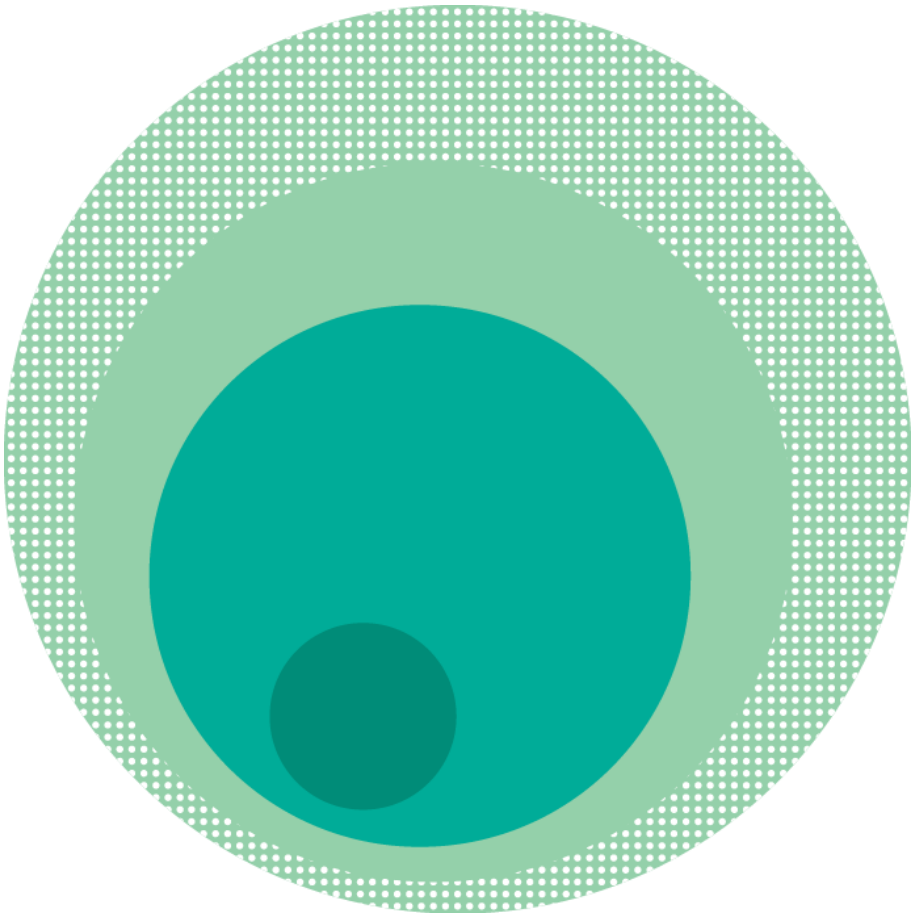
The New VAT Consolidated Act from 1 January 2027 and the TrovaTU Service: How to Prepare for the Renumbering of Provisions

From 1 January 2027, Presidential Decree 633/72 will be replaced by the Consolidated VAT Act (Legislative Decree 10/2026). The rules and VAT rates will not change, but the numbering of all provisions will change, with effects on accounting software, invoices, registers and contracts. To help users navigate the change, the Ministry of Economy and Finance has made available the service called “TrovaTU”.



1. The VAT Consolidated Act: What Changes and What Does Not

Following the new Consolidated Income Tax Act, VAT legislation is also preparing for a change of "address". **Legislative Decree No. 10 of 19 January 2026** (Official Gazette No. 24 of 30 January 2026) approved **the new Consolidated VAT Act**. The new legislation will enter into force on **1st January 2027** and will replace Presidential Decree No. 633/72, the rules governing intra-Community transactions (currently contained in Decree Law No. 331/93), the electronic invoicing provisions of Legislative Decree No. 127/2015, and numerous other scattered provisions.

Also in this case this is essentially a **consolidation exercise**: the rules and VAT rates remain **unchanged** (4%, 5%, 10% and 22%), as do the underlying principles, the right to VAT deduction and VAT recovery. Instead, the **numbering** will change radically: the 171 articles, divided into 18 Titles and accompanied by four Schedules (A, B, C and D), follow the structure of EU Directive 2006/112/EC. No historical article numbering will survive.

