Bolt

To: Estonian Ministry of Finance
Attn: Kevin Kassihin
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From: Bolt Technology OÜ, on behalf of the Bolt group
Subject: Comments on the European Commission proposal for a recast of the Directive on Administrative Cooperation, with particular reference to DAC7

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1. Introduction and executive summary

Bolt welcomes the opportunity to comment on the European Commission's proposal of 24 June 2026 for a recast of the Directive on Administrative Cooperation (DAC Recast). This response focuses specifically on DAC7 and the practical experience of operating the digital-platform reporting framework since its introduction.

The Bolt group is headquartered in Estonia. The group's EU DAC7 reporting is centralised in Estonia through its Estonian designated Reporting Platform Operator, which submits one consolidated DAC7 report to the Estonian Tax and Customs Board (EMTA). The information is then exchanged by the Estonian authorities with the other relevant Member States. Estonia is therefore Bolt's central EU DAC7 reporting jurisdiction, and the effectiveness of the DAC7 one-stop-shop model is of particular importance to the group.

Bolt supports several elements of the proposal, including:

- removing the 30-transaction test for sellers of goods and increasing the monetary threshold to €3,000;
- establishing an EU TIN-verification tool;
- introducing a binding prohibition on substantially duplicative national reporting obligations; and
- clarifying certain platform-on-platform and intermediary arrangements.

However, the proposal does not yet address several of the most significant practical burdens experienced by digital platforms. In particular, Estonia should support amendments that would:

1. permit seller-identification simplification where a platform has verified a TIN through other authoritative means;
2. reduce the seller-identification information that platforms are required to collect and validate;
3. make the one-stop shop effective for groups with multiple EU Reporting Platform Operators, including an express exemption from local registrations, annual status declarations and nil returns;
4. extend the reporting timetable;
5. introduce a harmonised correction cycle and clarify the threshold for when a correction to a filed report is required;
6. require one operator-facing EU XML schema and common technical standard;
7. strengthen the prohibition on duplicative national reporting, including monthly and quarterly reports and cross-regime duplication; and
8. introduce proportionate relief for occasional sellers of personal services.

2. Seller identification and TIN verification

2.1 The implementation date is too late

Article 36(1) requires the Commission to provide the TIN verification tool to Member States by 31 December 2030. From the date of this response, that is more than four years away.

In addition, the implementation timetable is not internally aligned. Article 55(2) requires Member States to apply Article 36 from 1 January 2030, while Article 36(1) permits the Commission to provide the central TIN-verification tool to Member States as late as 31 December 2030. The Directive should be amended to require the Commission tool to be fully operational and available for integration sufficiently before Article 36 begins to apply. Member States should have the necessary national access points, authentication arrangements and technical interfaces operational from the application date.

The Directive or implementing act should also clarify that the obligation in Article 36(2) includes effective access for Reporting Platform Operators to the central tool, whether directly or through a national interface, and should provide for real-time and bulk or API-based verification. Existing Member State governmental verification services should continue to qualify under Article 36(3)(b) during any transition to the central tool.

2.2 Simplification should not depend exclusively on use of the future EU tool

Article 36(3) would allow reduced seller-identification reporting where:

- the TIN has been verified using the Article 36 tool; or
- the taxpayer has been identified through a qualifying governmental, EU identification or EUID service.

As drafted, the same simplification does not appear to apply where a platform has verified the seller through its own reliable processes, even where those processes use official national registries or other authoritative sources.

This gap is particularly difficult to justify given that, according to the Commission's own Explanatory Memorandum, use of the Article 36 tool will be optional for reporting entities - it is compulsory only for tax administrations. The simplification benefit therefore cannot be designed around the assumption that all platforms will use the tool. If a platform may lawfully choose not to use it, the Directive must provide a workable alternative path to reduced-data reporting; otherwise the simplification is illusory for any platform that, for technical, contractual or cost reasons, does not integrate with the new interface.

This is difficult to justify. Annex V currently permits verification using information and documents already available in the platform's records and electronic interfaces made available by Member States or the Union. Platforms have invested substantially in integrations, official-registry checks, approved third-party services and manual documentary controls. A verification should not become less reliable merely because it was performed through an existing official source rather than the future Article 36 interface.

Bolt recommends that Article 36 recognise equivalent verification through:

- an official national tax or business register;
- an approved service that queries authoritative governmental data;

- a reliable and independent electronic record; or
- supporting documentation where no electronic verification is reasonably available.

An interim equivalence regime is particularly important because otherwise platforms would continue collecting duplicative information until at least the end of 2030.

2.3 The operative provision should deliver genuine data minimisation

The Explanatory Memorandum ("EM") indicates that, following successful TIN verification, collecting and reporting additional identifying information should no longer be necessary. The operative wording of Article 36(3), however, refers principally to what the reporting entity may report. It does not state equally clearly that the reporting entity is also relieved from collecting, verifying and retaining the additional fields.

