

Italy

A. Progress in the implementation of the minimum standard

Italy has 99 tax agreements in force, as reported in its response to the Peer Review questionnaire. One of those agreements, the agreement with Chile, complies with the minimum standard.

Italy signed the MLI in 2017 and has not listed its agreements with Albania, Congo, Montenegro, North Macedonia, Oman, Panama and Trinidad and Tobago. These agreements will therefore not, at this stage, be modified by the MLI. Albania, North Macedonia, Oman and Panama have listed their agreements with Italy under the MLI.

Italy indicated in its response to the Peer Review questionnaire that the agreements not listed under the MLI were concluded with treaty partners that were not Ad Hoc Group members at the time of Italy's signature of the MLI.

Italy is implementing the minimum standard through the inclusion of the preamble statement and the PPT.⁷²

The agreements that will be modified by the MLI will come into compliance with the minimum standard once the provisions of the MLI take effect.

B. Implementation issues

Italy's listed agreements under the MLI will start to be compliant after Italy's ratification of the MLI. Italy is encouraged to ratify the MLI as soon as possible.

As mentioned above, Italy has not listed its agreements with Albania, Congo, Montenegro, North Macedonia, Oman, Panama and Trinidad and Tobago under the MLI. Listing the agreements under the MLI or entering into bilateral renegotiations to implement the minimum standard would ensure that the minimum standard could be implemented in those non-covered agreements.

Summary of the jurisdiction response - Italy

	Treaty partners	Compliance with the standard	If compliant, the alternative implemented	Signature of a complying instrument	The alternative implemented through the complying instrument (if not the MLI)	Comments
1	Albania	No	N/A	No	N/A	This agreement is likely to be included in the Italian CTA revised list which has not been updated at the current date.
2	Algeria*	No	N/A	No	N/A	This agreement is likely to be included in the Italian CTA

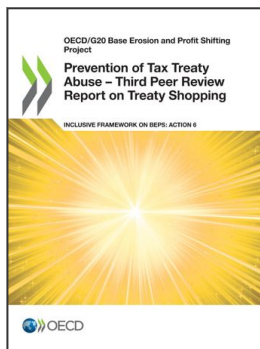
⁷² For its 80 agreements listed under the MLI, Italy is implementing the preamble statement (Article 6 of the MLI). For 67 of its agreements listed under the MLI, Italy is implementing the PPT (Article 7 of the MLI). Thirteen of Italy's agreements, the agreements with Azerbaijan*, Estonia, Hong Kong, Iceland, Kazakhstan, Kuwait*, Latvia, Lebanon*, Lithuania, Mongolia, Qatar, San Marino and Saudi Arabia, are within the scope of a reservation made by Italy under Article 7(15)(b) of the MLI. Italy made a reservation pursuant to Article 7(15)(b) of the MLI not to apply Article 7(1) of the MLI with respect to agreements, which already contain a PPT.

						revised list which has not been updated at the current date.
3	Argentina	No	N/A	Yes	N/A	
4	Armenia	No	N/A	Yes	N/A	
5	Australia	No	N/A	Yes	N/A	
6	Austria	No	N/A	Yes	N/A	
7	Azerbaijan*	No	N/A	Yes	N/A	
8	Bangladesh*	No	N/A	Yes	N/A	
9	Barbados	No	N/A	Yes	N/A	
10	Belarus*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
11	Belgium	No	N/A	Yes	N/A	
12	Bosnia-Herzegovina	No	N/A	Yes	N/A	
13	Brazil	No	N/A	Yes	N/A	
14	Bulgaria	No	N/A	Yes	N/A	
15	Canada	No	N/A	Yes	N/A	
16	Chile	Yes	PPT alone	N/A	N/A	
17	China (People's Republic of)	No	N/A	Yes	PPT alone	
18	Congo	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
19	Côte d'Ivoire	No	N/A	Yes	N/A	
20	Croatia	No	N/A	Yes	N/A	
21	Cyprus*	No	N/A	Yes	N/A	
22	Czech Republic	No	N/A	Yes	N/A	
23	Denmark	No	N/A	Yes	N/A	
24	Ecuador*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
25	Egypt	No	N/A	Yes	N/A	
26	Estonia	No	N/A	Yes	N/A	
27	Ethiopia*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
28	Finland	No	N/A	Yes	N/A	
29	France	No	N/A	Yes	N/A	
30	Georgia	No	N/A	Yes	N/A	
31	Germany	No	N/A	Yes	N/A	
32	Ghana*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of

