

Croatia — eRačun & HR-FISK

Croatia — eRačun and Fiscalization (Fiskalizacija)

Last Updated: 2026-02-20 **Confidence Level:** HIGH (Croatia is EU member with well-documented regulations)

Overview

Croatia, as an EU member state, implements a comprehensive e-invoicing and fiscalization system. **Two parallel systems operate as of January 1, 2026:**

- Fiscalization 1.0** — B2C (end consumer) transactions with real-time cash register fiscalization
- Fiscalization 2.0** — B2B and B2G electronic invoicing with mandatory use of the eRačun platform

Croatia Dual Fiscalization System

```
graph TD
    HR["Republika Hrvatska<br/>EU Member State<br/>VAT: PDV<br/>Currency: EUR (since 2023)"]
    FISC1["Fiskalizacija 1.0<br/>B2C transakcije<br/>Već na snazi (postojeći zahtjev)"]
    FISC2["Fiskalizacija 2.0<br/>B2B transakcije<br/>Obavezno od 01.01.2026"]
    F1_REQ["Zahtjevi:<br/>Certificirani fiskalni uređaji<br/>Real-time veza s Poreznom upravom<br/>JIR (Jedinstveni identifikator računa)<br/>Odmah"]
    F2_VAT["PDV Obveznici:<br/>Obavezno izdavati i primiti<br/>e-račune od 01.01.2026<br/>Real-time reporting na eRačun"]

    HR --> FISC1
    HR --> FISC2
    FISC1 --> F1_REQ
    FISC2 --> F2_VAT
```

```
FISC2 --> F2_NOVAT["Ne-PDV Obveznici:<br/>Primati e-račune od 01.01.2026<br/>Izdavati e-račune od 01.01.2027"]
```

```
FISC2 --> FINA["FINA (Financijska agencija)<br/>Operator eRačun platforme<br/>Centralni hub za B2G i B2B<br/>www.fina.hr"]
```

```
FISC2 --> B2G["B2G (Servis eRačun za državu)<br/>Obavezno od 01.07.2019<br/>UBL 2.1 (preporučeno)<br/>ili CII format"]
```

```
style HR fill:#e74c3c,color:#fff
```

```
style FISC1 fill:#fd7e14,color:#fff
```

```
style FISC2 fill:#dc3545,color:#fff
```

```
style FINA fill:#0d6efd,color:#fff
```

```
style B2G fill:#198754,color:#fff
```

```
style F2_VAT fill:#dc3545,color:#fff
```

```
style F2_NOVAT fill:#ffc107,stroke:#e0a800
```

1. VAT/PDV Rate and Rules [HIGH]

Rate Structure (2026)

- **Standard Rate:** 25% [HIGH] — one of the highest in the EU
- **First Reduced Rate:** 13% [HIGH] — applies to:
 - Food products
 - Accommodation services
 - Utilities
- **Second Reduced Rate:** 5% [HIGH] — applies to:
 - Books
 - Medicines
 - Daily newspapers
- **Zero Rate (0%):** [HIGH] — applies to:
 - Intra-EU passenger transport
 - International passenger transport (excluding rail and road)

NOTE: Croatia does NOT use a super-reduced rate below 5% as of 2026.

Filing Requirements [MEDIUM]

- **Monthly VAT filing:** Standard for most taxpayers [MEDIUM]
- **Annual tax return:** Required [MEDIUM]

Tax Authority

- **Porezna uprava** (Tax Administration) — Croatian Tax Authority **[HIGH]**
- VAT compliance monitored through eRačun platform and Fiscalization 2.0 system

