



DEBT COLLECTION AMNESTY SUMMARY OF THE RULES



1. INTRODUCTION

Article 1, paragraphs 82 to 100, of Law No. 199 of 30 December 2025 (the 2026 Budget Law) introduced a new debt collection amnesty (“rottamazione dei ruoli”), covering debts entrusted to the Collection Agent from 1 January 2000 to 31 December 2023 (the so-called “rottamazione-quinquies”).

In order to determine whether debts qualify for the amnesty, reference must therefore be made to the delivery of the tax roll (which precedes service of the payment notice) or to the transmission of the debt load flow (which follows service of the INPS payment notice).

The amnesty covers debts arising from:

- automated assessment and formal audit of income tax, VAT, IRAP and withholding agent returns;
- declared and unpaid INPS contributions, excluding those arising from tax assessments;
- penalties for violations of the Highway Code imposed by state authorities.

Unlike previous debt collection amnesties, the so-called “rottamazione-quinquies” therefore has a narrower scope of application.

The application must be filed by the peremptory deadline of 30 April 2026, and the amounts due (or the first instalment) must be paid by 31 July 2026.

The debtor may choose which debts to settle. Therefore, for example, if a payment notice concerns both INPS debts and Revenue Agency debts, it is possible to settle only the INPS debts.

2. SCOPE OF APPLICATION

The debts eligible for the amnesty must arise from:

- automated assessment and formal audit of income tax, VAT, IRAP and withholding agent returns (in brief, these include omitted payments of declared taxes, tax deductions or taxable income deductions unduly claimed or lacking supporting documentation, withholdings offset without the withholding agent’s certificate, or tax credits offset in excess of the statutory amount);
- declared and unpaid INPS contributions, excluding those arising from tax assessments;
- penalties for violations of the Highway Code imposed by state authorities (therefore, penalties imposed by local police do not benefit from the amnesty).

Excluded, for example, are debts owed to professional pension funds (such as those for chartered accountants and lawyers), ENASARCO, and local authorities (for example IMU-related debts). Likewise excluded are debts which, although issued by the Revenue Agency, arise from assessment notices, liquidation notices or tax credit recovery notices.

2.1 PERIODIC VAT SETTLEMENTS

Debts arising from cross-checks with the so-called “LIPE” (communications of periodic VAT settlements) appear to fall within the amnesty, as they still derive from the automated assessment of the return.

2.2 FORFEITURE OF INSTALMENT PLAN RELATING TO A TAX ASSESSMENT NOTICE



Debts arising from forfeiture of the settlement/instalment plan relating to a tax assessment notice (“avviso bonario”) should fall within the amnesty (including those relating to separate taxation).

This is because the tax assessment notice stems from the automated assessment or formal audit of the return; therefore, if the taxpayer forfeits the relevant instalment plan, the underlying tax roll still originates from the automated assessment or formal audit of the return.

3. PRIOR VERIFICATION OF ELIGIBLE DEBTS

The so-called “rottamazione-quinquies” applies to debts entrusted to the Collection Agent from 1 January 2000 to 31 December 2023.

To determine whether debts are eligible, the Collection Agent provides an information service for prior verification of debts, also available to the heirs of a deceased taxpayer.

It is possible to:

- access the taxpayer’s reserved area, for example through SPID, on the website of the Revenue Agency-Collection Agency. In this case, by clicking on the function dedicated to the facilitated settlement, before completing the relevant form the system displays the list of eligible debts, with the option to select those to be included in the request;
- request, also through the public area of the website, the statement of eligible debts indicating the amounts due, which will later be sent by email to the debtor.

4. BENEFITS

The main effect of the debt collection amnesty is the automatic cancellation of administrative penalties and interest included in the debts, first and foremost interest for late registration in the tax roll.

Default interest is also not due, i.e. the interest accruing in favor of the Collection Agent if payment is made more than 60 days after service of the payment notice.

Collection fees, where still due, are likewise eliminated (it should be recalled that collection fees were abolished as of 1 January 2022).

Amounts due as principal (taxes, contributions) and enforcement expenses, as well as the costs of service of the payment notice, must be paid in full.

4.1 PENALTIES FOR VIOLATIONS OF THE HIGHWAY CODE

As regards penalties relating to violations of the Highway Code imposed by state authorities, these are not cancelled as a result of the amnesty.

The cancellation applies only to collection fees, interest and surcharges referred to in Article 27, paragraph 6, of Law No. 689/81.

4.2 PREVIOUS DEBT COLLECTION AMNESTIES AND “SALDO E STRALCIO”

The “rottamazione-quinquies” may also benefit those who forfeited a previous debt collection amnesty provided for by:

- Article 6, paragraph 2, of Decree Law No. 193/2016 (first amnesty);



- Article 1, paragraph 5, of Decree Law No. 148/2017 (so-called “rottamazione-bis”);
- Article 3, paragraph 5, of Decree Law No. 119/2018 (so-called “rottamazione-ter”);
- Article 16-bis, paragraph 1, of Decree Law No. 34/2019;
- Article 1, paragraph 189, of Law No. 145/2018 (the so-called “saldo e stralcio” of omitted payments).

