Basic information

2025/0199(NLE) NLE - Non-legislative enactments	Procedure completed
EU-Switzerland agreement on the automatic exchange of financial account information: Amending Protocol **Subject** 2.50.02 Savings 2.70.01 Direct taxation 2.80 Cooperation between administrations 6.40.01 Relations with EEA/EFTA countries 7.30.30.06 Action to combat economic fraud and corruption	

Key players

European Parliament	**Committee responsible**	**Rapporteur**	**Appointed**
	ECON Economic and Monetary Affairs	KOLLÁR Kinga (EPP)	11/09/2025
		Shadow rapporteur FITA Claire (S&D) KUBÍN Tomáš (PfE) ÓDOR Ľudovít (Renew) PEDULLA' Gaetano (The Left)	
Council of the European Union			
European Commission	**Commission DG**	**Commissioner**	
	Taxation and Customs Union	ŠEFČOVIČ Maroš	

Key events

Date	Event	Reference	Summary
10/07/2025	Legislative proposal published	COM(2025)0376	
06/10/2025	Committee referral announced in Parliament		
13/10/2025	Vote in committee		
20/10/2025	Committee report tabled for plenary, 1st reading/single reading	A10-0202/2025	
13/11/2025	Decision by Parliament	T10-0273/2025	Summary

13/11/2025	Results of vote in Parliament		
20/11/2025	Act adopted by Council after consultation of Parliament		
05/12/2025	Final act published in Official Journal		

Technical information

Procedure reference	2025/0199(NLE)
Procedure type	NLE - Non-legislative enactments
Procedure subtype	Consultation of Parliament
Legal basis	Treaty on the Functioning of the European Union TFEU 218-p8-a2 Treaty on the Functioning of the European Union TFEU 115 Treaty on the Functioning of the European Union TFEU 218-p6b-ab Treaty on the Functioning of the European Union TFEU 113
Other legal basis	Rules of Procedure EP 165
Stage reached in procedure	Procedure completed
Committee dossier	ECON/10/03548

Documentation gateway

European Parliament

Document type	Committee	Reference	Date	Summary
Committee report tabled for plenary, 1st reading/single reading		A10-0202/2025	20/10/2025	
Text adopted by Parliament, 1st reading/single reading		T10-0273/2025	13/11/2025	Summary

European Commission

Document type	Reference	Date	Summary
Legislative proposal	COM(2025)0376	10/07/2025	Summary
Document attached to the procedure	COM(2025)0377	10/07/2025	

Additional information

Source	Document	Date
European Commission	EUR-Lex	

Final act

Decision 2025/2413
OJ OJ L 05.12.2025

EU-Switzerland agreement on the automatic exchange of financial account information: Amending Protocol

2025/0199(NLE) - 10/07/2025

PURPOSE: to amend the agreement between the EU and Switzerland on the automatic exchange of financial account information.

PROPOSED ACT: Council Decision.

ROLE OF THE EUROPEAN PARLIAMENT: Council may adopt the act only if Parliament has given its consent to the act.

BACKGROUND: the Agreement between the European Union and the Swiss Confederation on the automatic exchange of financial account information to improve international tax compliance has enhanced mutual assistance in tax matters between the Contracting Parties and improved international tax compliance.

Important changes to the Common Reporting Standard (CRS) were approved at international level on 26 August 2022 and have been introduced in Union legislation with the amending of Council Directive 2011/16/EU by Council Directive (EU) 2023/2226.

Therefore, the Agreement needs to be amended to ensure that the automatic exchange of financial account information between EU Member States and the Swiss Confederation is aligned with, and continues to take place in accordance with, the updated CRS from 1 January 2026.

CONTENT: the Commission called on the Council to conclude this Amending Protocol to the Agreement between the European Union and the Swiss Confederation (Switzerland) on the automatic exchange of financial account information to improve international tax compliance.

The envisaged amendments seek to:

- **expand the scope of reporting** to include new digital financial products, such as Specified Electronic Money Products and Central Bank Digital Currencies. Simultaneously and with the aim of improving the reliability and use of the exchanged information, the amendments introduce **more detailed reporting requirements** and strengthened due diligence procedures;

- include **Crypto-Assets** in the exchange of information, aligning with the latest Common Reporting Standard (CRS) and DAC8, which are based on the OECD's Crypto-Asset Reporting Framework (CARF);

- take account of the Union policies in the field of the **fight against money laundering and terrorist financing**, because the Customer Due Diligence activities to be performed by Financial Institutions, in view of collecting the financial account information to be exchanged under the Agreement, will be substantially aligned with those that the same Financial Institutions have to apply as obliged entities under the European Union legal framework in the fight against money laundering and terrorist financing;

- provide a **legislative framework** for mutual assistance between the European Union and Switzerland for the recovery of VAT claims. This framework closely aligns with the EU-Norway agreement, which in turn is similar to the EU Recovery Directive. Therefore, this initiative deepens Member States cooperation with Switzerland in line with the EU acquis;

- take account of the Union policies in the field of respect of fundamental rights, notably on **protection of personal data** in the case of the outflow of this data to non-EU and non-EEA countries.

EU-Switzerland agreement on the automatic exchange of financial account information: Amending Protocol

2025/0199(NLE) - 13/11/2025 - Text adopted by Parliament, 1st reading/single reading

The European Parliament adopted by 605 votes to 26, with 2 abstentions, a legislative resolution on the proposal for a Council decision on the conclusion, on behalf of the Union, of the Amending Protocol to the Agreement between the European Union and the Swiss Confederation on the automatic exchange of financial account information to improve international tax compliance.

Parliament approved the conclusion of the amending protocol to the agreement.

The agreement provides the legal basis for the reciprocal automatic exchange of financial account information between the Member States and the Swiss Confederation.

The main objective of the amending protocol is to improve administrative cooperation in the area of direct and indirect taxation in the following ways:

- to ensure that the automatic exchange of financial account information is in line with the updated Common Reporting Standard (CRS) developed by the Organisation for Economic Cooperation and Development (OECD) and with the respective EU rules. i.e. the Council Directive (EU) 2023/226

(DAC8), which implemented the latest amendments to the CRS within the EU. As a result of the recent update of the CRS, its scope was extended to cover electronic money products and central bank digital currencies.

Furthermore, the updates also contain provisions to ensure an efficient interaction between the CRS and the separate Crypto-Asset Reporting Framework;

- to ensure mutual assistance in the recovery of VAT claims. The amendments align as much as possible with the relevant provisions of the EU-Norway Agreement, which, in turn, replicates the EU Recovery Directive;

- to update the legal reference on data protection legislation: all the references to the repealed Directive 95/46/EC were removed and replaced with references to the GDPR (i.e. Regulation (EU) 2016/679). Switzerland is the beneficiary of an EU adequacy decision concerning data protection.

The modifications of CRS will apply from 1 January 2026 and - in line with that - the respective provisions of DAC8 will apply in the EU from that onwards.

The amending protocol ensures that the existing agreement remains aligned with the respective EU legislation.