Croatia PDV Rate Structure

```
graph TD
    PDV_HR["PDV (VAT) – Hrvatska<br/>Porezna uprava"]

    PDV_HR --> STD["Osnovna stopa<br/>25%<br/>Jedna od najviših u EU<br/>Opća primjena"]
    PDV_HR --> RED1["Smanjena stopa 1<br/>13%<br/>Hrana<br/>Smještaj (hoteli)<br/>Komunalije"]
    PDV_HR --> RED2["Smanjena stopa 2<br/>5%<br/>Knjige<br/>Lijekovi<br/>Dnevne novine"]
    PDV_HR --> ZERO["Nulta stopa<br/>0%<br/>Intra-EU putnički prevoz<br/>Međunarodni prevoz"]

    PDV_HR --> CIT["Porez na dobit"]
    CIT --> CIT_SMALL["10%<br/>Prihodi < 1M EUR<br/>Malo poduzetništvo"]
    CIT --> CIT_LARGE["18%<br/>Prihodi ≥ 1M EUR<br/>Veliko poduzetništvo"]

    PDV_HR --> REG["Prag PDV registracije<br/>60.000 EUR<br/>(EU 2025 usklađeno)"]

    style PDV_HR fill:#e74c3c,color:#fff
    style STD fill:#dc3545,color:#fff
    style RED1 fill:#fd7e14,color:#fff
    style RED2 fill:#ffc107,stroke:#e0a800
    style ZERO fill:#198754,color:#fff
    style CIT fill:#0d6efd,color:#fff
```

2. Electronic Invoicing — Dual System **[HIGH]**

A. B2G (Business-to-Government) — Mandatory Since July 1, 2019 **[HIGH]**

Legal Basis

- **Law:** Act on eInvoicing in Public Procurement (OJ 94/2018) **[HIGH]**
- **EU Directive:** Transposes Directive 2014/55/EU **[HIGH]**
- **Mandatory since:** July 1, 2019 **[HIGH]**

Technical Requirements **[HIGH]**

- **Platform:** Servis eRačun za državu (eRačun Service for the State) **[HIGH]**
- **Format:** Must comply with European Standard EN 16931 **[HIGH]**
- **Supported syntaxes:**
 - **UBL 2.1** (OASIS Universal Business Language) — recommended **[HIGH]**
 - **CII** (Cross-Industry Invoice) **[HIGH]**

Scope **[HIGH]**

- All suppliers to public sector entities must issue structured e-invoices
- Extended beyond EU requirements to include:
 - Procurement below EU thresholds (goods/services < €26,540, works < €66,360)
 - Direct award procedures (purchase orders)
- **Paper or non-compliant digital invoices are NOT accepted** since July 1, 2019 **[HIGH]**

B. B2B (Business-to-Business) — Mandatory Since January 1, 2026 **[HIGH]**

Legal Basis

- **Law:** New Fiscalization Act 2026 (Fiscalization 2.0) **[HIGH]**
- **Effective Date:** January 1, 2026 **[HIGH]**

Mandatory Requirements **[HIGH]**

- All VAT-registered taxpayers **MUST** issue and receive structured e-invoices for domestic B2B transactions
- Real-time reporting to tax authorities through national platform
- **Non-VAT registered taxpayers:**
 - **MUST** receive electronic invoices from January 1, 2026 **[HIGH]**
 - **MUST** issue and fiscalize e-invoices from January 1, 2027 **[HIGH]**

Technical Format **[HIGH]**

- **Standard:** EN 16931 compliance mandatory **[HIGH]**
- **Format:** UBL 2.1 or CII **[HIGH]**
- **Platform:** National eRačun monitoring system **[HIGH]**

Real-Time Reporting **[HIGH]**

- All B2B e-invoices must be transmitted to Croatian Tax Authorities in real time
- Centralized monitoring via eRačun platform (operated by FINA)

eRačun B2B Flow — Fiscalization 2.0

sequenceDiagram

```
participant BILKO as Bilko
participant CA as Certifikat<br/>(Croatian CA)
participant ERACUN as eRačun platforma<br/>(FINA)
participant BUYER as Kupac<br/>(B2B primatelj)
participant POREZNA as Porezna uprava<br/>(Tax Authority)
```