However, in order to access the new amnesty, the debts must in any case relate, in short, to automated assessment/formal audit of tax returns or to declared and unpaid INPS contributions. Therefore, those who had settled a debt arising from an immediately enforceable assessment and then forfeited that settlement cannot benefit from the new debt collection amnesty.

4.3 DEBTS ARISING FROM THE SO-CALLED “ROTTAMAZIONE-QUATER”

With regard to the amnesty provided for by Law No. 197/2022 (the so-called “rottamazione-quater”) or the related readmission under Decree Law No. 202/2024, only debtors who had forfeited the previous amnesty as of 30 September 2025 may benefit from the new debt collection amnesty.

Consequently, the new amnesty cannot be used by debtors who failed to pay or paid late the instalment due on 30 November 2025 or any subsequent instalment.

For these taxpayers, the so-called “rottamazione-quater” remains in force, and the relevant instalments must be paid according to the deadlines set out in the original plan.

5. PROCEDURE

The procedure governing the debt collection amnesty is fairly simple and, in most cases, does not present critical issues.

It begins with an application filed by the debtor, followed by the calculation of the amounts due by the Collection Agent.

5.1 APPLICATION

The application must be filed by the taxpayer through the IT application made available by the Collection Agent.

The forfeiture deadline for the application is 30 April 2026.

Debts consisting solely of penalties for late payment also fall within the amnesty; in that case there is no amount due, but the application must still be filed by 30 April 2026.

5.2 CALCULATION OF THE AMOUNTS DUE

The calculation of the amounts due, including any instalment breakdown, is carried out by the Collection Agent.

The deadline for communicating the calculation is 30 June 2026.

5.3 PAYMENTS

Payment may be made:

- in a single instalment by 31 July 2026;
- or in up to 54 two-monthly instalments, spread between 31 July 2026 and 31 May 2035.



The amounts due, broken down by instalment, are contained in the statement of calculation served by the Collection Agent by 30 June 2026.

5.3.1 Instalment payment

Payment may be made in instalments, subject to the relevant option being exercised in the amnesty application form. Within the maximum limit of 54 instalments, the debtor may specify the number of instalments in which the debt is to be repaid.

Interest at the annual rate of 3% is due on deferred amounts from 1 August 2026.

5.3.2 Methods of payment

As regards payment methods, it is possible to:

- use the pre-filled payment slips attached to the statement;
- use direct debit, by completing the form that will be attached to the statement of calculation of the amounts due;
- go to the Collection Agent's offices.

Further payment methods are also available, such as home banking, payment through collection points and the so-called "CBILL". Any form of set-off is excluded.

6. FILING OF THE APPLICATION

The application must be filed by the debtor by 30 April 2026, which is a forfeiture deadline.

It is mandatory to use the online application made available by the Collection Agent on its website.

It is not possible to send the PDF form, once scanned, to the Collection Agent's email or certified email addresses. This method is reserved for debtors subject to over-indebtedness procedures.

In the application, the debtor must indicate the number of instalments in which the debt is to be paid (without prejudice to the maximum number of 54) and undertake to waive any pending litigation.

The taxpayer may:

- decide which payment notices / INPS payment notices to settle;
- settle only some tax rolls contained in the same payment notice;
- supplement, by 30 April 2026, an application already filed by indicating further tax rolls to be settled, relating to the same or different payment notices.

6.1 SUBMISSION

The application is submitted through the online platform made available by the Collection Agent on its website.

It may also be used by taxpayers who do not have so-called "digital identity" (for example those who do not have an electronic identity card or SPID).

Once the form is completed, a filing receipt is generated.

6.1.1 Authorized intermediaries

Authorized intermediaries may file the application through the reserved "EquiPro" area using Entratel credentials.



6.1.2 Completion of the application (private area)

If the application is submitted through the private area, access is gained via digital identity (for example SPID).

When the debtor accesses the function dedicated to the facilitated settlement, the system displays only the debts falling within the amnesty.

6.1.3 Completion of the application (public area)

The form must be completed by indicating the debts to be settled included in the payment notice or INPS payment notice.

It is then necessary to specify contact details (address or certified email) and attach a copy of an identity document together with a self-certification declaration (useful, for example, if the application is filed in the capacity of heir).

Fields are provided for contact details, within which it appears possible to indicate the certified email or telephone number of the professional assisting the taxpayer (to whom the statement of calculation of the amounts due will be sent).

6.2 FILING OF SEPARATE APPLICATIONS

It should be possible to file separate debt settlement applications by 30 April 2026, so that each application generates a different instalment plan.

In this way, if one instalment plan is forfeited, the amnesty is lost only for that plan and not for the others, provided that the instalments relating to those other plans are being paid in full and on time.

