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To all
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Circular No. 47/2024

Bolzano, 17 December 2024

Subject: Industry 4.0 – new rules for 2025 – a race against time!

The investment incentives in the field of Industry 4.0 have, despite their step-by-step reduction over the past years, always retained at least a hint of legal certainty: already with the Budget Law for 2023, the investment incentive for tangible fixed assets for the years 2023, 2024 and 2025 had been restricted as follows:

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

And here, first of all, a positive clarification: although the wording of the law is different, the Italian Revenue Agency clarified in Circular No. 14 of 17 May 2022 (which for a long time no one was willing to believe, but which is now generally accepted) that the above limits for tangible fixed assets may be calculated separately for each of the three years 2023. 2024 and 2025 and that this is not a single threshold for the three-year period, as the wording of the law actually suggests. For investments in “Industry 4.0” intangible assets, on the other hand, an incentive of most recently 15% was granted.

And all undertakings will certainly have counted on these incentive mechanisms for 2025 as well and have also planned as provided for above. Until today! For today the debate on the 2025

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Budget Law began in the Chamber of Deputies, and an amendment tabled at short notice by the government largely calls into question the incentives in the field of “Industry 4.0” from 2025 onwards.

Accordingly, the “Industry 4.0” tax credits for 2025 are to be abolished entirely in the area of intangible assets, and for investments in tangible fixed assets a spending ceiling of 2.200 million euro is to be introduced in the State budget; as soon as the funding pot is exhausted, the support will come to an end, and that will certainly not take long.

The new restrictions do not, however, apply to investments in “Industry 4.0” tangible fixed assets in the first half of 2025, i.e. by 30 June 2025, if for these a binding order is still placed by the date of publication of the Budget Law for 2025 (i.e. presumably between 27 and 31 December 2024) and in addition a down payment of at least 20% is made. For investments in intangible assets, on the other hand, the order together with a down payment of 20% by 31 December 2024 should still be sufficient.

If, therefore, you are planning investments in the field of Industry 4.0 for which the quotations are already on hand and the essential decisions have been taken, it is worth placing the order and making a down payment without delay in order to secure the current incentives.

Legal certainty looks different!

We remain at your disposal for any further information.

Yours sincerely
Josef Vieider