



KPMG AEOI Updates & Tracking Service

CARF Alert



Date:	31 December 2025	Alert Type:	Document
Country:	Germany	Regime:	CARF
Document Type:	Other Guidance		

Germany: Update on the Implementation of EU DAC8 and CARF

On 3 December 2025, the Federal Central Tax Office (BZSt) updated its webpage with details on the upcoming implementation of the European Union's Eighth Directive on Administrative Cooperation (DAC8) and the OECD's Crypto-Asset Reporting Framework (CARF) into Germany's domestic law through the Crypto Asset Tax Transparency Act (KStTG) (found [here](#)). This law is expected to come into force by the end of the 2025 calendar year.

Starting with the 2026 reporting period, Reporting Crypto-Asset Service Providers (RCASPs) that fall within the scope of the regulations must collect specific information on aggregated transaction data relating to their customers' (crypto-asset users) and submit it electronically to the BZSt using the designated interface and prescribed format by 31 July of the following year. The BZSt will then forward this information to the EU Central Register and CARF partner jurisdictions by 30 September. The first domestic reporting and the initial international exchange of information under these frameworks are scheduled for 2027.

The key updates are as follows:

— Reportable Information Requirements:

RCASPs must collect and report the following information for individual or entity crypto-asset users who use their services:

- Name
- Address

Germany Contacts:



Lisa Wenqian Xu
Director
wxu@kpmg.com



Xin Rieger
Senior Manager
xrieger@kpmg.com



Maria Suarez Gonzalez
Manager
msuarezgonzalez@kpmg.com

- Tax residency
- Tax Identification Number (TIN)
- Date of birth
- Place of birth (if required by national law)
- Name of the crypto-asset
- Aggregated transaction volumes, broken down by:
 - Purchases and sales in fiat currency
 - Trades with other crypto-assets
 - Payments for goods and services using crypto-assets
 - Other transactions

If individuals are identified as controlling persons of a reporting entity and they use crypto assets, they must be reported. Notably, a third party acting solely on behalf of and for the account of another person is not considered a reportable user.

— **Reportable Transaction Data and Crypto Assets:**

Reportable transaction data must be categorized by type as prescribed under the OECD's CARF and EU DAC8, as follows:

- Crypto to Crypto In – Buying crypto-assets with other crypto assets
- Crypto to Crypto Out – Selling crypto-assets for other crypto-assets
- Crypto to Fiat In – Buying crypto-assets with fiat currency
- Crypto to Fiat Out – Selling crypto-assets for fiatcurrency
- Crypto Transfer In – Incoming crypto-assets transfers
- Crypto Transfer Out – Outgoing crypto-assets transfers
- Transfer Wallet – Transferring crypto-assets between wallets
- Reportable Retail Payment Transactions (RRPT)

Additionally, transactions must also be classified by transfer type, such as:

- Staking income

- Mining income
- Airdrops
- Income from crypto loans
- Other categories

— **Due Diligence Requirements:**

RCASPs must obtain a self-certification and verify its plausibility when opening a new account for an individual or an entity. Both individual and entity users are required to provide the self-certification along with any supporting documents, ensuring completeness and accuracy.

Key requirements include:

- Self-certification must be obtained and verified before any reportable transactions occur.
- For existing users (business relationships established before 31 December 2025), RCASPs must obtain a self-certification by 1 January 2027.
- If a crypto-asset user fails to provide a valid self-certification, the RCASP must:
 - Send a reminder.
 - Issue a formal demand if non-compliance continues.
 - If the user still does not comply, the RCASP must block the user from making reportable transactions within 90 days of the initial request and no later than 60 days after the formal demand.
 - Transactions may resume only after the user submits all required information and supporting documents.

Reference (German): [General Information of CARF](#)

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](#).

Contact us



Laurie Hatten-Boyd
Principal

T: +1 213 206 4001
E: lhattenboyd@kpmg.com

Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.

kpmg.com/socialmedia



Kelli Wooten
Principal

T: +1 404 739 5888
E: kwooten@KPMG.com

Learn about us:



kpmg.com

© 2025 KPMG LLP, a Delaware limited liability partnership and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. USCS010555-1A

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.