6.3 PAYMENT NOTICES CONTAINING BOTH ELIGIBLE AND NON-ELIGIBLE DEBTS

Where the payment notice or INPS payment notice contains several debts, only some of which are eligible for the amnesty, the form must indicate the debt that the taxpayer intends to settle.

If, for debts that are not eligible or not included in the amnesty application, a previous instalment plan is in place, it is possible to request a rescheduling of that instalment plan.

For this purpose, it is necessary to go to the Collection Agent's offices.

7. EFFECTS OF THE APPLICATION

Once the amnesty application has been filed, the Revenue Agency-Collection Agency may not initiate enforcement actions or impose administrative holds and mortgages; however, any such measures already in place before the filing of the application remain effective.

In general, the debtor is considered compliant for tax purposes; therefore:

- the so-called "block on payments by Public Administrations" does not apply, so Public Administrations may still make payments even in the presence of overdue tax rolls;
- it is possible to obtain the DURC;
- the prohibition on offsetting in form F24 in the presence of overdue tax rolls does not apply.

7.1 GARNISHMENTS



Once the amnesty application has been filed:

- no new enforcement procedures may be initiated;
- enforcement procedures previously initiated may not continue, unless the first auction has already taken place with a successful outcome.

Interventions in real estate foreclosure proceedings initiated by third parties are not suspended where the relevant property is subject to a tax mortgage.

Upon payment, by 31 July 2026, of the full amount due or of the first instalment, garnishments are extinguished.

In the case of a bank account garnishment, it is advisable to inform both the bank and the Collection Agent immediately that the amnesty application has been filed; in this way, the bank account may be released as soon as the bank receives the relevant notice from the Collection Agent.

7.2 INSTALMENT PLANS FOR TAX ROLLS

From the date on which the application is filed until 31 July 2026, payment obligations arising from existing instalment plans for tax rolls are suspended.

On 31 July 2026, previous instalment plans are automatically revoked.

8. FORFEITURE

The amnesty produces no effects in the event of omitted or insufficient payment of the full amount due, of two instalments even if non-consecutive, or of the last instalment. Subject to the above, no grace period is provided for late payments.

The debtor automatically forfeits the amnesty without the need for any formal measure.

Following forfeiture, and provided that the legal requirements are met, both protective measures (administrative holds and mortgages) and enforcement actions (garnishments) may again be adopted, as may the continuation of any measures already in place.

The limitation and forfeiture periods for the recovery of the tax roll debts, which had been suspended, start running again.

The entire outstanding debt, net of amounts already paid, may then be enforced. The outstanding debt will also include the items cancelled by virtue of the amnesty, namely penalties, interest included in the debts, default interest and collection fees, where still due.

8.1 FAILURE TO PAY AN INSTALMENT

Failure to pay, or underpayment of, the last instalment causes forfeiture of the amnesty. However, it should be noted that, according to the FAQs published on the Revenue Agency-Collection Agency website, "when the taxpayer makes payment of the instalment following the missed one, the amount paid will be allocated to cover the previous instalment that remained wholly/partially unpaid." For example, again according to the Revenue Agency-Collection Agency, "in the case of a Rottamazione-quinquies paid in three instalments, if the taxpayer pays the first and the third instalment (which is also the last), skipping the second, which remains unpaid, the payment of the last instalment (i.e. the third) will be allocated to the previous one (the second) and therefore, from



a substantive standpoint, the third instalment will remain unpaid. Consequently, since this constitutes non-payment of the last instalment, this will determine, as provided by law, forfeiture of the benefit of the Rottamazione-quinquies and the resumption of collection activities.”

Taking note of this interpretation, forfeiture occurs not only, as provided by law, when two instalments other than the last remain unpaid, but also where just one instalment is missed, as a result of the above payment allocation criteria.

8.2 INSTALMENT PLAN FOR THE OUTSTANDING DEBT FOLLOWING FORFEITURE

Once forfeiture from the amnesty has occurred, it will no longer be possible to obtain an instalment plan for the outstanding debt.

9. PENDING LITIGATION

The existence of pending litigation does not prevent access to the amnesty, but the application must include an undertaking to waive the pending proceedings.

In summary:

- once the amnesty application has been filed, it, together with the filing receipt, must be lodged with the Tax Court so that the proceedings may be suspended;
- if, by 31 July 2026, the first instalment or the full amount due is paid, then, upon filing the statement of calculation of the amounts due and the certificate of payment of the first or single instalment, the proceedings are terminated;
- if the first instalment or the full amount due is not paid, the suspension is effectively revoked and the proceedings continue.

If the taxpayer files the amnesty application and, after paying the first instalment, is unable to pay the subsequent ones, not only does the taxpayer forfeit the amnesty (with the consequent re-emergence of the debt in respect of penalties, interest and collection fees), but the proceedings, having already been terminated, may no longer be resumed.

The proceedings are terminated with costs set off between the parties.

Source: Eutekne