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To all
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Circular No. 04/2026
Bolzano, 6 January 2026

Subject: Changes for 2026 – VAT and excise duties

Set out below are the most important changes in the field of VAT and excise duties at the turn of the year 2026, as contained in the Budget Law (Law 199/2025), all of which take effect on 1 January 2026:

1. VAT

Accordingly, the value of a service includes all expenditure borne by the recipient in order to obtain that service, including the cost of ancillary services such as shipping costs connected with the supply of the goods, which must therefore be included in the taxable base. This criterion applies both where the exchange is between goods and where it is between services, as well as where the exchange is between goods and a service or vice versa. Consequently, the taxable base of the two supplies, which remain separate and independent, is no longer the open market value of the goods supplied or the services rendered, but the costs borne by the supplier in carrying out the supply.

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It is provided that, where the VAT return is not filed, the Revenue Agency may assess the tax, including by automated procedures, on the basis of the electronic invoices issued and received, the electronic data transmitted from cash registers and the information derived from the periodic VAT settlement communications.
Where tax is found to be payable, the result of the assessment is notified to the taxpayer, who may within the following sixty days point out any data or elements not taken into account or incorrectly assessed and provide the necessary explanations, or alternatively pay the tax including interest and administrative penalties.
The Revenue Agency is allowed a period of 7 years for this purpose.

VAT simplifications for supplies of goods to persons resident outside the European Union (Art. 1, paras. 934–936)

The tax-free shopping rules – i.e. the VAT exemption for supplies of goods for personal or family use to persons resident or habitually resident outside the territory of the European Union – are being revised.
To this end, the Customs and Monopolies Agency is authorised, in agreement with the Revenue Agency, to issue within 120 days of the entry into force of this Budget Law a measure laying down the arrangements for simplifying the procedures for processing applications for VAT refunds on export from the customs territory.
In particular, those arrangements are to include a single validation procedure for all invoices issued electronically by the supplier and made out to the same customer.

A charge of EUR 2 is introduced for consignments of low-value goods (i.e. up to EUR 150) originating in third countries outside the EU. This charge is levied by the customs authorities at the time of definitive importation of the goods concerned. On 30 December 2025 the Customs Agency issued initial guidance on the application of the new charge in Circular no. 37.

We have already informed you about this: in future, cash registers will have to be connected to electronic payment instruments (e.g. POS devices). The measure is intended to simplify tax processes and increase transparency in electronic payments. On 31 October 2025 the Revenue Agency published the necessary operational details in a regulation. The obligation only takes effect, however, once the necessary platform is activated on the Revenue Agency's website.
Contrary to general expectations, the connection is not made physically but via the

online service (“fatture e corrispettivi”) provided in the reserved area of the Revenue Agency's website. There the serial number of the cash register is linked to the electronic payment instruments. The platform automatically displays the payment instruments reported in advance by financial service providers. Anyone using the Agency's web application to transmit daily takings can make the connection directly within that application.

Note: the new functions are not expected to be available until the beginning of March 2026. The exact date will be announced on the Revenue Agency's website.

For payment instruments already in use on 1 January 2026 or used between 1 and 31 January 2026, a transitional period of 45 days from the launch of the online service applies.

In future, every new connection or amendment must be made from the 6th day of the second month following availability of the electronic payment instrument and by the last working day of that same month at the latest (example: payment instrument 2 February 2026; connection between 6 April and 30 April 2026).

Note: we ask you to check the necessary technical requirements of your devices with your cash register supplier. We are happy to assist with activating the service itself once the Agency has made the necessary functions available.

2. Excise duties

Alignment of excise duties on petrol and on diesel used as motor fuel (Art. 1, para. 129)

The excise duty rates on petrol and on diesel used as motor fuel are aligned by setting both at EUR 672.90 per 1,000 litres. At the pump this should reduce the price of petrol and increase that of diesel.

Exempt from the increase are fuels used for agricultural purposes and those used for machinery or stationary engines in industrial plants or for equipment used in cargo handling in ports (Table A, nos. 5 and 9 of the consolidated text under Legislative Decree no. 504/1995).

Incidentally, for certified biodiesel (HVO) the reduced rate of EUR 617.40 per 1,000 litres is expected to remain in place until the end of 2029. We already referred to the new invoicing rules and the effects on refund procedures for transport companies in a separate circular at the end of the year.

The excise duty rate on beer is reset as follows:

- EUR 2.98 per hectolitre and per degree Plato for the period from 1 January

2026 to 31 December 2027;
- EUR 2.99 per hectolitre and per degree Plato from 1 January 2028.

Excise duties on natural gas (Legislative Decree 43/2025)

Significant changes to excise duties on natural gas and electricity apply from 1 January 2026.
For natural gas, the distinction between "civil" and "industrial" consumption is abandoned in favour of the categories "domestic" and "non-domestic" use. For natural gas and electricity, an express rule for so-called mixed use ("mixed consumption") is also introduced.
Excise duty returns must in future be filed half-yearly (instead of annually). The duty is in principle collected through monthly advance payments.
In addition, monthly electronic reports of the quantities of energy billed are required.

We already informed you of this in our Circular no. 41/2025: since 1 January 2026, importers of iron and steel, aluminium, cement, fertilisers as well as electricity and hydrogen from outside the EU are subject to special monitoring: in future they must not only report emissions but also purchase CO2 certificates. The circle of businesses ultimately affected is limited: anyone importing less than 50 tonnes of CBAM goods per year is exempt from the CBAM obligations. There is no minimum threshold for electricity imports.
<u>Anyone affected by the change should register with the customs authority without delay, as reported in our Circular no. 41/2025.</u>

We remain at your disposal for any further information.

Yours sincerely
Josef Vieider