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To all
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Circular No. 22/2025

Bolzano, 21 May 2025

Subject: New notification obligations for Industry 4.0 tax credits – advance notifications already submitted in 2025 must be resubmitted without delay!

By decree of 15 May 2025, the Ministry of Enterprises and Made in Italy has finally published the forms together with the instructions for the tax credits in the Industry 4.0 area, taking into account the changes introduced since 2025; we enclose the form together with the instructions for ease of reference.

First of all, however, an overview of the current legal framework relating to this incentive is required. In the three-year period 2023 – 2025, the Industry 4.0 investment incentive is, as is known, granted as follows:

- 20% for investments of up to 2,5 million euro,
- 10% for investments of more than 2,5 million and up to ten million euro, and
- 5% for investments of more than ten million and up to a maximum of 20 million euro.

The above thresholds are not to be calculated for the three-year period as a whole, but separately for each year. However, for the year 2025 an expenditure ceiling of 2.200 million euro was introduced in the State budget for this incentive, and since these funds will certainly not be sufficient, entirely new conditions now apply:

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First of all, it should be recalled that the expenditure restrictions do not affect those 2025 investments which are carried out by 30 June 2025, provided that a binding order was placed for them by 31 December 2024 and, in addition, a down payment of at least 20% was made. Under the same conditions (binding order and down payment of at least 20% by 31.12.2024), the extension also applies to investments in intangible assets of the Industry 4.0 category (as a rule software) delivered by 30 June 2025, for which no incentive would otherwise be available any longer in 2025.

For investments made in 2025 which do not fall under the above exemption, an additional notification must be submitted in advance in order to allow the expenditure ceiling to be managed. In total, 3 (three) notifications must now be filed in order to claim this incentive, and by decree of 15 May 2025 the Ministry of Enterprises and Made in Italy has published a new single form by means of which all 3 notification obligations can be fulfilled.

Under the legislation in force, three periods must be distinguished, for each of which different notification obligations apply depending on the date of the investment:

1. Investments made in the period between 1 January 2023 and 29 March 2024 with IT activation in 2025 (keyword „interconnesione“): in this case the original final notification to the GSE upon completion of the investment is sufficient.

2. Investments made from 30 March 2024 onwards: in this case both the advance notification introduced last year (decree of 24 April 2024) and the final notification must be filed with the GSE. This regime also covers all investments which – as set out above – were booked in advance by 31 December 2024 in accordance with the rules applicable in 2024, i.e. with binding confirmation of the order and a down payment of at least 20% to the supplier.

3. Investments made from 1 January 2025 onwards without a binding order and a down payment of 20% in 2024: these fall under the new expenditure ceiling of 2,2 billion euro, and the new notification obligations apply to them. Three notifications are required in this case. In this respect, the Italian Revenue Agency has published a dedicated form by decree of 15 May 2025 which must be used for all three notifications; accordingly, it must be indicated on the first page in each case which notification is intended. The three notification procedures are as follows:

3.1 Advance booking notification: before the investment begins, the planned investment and the corresponding amount must be notified. This notification determines the ranking, i.e. the chronological order, for the allocation of the limited funds available.
3.2 Confirmation notification: within a deadline of 30 days from the dispatch of the aforementioned advance booking notification, a new confirmation notification must be sent confirming that the down payment of at least 20% of the order value has also been made. This additional bureaucratic burden is justified by the aim of preventing excessive investments from being booked in advance and thereby blocking funds.
3.3 Final notification: finally, this must be filed upon completion of the investment and in any case by 31 January 2026 (for investments made in 2025) or by 31 July 2026 (for investments made by 30 June 2026 where the advance booking was made by December 2025).
The above notifications must be sent electronically via the portal of the energy authority GSE using one's own registration, for which prior registration is required. According to the relevant announcement by the GSE, the GSE platform has been opened in recent days.

Subsequent filing of the advance notification on the new form:
But that is not all: anyone who has already filed an advance booking notification for 2025 investments in recent months using the form pursuant to the decree of 24 April 2024 must repeat this advance notification using the new form. The original ranking is thereby retained. For this purpose, the second box must also be ticked on the first page in the advance notification field, and the details of the first notification must then be indicated. This subsequent notification should originally have been made by 14 June 2025 (30 days after publication of the aforementioned implementing decree); however, due to delays in activating the notification procedures, the deadline will be postponed. In any event, we recommend making the subsequent notification without delay. If this repeat filing is not carried out, both the entitlement to the incentive and the ranking are forfeited.

The use of the tax credits arising from investments made in 2025 has also been newly regulated: after the final notification has been submitted, the Ministry of Industry will communicate the tax credit granted by the fifth day of the following month, and the companies concerned may use the credits for offsetting from the tenth day of the month following that in which the data are transmitted by the GSE. The following deadlines will evidently have to be observed (example):

- Completion of an investment with final notification in June 2025
- Communication of the tax credit by 5 July 2025
- Offsetting of the credit from 10 August 2025.

Conclusion: this can hardly be said to be a contribution to cutting red tape.

Should you have submitted advance notifications for investments in the Industry 4.0 area after 1 January 2025, we would be pleased to assist you with the required resubmission of the notification.

We remain at your disposal for any further information.

Yours sincerely
Josef Vieider