The operative text of the Directive should acknowledge the EM and expressly provide that successful verification relieves the platform from collecting, separately verifying, reporting and retaining duplicative identification information, except where a particular field is necessary to establish the seller's reportable jurisdiction.

The provision should also clarify that the name-and-TIN simplification applies to seller-identification fields. Transactional information, such as consideration, activities, fees and quarterly amounts, would remain reportable.

3. A genuine one-stop shop for multiple Reporting Platform Operators

3.1 The current exemption is incomplete

Annex V, Section III currently provides that, where there is more than one Reporting Platform Operator, an operator may be exempt from reporting where it has proof, in accordance with national law, that another Reporting Platform Operator has reported the same information. The recast substantially retains this model.

This avoids duplicate seller reports in principle, but it does not establish a complete group-level one-stop shop. In particular:

- the required proof is determined under national law;
- Member States can impose different notification forms, portals and deadlines;
- the provision exempts an operator from reporting the seller information but does not expressly exempt it from registration;
- it does not expressly prohibit annual status declarations or nil returns;
- it is unclear whether proof must be renewed every year; and
- secondary operators may remain exposed to local penalties despite all relevant information having been reported centrally.

This is a significant issue for groups operating through multiple legal entities. Bolt's EU report is submitted centrally in Estonia, but other Member States may still require local entities to register, declare that another entity is reporting or submit annual nil or status reports. The administrative process can therefore continue even where no further seller information is due.

3.2 Proposed solution

The Directive should establish a central, standing designation mechanism.

The designated Reporting Platform Operator should notify its competent authority - EMTA in Bolt's case - of:

- the designated reporting entity;
- the Member State in which the consolidated report will be filed;
- the legal names and TINs of the affiliated or otherwise covered Reporting Platform Operators;
- the platforms or seller populations covered; and
- the effective date of the designation.

The reporting Member State should communicate that information through the EU central register or the existing automatic-exchange infrastructure. Once recorded:

- covered secondary Reporting Platform Operators should be automatically exempt from duplicate reporting;
- no further local registration, annual status notification or nil return should be required;
- the designation should remain effective until the relevant facts change; and
- a new notification should be required only following a change of designated operator, reporting jurisdiction, covered platform or other material fact.

Responsibility for due diligence and complete reporting would remain with the designated Reporting Platform Operator. The requested simplification concerns duplicate administrative procedures, not the availability or quality of the underlying seller data.

4. Reporting deadlines, corrections and technical harmonisation

4.1 Reporting timetable

DAC7 requires due diligence to be completed by 31 December and the report to be filed by 31 January. Platforms therefore have approximately one month to close the calendar year, aggregate data across services and legal entities, identify reportable sellers, complete quality checks, prepare seller communications, investigate disputes and submit the final report.

The proposal does introduce a harmonised filing deadline as part of its preferred policy package, but that measure applies to the consolidated notification obligation under both DAC4 and DAC9 - specifically, the single notification covering country-by-country reporting and the top-up tax information return. It does not extend to DAC7. The 31 January DAC7 filing deadline is unchanged by the proposal.

At the same time, enforcement against a seller who has not provided required information generally requires two reminders and the expiry of 60 days. The seller-remediation period can therefore continue beyond the platform's reporting deadline. The proposal does not resolve this mismatch.

Bolt recommends:

- moving the annual filing deadline to 31 March;
- establishing a defined period in which sellers may review and correct their information before final filing;

- introducing a harmonised supplementary filing process for sellers verified after the principal deadline; and
- mandating a standard correction cycle, for example semi-annually, with common correction codes and procedures.

This would increase data quality rather than weaken reporting.

4.2 Correction threshold

The proposal also leaves unresolved when a correction to a filed report is actually required.

DAC7's annual due diligence cycle already provides that post-filing changes to seller information are captured in the following year's report rather than triggering a correction to the prior filing. However, it is less clear what happens where a platform identifies, after filing, that information was already incorrect or unreliable as of 31 December of the reporting year. This can arise in a number of circumstances, for example, where a seller responds to the mandated remediation process after the filing deadline. The Directive does not specify how material an error must be before a correction is required, or whether minor or technical discrepancies may be carried forward into the next annual cycle.

For a platform reporting at scale, this uncertainty creates a disproportionate risk: without a defined materiality threshold, platforms cannot distinguish between errors that require an immediate amended filing and those that are more appropriately addressed in the ordinary course of the next reporting period.

The Directive should clarify both the circumstances in which a correction obligation arises and the threshold of materiality that triggers it.

4.3 One EU operator-facing technical standard

Stakeholders specifically informed the Commission that Member States use different submission portals, formats, technical specifications, validation processes and timelines, and requested a unified EU system and a single XML standard. The impact assessment records those concerns, but the legislative proposal does not implement a single operator-facing filing standard.

