



KPMG AEOI Updates & Tracking Service CRS Alert



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Country:	Germany	Regime:	CRS

Germany: Issued CRS Newsletter 02/2026

On 16 March 2026, the Federal Central Tax Office of Germany (BZSt) issued CRS Newsletter 02/2026, providing the following updates:

— Publication of the Final Data Set Description and Website Update:

The BZSt has published the final data set description for the CRS XML Schema v3.0 on its website, under the section “*Electronic Data Transmission (BZSt Online-Portal / DIP) – CRS Scheme v3.0*” (found [here](#)). The data set description, now binding, was finalized on 14 January 2026 and published in the Federal Tax Gazette. The same update has also been reflected on the Federal Ministry of Finance website (found [here](#)).

This finalization follows CRS Newsletter 05/2025, issued on 2 December 2025, which announced the transition to CRS XML Schema v3.0 in alignment with the OECD’s CRS 2.0 from 1 January 2027, and also released the draft data set description (see [here](#) for a detailed KPMG alert on CRS Newsletter 05/2025).

— Activation of Bulk Data Upload in BOP for CRS Reporting:

The bulk upload function for submitting CRS reports in the BZSt Online Portal (BOP) is now activated in the live environment only. Reporting Financial Institutions (RFIs) are therefore advised not to submit test reports at this stage. The BZSt will issue a separate notification once the functionality becomes available in the test environment.

To assist with technical implementation and alignment with the required XML structure for bulk data submissions, the BZSt has

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added the sample file “*MU_CRS_Leerlieferung.xml*” to its XML example set on its website, under the section “*Electronic Data Transmission (BZSt Online-Portal / DIP)*” (found [here](#)).

Additional guidance on bulk data upload and processing log retrieval is available in the DIP Standard Communication Manual, under “*Manual Bulk Data Upload.*”

— **Specific Guidelines for CRS Reporting for the 2025 Reporting Period:**

The BZSt has issued specific guidelines to help RFIs prepare accurate CRS reports for the 2025 reporting period, due by 31 July 2026. These guidelines address common errors and clarify the distinction between:

- Technical submission requirements, and
- Statutory reporting and due diligence obligations under the Financial Accounts Information Exchange Act (FKAustG) (found [here](#)).

RFIs are reminded that the BZSt’s communication manuals (found [here](#)) do not provide a comprehensive description of the reporting and due diligence requirements; instead, they set out the technical requirements for electronic submission of CRS reports.

Diligent preparation of reporting data helps RFIs reduce incomplete, technically incorrect, or materially inaccurate submissions, thereby minimizing enquiries from the automatic exchange of information (AIA) audit team or CRS partner jurisdictions.

The specific guidelines include:

- **Name as per the Commercial Register:** RFIs must use their official name as registered in the commercial register. Abbreviations, internal short names, or altered spellings may create ambiguity and must be avoided.
- **Use of Placeholders:** RFIs must not use fictitious substitute information, especially for dates of birth (DoB) or tax identification numbers (TINs).

If the required information is missing, RFIs must follow the prescribed due diligence procedures under the FKAustG. If the information cannot be obtained despite these efforts, the relevant CRS fields should be left blank.

- **Mandatory Information - TIN and DoB:** The completeness of account holder information is determined by the inclusion of name, address, TINs, and date and place of birth (for individual account holders) (Section 8(1) sentence 1 of the FKAustG, subject to sub-sections 2 to 4).

- For pre-existing account holders, RFIs must make reasonable efforts to obtain the TIN and DoB (Section 8(2) sentences 2 and 3 of the FKAustG).
- For new accounts, a valid self-certification is mandatory at account opening (Sections 13(2) and 16(2) of the FKAustG), which must include TIN and DoB. In the absence of either item, the self-certification is considered invalid, and the account cannot be opened.

Notably, even if a field is labelled “non-mandatory” in the technical schema, this does not override the legal obligation to report TIN and DoB.

- **Undocumented Accounts:** Under Sections 11(2) and 12(4) and (6) of the FKAustG, classification as an “undocumented account” is allowed only for pre-existing individual accounts and only where:
 - The only address available is a postal delivery address or foreign address,
 - No other indicia are identified, and
 - No self-certification or other documentation establishing tax residence can be obtained.

The mere absence of a self-certification, certain documentation, or individual pieces of information does not by itself constitute grounds to classify an account as “undocumented.”

- **Reporting Country Code “DE”:** As a general rule, CRS reports cover non-German tax residents. Therefore, the country code “DE” should typically not appear in CRS reports.

Exceptions exist only in certain legally defined situations, such as:

- Reporting undocumented accounts, or
- Reporting controlling persons.

- **Reporting Country Code “US”:** The country code “US” is not associated with CRS reporting. Reportable accounts under FATCA must be submitted exclusively through FATCA reporting procedures; no reports are transmitted to the U.S. Internal Revenue Service (IRS) via CRS. The two regimes operate independently under distinct legal frameworks.

Using the country code “US” in a CRS report does not replace or satisfy FATCA reporting obligations under the FATCA-USA Implementation Ordinance.

— **Submission of Test Data:** RFIs are reminded that test reports must not be submitted in the live environment, as all live submissions are automatically transmitted to CRS partner jurisdictions.

— **Processing Log and Timely Filing:** The reporting deadline under Section 6(3) of the FKAustG is only met when a CRS report has been successfully submitted and accepted. A mere submission attempt is not sufficient.

RFIs must review the processing log to confirm whether the report was successfully processed and accepted or whether technical or content errors require correction and resubmission.

— **Notification Obligation for Missing or Implausible Self-Certification Applies Only to New Accounts:**

In line with Sections 13(2a) and 16(2a) of the FKAustG, the BZSt clarifies that notification of a missing or implausible self-certification applies only to new accounts. No such notification is required for pre-existing accounts with missing self-certifications.

If new or contradictory evidence arises for a pre-existing account, a self-certification may become necessary (see paragraph 223 of the amended Federal Ministry of Finance's (BMF) letter of 15 June 2022, [here](#)). However, in such cases, no notification under Sections 13(2a) sentence 4 and 16(2a) sentence 4 of the FKAustG is required. Submitting such a notification for a pre-existing account may constitute a data protection breach under the General Data Protection Regulation (GDPR).

For notification purposes, the determining factor is the status of the account (new or pre-existing) under Sections 19(32) and 19(33) of the FKAustG, not the status of the account holder.

The BZSt further clarifies, in line with paragraph 230 of the amended BMF letter of 15 June 2022, that the following situations are treated as new accounts:

- Transfer of an existing account to a new account holder.
- Opening of new financial accounts for existing account holders who have not yet provided a self-certification.
- Blocked student accounts upon entry.

Additional guidance is available in the presentation *“Obtaining a self-certification when opening an account”* (found [here](#)).

Reference (German): [CRS Newsletter 02/2026](#)

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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/CRS/CARF Insights page, [here](#).

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