For example:

- Article 10 (VAT-exempt transactions) will become Article 37;
- Article 17 (reverse charge) will become Article 64;
- Article 41 of Decree Law No. 331/93 (intra-Community supplies) will become Article 39.

Among the substantive changes introduced by the new Consolidated VAT Act, we would highlight the following:

- **Export transactions** (Article 45) must be supported by **electronic customs exit evidence**, replacing any reference to the former transport document;
- Reference to the **Consolidated Building Act** (Presidential Decree No. 380/2001) for identifying works subject to the 10% VAT rate;
- Extension of VAT exemption to **international transport services provided also through intermediaries**;
- The **VAT regime** applicable to **flat-rate taxpayers** (Article 157), which no longer has a separate set of VAT provisions and instead refers to the flat-rate regime now included in the Consolidated Income Tax Act;
- Consolidation of specific tax rates cases into a single article (Article 35) and of the provisions on authentic interpretation into another (Article 169).

2. Cross-Reference Table for the Most Frequently Used Provisions

The following correspondences are based on the references provided in the text of the Decree:

Transaction / Compliance Requirement	Until 2026	From 2027 (VAT Consolidated Act)
Supply of goods	Art. 2, DPR 633/72	Art. 5
Supply of services	Art. 3, DPR 633/72	Art. 10
Intra-Community acquisitions	Art. 38, DL 331/93	Art. 8
Place of supply of services (general rule)	Art. 7-ter, DPR 633/72	Art. 17
Place of supply of services (exceptions)	Art. 7-quarter, DPR 633/72	Art. 18
Time of supply	Art. 6, DPR 633/72	Art. 24
Taxable amount	Art. 13, DPR 633/72	Art. 27
Exclusions from taxable amount	Art. 15, DPR 633/72	Art. 29
VAT rates	Art. 16, DPR 633/72	Art. 34
Exempt transactions	Art. 10, DPR 633/72	Art. 37
Intra-Community supplies	Art. 41, DL 331/93	Art. 39
Chain transactions	Art. 41-ter, DL 331/93	Art. 41
Exports	Art. 8, DPR 633/72	Art. 45
Letters of intent	Art. 1, DL 746/83	Art. 46
Transactions treated as exports	Art. 8-bis, DPR 633/72	Art. 48
International services	Art. 9, DPR 633/72	Art. 49
VAT deduction	Art. 19, DPR 633/72	Art. 56
Pro-rata deduction	Art. 19-bis, DPR 633/72	Art. 57
Non-deductible VAT (cars, etc.)	Art. 19-bis1, DPR 633/72	Art. 58
Reverse charge	Art. 17, DPR 633/72	Art. 64
Split payment	Art. 17-ter, DPR 633/72	Art. 65
Invoicing	Art. 21, DPR 633/72	Art. 72
Simplified invoice	Art. 21-bis, DPR 633/72	Art. 73
E-invoicing and SDI	Art. 1, Legislative Decree 127/2015	Art. 77
Retail trade	Art. 22, DPR 633/72	Art. 81
Electronic cash register receipts	Art. 12, Law 413/91	Art. 84
Sales register	Art. 23, DPR 633/72	Art. 86

Purchase register	Art. 25, DPR 633/72	Art. 88
Credit/debit notes	Art. 26, DPR 633/72	Art. 92
VAT refunds	Arts. 30 and 38-bis, DPR 633/72	Arts. 114 and 116
Cash accounting VAT	Art. 32-bis, DL 83/2012	Art. 132
Travel agencies	Art. 74-ter, DPR 633/72	Art. 141
Margin scheme (second-hand goods)	Art. 36, DL 41/95	Art. 143

3. Practical Impact: Invoices, Registers and Accounting Software

The impact of the new Consolidated VAT Act will be mainly **administrative**. Accounting systems associate each transaction with a **VAT code** that determines the applicable rate, VAT treatment (taxable, non-taxable, exempt, reverse charge), accounting register, VAT settlement, electronic invoice **nature code** and often the **wording** printed on invoices referring to Presidential Decree No. 633/72.
These references must all be updated from **1 January 2027**.

