Italy: Input VAT recovery – new extended deadlines

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Recently published Legislative Decree no. 148/2026 (the ‘Omnibus Decree’) extends the deadline for input VAT recovery and the registration of purchase invoices and customs bills in VAT registers.

The Omnibus Decree entered into force on 12 August 2026.

Input VAT recovery

The previous rule for input VAT recovery (article 19(1) of Presidential Decree no. 633/72 − the ‘VAT Decree’) stated that input VAT could be recovered no later than the submission of the return for the calendar year in which the right to recovery arose.

For example, the right to recover input VAT on costs incurred and invoiced in 2025 could be exercised by the deadline for filing the FY2025 return, i.e. by 30 April 2026.

Under the new rule, the right to recover input VAT can be exercised up to the deadline for the submission of the return for the second year following that in which the right to recovery arises; therefore, input VAT on costs incurred and invoiced between 12 August and 31 December 2026 may be recovered no later than the deadline for filing the return for FY2028, i.e. 30 April 2029.

Registration of invoices and customs bills in VAT registers

The deadline to register purchase invoices and customs bills in the VAT register changes as well.

Under the previous wording of article 25(1) of the VAT Decree, the taxpayer should register those documents *‘[…] by the deadline for the submission of the return for the year in which the invoice is received and with reference to the same tax year’.*

The new rules change the wording to *‘[…] by the deadline for the submission of the return for the second year following the year in which the invoice is received’.*

This new wording would imply that an invoice or customs bill received in 2026 could be registered in the VAT registers for 2026, 2027 or 2028; furthermore (as explained in the illustrative notes on the Omnibus Decree), if the invoice or customs bill for purchases/imports made in 2026 is received in 2027 but registered before the deadline for the FY2026 VAT return, it can be included in the FY2026 VAT return.

A separate section of the FY2027 VAT registers should be created for such documents.

Open issues

The Omnibus Decree took effect on 12 August 2026.

However, questions arise about how to apply the new rules in certain circumstances.

1. The new rules do not appear to apply retrospectively. Pending confirmation from the Italian tax authority (ITA), it would seem that invoices issued and registered until 11 August 2026 should fall under the prior rules, whereas those issued and registered from 12 August 2026 should fall under the new rules. However, for invoices issued prior to 12 August 2026 and registered after that date, it is unclear whether the new or old rules would apply.
   The Omnibus Decree does not provide any clarification on this point.
   The recovery of input VAT on credit notes should also benefit from the new extended deadlines; however, it is unclear whether the new rules would apply to credit notes issued prior to 12 August 2026 and registered after that date.
2. There is also uncertainty about import VAT recovery, as it is unclear which set of rules applies to customs bills issued prior to 12 August 2026 but downloaded from the Italian customs agency website and posted in the VAT books after that date.
3. It is unclear whether ITA will change its current, restrictive approach on the use of corrective VAT returns to recover input VAT for past periods.

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