KPMG AEOI Updates & Tracking Service CARF Alert

Date:	6 July 2026	**Alert Type:**	Document
Country:	Italy	**Regime:**	CARF
Document Type:	Other Guidance		

Italy: Issued Implementing Measures for DAC8 in Line with CARF

On 22 June 2026, the Italian Revenue Agency (IRA) issued a provision implementing the measures set out in Legislative Decree no. 194 of 10 December 2025 (found here). This decree transposes Council Directive (EU) 2023/2226 of 17 October 2023 (DAC8), aligned with the OECD's Crypto-Asset Reporting Framework (CARF), into the Italian legislative framework.

The key updates include:

— **Reporting Obligations:**

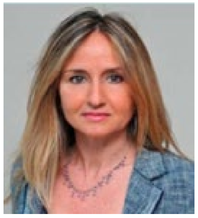
Effective from 1 January 2026, Reporting Crypto-Asset Service Providers (RCASPs), as defined under Article 7 of the Legislative Decree, are required to collect and report specific information to the IRA pursuant to Article 13 of the Decree. The definition of RCASPs include both:

- Crypto-Asset Service Provider as defined by Article 3(1)(15) of Regulation (EU) 2023/1114;
- Crypto-Asset Operator (CAOs) as defined by Article 6(1)(h) of Legislative Decree no. 194 of 10 December 2025, i.e. a provider of Crypto-Asset Services other than a Crypto-Asset Service Provider.

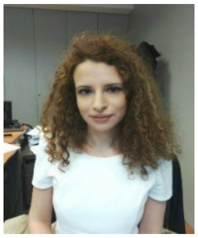
The information to be reported includes:

- Identification details of crypto-asset users:
  - For individual users: Name, address, tax residency, Tax Identification Number (NIF), date of birth, and place of birth.

Italy Contacts:



Sabrina Navarra
Associate Partner
snavarra@kpmg.it



Guilia Valacca
Senior Manager
gvalacca@kpmg.it

- For entity users: Name, address, NIF, details of controlling persons (same as required for individual users), and details on the role of each controlling person.
- Identification details of the RCASPs:
  - Italian Tax Identification Code (*Codice Fiscale*), if available
  - Individual Identification Number (IIN), if assigned
  - Email address
- Transaction details involving relevant crypto-assets, including:
  - Name of the crypto-asset,
  - Amount paid or received,
  - Number of units,
  - Total number of transactions.

  These reporting requirements apply to transactions involving:
  - Exchanges between relevant crypto-assets and fiat currencies;
  - Exchanges between different types of relevant crypto-assets; and
  - Transfers of relevant crypto-assets, including reportable retail payment transactions.

- **Reporting Timeline:**

  Reports must be submitted to the IRA by 30 June of the year following the reporting period. The first reporting deadline is set for 30 June 2027, covering the 2026 reporting period.

  The first exchange of information with partner jurisdictions under DAC8 is scheduled for 30 September 2027.

- **Notification of Reporting in Another Jurisdiction:**

  RCASPs that have reporting obligations in Italy but fulfill their reporting and due diligence requirements in another EU Member State or a qualified non-EU jurisdiction under substantially similar rules are exempt from reporting in Italy, provided they notify the IRA by the applicable reporting deadline.

- **Receipts of Reports:**

  Following the submission of a report, the IRA provides a receipt confirming the submission, indicating either a positive outcome (acceptance) or a negative outcome (rejection). Except in cases of force majeure, the receipt is made available within five working days of submission. If the submission is rejected, the RCASP must resubmit all reportable data.

- **Registration and System Access of CAOs:**

  Non-resident CAOs must register with the IRA through its electronic services to fulfill reporting obligations.

  For registration, CAOs must provide the following information:

  - Name
  - Postal address
  - Certified email (PEC) or other electronic address
  - Websites
  - Italian tax identification code (*Codice fiscale*) and any other tax identification numbers (TINs), if available
  - EU countries where reportable users are resident
  - Any relevant qualified non-EU countries where reportable users are resident.

  Upon completion of the registration process, an IIN is assigned to the CAO. The IRA then transmits this information to the Central Secure Register (CSR).

  CAOs must ensure that all submitted information remains accurate and up to date.

  If reporting obligations are transferred to another EU Member State, the CAO may request a transfer of registration through the IRA's electronic services. Notably, the originally assigned IIN remains valid even after such a transfer.

- **Deregistration of CAOS:**

  A CAO must request deregistration if:

  - It no longer maintains any reportable users in the EU; or
  - It no longer meets the conditions set out in Article 6(1)(h) of the Legislative Decree no. 194 of 10 December 2025.

  The IRA may also initiate deregistration in the CSR under the following circumstances:

  - The CAO has notified the IRA that it no longer maintains any reportable users in the EU;
  - No notification has been received from the CAO, but there is evidence of inactivity;
  - The CAO no longer meets the conditions set out in Article 6(1)(h) of the Legislative Decree no. 194 of 10 December 2025; or
  - The IRA has revoked the CAO's registration.

Additionally, the MEF has published the XML schema for CARF/DAC8 reporting (found here), along with the corresponding technical instructions (found here).

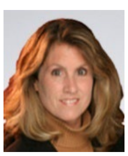
Reference: Provision of 22 June 2026

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**

© 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.