Example: Export Invoice Issued in 2027

In February 2027, a company sells machinery to a Swiss customer. The invoice will state:
"Non-taxable transaction pursuant to Article 45, paragraph 1(a), Legislative Decree No. 10/2026"
instead of:
"Article 8, paragraph 1(a), Presidential Decree No. 633/72".

The electronic invoice nature code remains **N3.1**. As currently required, electronic evidence of customs exit must be retained.
Special attention should be paid to the **nature code**: during VAT code updates, businesses must verify that the nature code assignment remains correct. Errors (for example exports associated to N3.4 instead of N3.1) may not be detected by the SDI system, which will still accept the invoice, but they may lead to incorrect pre-filled VAT returns and errors in monitoring exporters' VAT ceiling entitlement.

4. Year-End Transition and Incorrect References

Article 170(3) of the Consolidated VAT Act provides that whenever legislation or regulations refer to repealed provisions, such references shall be deemed to refer to the

corresponding provisions of the new Consolidated Act. An incorrect statutory reference, where the VAT treatment itself is correct, should be considered a **purely formal and non-penalizable error**, whereas substantive mistakes such as applying the wrong VAT rate or regime remain subject to penalties.

Example: 2026 Invoice Recorded in 2027

A deed for the sale of a VAT-exempt residential building is executed on 28 December 2026. The invoice correctly states "exempt under Article 10, paragrahp 1, no. 8-bis) of Presidential Decree No. 633/72" but it is recorded in January 2027. The preferred approach is to keep the **reference indicated on the invoice**, which is deemed to correspond to the equivalent provision in the new Consolidated Act (currently Article 37(1)(i)). Transactions carried out from 2027 onward should instead use the new references directly. It is to be hoped that the Revenue Agency will confirm its tolerance policy for the first months of 2027.

5. TrovaTU: The Tool for Navigating the New Consolidated Acts

The public tool designed to convert old references into the new numbering system is now available. The service is called **TrovaTU** and has been published on the **Department of Finance website (www.trovatu.finanze.gov.it)**.
Developed by the Ministry of Economy and Finance and Sogei, with the support from the Presidency of the Council of Ministers and the State Mint and Polygraphic Institute, TrovaTU covers all **eight Consolidated Acts** that will enter into force on **1 January 2027** (VAT, income taxes, tax compliance and assessment, registration tax and other indirect taxes, tax payments and collection, tax litigation, minor taxes and penalties). These Acts incorporate more than **4,700 provisions** originating from over **440 legislative measures**.
More specifically, this is not a database but an application that, starting from any provision currently in force, enables users to:

- identify where an existing provision **has been relocated** in the new Consolidated Act;
- view either the **current provision**, the future provision effective **from 1 January 2027** or **compare the two versions** side by side;
- reconstruct the legislative **evolution** of a provision over time.

Example

A company issuing reverse-charge invoices can search in TrovaTU for "Article 17 of

Presidential Decree No. 633/72": TrovaTU will identify the **corresponding provision** as **Article 64 of the Consolidated VAT Act** and allow users to compare the texts to verify that the content has remained unchanged. The same applies, for example, to a contractual clause referring to Article 109 of the Italian Income Tax Code (TUIR), which is now found in Article 118 of the new Consolidated Income Tax Act.

6. Practical Recommendations

To be ready for **1 January 2027**, clients are advised to:

- **contact their software provider immediately** to understand the timing and procedures for updating VAT codes and invoice wording;
- **by November**, map all VAT codes currently in use and prepare a **cross-reference table** to the new Consolidated VAT Act, also checking the associated electronic invoice **nature codes**;
- update **wording** used in invoices, delivery notes, **letters of intent**, contracts and general terms and conditions that still refer to Presidential Decree No. 633/72 or Decree Law No. 331/93;
- establish a rule for transactions spanning two tax years, applying the old references to 2026 transactions and the new references to transactions from 2027 onward;
- use **TrovaTU** to verify cross-references and keep evidence of the checks performed;
- consult their tax adviser whenever there is uncertainty regarding the correct VAT treatment, which remains the most important factor for penalty purposes.

The office is available to clients for any clarification and assistance.

Cristiano Fasanari
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