



KPMG AEOI Updates & Tracking Service CRS Alert



Date:	20 April 2026	Alert Type:	Document
Country:	Japan	Regime:	CRS
Document Type:	Guidance		

Japan: Issued Updated CRS FAQs

In March 2026, Japan's National Tax Agency (NTA) released an updated version of its CRS Frequently Asked Questions (FAQs). In addition to non-substantive revisions, the update introduced a new question:

— **Q.41. What are the reporting requirements with respect to “specified transactions” involving deposits of electronically recorded transferable securities-related rights?**

Under the FY2024 Tax Reform, the scope of “specified transactions” relevant for CRS reporting purposes was expanded to include certain contracts involving the deposit of certain electronically recorded transferable securities-related rights, as defined in Article 29-2(1)(8) of the Financial Instruments and Exchange Act (found [here](#)).

Effective 01 January 2026, Reporting Financial Institutions (RFIs) that enter into reportable contracts involving the deposit of electronically recorded transferable securities-related rights are required to report such contracts if they remain in force as of 31 December of the relevant calendar year.

This information must be submitted by 30 April of the following year to the tax office having jurisdiction over the location of the RFI's head office or principal place of business.

Income arising from the transfer of electronically recorded transferable securities-related rights that is reportable under the Crypto-Assets Reporting Framework (CARF) is excluded from CRS reporting.

Japan Contacts:



Taro Nakayama
Director

taro.nakayama@jp.kpmg.com



Ryukichi Kunori
Managing Director

ryukichi.kunori@jp.kpmg.com

Electronically recorded transferable securities-related rights fall within the scope of CARF when they possess the characteristics of a crypto-asset as defined in Article 2(14) of the Payment Services Act (found [here](#)).

Additionally, a corresponding example clarifies the circumstances under which electronically recorded transferable securities-related rights are exclusively reportable under CRS.

Reference (Japanese): [CRS FAQs](#) [PDF 947KB]

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

Contact us



Laurie Hatten-Boyd
Principal

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



Kelli Wooten
Principal

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

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

Learn about us:



[kpmg.com](https://www.kpmg.com)

© 2026 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.