						the signature of MLI by Italy.
33	Greece	No	N/A	Yes	N/A	
34	Hong Kong (China)	No	N/A	Yes	N/A	
35	Hungary	No	N/A	Yes	N/A	
36	Iceland	No	N/A	Yes	N/A	
37	India	No	N/A	Yes	N/A	
38	Indonesia	No	N/A	Yes	N/A	
39	Ireland	No	N/A	Yes	N/A	
40	Israel	No	N/A	Yes	N/A	
41	Japan	No	N/A	Yes	N/A	
42	Jordan	No	N/A	Yes	N/A	
43	Kazakhstan	No	N/A	Yes	N/A	
44	Korea	No	N/A	Yes	N/A	
45	Kuwait*	No	N/A	Yes	N/A	The other Jurisdiction has not notified this Agreement as a CTA for the purpose of MLI,
46	Kyrgyzstan*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
47	Latvia	No	N/A	Yes	N/A	
48	Lebanon*	No	N/A	Yes	N/A	
49	Lithuania	No	N/A	Yes	N/A	
50	Luxembourg	No	N/A	Yes	N/A	
51	Malaysia	No	N/A	Yes	N/A	
52	Malta	No	N/A	Yes	N/A	
53	Mauritius	No	N/A	Yes	N/A	
54	Mexico	No	N/A	Yes	N/A	
55	Moldova*	No	N/A	Yes	N/A	
56	Montenegro	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
57	Morocco	No	N/A	Yes	N/A	
58	Mozambique*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
59	Netherlands	No	N/A	Yes	N/A	
60	New Zealand	No	N/A	Yes	N/A	
62	North Macedonia	No	N/A	No	N/A	This Agreement is likely to be included in the Italian CTA revised list which has not been updated at the current date.
63	Norway	No	N/A	Yes	N/A	The other Jurisdiction has not notified this agreement as a Covered Tax Agreement for the purpose of MLI.
63	Oman	No	N/A	No	N/A	This agreement is likely to be included in the Italian CTA revised list which has not

						been updated at the current date.
64	Pakistan	No	N/A	Yes	N/A	
65	Panama	No	N/A	No	N/A	This agreement is likely to be included in the Italian CTA revised list which has not been updated at the current date.
66	Philippines*	No	N/A	Yes	N/A	
67	Poland	No	N/A	Yes	N/A	
68	Portugal	No	N/A	Yes	N/A	
69	Qatar	No	N/A	Yes	N/A	
70	Romania	No	N/A	Yes	N/A	
71	Russia	No	N/A	Yes	N/A	
72	San Marino	No	N/A	Yes	N/A	
73	Saudi Arabia	No	N/A	Yes	N/A	
74	Senegal	No	N/A	Yes	N/A	
75	Serbia	No	N/A	Yes	N/A	
76	Singapore	No	N/A	Yes	N/A	
77	Slovak Republic	No	N/A	Yes	N/A	
78	Slovenia	No	N/A	Yes	N/A	
79	South Africa	No	N/A	Yes	N/A	
80	Spain	No	N/A	Yes	N/A	
81	Sri Lanka	No	N/A	Yes	N/A	
82	Sweden	No	N/A	Yes	N/A	
83	Switzerland	No	N/A	Yes	N/A	
84	Syrian Arab Republic*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
85	Tajikistan*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
86	Tanzania*	No	N/A	Yes	N/A	
87	Thailand	No	N/A	Yes	N/A	
88	Trinidad and Tobago	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
89	Tunisia	No	N/A	Yes	N/A	
90	Turkey	No	N/A	Yes	N/A	
91	Uganda*	No	N/A	Yes	N/A	
92	Ukraine	No	N/A	Yes	N/A	
93	United Arab Emirates	No	N/A	Yes	N/A	
94	United Kingdom	No	N/A	Yes	N/A	
95	United States	No	N/A	Yes	N/A	The Agreement already contains an LOB. However the preamble is missing but it could be included subject to the signature of the MLI by

						the other Jurisdiction.
96	Uzbekistan*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
97	Venezuela*	No	N/A	No	N/A	For the time being, Italy has included in the CTA list only Jurisdictions that were members of the Ad Hoc Group on MLI at the date of the signature of MLI by Italy.
98	Viet Nam	No	N/A	Yes	N/A	
99	Zambia	No	N/A	Yes	N/A	



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