

# DAC8's Rollout Across the European Union

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## 1. Introduction

[Amending Directive to the 2011 Directive on Administrative Cooperation \(2023/2226\) \(DAC8\)](#) introduces the automatic exchange of information on crypto assets between EU Member States. The Directive, based on the OECD's [Crypto-Asset Reporting Framework \(CARF\)](#), aims at strengthening the fight against tax fraud and tax evasion by extending reporting obligations to crypto-asset transactions and service providers facilitating them.

The decentralized and cross-border nature of crypto assets has made it challenging for tax administrations to ensure effective compliance with existing rules on the taxation of income and gains derived from crypto transactions. This is where DAC8 comes into play, as the Directive determines the information to be reported to and exchanged with the tax authorities, including the identification requirements of both Reportable Crypto-Asset Service Providers (RCASPs) and taxpayers/investors.

The DAC8 rules had to be implemented by the Member States by 31 December 2025, with entry into force on 1 January 2026. However, Member States have been slow with their national implementation, and progress has been uneven. While several jurisdictions have already enacted transposing legislation, others remain in various stages of the legislative process or are still preparing draft bills and consultations. At the same time, many practical elements, including registration portals, IT systems and reporting guidelines, are still under development in many of the Member States.

This article provides a brief overview of what DAC8 is, summarizes the current implementation status across Member States and outlines key considerations for the near future.

## 2. DAC8 Reporting in a Nutshell

Under DAC8, RCASPs are required to report certain transactions carried out through their platforms as of 1 January 2026.

### Who must report?

The reporting obligation applies to legal persons and other undertakings that offer crypto-asset services as part of their commercial activities. Crypto-Asset Service Providers (CASPs) might need to report based on their EU nexus or whether they serve EU-resident customers. Generally, an RCASP is subject to [reporting and due diligence requirements](#) in one of the Member States if:

- (1) it has been authorized by the official local authorities in accordance with article 63 of the Markets in Crypto-Assets ([MiCA Regulation](#)) or is allowed to provide crypto-asset services following a notification to the local authorities;
- (2) it is not an authorized entity but:
  - (i) it is resident in a Member State for tax purposes;
  - (ii) it is an entity (a) incorporated under a Member State law; and (b) either has legal personality in a Member States or has an obligation to file tax returns to the Member State's tax authorities with respect to its income;
  - (iii) it is managed from a Member State; or

- (iv) it has its regular place of business in a Member State; or
- (3) it has a reportable transaction realized through a Member State's branch of the RCASP.

#### What must be reported?

RCASPs must disclose transactions made by crypto-asset users who are their customers. These users can be natural persons or companies, and their purchases, sales and transfers of crypto assets are reportable. Thus, the transactions can be exchanges between reportable crypto assets and fiat currencies or exchanges between one or more types of reportable crypto assets. The intention is to allow tax authorities to reconstruct taxable events and identify income derived from crypto activities. Furthermore, both domestic and cross-border transactions are covered.

The Directive covers a [wide range of crypto assets](#), including crypto assets that have been issued in a decentralized manner, as well as stablecoins, e-money tokens and certain non-fungible tokens (NFTs).

#### How is the information used?

To enable tax administrations to analyse and use the information, the information is subdivided in relation to each reportable crypto asset and includes quantitative information such as the aggregate gross amount paid or received in respect of acquisitions or disposals against fiat currencies or other reportable crypto assets, or the aggregate fair market value in the case of transfers.

Once collected by national tax authorities, the data will be exchanged automatically with other Member States where the relevant taxpayers are residents. This mirrors the exchange mechanisms already in place under the DAC framework, reinforcing the European Union's broader strategy of cross-border tax transparency.

### 3. Current Implementation Status Across Member States

Under DAC8, Member States are required to transpose the Directive into their national laws by 31 December 2025, with reporting obligations generally expected to apply from 1 January 2026, covering reportable periods beginning in 2026.

As of early January 2026, Member States can broadly be grouped into three categories based on their progress in transposing DAC8.

#### Category 1: Enacted or formally adopted

A first group of Member States has already transposed DAC8 into their national laws. Of the 27 Member States, 14 fall into this category, including Austria ([legislation gazetted on 24 December 2025](#)), Croatia ([gazetted on 3 December 2025](#)), Denmark ([gazetted on 16 December 2025](#)), Finland ([gazetted on 1 December 2025](#)), France ([gazetted on 15 February 2025](#)), Germany ([gazetted on 24 December 2025](#)), Hungary ([gazetted on 28 November 2025](#)), Ireland ([gazetted on 23 December 2025](#)), Italy ([gazetted on 22 December 2025](#)), Latvia ([gazetted on 21 November 2025](#)), Lithuania ([gazetted on 15 December 2025](#)), Romania ([gazetted on 10 December 2025](#)), the Slovak Republic ([gazetted on 6 November 2025](#)), Slovenia ([gazetted on 4 December 2025](#)), and Sweden ([gazetted on 3 December 2025](#)).

