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To whom it may concern

Reggio Emilia, Sept. 19, 2025

MEMORANDUM N. 49/2025

Insight

Subject: Reduction of assessment periods in the case of traceable receipts and payments

In order to encourage the traceability of payments, Article 3 of Legislative Decree No. 127 of August 5, 2015, as amended and supplemented, introduced a two-year reduction in the terms for assessment in favor of entities that:

- exclusively use electronic invoicing via the SdI (Interchange System) or electronic payments;
- make/receive payments using traceable means for amounts exceeding €500 each (**even a single collection or payment made using non-traceable means prevents the reduction of the assessment terms**).

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

The reduction in terms applies to VAT and direct tax assessments that expire by December 31 of the fifth year following the year in which the tax return was filed.

The reduction in the limitation period for assessments applies to VAT taxpayers who:

- 1) document active and passive transactions with:
 - a) electronic invoices;
 - b) electronic storage and electronic transmission of daily receipts;
- 2) make or receive payments exceeding €500 each in a traceable manner.

Article 3, paragraph 1 of Ministerial Decree 4.8.2016 identifies the following traceable means of payment:

- bank or postal transfer;
- debit and credit cards;
- bank, circular, and postal checks containing a non-transferability clause.

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In its response to request for ruling no. 404 of August 2, 2022, the Italian Revenue Agency specified that RI.BA and MAW are also traceable means of payment.

Article 4 of Ministerial Decree 4.8.2016 establishes that taxpayers must communicate, with regard to each tax period, the existence of the conditions for the reduction of the assessment terms in the relevant annual income tax return, by ticking the appropriate box in section RS. In the 2024 return, the boxes are:

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

The Firm remains available for any clarifications.

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