



# KPMG AEOL Updates & Tracking Service FATCA/CRS Alert



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Country:	Germany	Regime:	FATCA/CRS

## Germany: Issued CRS Newsletter 03/2025

On 17 June 2025, the Federal Central Tax Office of Germany (BZSt) issued CRS Newsletter 03/2025. The CRS Newsletter contains the following updates:

- **Final Exchange List for 2025:** The BZSt has published the final list of participating and reportable jurisdictions for the 2025 reporting on its website, [here](#). Starting in 2025, Belize's exchange status with Germany has changed to reciprocity, requiring reporting financial institutions (RFIs) in Germany to submit data for Belize to the BZSt, beginning with the 2024 reportable period. Additionally, Germany has newly established mutual exchange relationships for financial account information with Armenia, Moldova, Uganda, and Ukraine, effective from the 2024 reportable period. The BZSt also notes that changes have been made compared to the 2025 provisional exchange list. The CRS system is now configured to allow reports for all countries on the final exchange list.
- **CRS System Maintenance:** Planned system maintenance is scheduled from 27 June 2025 through no later than 02 July 2025. CRS report submissions will remain operational during this period; however, users may experience delays in processing of log transmissions.
- **Limitations of GIINs for Classifying Entities as Financial Institutions (FIs):** In reminding German RFIs of their obligation to accurately identify reportable accounts according to Sections 9 to 18 of the Financial Accounts Information Exchange Act (FKAustG) and Section 5(1) of the FATCA-USA Implementation Regulation (FATCA-USA-UmsV), the BZSt specifies that accounts held by FIs are not subject to reporting requirements. Consequently, correctly classifying account-holding entities as FIs is crucial. It is important to note that a Global Intermediary Identification

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Number (GIIN) alone is not sufficient to classify an entity as an FI. The IRS issues a GIIN to any legal entity that requests it without validating their status as FIs under the FKAustG or FATCA-USA-UmsV, meaning a non-financial institution (NFI) can also possess a GIIN. Therefore, having a GIIN in place does not replace the need for proper due diligence procedures, as avoiding them may lead to failing to report accounts with a reportable status.

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Reference (German): [CRS Newsletter 03/2025](#)

For information on KPMG's global AEOI network professionals, please email [GO-FM AEOI Program Support](#).

For more information on KPMG AEOI Updates & Tracking Service, please see [here](#).

For additional summaries of the latest AEOI developments, please visit KPMG's TaxNewsFlash-FATCA/IGA/CRS Insights page, [here](#).

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