenging in the current operating environment. In particular, the incompleteness of technical specifications and uncertainties related to the selection of standards complicate the efforts to plan the implementation and increase risks related to costs. The use of several parallel standards and the adaptation of existing systems to the related requirements are also considered key challenges. The opinions note that standardisation should be based on widely used solutions that are internationally compatible and independent of specific industries. Special attention is paid to the different capacities of small and medium-sized enterprises and international groups. For small operators, the transition to using structured data and new standards may cause a proportionally higher burden compared to large enterprises. On the other hand, the challenges faced by large and international businesses are especially concerned with the coordination of complex systems and simultaneous compliance with several regulatory frameworks.

The opinions emphasise the principle of data minimisation and the fact that the reported data must only be limited to the data necessary for public authorities to perform their statutory duties. Several parties issuing opinions raise concerns about the gradual expansion of the data content without clear legislative boundaries and the fact that data would be collected just in case it might be needed, without a justified purpose of use. The opinions also note that the scope and level of detail of data flows increase companies' reporting obligations and administrative burden.

They argue that, for micro and small enterprises, more detailed reporting could result in higher costs and workloads. Similarly, they note that the presented requirements may mean that companies have to make changes to their charts of accounts. At the same time, the opinions also express a view that the charts of accounts of small and medium-sized enterprises are largely

based on charts of accounts established in the market, which enables making the necessary changes in a centralised manner.

Many of the opinions emphasise that various data users should be identified more extensively already at the planning phase and that the rights of access to data should be clearly defined. Opportunities for the use of data flows are considered to occur in supervision by the authorities, production of statistics, funding decisions, research activities and the implementation of social security and insurance. One option presented is that businesses themselves could be the ones providing authorisation to the use of their data. For example, banks or private equity investors could use company-specific data for funding decisions and customer monitoring if there is a desire to make this possible. Funding rounds cause a lot of work for companies. For researchers, this data would be particularly valuable. In addition, real-time data could be useful in preparing economic forecasts. Alongside these, other data needs should also be given attention, as the broader societal benefits could make the arrangement more worthwhile. At the same time, the opinions, however, also emphasise that expanding the purposes needs to be carefully and separately assessed to avoid an increase in administrative burden and uncontrolled expansion of the purposes.

4.3 Impacts

While the parties providing opinions recognise potential benefits in the development of the centralised data transfer system, they also express reservations related to the impacts, costs and risks of the reform. According to the opinions, the cost and impact assessment must be specified further, and the division of costs and benefits between different operators must be assessed. It must also be ensured that the reform complies with the principle of proportionality and also produces concrete and demonstrable added value for companies.

Some of the parties issuing opinions consider that, at best, the reform can improve the efficiency of official activities. Key benefits identified include an increase in automation and the use of structured and real-time data. In addition, the reform is expected to reduce overlapping reporting, improve data quality, reduce errors and improve the efficiency of combating the grey economy. Some of the opinions also highlight possible positive impacts on the availability of funding, the utilisation of analytics in areas such as economic forecasting and, in the long term, the realisation of the one-stop shop principle.

Many parties issuing opinions also draw attention to the still essentially undefined nature of the exact content of the data flows, the level of detail of the data and the scope of the reporting obligation. Due to the incompleteness of the report, analysing and assessing concrete proposals is considered premature.

The parties point out that the report does not provide a clear picture of how the centralised data transfer solution is going to reduce the administrative burden on businesses in concrete terms and what this change will mean to businesses in practice. It is noted that the reform may, instead, increase the administrative burden on companies, especially in the early implementation phases and for small operators. This would be due to system changes, costs and changes in operating methods. The worry is that unless legislative amendments and limitations to the data content are made, the reform will not reduce the administrative burden, but may increase it, at least in the short and medium term.

The opinions highlight uncertainty related to costs. Based on the views expressed by several parties, the cost estimates are still incomplete, and the investment needs caused by the reform for businesses have not been assessed in sufficient detail. System changes, integrations, training and renewing processes may constitute a significant cost item, especially for businesses.

4.4 Phasing, dependencies and schedule

The opinions propose a need to examine the reform as a whole in relation to its dependencies, schedule, scope and conditions for further development. Some of the parties issuing opinions ask for the follow-up work to pay attention to the coordination of other national and EU-level regulation. In particular, restrictions related to securities market legislation set a significant boundary condition. The opinions also highlight the need to assess more extensively which changes are required in accounting, auditing and tax legislation.