Note over BILKO,POREZNA: B2B obavezno od 01.01.2026
Real-time reporting na Poreznu upravu

```
BILKO->>BILKO: Kreirati e-Račun<br/>UBL 2.1 ili CII format<br/>EN 16931 validacija
BILKO->>BILKO: Dodati PDV<br/>(25% / 13% / 5% / 0%)
BILKO->>CA: Potpisati digitalno<br/>(kvalificirani certifikat)
CA-->>BILKO: Potpisani račun
```

```
BILKO->>ERACUN: POST e-račun<br/>(FINA API)
ERACUN->>ERACUN: Validacija<br/>EN 16931 usklađenost<br/>Format i potpis
```

alt Uspješna validacija

```
ERACUN-->>BILKO: 200 OK + račun ID
ERACUN->>POREZNA: Real-time reporting<br/>(porezni podaci odmah)
ERACUN->>BUYER: Notifikacija: novi račun
BUYER->>ERACUN: Preuzimanje e-računa
ERACUN-->>BUYER: UBL 2.1 XML
BUYER->>BUYER: Procesiranje i knjiženje
```

else Neuspješna validacija

```
ERACUN-->>BILKO: Greška validacije<br/>(EN 16931 kršenje)
BILKO->>BILKO: Ispraviti i ponovo poslati
```

end

Note over BILKO: B2G (servis eRačun za državu):
Isti tok, obavezno od 01.07.2019
Svi dobavljači javnog sektora

3. FINA (Financijska agencija) [HIGH]

Role in E-Invoicing

- **FINA** is Croatia's national financial agency [HIGH]
- **Operator:** Manages the eRačun platform for B2G invoices [HIGH]
- **Function:** Central hub for invoice transmission, validation, and tax reporting
- **Website:** www.fina.hr

Croatia HR-FISK 2.0 Integration Architecture

```
graph TD
  subgraph BILKO_STACK["Bilko Internal Stack"]
    INV_ENGINE["Invoice Engine<br/>UBL 2.1 / CII Generator"]
    VAT_CALC["PDV Calculator<br/>25% / 13% / 5% / 0%"]
    CHART_HR["Računski plan (RRiF)<br/>HR Chart of Accounts"]
    CERT_MGR["Certifikat Manager<br/>Qualified CA Croatia"]
    EN16931["EN 16931 Validator<br/>EU standard compliance"]
  end

  subgraph FINA_PLATFORM["FINA eRačun Platform"]
    B2B_API["B2B API<br/>(Fiscalization 2.0)<br/>od 01.01.2026"]
    B2G_API["B2G API<br/>(Servis eRačun za državu)<br/>od 01.07.2019"]
    MONITOR["Monitoring sustav<br/>(Porezna uprava)"]
  end

  INV_ENGINE --> EN16931
  VAT_CALC --> INV_ENGINE
  CHART_HR --> INV_ENGINE
  CERT_MGR --> INV_ENGINE
  EN16931 --> B2B_API
  EN16931 --> B2G_API
  B2B_API --> MONITOR
  B2G_API --> MONITOR
```

```
subgraph FUTURE["Fiskalizacija 1.0 – B2C (Buduće)"]
    CASH_REG["Fiskalni uređaji<br/>Certificirani cash register<br/>JIR identifikator"]
end

BILKO_STACK -.->|"Phase 2 if retail"| FUTURE

style BILKO_STACK fill:#f8f9fa,stroke:#dee2e6
style FINA_PLATFORM fill:#e74c3c,color:#fff,stroke:#c0392b
style FUTURE fill:#adb5bd,color:#fff,stroke:#6c757d
style B2B_API fill:#dc3545,color:#fff
style B2G_API fill:#198754,color:#fff
```

4. Chart of Accounts Standard [MEDIUM]

Governing Framework [MEDIUM]

