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To all
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Circular
No. 43/2025

Bolzano, 22 November 2025

Subject: Transition 5.0 – advance notifications only until 27 November 2025; prohibition of cumulation now also applicable to advance notifications

By an emergency decree published last Friday (Art. 1, Law Decree No. 175 of 21 November 2025, in force since Saturday, 22 November), the government has quite unexpectedly ordered that the portal for booking investments in the Transition 5.0 area will be closed on 27 November 2025 at 6.00 p.m. Businesses therefore still have until Thursday to submit advance notifications for investments in this area, whereby incomplete notifications filed between 7 November 2025 and 27 November 2025 may still be corrected until 6 December 2025. Applications lacking the certification of energy savings cannot be corrected.

But that is not all: by way of a statutory interpretation, Art. 2 of Law Decree 175/2025 provides that a prohibition of cumulation between Industry 4.0 and Transition 5.0 applies already at the stage of the advance notifications. Until now, it was possible to register for both incentives and to decide on one funding track only at a later stage. That is now over, and anyone who has already registered the same investment project on both portals must likewise withdraw one application by Thursday, 27 November 2025 and opt for a single funding track. However, one safeguard remains in place for businesses: should the financial resources for funding

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investments in the Transition 5.0 area prove insufficient, businesses that now waive the 4.0 track may nevertheless still be considered under Industry 4.0.

The measure had become necessary after it emerged on 7 November 2025 that, of the 6.3 billion euro originally earmarked in the budget for the Transition 5.0 area, only 2.5 billion euro are actually available. The government has now increased the funds by 250 million euro, so that 2.75 billion euro are available in the current budget. However, this will not be sufficient to satisfy all applications. The emergency brake was therefore pulled, and it is hoped that, through the present time restriction and the prohibition of cumulation, the applications can be met even with limited resources.

A booking by 27 November 2025 is recommended in particular for those investments that are currently under way. There is indeed a risk that these will be excluded from the new incentives for the year 2026. Conversely, anyone planning investments in the Transition 5.0 or Industry 4.0 areas only in 2026 need not rush now. They can await the future incentives, which, at least according to the current budget draft for next year, should turn out to be rather more favourable.

Incidentally: as early as 11 November 2025, the government also announced that the funds earmarked in the budget for the Industry 4.0 area had been exhausted. To date, however, no closure of the portal has been ordered here. Rather, the government has promised that the funds will be topped up as soon as possible. Presumably, the above-mentioned prohibition of cumulation is also hoped to provide some breathing space for this funding track again.

We remain at your disposal to assist you with the notifications.

Yours sincerely
Josef Vieider