The opinions also point out that the reform is connected to a broad regulatory and development landscape. The combined effects of simultaneously ongoing projects, such as the ViDA legislative package and other digitalisation reforms, should be assessed in follow-up work. Attention is also paid to the need to take into account the existing registers and data systems and to assess the opportunities of eliminating overlaps.

The opinions emphasise the importance of using a phased approach, sufficiently long transition periods and a realistic and flexible schedule. In particular, it is stressed that structures supporting deployment, such as testing opportunities, instructions and support, must be available in advance, sufficiently early.

The opinions also highlight the scalability and long-term planning of the solution. The system should be scalable for different purposes and adaptable to a changing regulatory and operational environment without high additional costs. This is deemed to require flexible technical solutions and the possibility to also take into account future needs for data use.

5 ESTIMATES AND CONCLUSIONS OF THE PREPARATORY PROJECT

Based on the feedback received, the Tax Administration's preparatory project will specify the proposed solution as part of its follow-up work in 2026 and 2027. The aim of the documentation is to support the Government's discretion related to the implementation of the reform of the official reporting of financial data. The feedback obtained from the consultation round revealed a number of matters that require further examination. The Tax Administration's preparatory project will investigate them in cooperation with stakeholders.

The following subsections present the Tax Administration's preparatory project's assessments and conclusions on key matters.

5.1 Reporting

Coordination is required to manage the amount, minimisation principle and purposes of use of the reported data. The need for regulation and the assignment of responsibility for the task to a single public authority, as presented in the report, are based on the fact that this would limit the solution in terms of both content and operations, which would mean that in different practical situations and in situations involving changes in the operating environment would always involve taking a stance on solving new requirements. This would ensure that new requirements for parties with the reporting obligation would be under control and comprehensively coordinated, and that decentralised changes would not result in an increase in administrative burden and the erosion of the once-only principle. It would also enable more systematic and logical knowledge management at the societal level. It is necessary that there is a clear division of responsibilities between different authorities to ensure that changes do not result in overlapping practices and that a situation secured at the time of development will not unravel or erode uncontrollably.

The opinions also raised points concerning the details of reporting. Some of the parties issuing opinions noted that reporting should be voluntary. The planned centralised data transfer system is intended as a tool for meeting the statutory reporting obligations, and the reform does not aim to change the nature of reporting from obligatory to voluntary. To the extent that the reporting obligation is based on legislation, such as income tax or VAT returns, reporting is obligatory,

whatever the technical implementation method used. At the same time, the report does not present more binding provisions on the use of electronic services than those laid down elsewhere in legislation. In addition, the reform would not interfere with the way businesses organise their accounting.

Some of the opinions raised concerns about the transition to real-time reporting of data. The ViDA Directive lays down provisions on the deadlines related to the reporting of e-invoices. The report does not propose amendments to the deadlines set for accounting or data supplementary to accounting data. Instead, they would continue to be determined based on obligations arising from other legislation, i.e. the deadlines set for submitting VAT returns and the company's income tax returns. In the follow-up work, the reporting procedure for account-level accounting data must be further investigated in cooperation with stakeholders.

According to the report, in the future, VAT returns would still not be used to report sales and expenses outside the scope of value-added tax legislation or any tax-exempt sales for which there is no right to deduct VAT on the related purchases. If such data had to be reported based on some other reporting obligation or purpose of use, the Tax Administration is not, as the data user, entitled under its existing rights of access to data to receive the data in question on the VAT return.

The interpretation of some of the opinions that the proposed model would involve automatic transfer of VAT data from e-invoices without separate assessment does not correspond to the key operating principles presented in the report. The report does not propose any changes to the data content of e-invoices. In many situations, determining the VAT treatment requires a case-by-case assessment, and the correct tax treatment cannot be fully determined based on invoice data. Therefore, invoice entries alone do not determine, for example, deduction rights, which are based on the purpose of the procurement and the separate discretion of the party subject to the accounting obligation. Moreover, e-invoices do not cover the entire scope of data needed in value-added taxation, as they do not include card or cash transaction data. Real-time reporting of e-invoices applies to cross-border EU sales and purchases reported in the current VAT recapitulative statement. Member States may exclude purchases from the reporting. Based on a report by the Ministry of Finance and a separate political decision, the reporting may also be expanded to include domestic transactions.

An invoice serves as documentary evidence of a business transaction, while accounting entries are based on decisions made by the party subject to the accounting obligation. The accounting data flows presented in the report and the data flows related to e-invoices are distinct in nature and serve different purposes, and the interpretation that accounting data are included in the invoice data does not correspond to the basic principles of the proposed model.