- **Primary Source:** RRiF (Računovodstvo i financije) — Croatian accounting association [MEDIUM]
- **Document:** RRiF's Chart of Accounts for Entrepreneurs (Računski plan za poduzetnike) [MEDIUM]
- **Multiple editions published:** 18th (2014), 25th (2021), 26th (2023) [MEDIUM]

Accounting Standards [HIGH]

Croatia, as an EU member, follows:

- **EU Regulation 1606/2002:** Application of International Accounting Standards [HIGH]
- **IFRS Standards (EU-adopted):** Mandatory for:
 - Consolidated financial statements of publicly traded companies
 - Companies whose securities trade on a regulated market
- **SMEs:** May use simplified standards [MEDIUM]

Chart Structure [MEDIUM]

The Croatian Chart of Accounts (Računski plan) follows traditional structure:

- **Class 0:** Long-term assets (Stalna imovina)
- **Class 1:** Current assets (Obrtna imovina)
- **Class 2:** Short-term liabilities (Kratkoročne obaveze)
- **Class 3:** Capital/Equity (Kapital)
- **Class 4:** Long-term liabilities (Dugoročne obaveze)
- **Class 5:** Expenses (Rashodi)
- **Class 6:** Revenue (Prihodi)
- **Class 7:** Cost (Troškovi)
- **Class 8:** Off-balance sheet (Vanbilansna evidencija)
- **Class 9:** Internal accounting

Industry Bodies [MEDIUM]

- **HGK (Hrvatska gospodarska komora):** Croatian Chamber of Commerce — account codes for receivables [MEDIUM]
 - **RRiF:** Professional accounting guidance and chart publication [MEDIUM]
 - **Ministry of Finance:** Sets official accounting standards [HIGH]
-

5. Record Keeping Requirements [MEDIUM]

Retention Period [MEDIUM]

- **UNVERIFIED — needs confirmation from Croatian Accounting Law**
- Likely 5-10 years based on EU standards and neighboring country practices
- **RECOMMENDATION:** Consult Croatian accounting advisor for exact retention periods per document type

Electronic Storage [MEDIUM]

- **Allowed:** Yes, electronic storage permitted in Croatia [MEDIUM]
 - **EU Compliance:** Must follow EU standards for electronic archiving
 - **Requirements:**
 - Original format preservation
 - Integrity and authenticity guarantees
 - Audit trail maintenance
-

6. Fiscalization 1.0 (B2C) [HIGH]

Real-Time Cash Register Fiscalization [HIGH]

- **Applies to:** All B2C (end consumer) transactions [HIGH]
- **Requirement:** Tax receipt (or electronic equivalent) must be transmitted to Croatian Tax Authorities in real-time [HIGH]
- **Effective:** Existing requirement, continues alongside Fiscalization 2.0

Technical Requirements [MEDIUM]

- Certified fiscal devices (cash registers)
 - Real-time connection to Tax Authority servers
 - Unique receipt identifier (JIR — Jedinstveni identifikator računa)
-

7. MVP Impact Assessment

MVP-CRITICAL (Must Have for Legal Operation in Croatia)

1. **eRačun B2B Integration (Fiscalization 2.0) [HIGHEST PRIORITY]**
 - UBL 2.1 or CII XML invoice generation
 - EN 16931 standard compliance
 - Real-time transmission to eRačun platform API
 - FINA platform integration
 - **WITHOUT THIS: B2B invoicing is ILLEGAL in Croatia as of Jan 1, 2026**
2. **PDV (VAT) Calculation [HIGH PRIORITY]**
 - Support for 25% / 13% / 5% / 0% rates
 - Automatic rate selection based on product/service type
 - VAT report generation for monthly filing
3. **Croatian Chart of Accounts [HIGH PRIORITY]**
 - RRiF-compliant account structure
 - Croatian language support for account names
 - IFRS-aligned for publicly traded clients (if targeting them)
4. **eRačun B2G Integration (if targeting public sector clients) [HIGH PRIORITY]**
 - Servis eRačun za državu platform API
 - UBL 2.1 format (recommended)
 - EN 16931 compliance

