



To whom it may concern

Reggio Emilia, Jan. 31, 2025

MEMORANDUM N. 9/2025

Insight

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Subject: Reduction of assessment deadlines in case of traceable collections and payments

In order to incentivize the traceability of payments, Article 3 of Legislative Decree No. 127 of Aug. 5, 2015, as amended and supplemented, introduced a 2-year reduction in the time limit for assessment in favor of entities that

- use exclusively electronic invoicing via SdI or telematic payments;
- make/receive payments by traceable means for amounts exceeding 500 euros each (**even a single collection or payment made by untraceable means inhibits the reduction of the assessment terms**).

The relief applies to VAT taxpayers, entrepreneurs and self-employed income holders.

The reduction in time limits affects VAT and direct tax assessments that are due by Dec. 31 of the fifth year following the year in which the tax return is filed.

The reduction in time limits for the expiration of assessments concerns VAT taxpayers who:

1) document active and passive transactions with:

- a) electronic invoice;
- b) electronic storage and telematic sending of daily receipts;

2) make or receive payments exceeding Euro 500 each in a traced manner.

Article 3, first paragraph of Ministerial Decree 4.8.2016 identifies the following traceable means of payment:

- bank or postal transfer;
- debit and credit card;
- bank, bank draft and postal check containing the non-transferability clause.

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The Internal Revenue Service with its answer to interpellation 2.8.2022 No. 404 clarified that RI.BA and MAW also constitute traceable means of payment.

Art. 4 of Ministerial Decree 4.8.2016 stipulates that taxpayers report, with respect to each tax period, the existence of the prerequisites for the reduction of



the assessment terms in the relevant annual income tax return, by ticking the appropriate box in the RS box. In the return for 2023, the boxes are:

- RS 136 for the tax return of individuals and partnerships;
- RS 269 for the tax return of corporations.

Failure to tick the box will result in the loss of effectiveness of the benefit. It is believed, however, that the omission can be remedied by filing a supplementary return.

The Firm remains available for any clarifications.

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