5.2 Implementation of the reform and different implementation options

Some of the opinions presented observations on alternative implementation methods, such as enhancing the exchange of data between public authorities and making use of existing infrastructures, such as the Data Exchange Layer.

A lot of data exchange occurs between the public authorities in Finland. However, the current operating model is considerably authority-driven, as each operator determines its data needs independently. This has led to differentiated data content, structures and reporting practices, as well as reporting carried out in various channels that overlaps from companies' perspective. Merely improving the efficiency of the exchange of data does not eliminate this structural problem, but instead maintains decentralised data production for different purposes.

The use of the Data Exchange Layer raised in the opinions is primarily focused on developing data exchange between authorities. However, the Data Exchange Layer does not, as such, solve structural problems related to the fragmentation and overlapping of reporting. Although it enables the transfer of data between different systems, it does not in itself harmonise the data content or reduce the separate reporting obligations of companies.

The proposed reform is focused on the structural harmonisation of data and more efficient data use through semantic standardisation, which enables the data to be used jointly by the authorities. This also requires changes to the structures of the data generated by companies. Reforming the reporting channels will enable the centralised provision of data. The reform combines semantic standardisation with a technical reporting solution to form a coherent whole. The resulting solution implements the once-only and one-stop-shop principles, which aims to reduce overlapping reporting and improve the efficiency of activities. Achieving these goals requires more than merely developing existing data exchange solutions; instead, they require changing the operating model in which data production, transfer and use are integrated more closely into a coherent whole.

5.3 Small businesses' readiness for the reform

The readiness of small businesses to make use of new technical solutions plays a key role in the acceptability and practical feasibility of the reform. The planning will pay attention to the starting points of different operators and ensure that the reform does not result in unreasonable additional requirements or costs.

The planned reporting model can simplify reporting, especially for small businesses, as reporting would be based directly on accounting data and account structure. This would reduce the need to interpret the detailed requirements of separate forms and reduce the administrative burden. The model would also support a reduction in competence requirements, as companies would no longer have to manage the separate forms of different public authorities and instructions for filling them in.

The reform would not oblige businesses to introduce more extensive electronic financial administration or reporting solutions than they currently use. Businesses could still make their own decisions on the level of digitalisation of their financial administration. The aim is to increase the voluntary use of digital services by offering companies smoother and more efficient solutions for interacting with public authorities.

6 CHANGES AND FURTHER ASSESSMENT BASED ON THE OPINIONS

The preparatory project has processed all opinions and has begun processing the matters requiring further examination. The following subsections describe the further investigations already launched during spring 2026.

The Tax Administration carries out the study work through co-development with stakeholders. Registration for co-development takes place by submitting contact details by email to [virta\(a\)vero.fi](mailto:virta(a)vero.fi).

6.1 Follow-up work on the reform schedule and phasing

The Tax Administration's preparatory project has launched an assessment to specify the schedule for reform implementation and phasing. The aim is to draw up a controlled roadmap that supports the successful implementation of the reform.

EU-level regulation, especially the requirement under the ViDA Directive to report e-invoice data as of 1 July 2030, plays a key role in determining the schedule. For the centralised data transfer system to serve as a technical solution to this reporting obligation, the legislation concerning the system, as well as its technical implementation, must be ready before that date. It is important that the legislation is completed sufficiently early before launching the technical implementation so that the necessary system changes can be planned and implemented in a controlled manner. As the reform also requires changes to businesses' information systems, an adequate transition period must be reserved for implementation, testing and deployment. To support this, the Tax

Administration's preparatory project has launched a study aimed at software suppliers and companies, with the aim of determining a realistic timetable for implementing the changes.

The project will also prepare a proposal on the phasing of the reform. The proposal will be based on the opinions obtained and follow-up studies, which are prepared in close cooperation with stakeholders. The aim is to create a whole in which the legislative and technical framework, the capabilities of companies and the transition periods required for controlled deployment are taken into account in a balanced manner.

6.2 Specifying the details of reporting

The opinions highlighted several details related to reporting that are relevant for further examination. Specifying the details requires further preparation in cooperation with various stakeholders. The key objective of the consultation round was especially to identify special issues related to different groups of actors and use cases, and in this respect, the round produced plenty of useful material. More detailed analysis of these observations and clarification of the specifications will proceed as part of follow-up preparation.

In the spring of 2026, the Tax Administration's preparatory project launched several cooperation arrangements with different parties to explore various situations and sector-specific special features related to reporting in more depth. The amount of data to be reported and the proposed operating model will also be assessed and specified, together with various operators.

The preparations will also pay attention to ensuring that identified special situations can be addressed through clearly defined operating models and guidelines, which will improve the usability and predictability of the reform in practical implementation.