- Mandatory since 2019 — mature system

FUTURE (v2 or Later)

1. **Fiscalization 1.0 (B2C Cash Registers) [MEDIUM PRIORITY]**
 - Only needed if Bilko targets retail/POS segment
 - Most B2B SaaS accounting software does NOT need this
 - Fiscal device certification required
 2. **Advanced IFRS Features [LOW PRIORITY]**
 - Full IFRS reporting for PIEs (Public Interest Entities)
 - Consolidated financial statements
 - Multi-entity accounting
 3. **Multi-Currency Support [LOW PRIORITY]**
 - Croatia uses Euro (€) since January 1, 2023 **[HIGH]**
 - Initial MVP: Euro only
 - Foreign currency: Phase 2
-

Implementation Notes for Bilko

Critical Path for Croatia

1. **eRačun API Integration**
 - Priority #1 — B2B invoicing is MANDATORY since Jan 1, 2026
 - Study FINA eRačun API documentation
 - Sandbox testing environment available
 - **FINA Documentation:** www.fina.hr (Croatian language)
2. **UBL 2.1 Generator**
 - Same engine can serve B2G and B2B
 - EN 16931 validation library required
 - Consider open-source UBL libraries (Java, PHP, Python)
3. **Digital Certificates**
 - Qualified certificates required for invoice signing
 - Croatian CA (Certification Authority) needed
 - May require Croatian company registration
4. **Language Localization**
 - Croatian language MANDATORY for:
 - Chart of accounts
 - Invoice templates
 - Tax reports
 - User interface (if targeting Croatian SMBs)

Risks

- **Mature Market:** Croatia has had B2G e-invoicing since 2019 — competitors exist
- **Complexity:** Dual system (1.0 + 2.0) adds overhead
- **EU Compliance:** Stricter standards than Serbia/BiH
- **FINA Dependency:** Single national platform — downtime = business stoppage

Competitive Advantage

- **EU Standards:** Croatia's EN 16931 compliance means Bilko could expand to other EU markets more easily
- **First-Mover (Balkan SaaS):** Few Balkan-region SaaS products support Croatian Fiscalization 2.0
- **Cross-Border:** Croatian companies doing business in Serbia/BiH could use Bilko for all three markets

UNVERIFIED ITEMS — NEEDS LOCAL ADVISOR REVIEW

1. **Exact record retention period per document type:** Likely 5-10 years, needs confirmation
2. **Non-VAT registered taxpayer e-invoicing delay:** Confirmed Jan 1, 2027 — verify this is still valid
3. **FINA API technical specifications:** Requires registration and Croatian company status?
4. **Digital certificate requirements:** Type, issuing CA, cost
5. **Penalties for non-compliance:** Fine amounts for missing/late B2B e-invoices

Sources

- [Croatia Confirms Mandatory B2B E-Invoice Launch for 2026 | EDICOM](#)
- [Croatia mandatory eInvoicing 2026 | Fintua](#)
- [Mandatory e-Invoicing in Croatia starting January 1, 2026 | Fiscal Solutions](#)
- [eInvoicing in Croatia: What to Expect from the 2026 B2B Mandate | VATit](#)
- [Croatia requires B2G e-invoicing as of 1 July 2019 | SEEBURGER](#)
- [2025 Croatia eInvoicing Country Sheet | European Commission](#)
- [E-Invoicing in Croatia \(B2B, B2G\) | DDDInvoices](#)

- [Croatia VAT Rates and Compliance \(2026\) | Numeral](#)
 - [Global VAT Rates by Country \(2026\) | VATupdate](#)
 - [RRiF's Chart of Accounts for Entrepreneurs | RRiF](#)
 - [IFRS in Croatia | IFRS Foundation](#)
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