Italy’s Avviso Bonario: What It Is and What to Do When You Receive One

Descrizione

An **avviso bonario** is a preliminary notice issued by the Italian Revenue Agency (**Agenzia delle Entrate**) when automated or formal checks of a tax return reveal possible irregularities. It is not yet a formal assessment and not yet a tax bill — it is an invitation to either pay what the Agency believes is due, or demonstrate why the Agency is wrong, at substantially reduced penalties. For foreign residents and international businesses operating in Italy, handling it correctly is essential: ignoring the notice almost always leads to enforcement action at a much higher cost.

When and How It Arrives

The avviso bonario is generated after one of two types of control performed on a return already filed:

The **automated check** (controllo automatizzato), under Article 36-bis of Presidential Decree 600/1973 for direct taxes and Article 54-bis of Presidential Decree 633/1972 for VAT, is a computerised matching between what was declared and what was actually paid or withheld.

The **formal check** (controllo formale), under Article 36-ter, is a deeper review where the Agency verifies supporting documentation for deductions, tax credits, withholdings and other specific items on the return.

The notice usually arrives two to three years after the return was filed. For taxpayers who filed independently, it is delivered by registered post or made available in the taxpayer’s online tax account (**cassetto fiscale**). For those who filed through an accountant or a CAF, the notice is transmitted electronically via the Entratel channel directly to the intermediary, who is expected to forward it promptly.

Which Taxes and Contributions Are Covered

Avvisi bonari can concern virtually every tax or contribution managed through the Italian tax return: **IRPEF and IRES** (personal and corporate income tax), **IRAP**, **VAT**, **cedolare secca** on rental income,

IVIE and IVAFE on foreign real estate and financial assets, regional and municipal surcharges, substitute taxes on investment income, and withholding taxes. They also cover **INPS social security contributions** reported through the tax return, which is particularly relevant for self-employed professionals and holders of a partita IVA.

Payment Terms and Reduced Penalties

The key advantage of resolving an avviso bonario is a significant reduction of the statutory penalty.

For automated checks, the penalty is reduced to **one-third** of the ordinary amount. For formal checks, the reduction is to **two-thirds**. Following the 2024 reform of the Italian penalty system, the base penalty for omitted or insufficient payment is 25 percent for violations committed from 1 September 2024 onwards (it was 30 percent before that date). In practice, the effective penalty after reduction is approximately 8.3 percent for automated controls and 16.7 percent for formal ones, plus interest accrued from the original deadline to the date of payment.

To benefit from the reduction, the taxpayer must pay within **30 days** from receipt of the notice. When the notice is routed through a tax intermediary, the effective deadline is **90 days** from the Agency's transmission date.

Since January 2025, installment plans have been standardised: **up to 20 quarterly installments** are now available regardless of the amount due. Missing the first installment — or any two later ones in a row — causes the entire balance to become immediately payable with full penalties.

What to Do If You Receive One

The first step is to check whether the figures are correct. Common triggers include F24 payments not properly matched to the return, missing or misreported withholdings, documentation not transmitted by third parties (for example, medical expenses or mortgage interest), and double-counting of tax credits.

If the notice is correct, payment is made with the pre-filled F24 form attached to the communication, or through an installment request submitted via the taxpayer's online account.

If the notice contains errors, the taxpayer or their advisor can file a **CIVIS** request — an online service dedicated to the review of avvisi bonari — attaching documentation that supports the original return. The 30-day payment deadline is not automatically suspended, so the request should be filed immediately. In the majority of cases, a well-documented CIVIS submission leads to full or partial cancellation of the notice.

Ignoring the avviso bonario is the worst possible option. After the deadline, the sum is referred to **Agenzia delle Entrate Riscossione**, and a formal **cartella di pagamento** is issued with full penalties, statutory interest and collection fees. At that point, the reduced-penalty benefit is permanently lost, and recovery may include wage or bank account attachments.

A Note for U.S. Citizens and Other Foreign Taxpayers

Expats frequently receive avvisi bonari because of mismatches in the reporting of foreign income, foreign tax credits, or assets held abroad (quadro RW). Before paying, it is always worth checking whether the underlying issue is a genuine additional liability or a reporting mismatch that can be corrected. In many cross-border situations, the notice can be cancelled by producing evidence of foreign withholding tax actually paid or of treaty-based relief. U.S. citizens should be especially careful: an Italian adjustment can change the Foreign Tax Credit position on Form 1116, and any correction on the Italian side may require a corresponding amendment in the U.S. return to preserve the credit.

Final Considerations

An avviso bonario is not yet a legal dispute — it is the final opportunity to resolve a tax position at a reduced cost and without litigation. The 30-day window is short, but it is almost always enough either to pay, to request installments, or to challenge the figures through CIVIS. Given the cross-border complexity that typically affects expats and foreign companies in Italy, the most effective course of action is to involve a qualified Italian tax professional as soon as the notice is received — well before the deadline, rather than after.

Tag

1. Self-employed in Italy
2. Working in Italy

Data
21/09/2026
Data di creazione
20/04/2026