6.3 More extensive examination of the purposes of data use

The full implementation of the one-stop shop and once-only principles continues to require further development, especially in relation to the number of data users and the scope of the purposes of data use. For this reason, a need has been identified to expand the examination to enable a more diverse assessment of the impacts and benefits of the reform from the perspective of different stakeholder groups.

The Tax Administration's preparatory project has launched a more extensive study on the purposes of data use by data users and their data needs. After the consultation round, cooperation with key authorities has been intensified, and joint studies have been launched with parties such as Kela, pension sector operators, the Incomes Register Unit and the Grey Economy Information Unit. In addition, the preparatory project has started a follow-up study to identify several potential data users and investigate their data needs. The aim is to form a more comprehensive overall view of the possibilities of data use in 2026 and to identify new purposes for the use of companies' financial data. At the same time, conditions will be created for broader societal benefits.

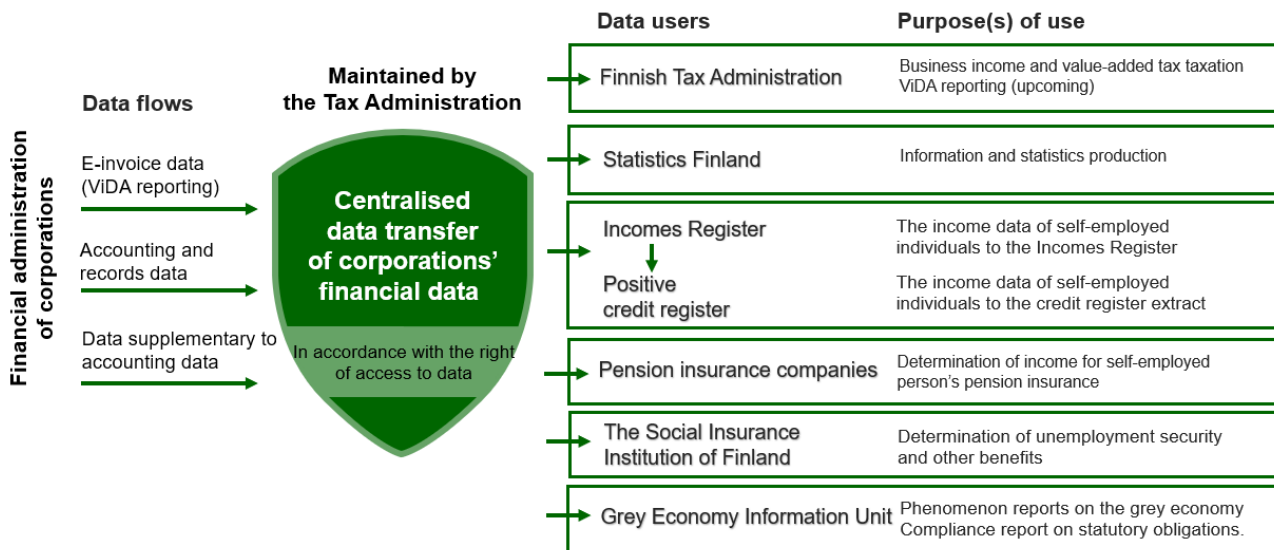


Figure 1: Concept diagram updated in spring 2026

6.4 Impact assessment

The preparatory project agrees with the view of the parties issuing opinions that the impact assessment was still incomplete at the point when the report was submitted for the consultation round. This has been identified as part of the normal progress of the preparation process, in which a more detailed impact assessment will only be possible after the key definitions have been specified and the scope of the reform has been determined with sufficient accuracy.

The impact assessment is carried out in accordance with the Government guidelines in both qualitative and quantitative terms to the extent required for legislative drafting. The assessment will include a broad examination of the impacts of the reform on businesses, public authorities, general government finances and information systems. In addition, the appropriateness of the impact assessment will be ensured by following the assessment procedure laid down in the Act on Information Management in Public Administration. To support the assessment in this context, the preparatory project has requested an opinion from the Ministry of Finance in accordance with the Act on Information Management in Public Administration.

Further preparatory work should deepen the impact assessment, especially on business impacts, implementation costs and dependencies related to the implementation schedule. This will ensure that a sufficiently accurate and reliable overall picture of the impacts of the reform will be available to support decision-making.

Before the transition to the implementation phase, it would be appropriate to carry out an independent feasibility assessment for the solution by an external party. Such an assessment supports risk management and ensures that the planned solution is technically, operationally and economically feasible and compatible with the existing systems and operating environment.