



Italy's 2026 New-Resident Tax Regime: Key Changes for International Taxpayers

Descrizione

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Italy continues to offer a special tax regime for individuals transferring their tax residence to the country after a prolonged period abroad. Commonly referred to as the **new-resident flat tax regime**, this incentive is designed to attract high-net-worth individuals and internationally mobile taxpayers by providing certainty and simplification in the taxation of foreign income.

With the **2026 Budget Law**, the regime has been confirmed but significantly recalibrated.

Eligibility

The regime is available to individuals who:

- become tax resident in Italy; and
- have not been Italian tax residents for at least **9 of the previous 10 years**.

Once elected, the regime may apply for a maximum period of **15 years**.

How the regime operates

Taxpayers opting for the regime are subject to:

- a **fixed annual substitute tax on foreign-source income**;
- ordinary taxation on **Italian-source income**.

Foreign assets and income covered by the regime are excluded from Italian wealth taxes and related reporting obligations, offering a high degree of administrative simplicity.

What changes from 2026

For individuals transferring tax residence **from 1 January 2026**, the annual flat tax amounts are increased as follows:

- **€300,000 per year** for the main taxpayer;
- **€50,000 per year** for each qualifying family member included in the election.

The increase represents a substantial adjustment compared to prior years and directly affects the overall cost of accessing the regime.

What remains unchanged

The reform does not alter:

- the eligibility criteria;
- the duration of the regime;
- the scope of income covered, which remains limited to foreign-source income.

Strategic considerations

The 2026 changes confirm Italy's intention to maintain the new-resident regime while narrowing its focus. The regime remains attractive for individuals with **significant foreign income or complex international structures**, but the higher fixed tax requires a careful evaluation of expected benefits versus cost.

For prospective new residents, advance tax planning is essential to assess:

- effective tax savings compared to ordinary Italian taxation;
- interaction with double tax treaties;
- timing of the transfer of residence.

Conclusion

Italy's new-resident tax regime remains a key instrument in international tax planning, but from 2026 it is clearly positioned as a **selective regime for high-income taxpayers**. Proper structuring and professional advice are crucial to ensure that the regime is both accessible and advantageous under the updated framework.

Tag

1. Retiring in Italy
2. U.S. citizens

Data

25/08/2026

Data di creazione

30/12/2025