Although in these jurisdictions the Directive's main concepts – including definitions of reporting entities, the scope of reportable transactions and penalty frameworks – are part of domestic tax legislation, there might still be operational aspects that have not been finalized. For example, detailed guidance and reporting portals may still be under development. In some cases, authorities have explicitly stated that further technical rules will follow at a later stage. The Danish Tax Authority has announced that a [reporting solution](#) will be ready in January 2027. This illustrates that, even where DAC8 has been formally transposed into national law, tax administrations may not yet

be fully operationally prepared to receive and process reports, highlighting the distinction between legal implementation and practical readiness.

### Category 2: Advanced legislative process

The second group consist of Member States which are in the final stages of the legislative process. This means that the implementation bills are being reviewed by the parliaments and are waiting on parliamentary approval, or the bills have already been approved and are waiting to be published in the Official Gazette. Belgium, Estonia, Luxembourg, the Netherlands, and Poland fall into this group.

[Belgium](#), [Estonia](#) and [Luxembourg](#) have bills submitted to their parliaments. The [Polish Council of Ministers](#) has approved the bill. In the Netherlands, the [lower house of the parliament](#) has also approved the DAC8 bill. The [Dutch State Secretary for Finance has urged the upper house of the parliament](#) for a swift adoption, since the implementation deadline has already passed. Thus, in these jurisdictions, the overall direction of implementation is already visible, with formal adoption still pending.

### Category 3: Early stage or pending

The third group includes countries in which public consultations are ongoing or have recently been closed; where the bills have not yet been formally submitted to the parliament; and countries in which no draft legislation has yet been published.

This group consist of Bulgaria, Cyprus, Greece, the Czech Republic, Malta, Portugal and Spain. In the [Czech Republic](#) and [Spain](#), draft bills were made available for public consultation.

## 4. Practical Implications for In-Scope Businesses

For crypto-asset service providers and other potentially affected entities, DAC8 introduces both legal and operational challenges that require early preparation.

### Scope assessment

The first step is determining whether an entity qualifies as an RCASP under national law. This requires analysing business models, customer profiles and geographic presence. Groups operating across multiple jurisdictions may face different registration and reporting obligations in different Member States and might need to coordinate these on a group level.

### Data and systems readiness

DAC8 reporting requires consistent and reliable customer identification and transaction data. Service providers will need to assess whether their current systems capture all [required data points](#) (such as names, addresses, Member State(s) of residence, tax identification numbers (TINs), etc.), whether historical data is available and how data can be structured for reporting purposes. Internal governance processes and audit trails will also need to be assessed.

## 5. What to Expect in the Coming Months

DAC8 follows the same approach as previous DAC amendments: mandatory reporting at source, standardized data formats and automatic exchange between tax authorities. The introduction of this new reporting obligation reflects the growing importance of digital finance and the increasing regulatory focus on crypto markets.

Although Member States had to transpose the Directive by 31 December 2025, implementation has not been uniform across the European Union. While a significant number of jurisdictions have already transposed the Directive (even though with a very last-minute implementation close to the deadline), several Member States are yet to do so. Based

on previous experience with DAC6 and DAC7, where delayed transposition and late issuance of guidance were also common, further transpositions can be expected in the coming months, with complete transposition likely to be achieved during the first quarter of 2026.

Looking ahead, in 2026, the focus is expected to fall on technical implementation. Reporting is due within 9 months after the end of the first fiscal year covered by the directive – that is, between [1 January and 30 September 2027](#). In this context, reporting schemas, data formats and validation rules will determine how burdensome compliance is in practice. For businesses, early engagement and proactive compliance planning will be key to managing their compliance and risks. To support this process, IBFD will publish comprehensive implementation tables providing in-depth guidance on DAC8 transposition across all EU Member States – and we will keep updating them as long as Member States keep us busy.

## IBFD references:

- > EU tax law developments are reported on the daily IBFD [Tax News Service](#) page.
- > For an overview of the implementation status of DAC8 across Member States, see the [DAC6-DAC9 Implementation Status Tax Dossier](#).
- > A.M.L. Gorissen, [Compliance Countdown: DAC8 Implementation Status and the Future of Crypto Asset Reporting](#), 26 Fin. & Cap. Mkts 3 (2025), Journal Articles & Opinion Pieces IBFD.
- > C. Valério, [Let me brief you on DAC8: Key contextualized topics on crypto and beyond](#), EU Tax Focus (11 Mar. 2024).
- > For an overview of legislative initiatives at the EU level on direct tax matters, see the [EU Direct Tax Law Initiatives Tax Dossier](#).