The Directive should require one EU DAC7 submission schema and common business rules that every Member State must accept. The standard should include:

- API and bulk-upload capability;
- common encryption and security requirements;
- standard validation and error codes;
- immediate technical and business acknowledgements;
- harmonised correction functionality; and
- a common EU testing environment.

The existence of a standard format for exchange between tax authorities is not sufficient. Harmonisation must extend to the interface through which Reporting Platform Operators submit information to their competent authority.

5. National duplication and a once-only reporting principle

5.1 "Comparable timeframe" must be defined

Bolt strongly welcomes proposed Article 1(4), under which Member States shall not introduce or maintain domestic reporting obligations that substantially duplicate information required under the DAC.

However, a national obligation is assessed partly by whether it requires information within a "comparable timeframe." That expression is not defined. It is therefore unclear whether a Member State could retain a monthly or quarterly report on the basis that its frequency differs from the annual DAC7 report.

A monthly report requiring the same seller and transaction data is not less duplicative than an annual report. It is generally more burdensome because the platform must prepare and transmit the data 12 times rather than once.

It should also be made clear that the criteria in Article 1(4) are applied functionally and are not rigid cumulative conditions that a national regime can avoid through minor differences.

5.2 Duplication should be assessed by the data, not the label

Member States should not be able to preserve a substantially duplicative obligation merely by, inter alia:

- giving it a different legal title;
- locating it in VAT or other tax legislation;
- changing the submission format;or
- adding a small number of fields.

The relevant question should be whether the platform must collect and transmit the same or substantially similar underlying seller or transaction information.

5.3 A broader once-only principle is required

Article 1(4) may prevent a direct national duplicate of DAC7, but it does not clearly create a horizontal once-only rule across DAC7, VAT reporting, e-invoicing, CESOP, withholding and other platform-reporting regimes. This is particularly uncertain because some overlapping obligations arise under separate EU legislation rather than purely domestic measures.

Authorities should reuse information already available and request only the additional data strictly required for the distinct purpose.

The Commission should also undertake a horizontal review of DAC7, CESOP, ViDA, e-invoicing and related reporting obligations, with the aim of establishing interoperable definitions, common data standards and "delta-only" reporting.

Member States should also be required to:

- inventory their existing platform-reporting obligations;
- identify those that overlap with DAC7;
- repeal or narrow duplicative regimes before Article 1(4) applies; and
- provide a clear mechanism through which a reporting entity can challenge a continuing duplicate

obligation.

The current proposal would apply Article 1(4) only from 1 January 2030. Given that the duplicated burden already exists, the provision should apply from the earliest application date of the DAC7 recast amendments.

6. Scope and seller classification

6.1 De minimis threshold for personal services

Bolt supports removing the 30-transaction limb for sales of goods and increasing the monetary threshold to €3,000. However, the change does not provide equivalent relief for sellers providing personal services.

This significantly limits the practical benefit for platforms operating primarily in ride-hailing and delivery. Drivers and couriers remain reportable regardless of whether they provide only a small number of services or earn a very low amount through the platform.

Bolt recommends extending a proportionate monetary de minimis threshold to occasional sellers of personal services. At minimum, the same €3,000 threshold should be assessed for service providers, accompanied by appropriate rules preventing artificial fragmentation.

6.2 Sole traders

The proposal adds sole traders to the definition of an "Entity." This may improve consistency where Member States have previously classified sole traders differently. However, a sole trader remains a natural person carrying on business in their own name and may not possess all of the information required for an Entity, such as a separate legal name, business-registration number or permanent-establishment information.

The Directive should therefore clarify:

- whether a sole trader's personal name is also the reportable legal name;
- whether the personal TIN or a separate business identifier is required;
- that unavailable entity fields need not be created or separately collected;
- that the same natural person must not be reported twice as both an individual and an Entity;
- how a change between individual and sole-trader status during a reporting period is treated; and
- whether existing sellers must be reclassified and reverified when the new definition begins to apply.

Without these rules, the amendment may replace national classification uncertainty with new operational and data-mapping uncertainty.

7. Implementation and conclusion

The proposal contains useful building blocks, but the principal simplification benefits will arise only if those provisions are operational, harmonised and legally enforceable.

Estonia should therefore support:

1. an accelerated EU TIN-verification service;
2. data minimisation based on any equivalent authoritative verification;
3. a standing, group-level one-stop-shop designation with no duplicate registrations or nil returns;

4. a later filing deadline;
5. a harmonised correction cycle and a defined materiality threshold for when a correction to a filed report is required;
6. one operator-facing EU XML/API standard;
7. a clear and broadly effective prohibition on national duplication, including monthly and cross-regime reporting; and
8. proportionate treatment of low-value personal services and sole traders.

These changes would preserve the tax-transparency objectives of DAC7 while materially improving data quality, reducing repeated collection of sensitive information and ensuring that central reporting in Estonia operates as a genuine EU one-stop shop.

Bolt Technology OÜ